The Draft Environmental Impact Report (EIR) on the Hollywood Community Plan was released and made available for public review on November 15, 2018. A copy of the Draft EIR is included here. For a full copy of the Draft EIR, including the appendices, please visit the Department of City Planning's website at: https://planning4la.org/development-services/eir.

A physical copy of the Draft EIR is also available for review by appointment at the City of Los Angeles Department of City Planning at 200 N. Spring Street, Room 667, Los Angeles. Appointments must be made in advance by emailing hollywoodplan@lacity.org.

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November 15, 2018

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT

Hollywood Community Plan Update
City EIR No. ENV-2016-1451-EIR
CPC-2016-1450-CPU
State Clearinghouse No. 2016041093

TO: Affected Agencies, Organizations, and Other Interested Parties

PROJECT NAME: Hollywood Community Plan Update

In accordance with the California Environmental Quality Act, the City of Los Angeles (City), as Lead Agency, has prepared a Draft Environmental Impact Report (DEIR) for the proposed Hollywood Community Plan Update (Proposed Plan). This notice provides the general public, the local community, responsible agencies, and other interested parties with a summary of the Proposed Plan, conclusions of the DEIR, information regarding the availability of the DEIR for public review, and the timeframe for submitting comments on the DEIR. Comments must be submitted in writing according to the directions below.

COMMENT REVIEW PERIOD: November 15, 2018 to January 31, 2019

PROJECT LOCATION: The Hollywood Community Plan Area (CPA) is located within the incorporated City of Los Angeles and contains approximately 13,962 acres or 21.8 square miles. The CPA extends roughly south of the Cities of Burbank and Glendale and the Ventura Freeway (State Highway 134), west of the Golden State Freeway (Interstate 5), north of Melrose Avenue and south of Mulholland Drive and the Cities of West Hollywood and Beverly Hills, including land south of the City of West Hollywood, and north of Rosewood Avenue, between La Cienega Boulevard and La Brea Avenue.

COUNCIL DISTRICTS: 4, 5 and 13

PROJECT BACKGROUND: The Hollywood Community Plan is one of 35 Community Plans, which comprise the Land Use Element of the General Plan. The Land Use Element is one of the seven State-mandated elements of the General Plan that also include noise, transportation, and conservation among others. The Hollywood Community Plan (the land use plan for Hollywood) is being updated consistent with California Code Section 65302 for General Plans.

The City previously approved an update to the Hollywood Community Plan in substantially similar form as the Proposed Plan and certified EIR No. ENV-2005-2158-EIR, SCH No. 2002041009 (2012 EIR), on June 19, 2012, (2012 Approvals). On February 11, 2014, after a legal challenge to the 2012 Approvals, the Los Angeles Superior Court issued a Judgment directing the City to: (1) rescind its 2012 Approvals and (2) prepare, circulate and certify, consistent with the requirements of CEQA, an adequate and valid EIR, which could include a supplemental, revised 2012 EIR or a new EIR. The City elected to prepare a new EIR for the Proposed Plan.

PROJECT DESCRIPTION: The Proposed Plan would guide development for the Hollywood CPA through 2040 and includes amending both the text (land use policies) and the land use map of the Hollywood Community Plan. The Proposed Plan would also adopt several resolutions and zoning ordinances to implement the updates to the Community Plan, including changes for certain portions of the Hollywood CPA to allow specific uses and changes to development regulations (including height, floor area ratio (FAR), and density). These zoning ordinances would take a number of different forms, including amendments to the Zoning Map for zone and height district changes under Los Angeles Municipal Code (LAMC) Section 12.32, amendments to an existing specific plan (Vermont/Western Transit Oriented District Specific Plan), and development of a Community Plan Implementation Overlay (CPIO) District.

The Hollywood CPIO District Subarea boundaries would generally follow Franklin Avenue to the north, U.S. Route 101 (US-101) to the east, Fountain Avenue to the south and La Brea Avenue to the west. The CPIO District would propose regulatory protections for designated historical resources and pedestrian-oriented design standards in the Hollywood CPA. The CPIO would require that the rehabilitation of designated resources comply with the Secretary of the Interior's Standards and restrict applicants from obtaining a demolition permit without an approved replacement project. Also, to ensure consistency between the updated Community Plan and other City plans and ordinances, the Proposed Project includes amendments to the Framework and Mobility Elements of the General Plan, and other elements as necessary.

The table below identifies the reasonably expected population, housing, and employment in the Proposed Plan, and compares this to the 2016 Baseline, Existing Plan and Southern California Association of Governments (SCAG) 2040 projections. Note: Revisions to the Reasonably Expected Development were made from those included in the Notice of Preparation to respond to new data and analysis that occurred during the preparation of the Draft EIR.

2040 REASONABLY EXPECTED DEVELOPMENT OF THE HOLLYWOOD COMMUNITY PLAN

	2016 Baseline	Existing Plan	Proposed Plan	SCAG 2040 /c/ Forecast
Population	206,000	226,000 – 243,000	243,000 - 264,000	226,000
Housing /a,b/	104,000	113,000 – 121,000	121,000 - 132,000	113,000
Employment	101,000	119,000	124,000 - 127,000	119,000

Numbers are rounded to the nearest thousand.
/a/ SCAG provides forecasts for households, which is the equivalent of occupied housing units, and does not include all units.
/b/ The Existing Plan and the Proposed Plan factor in additional housing units that can be expected from the City's housing incentives. It assumes all units are occupied.
/c/ The SCAG 2040 Forecast does not factor in potential additional units from the City's TOC Guidelines, which were adopted in 2017 after the adoption of the SCAG 2016/2040 RTP/SCS.
SOURCE: SCAG 2016-2040 RTP/SCS; City of Los Angeles, 2016, 2018.

ANTICIPATED SIGNIFICANT ENVIRONMENTAL EFFECTS: Based on the analysis contained in the Draft EIR, the Proposed Plan would result in unavoidable significant environmental impacts with regard to: Air Quality (Violate Air Quality Standards during Construction and Operations; Cumulative Net Increase in Criteria Pollutants; Sensitive Receptors during Construction); Biological Resources (Special Status Species Habitat, Riparian Habitat, Wetlands, and Migratory Wildlife); Cultural Resources (Historical Resources); Noise (Groundborne Vibration/Noise; and Permanent and Temporary Noise increases); Public Services (Parks); and Transportation and Traffic (Circulation System, Neighborhood Traffic Intrusion, Congestion Management Plan [CMP], and Disruption to Traffic During Construction).

As identified in the Draft EIR, Section 4.8, there are sites in the Proposed Plan area that are included on lists enumerated under Section 65962.5. Interested parties and agencies should review Section 4.8 of Draft EIR to identify the particular sites.

DOCUMENT REVIEW AND COMMENT: The Draft EIR and all documents referenced in the EIR are available for public review for a 75-day period from November 15, 2018 to January 31, 2019. If you wish to review a copy of the Draft EIR or the documents referenced in the Draft EIR, you may do so at the City of Los Angeles Department of City Planning at: 200 North Spring Street, Room 667, Los Angeles. Copies of the Draft EIR are also available for general public review at the following City of Los Angeles Public Library branches:

Richard J. Riordan Central Library
630 W. 5th Street
Los Angeles, CA 90071

Cahuenga Branch Library
4591 Santa Monica Blvd.
Los Angeles, CA 90029

Frances Howard Goldwyn - Hollywood Regional Branch Library
1623 Ivar Ave.
Los Angeles, CA 90028

John C. Fremont Branch Library
6121 Melrose Ave.
Los Angeles, CA 90038

Los Feliz Branch Library
1874 Hillhurst Ave.
Los Angeles, CA 90027

Will & Ariel Durant Branch Library
7140 Sunset Blvd.
Los Angeles, CA 90046

The Draft EIR can be downloaded or reviewed at DCP's website [http://planning.lacity.org/ (click on "Environmental Review" and then "Draft EIR")]. The Draft EIR can be purchased on cd-rom for $7.50 per copy. Contact Linda Lou at linda.lou@lacity.org or (213) 978-1473 to purchase one.

If you wish to submit comments on the Draft EIR, comply with the following instructions. The comments shall be written or typed and the comment shall include the commenter's name, contact information, and file number ENV-2016-1451-EIR. The written or typed comments shall be submitted to Linda Lou, in one of the following manners:

Mail: Linda Lou
Los Angeles Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, California 90012

E-mail: linda.lou@lacity.org

Written comments must be submitted between November 15, 2018 and January 31, 2019, and **no later than 5:00 PM on January 31, 2019**.

Comments that fail to comply with the above instructions for submissions for comments on the DEIR may not be included in the Final EIR and receive a response to comments under CEQA Guideline section 15088.

LOS ANGELES
DEPARTMENT OF CITY
PLANNING
200 North Spring Street, Room 667
Los Angeles, CA 90012

DRAFT
ENVIRONMENTAL IMPACT REPORT

Hollywood Community Plan Update

Environmental Case: ENV-2016-1451-EIR
State Clearinghouse No.: 2016041093

Project Location: The Hollywood Community Plan Area (CPA) is located within the incorporated City of Los Angeles and contains approximately 13,962 acres or 21.8 square miles. The CPA extends roughly south of the Cities of Burbank and Glendale and the Ventura Freeway (State Highway 134), west of the Golden State Freeway (Interstate 5), north of Melrose Avenue and south of Mulholland Drive and the Cities of West Hollywood and Beverly Hills, including land south of the City of West Hollywood, and north of Rosewood Avenue, between La Cienega Boulevard and La Brea Avenue.

Council District: 4 (Ryu), 5 (Koretz), 13 (O'Farrell)

Project Description: The Hollywood Community Plan Update (Project) would guide development for the Hollywood CPA through 2040 and includes amending both the text and the land use map of the Hollywood Community Plan. The Proposed Project would also adopt several resolutions and zoning ordinances to implement the updates to the Community Plan, including changes for certain portions of the Hollywood CPA to allow specific uses and changes to development standards (including height, floor area ratio (FAR), and density). These zoning ordinances would take a number of different forms, including amendments to the Zoning Map for zone and height district changes under Los Angeles Municipal Code (LAMC) Section 12.32, amendments to an existing specific plan (Vermont/Western Transit Oriented District Specific Plan), and adoption of a Hollywood Community Plan Implementation Overlay (CPIO) District. Also, to ensure consistency between the updated Community Plan and other City plans and ordinances, the Proposed Project includes amendments to the Framework and Mobility Elements of the General Plan, and other elements as necessary.

PREPARED FOR:
The City of Los Angeles
Department of City Planning

PREPARED BY:
Terry A. Hayes Associates Inc.

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Date: 11-5-18

November 2018

HOLLYWOOD COMMUNITY PLAN UPDATE

VOLUME I

DRAFT
ENVIRONMENTAL IMPACT REPORT

Prepared for

THE CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
200 North Spring Street, Room 667
Los Angeles, CA 90012

Prepared by

TERRY A. HAYES ASSOCIATES INC.
3535 Hayden Avenue, Suite 350
Culver City, CA 90232

November 2018

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1.0 INTRODUCTION

The subject of this Draft Environmental Impact Report (EIR) is the proposed update to the Hollywood Community Plan and implementing ordinances (collectively, Proposed Plan or Proposed Project). This chapter provides an overview of the purpose and focus of the Draft EIR, a discussion of the intended use of this Draft EIR, a description of the organization of the Draft EIR, and a discussion of the public review process and potential areas of controversy.

The Department of City Planning (DCP) established a New Community Plan program in order to comprehensively revise several of the community plans in the City of Los Angeles. Under this program, the existing Hollywood Community Plan is being revised to guide development through the year 2040. Because the approval of the Proposed Plan will require certain discretionary actions by the City of Los Angeles and other governmental agencies, the amendment of the Hollywood Community Plan and adoption of implementing ordinances are subject to the California Environmental Quality Act (CEQA).

The City previously approved a Hollywood Community Plan Update in substantially similar form as the Proposed Plan and certified EIR No. ENV-2005-2158-EIR, State Clearinghouse (SCH) No. 2002041009 (2012 EIR) on June 19, 2012 (2012 Approvals). On February 11, 2014, after a legal challenge to the 2012 Approvals, the Los Angeles Superior Court issued a Judgment directing the City to (1) rescind its 2012 Approvals and (2) prepare, circulate and certify, consistent with the requirements of CEQA, an adequate and valid EIR, which could include a supplemental, revised 2012 EIR or a new EIR. The City does not intend to certify the 2012 EIR, revise, or prepare a supplement to the 2012 EIR. Rather, with this EIR, the City is electing to prepare a new EIR.

1.1 LEAD AGENCY

The lead agency for the Hollywood Community Plan is:

City of Los Angeles
Department of City Planning
200 North Spring Street, Room 667
Los Angeles, CA 90012

In accordance with Section 15367 of the CEQA Guidelines, the lead agency is "the public agency which has the principal responsibility for carrying out or approving the project."

1.2 PURPOSE OF THE EIR

The City of Los Angeles DCP has prepared this Draft EIR for the following purposes:

- To satisfy the requirements of the CEQA (Public Resources Code [PRC] Sections 21000–21178) and the CEQA Guidelines (California Code of Regulations [CCR] Title 4, Chapter 14, Sections 15000–15387).
- To inform the general public, local community, and responsible and interested public agencies of the nature of the Proposed Plan, its possible environmental effects, possible measures to mitigate those effects, and alternatives to the Proposed Plan.

- To enable the City to consider environmental consequences when deciding whether to approve the Proposed Plan.
- To provide a basis for preparation of future environmental documents.

As described in CEQA and the CEQA Guidelines, public agencies are charged with the duty to avoid or substantially lessen significant environmental impacts, where feasible. This Draft EIR is an informational document, the purpose of which is to identify the potentially significant impacts of the Proposed Plan on the environment and to indicate the manner in which those significant impacts can be avoided or significantly lessened; to identify any significant and unavoidable adverse impacts that cannot be mitigated; and to identify reasonable and feasible alternatives to the Proposed Plan that would eliminate or substantially reduce any significant adverse environmental impacts.

The lead agency is required to consider the information in the EIR, along with any other relevant information, in making its decision on the Hollywood Community Plan. Although the EIR does not determine the ultimate decision that will be made regarding implementation of the project, CEQA requires the City to consider the information in the EIR and make findings regarding each significant effect identified in the EIR. Once certified, the EIR will serve as the environmental document for the approval of the Proposed Plan and, consistent with the requirements of CEQA, as a first tier EIR or as the environmental clearance on subsequent projects or approvals as deemed appropriate by the City or other lead agencies.

This Draft EIR was prepared in accordance with Section 15151 of the CEQA Guidelines which defines the standards for EIR adequacy as follows:

> *An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection; but for adequacy, completeness, and a good faith effort at full disclosure.*

1.3 PROPOSED PROJECT

The Proposed Project would include amending both the text and the land use map of the Hollywood Community Plan. The Proposed Project would also adopt several zoning ordinances to implement the updates to the Community Plan, including changes for certain portions of the Hollywood Community Plan Area (CPA) to allow specific uses and changes to development standards (including height, floor area ratio (FAR), and density). These zoning ordinances would take a number of different forms, including amendments to the Zoning Map for zone and height district changes under Los Angeles Municipal Code (LAMC) Section 12.32, amendments to an existing specific plan (Vermont/Western Transit Oriented District Specific Plan (Station Neighborhood Area Plan [SNAP]), and adoption of a Hollywood Community Plan Implementation Overlay (CPIO) District.

The Hollywood CPIO District subarea boundaries would generally follow Franklin Avenue to the north, U.S. Route 101 (US-101) to the east, Fountain Avenue to the south and La Brea Avenue to the west. The CPIO District would propose regulatory protections for designated historical resources and pedestrian-oriented design standards in the Hollywood CPA. The CPIO would require that the rehabilitation of designated resources comply with the Secretary of the Interior's Standards and restrict applicants from obtaining a demolition permit without an approved replacement project. Also, to ensure consistency

between the updated Community Plan and other City plans and ordinances, the Proposed Project includes amendments to the Framework and Mobility Elements of the General Plan, and other elements as necessary.

1.4 TYPE OF EIR

The Proposed Plan would guide development for the CPA through 2040. This EIR considers broad community plan level issues and evaluates the effects of the Proposed Plan at a program level. This EIR addresses environmental impacts from the Proposed Plan to the level that they can be assessed without undue speculation, in light of the scope of the Proposed Plan both as long-term planning documents with an approximate 20-year planning horizon and as a community plan covering a significant portion of the City.

The Proposed Project, as discussed above, consists of amendments to the existing community plan with related amendments to other General Plan elements and adoption of implementing zoning ordinances. With that said, large portions of the CPA will retain their existing land use designation and zoning. Consistent with the requirements of CEQA, the EIR will analyze the reasonably foreseeable indirect impacts from the Proposed Plan against the existing environment for all areas of the CPA, including those areas that have proposed changes to land use and zoning and those areas that are retaining their existing land use and zoning. Consistent with the CEQA Guidelines, the No Project alternative will analyze the difference in foreseeable impacts between the existing plan and the Proposed Plan.

FUTURE USE OF THE EIR AND SUBSEQUENT PROJECTS IN THE COMMUNITY PLAN AREA (CPA)

The adoption of the Proposed Plan does not constitute a commitment to any specific development project. It is contemplated that future site-specific approvals in the CPA may be evaluated with consideration of the EIR under CEQA rules for subsequent approvals, where applicable, including but not limited to the following:

- **Addendums (CEQA Guidelines Sections 15162 and 15164)**. Addendums may be used when a subsequent approval is consistent with the Proposed Plan and no major revisions to the EIR are required based on a change to the Proposed Plan, a change in circumstances, or new information, as a result of a new significant impact or an identified significant impact being more severe.

- **Tiering (Public Resources Code Section 21094 and CEQA Guidelines Section 15152)**. Tiering refers to using the analysis of general matters contained in a broader EIR with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussion from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.

- **Program EIR/Subsequent Approvals (CEQA Guidelines Section 15168)**. Projects within the scope of a Program EIR are eligible for streamlined review.

- **Projects Consistent with a Community Plan, General Plan, or Zoning (CEQA Guidelines Section 15183)**. Streamlined environmental review is available for a project consistent with community plan adopted with an EIR (PRC Section 21083).

- **Streamlining for Infill Projects (Senate Bill (SB) 226; PRC Section 21094.5; CEQA Guidelines Section 15183.3)**. Streamlined environmental review is available for an infill project that meets stated requirements.

- **Transit Priority Projects (SB 375; PRC Section 21155-21155.2)**. Projects consistent with the SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) near transit that have imposed all or all applicable mitigation measures from a prior EIR may be exempt from CEQA or be subject to streamlined review.

- **Statutory Exemption for Projects Consistent with Specific Plan (SB 743; PRC Section 21155.4; CEQA Guidelines Section 15182)**. Eligible projects consistent with the proposed CPIO or SNAP may be eligible for these statutory exemptions if all requirements are met.

1.5 EIR REVIEW PROCESS

Pursuant to CEQA Guidelines Section 15082, the Notice of Preparation (NOP) was published and distributed to the State Clearinghouse, trustee agencies, responsible agencies, and other interested parties on April 29, 2016 by the City (State Clearinghouse No. 2016041093). The NOP initially had a 30-day review period that was extended to a 45-day review period. The NOP is included as Appendix A of this Draft EIR. Information, data, and observations resulting from public input are included throughout this Draft EIR where relevant.

A public scoping meeting was held on May 17, 2016. The purpose of this meeting was to provide early consultation for the public to express their concerns about the Proposed Plan, and acquire information and make recommendations on issues to be addressed in the Draft EIR.

In accordance with CEQA Guidelines Sections 15087 and 15105, this Draft EIR is being circulated for a 75-day review period. The Draft EIR will also be submitted to the State Clearinghouse for distribution to state agencies. All comment letters received concerning the Draft EIR will be responded to in writing, and the comment letters, together with the responses to those comments will be included in the Final EIR. During the review period, copies of the Draft EIR will be available for review at the City of Los Angeles Department of City Planning during normal business hours (see address below).

City of Los Angeles
Department of City Planning
200 North Spring Street, Room 667
Los Angeles, CA 90012

Interested parties may provide written comments on the Draft EIR during the comment period. Comment letters may be sent via U.S. mail or email addressed to the following:

City of Los Angeles
Department of City Planning
Attn: Linda Lou
200 North Spring Street, Room 667
Los Angeles, CA 90012
linda.lou@lacity.org

1.6 FINAL EIR AND EIR CERTIFICATION

Following the close of the public review period on the Draft EIR the City will prepare and publish a Final EIR which will contain a summary of all written and recorded oral comments on this EIR received during the public review period for the Draft EIR and written responses to those comments, along with copies of the letters received, and any necessary revisions to the EIR. The Draft EIR, comments on the EIR and a list of persons, organizations and public agencies that commented on the Draft EIR, response to comments, and any revisions to the Draft EIR will constitute the Final EIR. The City Council, in an advertised public meeting(s), will consider the documents and then, if found adequate, certify the Final EIR as completed in compliance with CEQA and the CEQA Guidelines.

1.7 CEQA FINDINGS FOR PROJECT APPROVAL

Where a certified EIR identifies significant environmental effects, CEQA Guidelines Sections 15091 and 15092 require the adoption of findings prior to approval of a project. According to PRC Section 21081, the lead agency must make specific Findings of Fact (Findings) before approving a project for which a Final EIR has been certified that identifies one or more significant effects on the environment that may result from that project. The purpose of the Findings is to establish the connection between the contents of the Final EIR and the action of the lead agency with regard to approval of the project, if the lead agency approves the project. Prior to approval of a project, one of three findings must be made, as required by PRC Section 21081 and CEQA Guidelines Section 15091:

- Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
- Such 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.
- Specific 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.

If the City were to approve the Proposed Plan, despite significant impacts identified in the Final EIR that cannot be mitigated, if any, the City must state in writing the reasons for its actions, under CEQA Guidelines Section 15093. Those findings, called a Statement of Overriding Considerations, must be prepared to substantiate the City's decision to accept the unavoidable significant effects when balanced against the benefits afforded by the Proposed Plan, and must be supported by substantial evidence in the record.

1.8 MITIGATION MONITORING PROGRAM

At the time of project approval, CEQA and the CEQA Guidelines require lead agencies to adopt a mitigation monitoring program for monitoring on the revisions it has required in the project and the measures it has imposed to mitigate or avoid significant effects on the environment (CEQA Section 21081.6; CEQA Guidelines Section 15097). This Draft EIR contains mitigation measures that if found feasible will be included in the Mitigation Monitoring Program for the Proposed Plan.

1.9 ORGANIZATION OF THE DRAFT EIR

This Draft EIR is organized into seven chapters, as follows:

1.0 INTRODUCTION. This chapter contains an overview of the purpose and focus of the Draft EIR, a discussion of the intended use of this Draft EIR, a description of the organization of the Draft EIR, and a discussion of the public review process and potential areas of controversy.

2.0 SUMMARY. This chapter provides a summary of the Proposed Plan potential environmental impacts that would result from implementation of the Proposed Plan, proposed mitigation measures where applicable, and the level of significance of the impact before and after mitigation.

3.0 PROJECT DESCRIPTION. This chapter describes the Proposed Plan, including project location, existing conditions, project objectives, and a description of the proposed changes to existing plan and zoning under the project.

4.0 ENVIRONMENTAL IMPACTS. This chapter is the primary focus of this Draft EIR. Each environmental issue is considered in a separate section, which contains a discussion of the environmental settings for the CPA, the regulatory setting, the methodology and the thresholds of significance. Each section also includes the project analyses, mitigation measures, conclusions regarding the level of significance after mitigation, and cumulative impacts for each of the following environmental issues:

4.1 Aesthetics
4.2 Agriculture and Forestry Resources
4.3 Air Quality
4.4 Biological Resources
4.5 Cultural Resources
4.6 Geology and Soils
4.7 Greenhouse Gas Emissions
4.8 Hazards and Hazardous Materials
4.9 Hydrology and Water Quality
4.10 Land Use and Planning
4.11 Mineral Resources
4.12 Noise
4.13 Population, Housing, and Employment
4.14 Public Services
4.15 Transportation and Traffic
4.16 Utilities and Service Systems

5.0 ALTERNATIVES. This chapter provides analysis of a range of reasonable alternatives to the Proposed Plan in accordance with CEQA Guidelines Section 15126(f). The range of alternatives considered is based on their ability to feasibly attain most of the project's primary or basic objectives and avoid or substantially lessen any of the significant effects of the Proposed Plan.

6.0 OTHER CEQA DISCUSSIONS. This chapter provides a discussion of the (1) significant environmental effects of the Proposed Plan, (2) significant environmental effects that cannot be avoided if the Proposed Plan is implemented, (3) significant irreversible environmental changes that would result from implementation of the Proposed Plan, and (4) growth-inducing impacts of the Proposed Plan.

7.0 PREPARERS OF THE DRAFT EIR. This chapter lists the persons and lead agency that were consulted or contributed in the preparation of this Draft EIR.

2.0 SUMMARY

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15123, this chapter of the Draft Environmental Impact Report (Draft EIR) contains an overview of the Hollywood Community Plan Update (Proposed Project or Proposed Plan), its potential environmental effects and mitigation measures, and a summary of the alternatives to the Proposed Plan evaluated in this Draft Environmental Impact Report (EIR).

2.1 INTRODUCTION

The purpose of an EIR, as defined in CEQA Guidelines Section 15121(a) is to "inform public agency decisionmakers and the public generally of the potential significant environmental effects of a project, identify possible ways to minimize the significant effect and describe reasonable alternatives to the project." This document assesses the potential significant environmental impacts, including significant unavoidable impacts and cumulative impacts, related to the Proposed Plan. Where there is potential for a significant adverse effect, this report identifies mitigation measures that would either eliminate the impact or reduce the effect to a less-than-significant level, where possible.

This Draft EIR was prepared at the direction and under the supervision of the City of Los Angeles Department of City Planning (DCP). The intended use of this Draft EIR is to assist the City in making decisions regarding the approval of the Proposed Plan.

2.2 SUMMARY OF THE PROPOSED PROJECT

The Proposed Plan is part of the Department of City Planning's New Community Plan (NCP) Program. It is a comprehensive update of the Hollywood Community Plan, one of the City's 35 Community Plans. The Proposed Plan addresses changes (including state and regional regulatory and policy changes) that have occurred since the existing Hollywood Community Plan (Existing Plan) was last updated in 1988. The updated community plan is intended to guide development in the Hollywood Community Plan Area (CPA) through 2040. A detailed description of the Proposed Plan is provided in Chapter 3.0, Project Description.

The Proposed Project includes amending both the text and the land use map of the Hollywood Community Plan. The Proposed Project would also adopt several resolutions and zoning ordinances to implement the updates to the Community Plan, including changes for certain portions of the Hollywood CPA to allow specific uses and changes to development regulations (including height, floor area ratio (FAR), and density). These zoning ordinances would take a number of different forms, including amendments to the Zoning Map for zone and height district changes under Los Angeles Municipal Code (LAMC) Section 12.32, amendments to an existing specific plan (Vermont/Western Transit Oriented District Specific Plan (Station Neighborhood Area Plan [SNAP]), and development of a Community Plan Implementation Overlay (CPIO) District.

The Hollywood CPIO District Subarea boundaries would generally follow Franklin Avenue to the north, U.S. Route 101 (US-101) to the east, Fountain Avenue to the south and La Brea Avenue to the west. Regulations in the CPIO District would apply to commercial zoned properties. The CPIO District would propose regulatory protections for designated historical resources and pedestrian-oriented design standards in the Hollywood CPA. The CPIO would require that the rehabilitation of designated resources comply with the Secretary of the Interior's Standards and restrict applicants from obtaining a demolition permit

without an approved replacement project. Also, to ensure consistency between the updated Community Plan and other City plans and ordinances, the Proposed Project includes amendments to the Framework and Mobility Elements of the General Plan, and other elements as necessary.

PROJECT OBJECTIVES

The **primary objectives** of the Proposed Plan are as follows:

- Accommodate projected population, housing, and employment growth consistent with the growth strategies of the Framework Element, including:
  - Maximize development opportunities around existing transit systems to encourage sustainable land use while minimizing potential adverse impacts,
  - Direct growth to transit hubs and corridors,
  - Plan for increases to the housing supply,
  - Encourage a better balance of jobs and housing with mixed-use development,
  - Accommodate commercial uses for future employment opportunities, and
  - Focus growth into Framework identified Centers and corridors while preserving single-family neighborhoods, hillsides, and open space.
- Direct growth away from low-density neighborhoods; preserve single-family and low-density residential neighborhoods.
- Provide a range of employment opportunities; promote the vitality and expansion of Hollywood's media, entertainment, and tourism industry.
- Protect historical and cultural resources.

The **secondary objectives** of the Proposed Plan are as follows:

- Encourage and promote a variety of mobility options; make streets walkable.
- Improve the function and design of neighborhoods throughout the Project Area by preserving and strengthening the appearance of the overall Project Area to promote pedestrian-friendly environments, nurture neighborhood character, improve economic vitality, create identity, and integrate a combination of land uses to create positive visual experiences.
- Improve open space, parks and public spaces.
- Provide adequate public services and infrastructure.
- Encourage sustainable land use.
- Maintain Land Use and Zoning Consistency.

The underlying purpose of the Proposed Plan is to plan for and accommodate foreseeable growth in the Project Area, consistent with the growth strategies of the City as provided in the Framework Element, as well as the policies of Senate Bill (SB) 375 and the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). SB 375 coordinates land use and transportation planning to reduce greenhouse gas emissions and, to that end, requires SCAG to prepare an SCS as an integral part of the RTP, which is a 20-year transportation plan for the region that addresses regional growth, air quality and other issues, based on an analysis of past and future regional trends.

PROPOSED PLAN REASONABLY EXPECTED DEVELOPMENT

The Existing and Proposed Plan's reasonably expected development potential is compared in **Table 2-1**. The Proposed Plan would increase reasonably expected housing, population, and employment as compared to the Existing Plan.

TABLE 2-1: 2040 REASONABLY EXPECTED DEVELOPMENT OF THE HOLLYWOOD COMMUNITY PLAN COMPARED TO SCAG FORECAST

	2016 Baseline	Existing Plan Reasonably Expected Development /c/	Proposed Plan Reasonably Expected Development	SCAG 2040 Growth Forecast /c,d/
Housing /a,b/	104,000	113,000 – 121,000	121,000 – 132,000	113,000
Population	206,000	226,000 – 243,000	243,000 – 264,000	226,000
Employment	101,000	119,000	124,000 –127,000	119,000

/a/ SCAG provides estimates and forecasts for households, which is the equivalent of occupied housing units, not including vacancies. The estimated number of households in 2016 is approximately 99,000.

/b/ The Proposed Plan factors in additional units that can be expected from the City's housing incentives. It assumes all units are occupied.

/c/ Under the Existing Plan's lower range for Reasonably Expected Development and SCAG's 2040 Growth Forecast, the numbers are similar but the geographic distribution of housing, population, and employment in the Community Plan Area would be different.

/d/ The SCAG 2040 Growth Forecast does not factor in potential additional units from the City's TOC Guidelines, which were adopted in 2017 after the adoption of the SCAG 2016/2040 RTP/SCS.

Note: Numbers are rounded to the nearest thousand.

SOURCE: SCAG, 2016-2040 RTP/SCS; City of Los Angeles, 2016, 2018.

The Proposed Plan would accommodate more population, housing, and employment than SCAG's 2040 forecast. This is based on the Proposed Plan's land use designations, zoning, and policies. A range is provided to include development potential associated with affordable housing incentive programs, including the Transit Oriented Communities Affordable Housing Incentive Program Guidelines (TOC) and accessory dwelling unit (ADU) provisions governed by the state. In addition, a range is provided because the Proposed Plan does not prescribe exact numbers for development and conditions could change over the course of two decades. The upper numerical range of the reasonably expected development is the basis of analysis.

The Proposed Plan includes a map of proposed land use designations in the Project Area. Land use designations help guide development by establishing the intensity of different uses of land, such as residential, commercial, industrial and open space. Each land use designation has corresponding zones that regulate development, including uses, density and height. The map shows the general locations of the proposed land use designations in the CPA. The proposed changes would maintain a pattern of land use that directs future growth to already urbanized areas.

One of the ways the Proposed Plan's objectives are met is through proposed changes in land use designations and zoning regulations. Land use and zoning changes are intended to provide the potential for more growth than is anticipated to ensure that the projected growth in the Project Area – housing, population, and employment – is accommodated over the next approximately 20 years. These strategic changes would allow for infill development of additional residential units and job-producing uses in areas with existing transportation infrastructure located near Los Angeles County Metropolitan Transportation Authority (Metro) Red Line stops and along major corridors with transit. Locating jobs and housing near transit to reduce automobile reliance and improve mobility is consistent with state mandates for sustainability. As a result, growth is directed away from low-density neighborhoods. The changes would also result in a pedestrian-friendly environment, protect historical resources, and address updates that have occurred since the last Plan Update.

As part of the Proposed Plan, certain areas of the Project Area are proposed to undergo changes to the land use designation and/or zoning by amending the land use map and/or the zoning map. These areas are referred to as Change Areas. In the remainder of the Project Area, the Proposed Plan would retain the existing General Plan land use designations and zoning. These are referred to as "Non-Change Areas." Future development in the Non-Change Area would be subject to the same zoning regulations and standards as they would have been subject to under the current land use designation and zoning. The Proposed Plan will also include new and modified objectives, policies, and programs from those in the Existing Plan.

These new and/or modified objectives, policies, and program will be applicable to the entire Project Area, both Change Areas and Non-Change Areas.

2.3 CLASSIFICATION OF ENVIRONMENTAL IMPACTS

The environmental impact categories analyzed in this EIR are as follows:

- **Aesthetics**. Changes to scenic vistas, scenic highways, visual character and light and glare.
- **Agriculture and Forestry Resources**. Changes to farmlands and forest lands.
- **Air Quality**. Changes in pollutants affecting air quality, and consistency with applicable air quality plan.
- **Biological Resources**. Impacts on any sensitive wildlife habitats or special species, wetlands, and wildlife corridors, and consistencies with policies, ordinances, or plans protecting biological resources.
- **Cultural Resources**. Impacts to historical resources, archaeological, unique or geological features or paleontological resources, human remains, and tribal cultural resources.
- **Geology and Soils**. Risk from geologic and seismic hazards.
- **Greenhouse Gas Emissions**. Changes in the level of gases (i.e., carbon dioxide and methane) that contribute to climate change, and consistencies with applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions.
- **Hazards and Hazardous Materials**. Changes in the risk or exposure to hazardous materials, interference with adopted emergency response plan or evacuation plan, and proximity to wildland fire hazards.
- **Hydrology and Water Quality**. Changes in water quality, groundwater supplies, drainage patterns, and the amount of stormwater runoff; and risks associated with flood hazards and inundation by seiche, tsunami, or mudflow.
- **Land Use and Planning**. Changes to land use and zoning, and consistency with applicable land use plan, policy, or regulation.
- **Mineral Resources**. Changes to mineral resource recovery.
- **Noise**. Changes in noise and vibration levels due to construction, traffic and operation of future development.
- **Population, Housing, and Employment**. Impacts related to changes in population, and the displacement of a substantial number of housing units or persons.
- **Public Service.** Impacts related to the construction of new or expanded public facilities (i.e., fire protection, police protection, parks, public schools and libraries).
- **Transportation and Traffic**. Changes in traffic conditions, and consistency with adopted policies, plans, and programs.
- **Utilities and Service Systems**. Impacts related to the increased need for utilities and infrastructure improvements and the construction of new or expanded facilities.

Each environmental impact category includes one or more criteria, called thresholds, by which the Proposed Plan are measured to determine if the Proposed Plan would cause a substantial or potentially adverse physical change to existing environmental conditions. A significance determination is made for each threshold, classified as follows:

- **No Impact**: The Proposed Plan results in no effect or impact in that environmental impact category.
- **Less Than Significant**: The Proposed Plan results in changes that do not exceed the defined threshold of significance.
- **Potentially Significant**: The Proposed Plan could result in substantial adverse changes that exceed the threshold of significance. Potentially significant can be reduced to a less-than-significant level through the implementation of feasible mitigation measures. If feasible mitigation measures are not available or would not reduce the magnitude of the impact below the threshold of significance, the impact would be deemed significant and unavoidable.
- **Significant and Unavoidable**: The Proposed Plan would result in an adverse change that exceeds the defined threshold of significance and cannot be eliminated or reduced to a less-than-significance level by implementation of feasible mitigation measures.
- **Cumulatively Considerable Contribution to a Significant and Unavoidable Cumulative Impact**: The Proposed Plan alone would not result in a substantial adverse impact, but would make a substantial contribution to a significant adverse impact that would occur as a result of the project combined with other cumulative projects.

2.4 SUMMARY OF ALTERNATIVES

Section 15126.6 of the CEQA Guidelines requires that an EIR describe a range of reasonable alternatives to the project or to the location of the project that could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant environmental impacts of the project. An EIR should also evaluate the comparative merits of the alternatives. The range of feasible alternatives is selected and discussed in a manner intended to foster meaningful public participation and informed decision making. Among the factors that may be taken into account when addressing the feasibility of alternatives (as described in CEQA Guidelines Section 15126.6[f][1]) are environmental impacts, site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent could reasonably acquire, control, or otherwise have access to the alternative site.

The alternatives considered for the Proposed Plan are more fully described in Chapter 5.0, Alternatives but are briefly summarized below.

- **Alternative 1: Continuation of Existing Plan (No Project Alternative)**. CEQA Guidelines Section 15126.6(e) requires that a No Project Alternative be evaluated to allow decision makers to compare the impacts of approving the project with the impacts of not approving the Proposed Plan. This legally mandated alternative is not required to meet the objectives of the Proposed Plan or to substantially lessen any of the significant effects of the Proposed Plan. The No Project Alternative reflects "no project" conditions (i.e., without the adoption of the Proposed Plan). Under the No Project Alternative, no changes to General Plan land use designations and/or zoning would occur, the CPIO District would not be established, and future development would not be subject to the Proposed Plan's development regulations, design regulations, or policies. The No Project Alternative assumes what would be reasonably expected to be developed under the Existing Plan, based on existing General Plan land use designations and zoning in the Hollywood CPA. Based on existing zoning under the Existing

Plan's land use designations, the reasonably expected growth in the Hollywood CPA under the No Project Alternative would result in 113,000 to 121,000 housing units, 226,000 to 243,000 residents, and 119,000 jobs.

- **Alternative 2: Reduced Transit Oriented Development (TOD) and Corridors Alternative**. The Reduced TOD and Corridors Alternative (Reduced Alternative) focuses development potential at selected transit stations and corridor areas of the Hollywood CPA, with less development potential for housing and population than the Proposed Plan. The proposed changes under the Reduced Alternative reflect public input on the Proposed Plan. In general, this Alternative consists of similarly-located subareas around transit stations and corridors, but this Alternative has less development potential in selected subareas, including approximately 4,000 less housing units, 8,000 fewer persons and a similar number of jobs compared to the Proposed Plan. This Alternative would reduce the allowable base floor area ratio (FAR) in selected Regional Center subareas and the allowable base FAR along selected corridors, and also could reduce the proposed density of selected High Medium subareas.

- **Alternative 3: Targeted Corridors Alternative**. The Targeted Corridors Alternative would generally concentrate development along targeted corridors in the Hollywood CPA that could accommodate new housing, population and jobs. The amount of development potential anticipated to occur under the Proposed Plan would occur under the Targeted Corridors Alternative, but it would be less concentrated in the Regional Center and would be dispersed along targeted corridors throughout the CPA. Under the Targeted Corridors Alternative, the Hollywood CPA would meet the same population, housing and employment projections anticipated in the Proposed Plan. This would be achieved through an increase in the maximum permitted FAR along corridors.

- **Alternative 4: High TOD Alternative**. The High TOD Alternative for the Hollywood CPA would increase opportunities for TOD development around existing major rail infrastructure but the same amount of development potential as the Proposed Plan would occur. This Alternative would concentrate the Proposed Plan's reasonably expected housing, population, and employment at the five Metro Red Line station areas in the Hollywood CPA, including East Hollywood. Under the High TOD Alternative, the Hollywood CPA would meet the same population, housing and employment projections anticipated in the Proposed Plan.

- **Alternative 5: SCAG Forecast Alternative**. This alternative is growth under the SCAG 2040 forecast in the CPA under the 2016-2040 RTP/SCS. The projections are similar to the reasonably expected development at the lower range of the No Project Alternative (Alternative 1). This alternative is therefore substantially similar to Alternative 1. The difference between the No Project Alternative and Alternative 5 is that projected growth under Alternative 5 does not include reasonably expected development from use of the TOC Guidelines because TOC was not adopted before SCAG made its 2040 forecast. Therefore, Alternative 5 does not include the high range of reasonably expected growth that Alternative 1 includes. For this reason, Alternative 5 would not be as reasonably foreseeable as Alternative 1 if the Proposed Plan were not adopted. Additionally, Alternative 5 is different from Alternative 1 in that the projected growth by SCAG is more spread out in the CPA and less development is expected to occur in the regional center and around transit infrastructure systems than it would in Alternative 1.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines Section 15126.6 requires that an "environmentally superior" alternative be selected among the alternatives that are evaluated in an EIR. In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. If the No Project alternative is identified as environmentally superior, then another environmentally superior alternative shall be identified among the other alternatives.

Based on the ability to result in reduced environmental impacts and meet project objectives, the Reduced Alternative (Alternative 2) is the Environmentally Superior Alternative. None of the alternatives analyzed are capable of avoiding the significant and unavoidable impacts that would occur under the Proposed Plan. However, the Reduced Alternative would reduce the severity of Proposed Plan's significant and unavoidable impacts related to air quality, greenhouse gas emissions, noise, and traffic.

COMPARISON OF ALTERNATIVES – PROJECT OBJECTIVES

An EIR must evaluate the comparative merits of a reasonable range of alternatives to the proposed project that could feasibly attain most of the basic objectives of the project while avoiding or lessening any adverse effects of the project. For purposes of this analysis, the four alternatives are evaluated to determine the extent to which they attain the basic objectives of the Proposed Plan.

Based on the comparative evaluation of the project objectives (see Table 5-1 in Chapter 5.0, Alternatives), in contrast to the Proposed Plan, none of the alternatives would meet the primary or secondary project objectives or the underlying purpose as well as the Proposed Plan, including because they would not meet the growth strategies of the Framework Element as well as the Proposed Plan, and the policies of SB 375 and the SCS to increase density around transit and regional centers.

2.5 SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

A summary of the environmental impacts associated with the Proposed Plan and mitigation measures proposed to avoid or lessen the severity of the potentially significant environmental impacts is identified in **Table 2-2**. The level of significance of environmental impacts after mitigation is also identified in the table, where applicable.

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES				
Impact Category	**Checklist Threshold**	**Level of Impact Before Mitigation**	**Mitigation Measure**	**Level of Impact After Mitigation**
AESTHETICS				
Scenic Vista	**Impact 4.1-1**: Would implementation of the Proposed Plan have a substantial adverse effect on a scenic vista?	Less than Significant	No Mitigation Required	Less than Significant
Scenic Resources Within a State Scenic Highway	**Impact 4.1-2**: Would implementation of the Proposed Plan substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No Impact	No Mitigation Required	No Impact
Visual Character	**Impact 4.1-3**: Would implementation of the Proposed Plan substantially degrade the existing visual character or quality of the site and its surroundings?	Less than Significant	No Mitigation Required	Less than Significant
Light and Glare	**Impact 4.1-4**: Would implementation of the Proposed Plan create a new source of substantial light or glare that could adversely affect day- or nighttime views in the Project Area?	**Light:** Less than Significant **Glare:** Potentially Significant	**Light:** No Mitigation Required **Glare:** **AE1** For any new construction on a building requiring site plan review, prior to the issuance of any building permits, the applicant shall submit plans and specifications for all exterior building materials to the Department of City Planning and the Department of Building and Safety for review and approval. Glass as part of the external façade of buildings shall be no more reflective than necessary to comply with Green Building Code or other state or local UV requirements.	**Light:** Less than Significant **Glare:** Less than Significant
AGRICULTURE & FORESTRY RESOURCES				
Important Farmland	**Impact 4.2-1**: Would implementation of the Proposed Plan convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping Monitoring Program of the California Resources Agency, to non-agricultural uses?	No Impact	No Mitigation Required	No Impact
Zoning and Williamson Act	**Impact 4.2-2**: Would implementation of the Proposed Plan conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact	No Mitigation Required	No Impact

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
Timberland/Forest Land Conflict	**Impact 4.2-3**: Would implementation of the Proposed Plan conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC Section 12220(g)), timberland (as defined in PRC Section 4526), or timberland-zoned Timberland Production (as defined in Government Code Section 511049(g))?	No Impact	No Mitigation Required	No Impact
Forest Land Conversion	**Impact 4.2-4**: Would implementation of the Proposed Plan result in the loss of forest land or conversion of forest land to non-forest use?	No Impact	No Mitigation Required	No Impact
Conversion of Farm or Forestland	**Impact 4.2-5**: Would implementation of the Proposed Plan involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use?	No Impact	No Mitigation Required	No Impact
AIR QUALITY				
Air Quality Plan	**Impact 4.3-1**: Would implementation of the Proposed Plan conflict with or obstruct implementation of the applicable air quality plan?	Less than Significant	No Mitigation Required	Less than Significant
Violate Air Quality Standard	**Impact 4.3-2**: Would implementation of the Proposed Plan violate any air quality standard or contribute substantially to an existing or projected air quality violation?	**Construction**: Potentially Significant **Operational**: Potentially Significant	**Construction**: **AQ1** The City shall require all projects that are in a CPIO District subarea or are discretionary to include in the agreements with contractors and subcontractors the following, or equivalent, best management practices in contract specifications: • All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the USEPA Tier 4 emission standards, where available. In the event that Tier 4 engines are not available for any off-road equipment larger than 100 horsepower, that equipment shall be equipped with a Tier 3 engine, or an engine that is equipped with retrofit controls to reduce exhaust emissions of NOX and DPM to no more than Tier 3 levels unless certified by engine manufacturers or the on-site air quality	**Construction**: Significant and Unavoidable **Operational**: Significant and Unavoidable

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
			construction mitigation manager that the use of such devices is not practical for specific engine types. For purposes of this condition, the use of such devices is "not practical" for the following, as well as other, reasons: - There is no available retrofit control device that has been verified by either the CARB or USEPA to control the engine in question to Tier 3; - The construction equipment is intended to be on site for five days or less; or - Relief may be granted from this requirement if a good faith effort has been made to comply with this requirement and that compliance is not practical for technical, legal, economic, or other reasons. • All construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. • Construction contractors shall use electricity from power poles rather than temporary gasoline or diesel power generators, as feasible, or solar where available. • Construction contractors shall use pre-painted construction materials, as feasible. • Construction contractors shall provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow. • Construction contractors shall provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site, as feasible.	

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
			• Construction contractors shall reroute construction trucks away from congested streets or sensitive receptor areas, as feasible. • Construction contractors shall appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM_{10} generation. **Operational**: No feasible mitigation measures have been identified.	
Cumulative Increase	**Impact 4.3-3**: Would implementation of the Proposed Plan result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	Potentially Significant	**Construction**: Mitigation Measure **AQ1**. **Operational**: No feasible mitigation measures have been identified.	Significant and Unavoidable
Sensitive Receptors	**Impact 4.3-4**: Would implementation of the Proposed Plan expose sensitive receptors to substantial pollutant concentrations?	**Construction**: Potentially Significant **Operational**: Less than Significant	**Construction**: Mitigation Measure **AQ1.** **Operational:** No Mitigation Required	**Construction**: Significant and Unavoidable **Operational**: Less than Significant
Odors	**Impact 4.3-5**: Would implementation of the Proposed Plan create objectionable odors affecting a substantial number of people?	Less than Significant	No Mitigation Required	Less than Significant
BIOLOGICAL RESOURCES				
Special Status Species Habitat	**Impact 4.4-1**: Would implementation of the Proposed Plan have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFW?	Potentially Significant	**BR1** For discretionary projects that are in or within 200 feet of Griffith Park or are required to comply with the City's Baseline Hillside Ordinance, project applicants shall be required to conduct a biological resources assessment report to characterize the biological resources on-site and to determine the presence or absence of sensitive species. The report shall identify 1) approximate population size and distribution of any sensitive plant or animal species, 2)	Significant and Unavoidable

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
			any sensitive habitats (such as wetlands or riparian areas), and 3) any potential impacts of proposed project on wildlife corridors. Off-site areas that may be directly or indirectly affected by the individual project shall also be surveyed. The report shall include site location, literature sources, methodology, timing of surveys, vegetation map, site photographs, and descriptions of on-site biological resources (e.g., observed and detected species, as well as an analysis of those species with the potential to occur on-site). The biological resources assessment report and surveys shall be conducted by a qualified biologist, and any special status species surveys shall be conducted according to standard methods of surveying for the species as appropriate. If sensitive species and/or habitat are absent from the individual project site and adjacent lands potentially affected by the individual project, a written report substantiating such shall be submitted to DCP prior to issuance of a grading permit, and the project may proceed without any further biological investigation. If sensitive species and/or habitat are identified, the biological resources assessment report shall require pre-construction surveys for sensitive species and/or construction monitoring to ensure avoidance, relocation, or safe escape of the sensitive species from the construction activities, as appropriate. If sensitive species are found to be nesting, brooding, denning, etc. on-site during the pre-construction survey or during construction monitoring, construction activities shall be halted until offspring are weaned, fledged, etc. and are able to escape the site or be safely relocated to appropriate off-site habitat areas. A qualified biologist shall be on-site to conduct surveys, for construction monitoring, to perform or oversee implementation of protective measures, and to determine when construction activity may resume.	

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
			Additionally, the biological resources assessment report shall be submitted to DCP and CDFW prior to ground-disturbing activities. A follow-up report documenting construction monitoring, relocation methods, and the results of the monitoring and species relocation shall also be submitted to DCP and CDFW following construction. **BR2** If indicated as appropriate by the biological resources assessment report required in BR-1, focused surveys for special status plants shall be conducted. Prior to vegetation clearing for construction in open space areas, special status plants identified in the focused surveys shall be counted and mapped and a special-status plant relocation plan shall be developed and implemented to provide for translocation of the plants. The plan shall be prepared by a qualified biologist and shall include the following components: (1) identify an area of appropriate habitat, on-site preferred; (2) depending on the species detected, determine if translocation will take the form of seed collection and deposition, or transplanting the plants and surrounding soil as appropriate; (3) develop protocols for irrigation and maintenance of the translocated plants where appropriate; (4) set forth performance criteria (e.g., establishment of quantitative goals, expressed in percent cover or number of individuals, comparing the restored and impacted population) and remedial measures for the translocation effort; and (5) establish a five-year monitoring procedures/protocols for the translocated plants. Five years after initiation of the restoration activities, a report shall be submitted to DCP and CDFW, which shall at a minimum discuss the implementation, monitoring, and management of the restoration activities over the five-year period and indicate whether the restoration activities have, in part or in whole, been successful based on the established performance criteria. The restoration	

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
			activities shall be extended if the performance criteria have not been met at the end of the five-year period to the satisfaction of DCP, CDFW, and USFWS, when applicable.	
Riparian Habitat	**Impact 4.4-2**: Would implementation of the Proposed Plan have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Potentially Significant	Mitigation Measures **BR1** and **BR2**. **BR3** During environmental review for projects that are discretionary or in a CPIO District subarea, in areas potentially containing jurisdictional waters and riparian habitat, including streams, wetlands, riparian habitat, and other water bodies, affected sites as well as off-site areas that may be directly or indirectly affected by the individual development project shall be surveyed by a qualified biologist for Waters of the U.S. and Waters of the State (e.g., streams, wetlands, or riparian habitat). Whenever possible, individual projects shall be designed and/or sited to avoid disturbance to or loss of jurisdictional resources. If Waters of the U.S. or Waters of the State cannot be avoided and would be affected by the individual project, the regulatory agencies shall be consulted regarding the required permits. Individual project applicants shall demonstrate to DCP, if the lead agency, the regulating agency that the requirements of agencies with jurisdiction over the subject resource can be met prior to obtaining grading permits. This will include, but not be limited to, consultation with those agencies, securing the appropriate permits, waivers, or agreements, and arrangements with a local or regional mitigation bank including in lieu fees, as needed. **BR4** At the discretion of the regulatory agencies, including DCP, if applicable, discretionary development projects resulting in the modification, change, and/or loss of Waters of the U.S. and Waters of the State (e.g., streams, wetland, or riparian habitat) under jurisdiction of the regulatory agencies shall be required to contribute to a mitigation bank, contribute to an in-lieu fee program, establish on-site or off-site restoration of in-kind habitat, or establish on-site	Significant and Unavoidable

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
			or off-site restoration of out-of-kind habitat that is of high value to the watershed and provides important watershed functions. Individual project applicants shall submit a compensatory plan for review and approval by relevant regulatory agencies, including DCP, if applicable. The compensatory plan shall be developed by a qualified biologist or restoration ecologist and approved by the relevant regulatory agencies prior to issuance of a grading permit. The plan shall be based on the ACOE *Final Mitigation Guidelines and Monitoring Requirements* (April 19, 2004) and the Los Angeles District's Recommended Outline for Draft and Final Compensatory Mitigation and Monitoring Plans.[1] In broad terms, this plan shall at a minimum include: • Description of the project/impact and mitigation sites • Specific objectives • Implementation plan • Success criteria • Required maintenance activities • Monitoring plan • Contingency measures At the discretion of DCP and relevant regulatory agencies, Waters of the U.S. and Waters of the State shall be replaced at a minimum 3:1 ratio. The specific success criteria and methods for evaluating whether an individual development project has been successful at meeting those criteria shall be determined by the qualified biologist or restoration ecologist and included in the compensatory plan.	

[1]*The USACOE's Final Mitigation Guidelines and Monitoring Requirements (April 19, 2004) is available at the Army Corps of Engineers Los Angeles District Regulatory Division webpage at www.spl.usace.army.mil/regulatory/. This document contains the Los Angeles District's Recommended Outline for Draft and Final Compensatory Mitigation and Monitoring Plans. This publication is intended to serve as a technical guide for permit applicants preparing compensatory mitigation plans and identifies the types and extent of information that agency personnel need to assess the likelihood of the success of mitigation proposals. The Los Angeles District's outline is adapted to specific issues encountered in the region.*

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
			Implementation of the compensatory plan shall commence prior to issuance of a grading permit for individual projects. If the compensatory plan involves establishment or restoration activities, these activities shall be implemented over a five-year period. The establishment or restoration activities shall incorporate an iterative process of annual monitoring and evaluation of progress, and allow for adjustments to the activities, as necessary, to achieve desired outcomes and meet the success criteria. Five years after initiation of establishment or restoration activities, a final report shall be submitted to the relevant regulatory agencies and DCP, which shall at a minimum discuss the implementation, monitoring, and management of the activities over the five-year period, and indicate whether the activities have, in part, or in whole, been successful based on established success criteria. The establishment or restoration activities shall be extended if the success criteria have not been met to the satisfaction of DCP and relevant regulatory agencies. **BR5** For projects that are discretionary or in a CPIO District subarea, prior to construction activities on properties that contain seasonal or perennial streams, year-round or intermittent wetlands, riparian habitat, or the Los Angeles River, project applicants shall be required to prepare and submit to the U.S. Army Corps of Engineers a "Preliminary Delineation Report for Waters of the U.S." (which shall delineate any on-site wetlands) and, as appropriate, a Streambed Alteration Notification package to CDFW. If these agencies determine that project features are not regulated under their jurisdiction, then no further protection measure is necessary. However, if the U.S. Army Corps of Engineers determines that a federally-protected wetland is located on-site or considers the feature to be jurisdictional through a "significant nexus" test per recent U.S. Army Corps of Engineers and	

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
			USEPA guidance,[2] then a Clean Water Act Section 404 permit shall be obtained from the U.S. Army Corps of Engineers, and any permit conditions shall be agreed to, prior to the start of construction activities in the affected area. If CDFW determines that the drainage is a regulated "streambed", then a Streambed Alteration Agreement shall be entered into with CDFW and any associated conditions shall be agreed to prior to the start of construction in the affected area.	
Wetlands	**Impact 4.4-3**: Would implementation of the Proposed Plan have a substantial adverse effect on federally-protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Potentially Significant	Mitigation Measure **BR5**.	Significant and Unavoidable
Migratory Wildlife	**Impact 4.4-4**: Would implementation of the Proposed Plan interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Potentially Significant	Mitigation Measure **BR1**. **BR6** For discretionary projects that are in or within 200 feet of Griffith Park or are required to comply with the City's Baseline Hillside Ordinance, the biological resources assessment report, as mentioned in Mitigation Measure **BR1**, shall analyze how the individual development project could affect wildlife corridors. The report shall identify measures (such as providing native landscaping to provide cover on the wildlife corridor) that the individual project would be required to implement such that the existing wildlife corridor would remain. Wildlife corridors identified in the biological resources assessment report shall not be entirely closed by any development or improvements occurring within the Project Area.	Significant and Unavoidable

[2]U.S. Environmental Protection Agency and U.S. Department of the Army, *Clean Water Act Jurisdiction Following the US. Supreme Court's Decision in Rapanos v United States & Carabell v. United States.* June 5, 2007.

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
Local Polices or Ordinances	**Impact 4.4-5**: Would implementation of the Proposed Plan conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	Less than Significant	No Mitigation Required	Less than Significant
Habitat Conservation Plan	**Impact 4.4-6**: Would implementation of the Proposed Plan conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No Impact	No Mitigation Required	No Impact
CULTURAL RESOURCES				
Historical Resources	**Impact 4.5-1**: Would implementation of the Proposed Plan cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?	Potentially Significant	No feasible mitigation measures have been identified.	Significant and Unavoidable
Archaeological Resources	**Impact 4.5-2**: Would implementation of the Proposed Plan cause a substantial adverse change in the significance of an archaeological resource?	Potentially Significant	**CR1** For all discretionary projects or projects in a CPIO District Subarea, a qualified archaeologist shall be required to monitor excavation and grading activities in soils that have not been previously disturbed, to identify, record, and evaluate the significance of any archaeological finds during construction. If archaeological resources are uncovered (in either a previously disturbed or undisturbed area), the City Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, state, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the project shall not collect or move any archaeological materials or associated materials. Construction activity may continue unimpeded on other portions of the project site. The found deposits shall be treated in accordance with federal, state, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Construction activities in the area where resources were found may commence once the	Less than Significant

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
			identified resources are properly assessed and processed by a qualified archeologist. **CR2** For all discretionary projects or projects in a CPIO District Subarea, the City shall require that all cultural resources identified on a site be assessed and treated in a manner consistent with PRC Section 21083.2, as determined appropriate by a qualified archaeologist in consultation with the City's Office of Historic Resources. A report shall be prepared according to current professional standards that describes the resource, how it was assessed, and disposition. **CR3** For all projects that are not subject to Mitigation Measures **CR1** and **CR2** that are seeking excavation or grading permits, the Department of Building and Safety shall issue the following notice and obtain an acknowledgement of receipt of the notice from applicants: • California Penal Code Section 622.5 provides the following: "Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor." • Best practices to ensure archaeological resources are not damaged include but are not limited to the following steps: ○ A qualified archaeologist monitors excavation and grading activities in soils that have not been previously disturbed, to identify, record, and evaluate the significance of any archaeological finds during construction. ○ If archaeological resources are uncovered (in either a previously disturbed or undisturbed area), all work ceases in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, state, and local guidelines.	

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
			○ Personnel of the project shall not collect or move any archaeological materials or associated materials. ○ If cleared by a qualified archaeologist, construction activity may continue unimpeded on other portions of the project site. ○ The found deposits shall be treated in accordance with federal, state, and local guidelines and regulations. ○ As provided in Public Resources Code Section 21083.2, archaeological resources should be preserved in place or left in an undisturbed state. When preserving in place or leaving in an undisturbed state is not possible, excavation should occur unless testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, and this determination is documented by an archaeologist. ○ Construction activities in the area where resources were found may commence once the identified resources are properly assessed and processed by a qualified archeologist and the archaeologist clears the site for construction activity.	
Paleontological Resources	**Impact 4.5-3**: Would implementation of the Proposed Plan directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Potentially Significant	**CR4** At the time of application for discretionary projects or project in a CPIO District Subarea that involve grading, trenching, or other new ground disturbance in areas with high paleontological resource sensitivity, the project applicant shall conduct a paleontological assessment to further evaluate the potential impacts to paleontological resources and, as necessary, take actions to preserve significant paleontological resources. Specific requirements include: a) **Retain a Qualified Paleontologist**. Prior to initial ground disturbance, the applicant shall retain a project paleontologist, defined as a paleontologist who meets the SVP standards for Qualified Professional	Less than Significant

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
			Paleontologist, to direct all mitigation measures related to paleontological resources. A qualified paleontologist (Principal Paleontologist) is defined by the SVP standards as an individual preferably with an M.S. or Ph.D. in paleontology or geology who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology of California, preferably southern California, and who has worked as a paleontological mitigation project supervisor for a least one year. b) **Paleontological Resources Assessment**. Prior to any construction activity in areas determined to have a low to high paleontological sensitivity that increases with depth, a Qualified Professional Paleontologist shall prepare a Paleontological Resources Assessment to the satisfaction of the City to evaluate potential for impacts to paleontological resources from development of the proposed project. The Paleontological Resources Assessment may require a museum records search from the Natural History Museum of Los Angeles County to identify whether previous paleontological localities exist within the development area and if so, at what depth(s). If the project paleontologist determines that sediments on a development site are sensitive for scientifically important paleontological resources, steps Mitigation Measure **CR4c** to g shall be taken prior to, during, and after construction activities. A Paleontological Resources Assessment shall not be required for development areas already identified as having a high paleontological sensitivity at the surface. c) **Paleontological Mitigation and Monitoring Program**. Prior to construction activity a qualified paleontologist shall prepare a Paleontological Mitigation and Monitoring Program, subject to City approval, to be implemented during ground disturbance	

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
			activity for the proposed project. This program should outline the procedures for construction staff Worker Environmental Awareness Program (WEAP) training, paleontological monitoring extent and duration, salvage and preparation of fossils, the final mitigation and monitoring report, and paleontological staff qualifications. d) **Paleontological Worker Environmental Awareness Program (WEAP)**. Prior to the start of construction, the project paleontologist or his or her designee shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff. The WEAP shall be fulfilled at the time of a preconstruction meeting at which a qualified paleontologist shall attend. In the event of a fossil discovery by construction personnel, all work in the immediate vicinity of the find shall cease and a qualified paleontologist shall be contacted to evaluate the find before restarting work in the area. If it is determined that the fossil(s) is(are) scientifically significant, the qualified paleontologist shall complete the following conditions to mitigate impacts to significant fossil resources. e) **Paleontological Resource Construction Monitoring.** Ground disturbing construction activities (including grading, trenching, foundation work and other excavations) in undisturbed sediments, below five feet, with high paleontological sensitivity should be monitored on a full-time basis by a qualified paleontological monitor during initial ground disturbance. The Paleontological Mitigation and Monitoring Program shall be supervised by the project paleontologist. Monitoring should be conducted by a qualified paleontological monitor, who is defined as an individual who has experience with collection and salvage of paleontological resources. The duration and timing of the monitoring will be determined by the project paleontologist.	

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
			If the project paleontologist determines that full-time monitoring is no longer warranted, he or she may recommend that monitoring be reduced to periodic spot-checking or cease entirely. Monitoring would be reinstated if any new or unforeseen deeper ground disturbances are required and reduction or suspension would need to be reconsidered by the Supervising Paleontologist. Ground disturbing activity that does not occur in undisturbed sediments with high paleontological sensitivity would not require paleontological monitoring. f) **Fossil Salvage.** If fossils are discovered, the project paleontologist or paleontological monitor shall recover them. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. Once salvaged, significant fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition and curated in a scientific institution with a permanent paleontological collection (such as the Natural History Museum of Los Angeles County), along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the project paleontologist. g) **Final Paleontological Mitigation Report.** Upon completion of ground disturbing activity (and curation of fossils if necessary) the qualified paleontologist shall prepare a final mitigation and monitoring report outlining the results of the mitigation and monitoring program. The report shall include discussion of the location, duration and methods of the	

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
			monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated. h) For any discoveries of paleontological resources not covered by the above process, the applicant shall comply with Mitigation Measure **CR4f**. **CR5** For all discretionary projects or projects in a CPIO District Subarea, the City shall require that all paleontological resources identified on a project site be assessed and treated in a manner determined by a qualified paleontologist in consultation with the City's Office of Historic Resources. A report shall be prepared according to current professional standards that describes the resource, how it was assessed, and disposition. Any reports and surveys shall be submitted to the City's Office of Historic Resources and the Natural History Museum of Los Angeles County. **CR6** For all projects that are not subject to Mitigation Measure **CR4** and **CR5** that are seeking excavation or grading permits, the Department of Building and Safety shall issue the following notice and obtain an acknowledgement of receipt of the notice from applicants: • California Penal Code Section 622.5 provides the following: "Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor." • Public Resources Code Section 5097.5 (a) states, in part, that: No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological,	

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
			paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands. • Best management practices to ensure unique geological and paleontological resources are not damaged include but are not limited to the following steps: ○ Prior to excavation and grading activities a qualified paleontologist prepares a resource assessment using records from the Natural History Museum of Los Angeles County. ○ If in the assessment, the soil is identified as potentially containing paleontological resources, a qualified paleontologist monitors excavation and grading activities in soils that have not been previously disturbed, to identify, record, and evaluate the significance of any paleontological finds during construction. ○ If paleontological resources are uncovered (in either a previously disturbed or undisturbed area), all work ceases in the area of the find until a qualified paleontological has evaluated the find in accordance with federal, state, and local guidelines. ○ If fossils are discovered, a qualified paleontologist shall recover them. Typically fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the paleontologist would have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. Once salvaged, significant fossils should be identified to the lowest possible taxonomic level, prepared to a curation-ready condition	

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
			and curated in a scientific institution with a permanent paleontological collection (such as the Natural History Museum of Los Angeles County), along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the project paleontologist. All other federal, state and local laws related to such resources would be complied with. ○ Personnel of the project would not collect or move any paleontological materials or associated materials. ○ If cleared by the qualified paleontologist, construction activity would continue unimpeded on other portions of the project site. ○ Construction activities in the area where resources were found would commence once the identified resources are properly assessed and processed by a qualified paleontologist and if construction activities were cleared by the qualified paleontologist.	
Human Remains	**Impact 4.5-4**: Would implementation of the Proposed Plan disturb human remains, including those interred outside of dedicated cemeteries?	Less than Significant	No Mitigation Required	Less than Significant
Tribal Cultural Resources	**Impact 4.5-5**: Would implementation of the Proposed Plan cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is 1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or 2) A resource determined by the lead agency, in	Potentially Significant	**CR7** For all discretionary projects or projects in a CPIO District Subarea where excavation could extend below previously disturbed levels, notification shall be provided to California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project site and have submitted a written request to the Department of City Planning to be notified of proposed projects in that area. If the potential for tribal resources exists, excavation in previously undisturbed soils shall be monitored by a qualified Tribal Monitor. If tribal resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until an	Less than Significant with Mitigation

	its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?		appropriate Tribal Representative has evaluated the find. Construction personnel shall not collect or move any tribal resources. Construction activity may continue unimpeded on other portions of the project site. Any tribal resources shall be treated with appropriate dignity and protected and preserved as appropriate. **CR8** For all projects that are not subject to CR7 that are seeking excavation or grading permits, the Department of Building and Safety shall issue the following notice and obtain an acknowledgement of receipt of the notice from applicants: • Several federal and state laws regulate the treatment of tribal resources, as well as make it a criminal violation to destroy those resources. These include but are not limited to: ○ California Penal Code Section 622.5 provides the following: "Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor." ○ Public Resources Code Section 5097.5 (a) states, in part, that: No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.	

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
			• Best practices to ensure tribal resources are not damaged include but are not limited to the following steps: ○ A qualified tribal monitor or archaeologist qualified to identify tribal resources would monitor excavation and grading activities in soils that have not been previously disturbed, to identify, record, and evaluate the significance of any archaeological finds during construction. ○ If tribal resources are uncovered (in either a previously disturbed or undisturbed area), all work ceases in the area of the find until an appropriate tribal representative has evaluated the find or, if no tribal representative is identified, the qualified archaeologist has evaluated the find in accordance with federal, state, and local guidelines. ○ The found deposits shall be treated with appropriate dignity and protected and preserved as appropriate with the agreement of the Tribal Representative, as well as in accordance of federal, state, and local guidelines. ○ An agreement would be reached with the Tribe to mitigate or avoid any significant impacts to the Tribal Resources. ○ The location of the find of Tribal Resources and the type and nature of the find would not be published beyond providing it to public agencies with jurisdiction or responsibilities related to the resources, the qualified archaeologist, and tribal representatives. ○ Absent an agreement with the Tribe, as provided in Public Resources Code Section 21083.2, archaeological resources should be preserved in place or left in an undisturbed state. When preserving in place or leaving in an undisturbed state is not possible, excavation should occur unless testing or studies already completed have adequately recovered the scientifically	

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
			consequential information from and about the resource, and this determination is documented by a qualified archaeologist. ○ Personnel of the project shall not collect or move any archaeological or tribal resources or associated materials, or publish the location of the tribal resources. ○ Construction activity may continue unimpeded on other portions of the project site if cleared by the tribal representative or the qualified archaeologist. ○ Construction activities in the area where resources were found may commence once the identified resources are properly assessed and processed by a tribal representative, or if no tribal representative is identified, a qualified archeologist.	
GEOLOGY & SOILS				
Earthquake Fault	**Impact 4.6-1**: Would implementation of the Proposed Plan expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving the rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	No Impact	No Mitigation Required	No Impact
Seismicity	**Impact 4.6-2**: Would implementation of the Proposed Plan expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?	No Impact	No Mitigation Required	No Impact
Seismic-Related Ground Failure	**Impact 4.6-3**: Would implementation of the Proposed Plan expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction and/or landslides?	No Impact	No Mitigation Required	No Impact

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
Soil Erosion	**Impact 4.6-4**: Would implementation of the Proposed Plan result in substantial soil erosion or the loss of topsoil?	Less than Significant	No Mitigation Required	Less than Significant
Geologic Hazards / Unstable Soils	**Impact 4.6-5**: Would implementation of the Proposed Plan be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, or collapse?	No Impact	No Mitigation Required	No Impact
Expansive Soil	**Impact 4.6-6**: Would implementation of the Proposed Plan be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	No Impact	No Mitigation Required	No Impact
Septic Tanks	**Impact 4.6-7**: Would implementation of the Proposed Plan have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	No Impact	No Mitigation Required	No Impact
GREENHOUSE GAS EMISSIONS				
Greenhouse Gas Emissions	**Impact 4.7-1**: Would implementation of the Proposed Plan generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?	Less than Significant	No Mitigation Required	Less than Significant
Applicable Plans, Polices, or Regulations	**Impact 4.7-2**: Would implementation of the Proposed Plan conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions?	Less than Significant	No Mitigation Required	Less than Significant
HAZARDS & HAZARDOUS MATERIALS				
Hazardous Materials Transport, Use, Disposal	**Impact 4.8-1**: Would implementation of the Proposed Plan create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than Significant	No Mitigation Required	Less than Significant
Hazardous Materials Upset or Accident	**Impact 4.8-2**: Would implementation of the Proposed Plan create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Potentially Significant	**HM1** Discretionary projects or projects in a CPIO Subarea District that involve construction-related soil disturbance located on land that is currently or was historically zoned as industrial or, previously had a gas station or dry-cleaning facility on-site, shall conduct a comprehensive	Less than Significant

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
			search of databases of sites containing hazardous waste or hazardous materials, including on lists prepared pursuant to Government Code, section 65962.2. A report setting forth the results of this database search shall be provided to the City and shall be made publicly available (e.g. historical environmental reports prepared by Enviroscan, EDR or similar firms). If the report indicates the project site or property within one-quarter mile of the project site has the potential to be contaminated with hazardous waste or hazardous materials for any reason, Phase I and, as needed, Phase II Environmental Site Assessments shall be prepared by a qualified Environmental Professional (as defined in Title 40 Code of Federal Regulations §312.10 Definitions). Applicants of the development project shall implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action. All remediation shall be subject to City review and approval. Applicants shall consult with appropriate oversight agencies, including the Department of Toxic Substances Control and the Los Angeles Regional Water Quality Control Board, and implement remediation measures to minimize human exposure and prevent further environmental contamination. No development shall occur until a letter of No Further Action is obtained, if required, by an appropriate agency. **HM2** For any project not subject to HM1 that seek to excavate below previously disturbed soils, DBS should issue the following notice and obtain an acknowledgement of the receipt of the following notice to all applicants: Hazardous Materials are regulated at the federal, state and local level through numerous regulatory schemes. Applicants are legally required to comply with these laws when development activities involve soils contaminated with hazardous materials. Best management practices to ensure compliance	

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
			with these federal, state and local laws may include the following: • Prior to doing any soil disturbing activities, a comprehensive search of databases of sites containing hazardous waste or hazardous materials (e.g. historical environmental reports prepared by Enviroscan, EDR or similar firms) is conducted, including on lists prepared pursuant to Government Code, section 65962.2. • If the database search indicates the project site, or property is within one-quarter mile of the project site, has the potential to be contaminated with hazardous waste or hazardous materials for any reason, Phase I and, as needed, Phase II Environmental Site Assessments shall be prepared by a qualified Environmental Professional (as defined in Title 40 Code of Federal Regulations §312.10 Definitions). • Recommendations provided in any Phase II Environmental Site Assessment report for the project site shall be implemented for remedial action. • Property owners and/or applicants consult with appropriate oversight agencies, including the Department of Toxic Substances Control and the Los Angeles Regional Water Quality Control Board, and implement remediation measures to minimize human exposure and prevent further environmental contamination. • No development occurs until a letter of No Further Action is obtained, if required, by an appropriate agency.	
Hazards within 1/4 Mile of a School	**Impact 4.8-3**: Would implementation of the Proposed Plan emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less than Significant	No Mitigation Required	Less than Significant

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES				
Impact Category	**Checklist Threshold**	**Level of Impact Before Mitigation**	**Mitigation Measure**	**Level of Impact After Mitigation**
Hazardous Materials Sites	**Impact 4.8-4**: Would development under the Proposed Plan be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result has the potential to create a significant hazard to the public or the environment?	Potentially Significant	Refer to Mitigation Measure **HM1**.	Less than Significant
Public Airport or Airport Plan	**Impact 4.8-5**: Would implementation of the Proposed Plan result in a safety hazard for people residing or working in the project area within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport?	No Impact	No Mitigation Required	No Impact
Private Airstrip	**Impact 4.8-6**: Would implementation of the Proposed Plan result in a safety hazard for people residing or working in the project area within the vicinity of a private airstrip?	No Impact	No Mitigation Required	No Impact
Emergency Response Plans	**Impact 4.8-7**: Would the Proposed Plan impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than Significant	No Mitigation Required	Less than Significant
Wildland Fire	**Impact 4.8-8**: Would implementation of the Proposed Plan expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	Less than Significant	No Mitigation Required	Less than Significant
HYDROLOGY & WATER QUALITY				
Water Quality Standards/ Discharge Requirements	**Impact 4.9-1**: Would implementation of the Proposed Plan violate any water quality standards or waste discharge requirements?	Less than Significant	No Mitigation Required	Less than Significant

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
Groundwater	**Impact 4.9-2**: Would implementation of the Proposed Plan substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?	Less than Significant	No Mitigation Required	Less than Significant
Drainage - Erosion or Siltation	**Impact 4.9-3**: Would implementation of the Proposed Plan substantially alter the existing drainage pattern of the area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?	Less than Significant	No Mitigation Required	Less than Significant
Drainage - Flooding	**Impact 4.9-4**: Would implementation of the Proposed Plan substantially alter the existing drainage pattern of the area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	Less than Significant	No Mitigation Required	Less than Significant
Stormwater Drainage Systems	**Impact 4.9-5**: Would implementation of the Proposed Plan create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Less than Significant	No Mitigation Required	Less than Significant
Water Quality	**Impact 4.9-6**: Would implementation of the Proposed Plan otherwise substantially degrade water quality?	Less than Significant	No Mitigation Required	Less than Significant
Housing in Flood Hazard Area	**Impact 4.9-7**: Would implementation of the Proposed Plan place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	Less than Significant	No Mitigation Required	Less than Significant

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES				
Impact Category	**Checklist Threshold**	**Level of Impact Before Mitigation**	**Mitigation Measure**	**Level of Impact After Mitigation**
Structures Impeding Flood Flows	**Impact 4.9-8**: Would implementation of the Proposed Plan place structures which would impede or redirect flood flows within a 100-year flood hazard area?	Less than Significant	No Mitigation Required	Less than Significant
Risk from Flooding	**Impact 4.9-9**: Would implementation of the Proposed Plan expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	No Impact	No Mitigation Required	No Impact
Risk from Inundation	**Impact 4.9-10**: Would implementation of the Proposed Plan result in inundation by seiche, tsunami, or mudflow/mudslides?	No Impact	No Mitigation Required	No Impact
Flooding During 50-year Event	**Impact 4.9-11**: Would implementation of the Proposed Plan cause flooding during the projected 50-year storm event, which would have the potential to harm people or damage property or sensitive biological species?	Less than Significant	No Mitigation Required	Less than Significant
LAND USE				
Physically Divide a Community	**Impact 4.10-1**: Would implementation of the Proposed Plan physically divide an established community?	No Impact	No Mitigation Required	No Impact
Land Use Plans and Policy Consistency	**Impact 4.10-2**: Would implementation of the Proposed Plan conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	Less than Significant	No Mitigation Required	Less than Significant
Habitat Conservation Plans	**Impact 4.10-3**: Would implementation of the Proposed Plan conflict with any applicable habitat conservation plan or natural community conservation plan?	No Impact	No Mitigation Required	No Impact
MINERAL RESOURCES				
Statewide/Regional Mineral Resources	**Impact 4.11-1**: Would implementation of the Proposed Plan result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	No Impact	No Mitigation Required	No Impact

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
Local Mineral Resources (i.e. MRZ-2)	**Impact 4.11-2**: Would implementation of the Proposed Plan result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific land or other land use plan?	No Impact	No Mitigation Required	No Impact
NOISE				
Noise Levels	**Impact 4.12-1**: Would implementation of the Proposed Plan result in the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards or other agencies?	**Construction**: No Impact **Operational**: No Impact	**Construction**: No Mitigation Required **Operational**: No Mitigation Required	**Construction**: No Impact **Operational**: No Impact
Groundborne Vibration/Noise	**Impact 4.12-2**: Would implementation of the Proposed Plan expose people to or generate excessive vibration or groundborne noise levels?	**Construction**: Potentially Significant **Operational**: Less than Significant	**Construction**: **N1** The following Vibration Control Plan shall apply to all projects within the Community Plan Implementation Overlay (CPIO) District Subarea and discretionary projects outside the CPIO subarea that would include operational heavy-duty construction (e.g., large bulldozer or excavator) equipment within 25 feet of a historical resource, including those in a survey that meets the requirements of Public Resources Code 5024.1, unless determined not to be a historical resource by the Director of Planning, in consultation with the Office of Historical Resource. The Vibration Control Plan shall also apply to all projects that would utilize pile drivers within 135 feet of historic structures. • Prepare a Vibration Control Plan. The Vibration Control Plan shall be approved by the City prior to issuance of a building permit. ○ The Vibration Control Plan shall be completed by a qualified structural engineer. ○ The Vibration Control Plan shall include a pre-construction survey letter establishing baseline conditions at potentially affected historical resource structure. The survey letter shall provide a shoring design to protect the historical resource structure from potential damage. The structural engineer may	**Construction**: Significant and Unavoidable **Operational**: Less than Significant

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
			recommend alternative procedures that produce lower vibration levels, such as sonic pile driving or caisson drilling instead of impact pile driving. Development projects shall implement the structural engineer's recommendations. At the conclusion of vibration causing activities, the qualified structural engineer shall issue a follow-up letter describing damage, if any, to any impacted buildings. The letter shall include recommendations for any repair, as may be necessary, in conformance with the Secretary of the Interior's Standards. Repairs shall be undertaken and completed in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24). **N2** Projects within the CPIO subarea and discretionary projects outside the CPIO subarea shall be required to ensure that contractors include best management practices in the contract specifications to reduce damage to vibration-sensitive uses, where appropriate, such as the following: • Impact pile drivers shall be avoided to eliminate excessive vibration levels. Drilled piles or the use of a sonic vibratory pile driver are alternatives that shall be utilized where geological conditions permit their use. • Construction activities shall involve rubber-tired equipment rather than metal-tracked equipment. • The construction contractor shall manage construction phasing (scheduling demolition, earthmoving, and ground-impacting operations so as not to occur in the same time period), use low-impact construction technologies, and shall avoid the use of vibrating equipment when allowed by best engineering practices. **Operational**: No Mitigation Required	

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
Permanent Increase - Noise	**Impact 4.12-3**: Would implementation of the Proposed Plan result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	**Stationary Noise**: Potentially Significant **Mobile Noise**: Less than Significant	**Stationary Noise**: **N3** The following conditions shall apply to all projects within the CPIO subarea and discretionary projects outside the CPIO subarea: • A Noise Study shall be required for Conditional Use Permits for projects that include sources of exterior noise and are located within 500 feet of noise-sensitive uses. Noise-sensitive uses are residences, transient lodgings, schools, libraries, churches (or other places of assembly), hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. The Noise Study shall characterize the proposed noise sources, quantify noise levels at sensitive uses, and require feasible mitigation measures to reduce noise levels to less than 5 dBA CNEL above the existing noise levels. Feasible mitigation measures include: ○ Installation of sound barriers between noise source and receptor; ○ Use of building design to block line-of-sight between noise source and receptor; and ○ Decibel and time limitations for stationary sources. • A Noise Study shall be required for projects that include loud source of impulsive sound. The Los Angeles Municipal Code (LAMC) defines impulsive sound as sound of short duration, usually less than one second, with an abrupt onset and rapid decay. By way of example in the LAMC, impulsive sound includes explosions, musical base drum beats, or the discharge of firearms. The Noise Study shall characterize the proposed noise sources, quantify noise levels at sensitive uses, and require feasible mitigation measures to reduce noise levels to less than 20 dBA above the existing noise levels.	**Stationary Noise**: Significant and Unavoidable **Mobile Noise**: Less than Significant

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
			• Industrial activity yards that include the operation of heavy equipment shall be shielded by sound barriers that block the line-of-sight to sensitive receptors. • Parking structures located within 200 feet of any residential use shall be constructed with a solid wall abutting the residences and utilize textured surfaces on garage floors and ramps to minimize tire squeal. **Mobile Noise:** No Mitigation Required	
Temporary Increase - Noise	**Impact 4.12-4**: Would implementation of the Proposed Plan result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	Potentially Significant	**N4** A Noise Study, prepared by a qualified noise expert and reviewed and approved by DCP to meet the requirements herein, shall be required for all projects within the CPIO subarea and discretionary projects outside the CPIO subarea located within 500 feet of noise-sensitive land uses (e.g., residences, schools, hospitals, and recording studios) and have one or more of the following characteristics: • Two or more subterranean levels or more or 20,000 cubic yards or more of excavated material; • Construction duration (excluding architectural coatings) of 18 months or more; • Use of large, heavy-duty equipment rated 300 horsepower or greater; or • The potential for impact pile driving. Noise-sensitive land uses are residences, transient lodgings, schools, libraries, churches (or other places of assembly), hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. The Noise Study shall characterize sources of construction noise, quantify noise levels at noise-sensitive uses, and identify measures to reduce noise exposure. The Noise Study shall characterize sources of construction noise, quantify noise levels at noise-sensitive uses, and identify measures to reduce noise exposure. Specifically, the Noise Study shall identify reasonably available noise reduction	Significant and Unavoidable

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
			devices or techniques to reduce noise levels to acceptable levels and/or durations including through reliance on any relevant federal, state or local standards or guidelines or accepted industry practices, and in compliance with LAMC standards. Noise reduction devices or techniques, shall include but not be limited to: mufflers, shields, sound barriers, and time and place restrictions on equipment and activities. Each measure in the Noise Study shall identify anticipated noise reductions at noise-sensitive land uses. Project applicants shall be required to comply with all measures identified and recommended by the Noise Study and shall provide proof that notice of, as well as compliance with, the identified measures have been included in contractor agreements.	
Noise Exposure – Airport Plan	**Impact 4.12-5**: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would implementation of the Proposed Plan expose people residing or working in the project area to excessive noise levels?	No Impact	No Mitigation Required	No Impact
Noise Exposure – Private Airstrip	**Impact 4.12-6**: For a project within the vicinity of a private airstrip, would implementation of the Proposed Plan expose people residing or working in the project area to excessive noise levels?	No Impact	No Mitigation Required	No Impact
POPULATION, HOUSING, & EMPLOYMENT				
Induce Substantial Population Growth	**Impact 4.13-1**: Would implementation of the Proposed Plan induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Less than Significant	No Mitigation Required	Less than Significant

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES				
Impact Category	**Checklist Threshold**	**Level of Impact Before Mitigation**	**Mitigation Measure**	**Level of Impact After Mitigation**
Displacement of Existing Housing	**Impact 4.13-2**: Would implementation of the Proposed Plan displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	Less than Significant	No Mitigation Required	Less than Significant
Displacement of People	**Impact 4.13-3**: Would implementation of the Proposed Plan displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	Less than Significant	No Mitigation Required	Less than Significant
PUBLIC SERVICES				
Fire Protection & Emergency Facilities	**Impact 4.14-1**: Would implementation of the Proposed Plan result in substantial adverse physical impacts associated with the provision of new or physically altered fire or emergency facilities, the need for new or physically altered fire or emergency facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection and emergency response?	Less than Significant	No Mitigation Required	Less than Significant
Police Protection Facilities	**Impact 4.14-2**: Would implementation of the Proposed Plan result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities, need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, and other performance objectives?	Less than Significant	No Mitigation Required	Less than Significant
Impact 4.14-3: Public Schools	**Impact 4.14-3**: Would implementation of the Proposed Plan result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for public schools?	Less than Significant	No Mitigation Required	Less than Significant

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
Existing Parks and Recreational Facilities	**Impact 4.14-4**: Would implementation of the Proposed Plan a) increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, and/or b) result in substantial adverse physical impacts associated with the provision of new or physically altered recreational facilities, need for new or physically altered recreational facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios or other performance objectives for parks?	**Degradation of Existing Facilities**: Potentially Significant **Construction of New Facilities**: Less than Significant	No feasible mitigation measures available. **Construction of New Facilities**: No Mitigation Required.	**Increased Use Related to Degradation of Existing Facilities**: Significant and Unavoidable **Construction Impacts from New Facilities**: Less than Significant
Libraries	**Impact 4.14-5**: Would implementation of the Proposed Plan result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios or other performance objectives for libraries?	Less than Significant	No Mitigation Required	Less than Significant
TRANSPORTATION & TRAFFIC				
Public Transit, Bicycle, or Pedestrian Facilities	**Impact 4.15-1**: Would implementation of the Proposed Plan conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	Less than Significant	No Mitigation Required	Less than Significant
Circulation System	**Impact 4.15-2**: Would implementation of the Proposed Plan exceed the City's threshold relating to operation of the vehicular circulation system?	Potentially Significant	**T1** **Technology Upgrades and Intersection Improvements**. As growth occurs within the Proposed Plan Area and transportation improvements contained in the Project List are implemented, Los Angeles Department of Transportation (LADOT) shall implement, as resources permit, Intelligent Transportation System (ITS) signal and corridor upgrades, major intersection improvements such as turn-lane or safety improvements, and/or congestion monitoring technology upgrades both along project routes and parallel roadways if traffic	Significant and Unavoidable

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
			diversions have occurred as a result of the Proposed Plan. Improvements to be implemented shall be determined based on an analysis of project-specific impacts conducted according to LADOT's *Transportation Impact Study Guidelines*.	
Neighborhood Traffic Intrusion	**Impact 4.15-3**: Would the implementation of the Proposed Plan exceed the City's thresholds related to neighborhood traffic intrusion?	Potentially Significant	**T2** **Neighborhood Traffic Management Program**. As growth occurs within the Plan Area and transportation improvements contained in the proposed Project List are implemented, LADOT shall implement, as resources permit, the Neighborhood Traffic Management (NTM) Program on the impacted residential streets based on an analysis of project-specific impacts conducted according to LADOT's *Transportation Impact Study Guidelines*.	Significant and Unavoidable
Congestion Management Plan	**Impact 4.15-4**: Would implementation of the Proposed Plan exceed Metro's thresholds related to its Congestion Management Plan (CMP)?	Potentially Significant	**T3** **Coordination with Other Agencies on Transportation Improvements and Funding**. As development occurs in the Project Area and the City of Los Angeles implements projects that could potentially impact vehicular operations as determined by LADOT on transportation systems managed by other agencies, such as California Department of Transportation (Caltrans), Los Angeles County Metropolitan Transportation Authority (Metro), or neighboring jurisdictions, the City of Los Angeles shall coordinate with these entities to identify transportation improvements and seek opportunities to jointly pursue funding. Mobility solutions shall be focused on safety, enhancing mobility options, improving access to active modes, and implementing Transportation Demand Management (TDM) measures to achieve both local and regional transportation and sustainability goals.	Significant and Unavoidable
Air Traffic Patterns	**Impact 4.15-5**: Would implementation of the Proposed Plan result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	No Impact	No Mitigation Required	No Impact

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Category	Checklist Threshold	Level of Impact Before Mitigation	Mitigation Measure	Level of Impact After Mitigation
Design Feature Hazard	**Impact 4.15-6**: Would implementation of the Proposed Plan substantially change physical conditions that would adversely affect transportation safety, or increase hazards due to a design feature (e.g., sharp curves, dangerous intersections, or configurations that affect visibility of cars to pedestrians and bicyclists) or incompatible uses (e.g., farm equipment)?	Less than Significant	No Mitigation Required	Less than Significant
Emergency Access	**Impact 4.15-7**: Would implementation of the Proposed Plan result in inadequate emergency access that could require the addition of a new governmental facility or the expansion, consolidation or relocation of an existing facility to maintain service?	Less than Significant	No Mitigation Required	Less than Significant
Transit Facilities	**Impact 4.15-8**: Would the implementation of the Proposed Plan substantially disrupt existing public transit, bicycle, or pedestrian facilities or interfere with planned facilities, or create conflicts or inconsistencies with adopted public transit, bicycle, or pedestrian system plans, guidelines, policies, or standards?	Less than Significant	No Mitigation Required	Less than Significant
Disruption to Traffic During Construction	**Impact 4.15-9**: Would the Proposed Plan result in a substantial disruption to traffic during construction, which could include temporary street closures; temporary loss of regular vehicular or pedestrian access to existing land uses; temporary loss of an existing bus stop or rerouting of bus lines; or creation of traffic hazards?	Potentially Significant	**T4** **Traffic Control Plan**. Construction activities that may result from the Proposed Plan will be evaluated on a project-by-project basis by LADOT for construction-related impacts to traffic. Construction activities will be managed through the implementation of a traffic control plan, approved by LADOT, to reduce the severity and duration of traffic disruption and to ensure the safety of all users of the affected roadway, including, as appropriate, through the use of temporary traffic signals, detours, or the use of flagmen adjacent to construction activities.	Significant and Unavoidable

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES				
Impact Category	**Checklist Threshold**	**Level of Impact Before Mitigation**	**Mitigation Measure**	**Level of Impact After Mitigation**
UTILITIES & SERVICE SYSTEMS				
Water Treatment Facilities	**Impact 4.16-1**: Would implementation of the Proposed Plan require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Less than Significant	No Mitigation Required	Less than Significant
Water Supply	**Impact 4.16-2**: Would implementation of the Proposed Plan have insufficient water supplies available to serve the Project Area from existing entitlements and resources, or result in new or expanded entitlements needed?	Less than Significant	No Mitigation Required	Less than Significant
Wastewater Treatment Requirements	**Impact 4.16-3**: Would implementation of the Proposed Plan exceed wastewater treatment requirements of LARWQCB?	Less than Significant	No Mitigation Required	Less than Significant
Require New Wastewater Treatment Facility	**Impact 4.16-4**: Would implementation of the Proposed Plan require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Less than Significant	No Mitigation Required	Less than Significant
Stormwater Drainage Facilities	**Impact 4.16-5**: Would implementation of the Proposed Plan require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Less than Significant	No Mitigation Required	Less than Significant
Wastewater Treatment Capacity	**Impact 4.16-6**: Would implementation of the Proposed Plan result in a determination by the wastewater treatment provider which serves or may serve the project that it has does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less than Significant	No Mitigation Required	Less than Significant
Solid Waste Disposal	**Impact 4.16-7**: Would the Proposed Plan be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	Less than Significant	No Mitigation Required	Less than Significant
Solid Waste Regulations	**Impact 4.16-8**: Would the Proposed Plan comply with federal, state, and local statutes and regulations related to solid waste?	Less than Significant	No Mitigation Required	Less than Significant

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES				
Impact Category	**Checklist Threshold**	**Level of Impact Before Mitigation**	**Mitigation Measure**	**Level of Impact After Mitigation**
Energy - Electricity	**Impact 4.16-9**: Would implementation of the Proposed Plan result in the wasteful or inefficient use of energy as a result of project implementation?	Less than Significant	No Mitigation Required	Less than Significant
Energy - Gas	**Impact 4.16-10**: Would implementation of the Proposed Plan result in the wasteful or inefficient use of natural gas?	Less than Significant	No Mitigation Required	Less than Significant
SOURCE: TAHA, 2018.				

3.0 PROJECT DESCRIPTION

Consistent with the provisions of the California Environmental Quality Act (CEQA) Guidelines Section 15124, this section provides information regarding the proposed Hollywood Community Plan Update (Proposed Plan or Proposed Project), being environmentally evaluated in this Environmental Impact Report (EIR).

A community plan update generally refers to: (i) an amendment to the policies and land use designations in one or more of the City's 35 community plans, (which make up the Land Use Element of the City's General Plan); (ii) the adoption of resolutions and zoning ordinances to implement the community plan amendments; and (iii) any other necessary and related actions to implement the community plan amendments, including adopting amendments to other elements of the City's General Plan (e.g., the Framework or Circulation Elements) to ensure consistency or adopting other land use related ordinances (such as amendments to housing regulations). A community plan, as a portion of the Land Use Element of the General Plan, is a vision statement for the City's desired growth and development of a particular area of the City. As a general matter, that vision is implemented through zoning ordinances that specifically regulate allowed land uses and regulations for development and design for properties throughout the Community Plan Area (CPA).

The Proposed Project studied in this EIR is the Community Plan Update for the area of the City that is located within the boundaries of the Hollywood CPA. The Proposed Project would include amending both the text and the land use map of the Hollywood Community Plan. The Proposed Project would also adopt several zoning ordinances to implement the updates to the Community Plan, including changes for certain portions of the Hollywood CPA to allow specific uses and changes to development regulations (including height, floor area ratio (FAR), and density). These zoning ordinances would take a number of different forms, including amendments to the Zoning Map for zone and height district changes under Los Angeles Municipal Code (LAMC) Section 12.32, amendments to an existing specific plan (Vermont/Western Transit Oriented District Specific Plan), and adoption of a Hollywood Community Plan Implementation Overlay (CPIO) District.

The CPIO boundary subareas would generally follow Franklin Avenue to the north, U.S. Route 101 (US-101) to the east, Fountain Avenue to the south and La Brea Avenue to the west. Regulations in the CPIO District would apply to commercial zoned properties. The CPIO District would propose regulatory protections for designated historical resources and pedestrian-oriented design standards in the Hollywood CPA. The CPIO would require that the rehabilitation of designated resources comply with the Secretary of the Interior's Standards and restrict applicants from obtaining a demolition permit without an approved replacement project. See Appendix E for more information. Also, to ensure consistency between the updated Community Plan and other City plans and ordinances, the Proposed Project includes amendments to the Framework and Mobility Elements of the General Plan, and other elements as necessary.

The Proposed Project evaluated in this EIR includes all of the above-described actions necessary for the Community Plan Update to the Hollywood Community Plan. Components of the Proposed Project are described and addressed in the EIR, as appropriate and necessary to analyze particular impacts or sets of impacts.

This section discusses the background for the Proposed Plan, identifies the location of the Project Area, sets forth Proposed Plan objectives, provides a description of the existing environment in the Project Area, describes the specifics of the Proposed Plan (land use designation and zone changes) and provides information on growth trends including existing development trends and reasonably expected changes in growth anticipated to result from the Proposed Project.

3.1 PROJECT BACKGROUND

GENERAL PLAN

State law (Government Code Section 65300) requires that each city and county, including charter cities and counties, adopt a comprehensive, integrated, long-term General Plan to direct future growth and development and accommodate projected increases in population and employment. The General Plan is a fundamental policy document. It defines how a city should use and manage its physical and economic resources over time. State law requires seven General Plan Elements: land use, circulation, housing, conservation, open space, noise, and safety. Government Code Section 65302(a) requires the General Plan to include a land use element described as follows:

> *(a) A land use element that designates the proposed general distribution and general location and extent of the uses of the land for housing, business, industry, open space, including agriculture, natural resources, recreation, and enjoyment of scenic beauty, education, public buildings and grounds, solid and liquid waste disposal facilities, and other categories of public and private uses of land. The location and designation of the extent of the uses of the land for public and private uses shall consider the identification of land and natural resources pursuant to paragraph (3) of subdivision (d). The land use element shall include a statement of the standards of population density and building intensity recommended for the various districts and other territory covered by the plan…*

The state requires that the General Plan be periodically revised to reflect new conditions, community input, and technological advances.

The Los Angeles Charter also requires that the City adopt a General Plan:

> *Section 554. General Plan – Purpose and Contents.*
>
> *The General Plan shall be a comprehensive declaration of goals, objectives, policies and programs for the development of the City and shall include, where applicable, diagrams, maps and text setting forth those and other features.*
>
> *(a) Purposes. The General Plan shall serve as a guide for:*
>
> *(1) the physical development of the City;*
> *(2) the development, correlation and coordination of official regulations, controls, programs and services; and*
> *(3) the coordination of planning and administration by all agencies of the City government, other governmental bodies and private organizations and individuals involved in the development of the City.*
>
> *(b) Content. The General Plan shall include those elements required by state law and any other elements determined to be appropriate by the Council, by resolution, after considering the recommendation of the City Planning Commission.*

The General Plan's guiding document for the City of Los Angeles is the **Framework Element**, which provides ***a strategy for long-range growth and development*** focused around the following guiding principles:

- grow strategically;
- conserve existing residential neighborhoods;
- balance the distribution of land uses;

- enhance neighborhood character through better development standards;
- create more small parks, pedestrian districts, and public plazas;
- focus growth around transit stations;
- improve mobility and access; and
- identify a hierarchy of commercial districts and centers.

The Framework Element, adopted in 1996, establishes the big-picture goals that are then further refined in other planning documents such as the community plans and the zoning code. In the City of Los Angeles, the Land Use Element is composed of the 35 community plans. The 35 community plans guide the physical development of neighborhoods by establishing goals and policies for land use within each CPA. The community plans implement, at a community level, the citywide goals and policies established in the overarching Framework Element and all other elements of the General Plan.

EXISTING HOLLYWOOD COMMUNITY PLAN

The existing Hollywood Community Plan (Existing Plan), adopted in 1988, was written to guide development occurring through 2010. The Existing Plan was designed to accommodate growth anticipated at the time of adoption. It designates the general distribution, general location, and extent of uses of the land for housing, business, industry, open space, education, public facilities and other categories of public and private uses of land. The Existing Plan has several objectives, including furthering the development of the Project Area as a major center of population, employment, retail services, and entertainment; providing housing for all economic segments of the community; promoting economic well-being; supporting the expansion of open space and parks; and encouraging the expansion and improvement of public transportation. The Existing Plan recognized that several Los Angeles County Metropolitan Transportation Authority (Metro) rail stations were in planning stages at that time and suggested further planning through the adoption of specific plans and updating of regulations once the infrastructure system was in place.

Substantial changes have occurred since the adoption of the Existing Plan in 1988, including the development of the Metro Red Line and its associated rail stations. The Vermont/Western Transit Oriented District Specific Plan (Station Neighborhood Area Plan [SNAP]) was adopted in 2001. The SNAP promotes mixed-use development near the Metro stations, preserves existing low-scale residential neighborhoods, and supports the hospital core near the corner of Sunset Boulevard and Vermont Avenue along with improving neighborhood services for residents. In addition, new regulations and issues have emerged and community objectives regarding the management of new development and community preservation have evolved. In particular, the following issues have substantially evolved or been prioritized since the last Plan Update: ***sustainability*** (including through the 2006 California Global Warming Solutions Act, or Assembly Bill [AB] 32, and 2008 Sustainable Communities Act, or Senate Bill [SB] 375); ***mobility*** (the 2008 Complete Streets Act or AB 1358, and the City's revised Mobility Element); ***housing*** (the City's updated Housing Element and AB 2299 and SB 1069 for accessory dwelling units); ***health and wellness*** (the City's Plan for a Healthy Los Angeles); and ***historic preservation***. In November 2016, voters in the City of Los Angeles approved Measure JJJ, which led to the adoption of Transit Oriented Communities Affordable Housing Incentive Program Guidelines (TOC Guidelines) in 2017. In early 2018, updates to state laws for Accessory Dwelling Units (ADUs) became effective. The EIR for the existing Hollywood Community Plan was certified in 1988 and included mitigation measures to reduce the potential impacts of implementing the Community Plan. As part of the Proposed Project, this EIR, which includes new mitigation measures, will replace and supersede the mitigation measures from the certified 1988 EIR. Appendix M states why the 1988 Hollywood Community Plan EIR's mitigation measures are infeasible or are no longer necessary, and whether any modification or deletion will or will not result in any significant impacts different from those identified in this EIR.

DEPARTMENT OF CITY PLANNING'S NEW COMMUNITY PLAN (NCP) PROGRAM

In 2006, the City established the NCP Program in order to update the current community plans. The intent of the NCP Program is to update the community plans regularly in order to encourage smart growth, identify appropriate locations for new development, minimize lengthy discretionary approvals, and provide certainty and predictability for developers, homeowners and anyone else concerned with the future development of the City of Los Angeles. ***One of the primary goals of the NCP Program is to accommodate projected growth consistent with the Framework Element*** (Framework Element, page 1). The NCP Program also establishes an ongoing method to revise community plans with community and public input in order to address prevailing neighborhood and community issues. Recommended changes to Community Plans and their policies and programs are based on public input, as well as collaboration with other City departments and governmental agencies.

PRIOR EIR

The City previously approved a Hollywood Community Plan Update in substantially similar form as the Proposed Plan and certified EIR No. ENV-2005-2158-EIR, State Clearinghouse (SCH) No. 2002041009 (2012 EIR) on June 19, 2012 (2012 Approvals). On February 11, 2014, after a legal challenge to the 2012 Approvals, the Los Angeles Superior Court issued a Judgment directing the City to (1) rescind its 2012 Approvals and (2) prepare, circulate and certify, consistent with the requirements of CEQA, an adequate and valid EIR, which could include a supplemental, revised 2012 EIR or a new EIR. The City does not intend to certify, revise, or prepare a supplement to the 2012 EIR. Rather, with this EIR, the City is electing to prepare a new EIR.

3.2 LOCATION AND EXISTING LAND USES

PROJECT LOCATION

The Project Area is the Hollywood CPA, which is located within the incorporated City of Los Angeles and contains approximately 13,962 acres or 21.8 square miles. It is approximately 2.5 miles northwest of downtown Los Angeles. The Project Area is bounded by the following streets and cities:

- Crescent Drive (between the City of Beverly Hills and Wonderland Avenue), Wonderland Avenue (between Crescent Drive and Lookout Mountain Avenue), Lookout Mountain Avenue (between Wonderland Avenue and Laurel Canyon Boulevard), Laurel Canyon Boulevard (between Lookout Mountain Avenue and Mulholland Drive), Mulholland Drive (between Laurel Canyon Boulevard and Cahuenga Park Terrace), Cahuenga Boulevard (between Cahuenga Park Terrance and Barham Boulevard), Barham Boulevard (between Cahuenga Boulevard and the Los Angeles River), and the Cities of Burbank and Glendale to the north;
- Interstate 5 (I-5), Glendale Boulevard (between I-5 and Rowena Avenue), Rowena Avenue (between Glendale Boulevard and Hyperion Avenue), Hyperion Avenue (between Rowena Avenue and Fountain Avenue), Fountain Avenue (between Rowena Avenue and Sunset Boulevard), Sunset Boulevard (between Fountain Avenue and Santa Monica Boulevard), Santa Monica Boulevard (between Sunset Boulevard and Hoover Street), and Hoover Street (between Santa Monica Boulevard and Melrose Avenue) to the east;
- Melrose Avenue (between June Street and Hoover Avenue, as well as between La Cienega Boulevard and Sweetzer Avenue) and Rosewood Avenue (between Sweetzer Avenue and June Street) to the south; and the Cities of Beverly Hills and West Hollywood to the west.

The Project Area is bordered by the Northeast Los Angeles and Silver Lake-Echo Park-Elysian Valley CPAs to the east, the Wilshire CPA to the south, and the Bel Air-Beverly Crest and the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass CPAs to the west. The location of the Project Area is shown in **Figure 3-1**, and the location of the Project Area relative to the City's other CPAs is shown in **Figure 3-2**.

The geography of the Project Area includes mountains, hills, flatlands, and a river. The Santa Monica Mountain Range extends from the Project Area's northern boundary to Franklin Avenue. The portion of the Project Area generally east of Talmadge Street is part of a hillside. The flatlands stretch south from Franklin Avenue to Melrose Avenue and Rosewood Avenue within the Project Area boundaries. The Los Angeles River roughly defines the northeasterly boundaries of the Project Area.

EXISTING LAND USES

The Project Area contains large single-family and multi-family residential neighborhoods, as well as multiple centers of commercial and industrial activity. The hillside area north of Franklin Avenue (i.e., Santa Monica Mountains) is divided between single-family neighborhoods and two regional parks: Runyon Canyon and Griffith Park. The western half of the hills contains the single-family neighborhood known as Hollywood Hills and Runyon Canyon. The eastern section of the hills encompasses Griffith Park (the largest municipal park with an urban wilderness area in the United States) and the Los Feliz neighborhood.

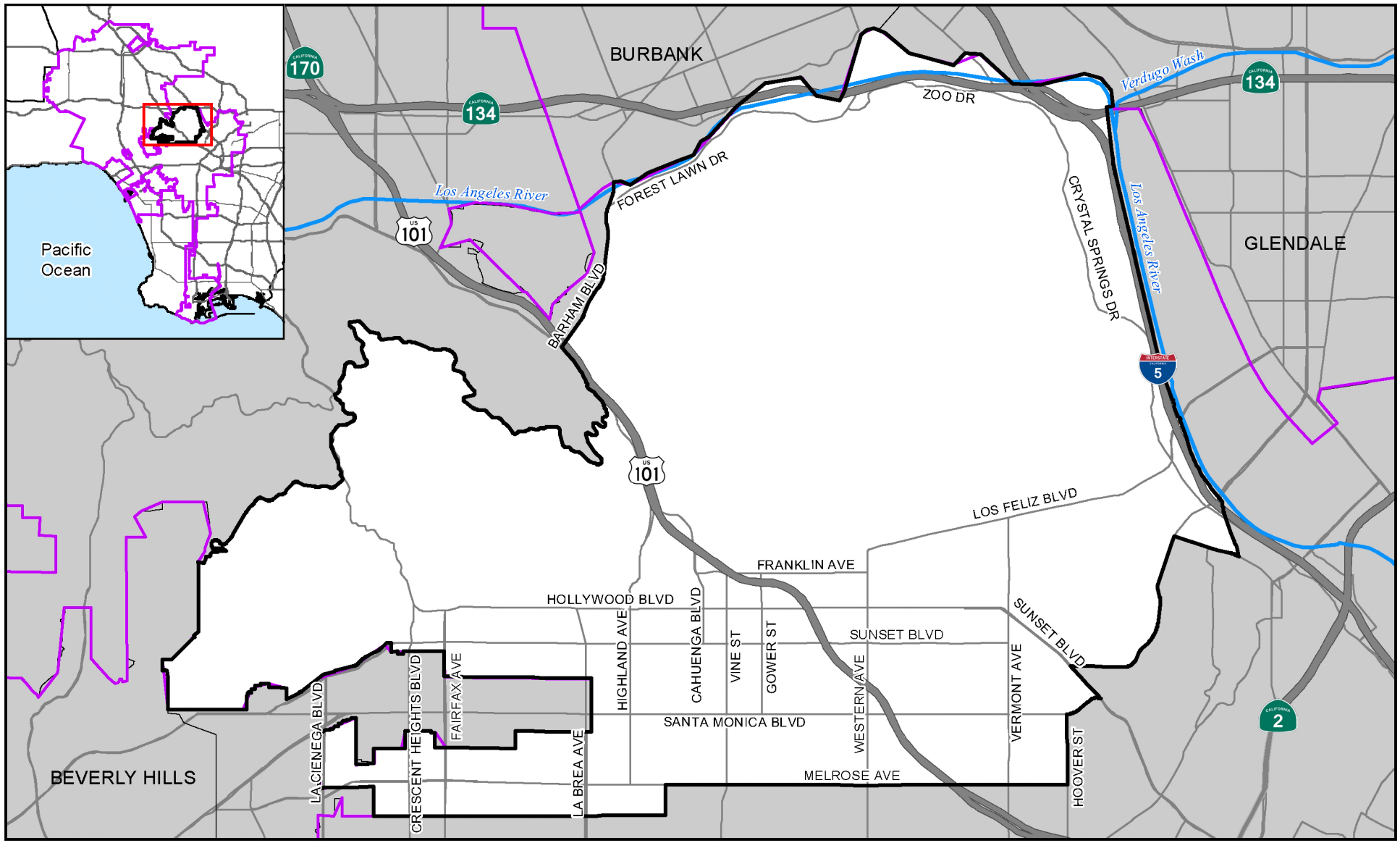
The flatlands consist of a grid of streets lined with commercial centers and corridors. The flatlands are densely populated with multi-family residential neighborhoods and a few low-density residential neighborhoods around the northwestern, southern, and eastern edges of the Project Area.

The heart of Hollywood has a Regional Center land use designation, and is generally located in the center of the Project Area between La Brea Avenue to the west and US-101 to the east, and Franklin Avenue to the north and Sunset Boulevard to the south. This area serves as a regional center for the City of Los Angeles and has a mixture of both historic and modern low-to-high rise buildings ranging from one story to more than 20 stories (occupied primarily by tourist and entertainment-related uses), other commercial uses and multi-family residential development.

Well-known landmarks are located along Hollywood Boulevard, including the Hollywood Walk of Fame, historic theaters, and the Hollywood and Highland entertainment center. The Project Area also contains a cluster of hospitals and entertainment/movie studios.

Existing Residential. The Project Area contains approximately 6,904 acres of land that are designated for residential use, which is equivalent to nearly 50 percent of the land area for the Project Area. Single-family neighborhoods comprise 34 percent of the Project Area, and multi-family neighborhoods comprise 16 percent of the land area. Nearly half of the acreage of the Project Area historically has been, and continues to be, planned for residential uses. Single-family uses are located primarily in the hills, while multi-family uses are concentrated south of the hills in the flatlands.

Existing Commercial. Land designated for commercial use represents approximately six percent of the Project Area, or approximately 849 acres, and is concentrated in the heart of Hollywood, and along commercial corridors including Hollywood Boulevard, Sunset Boulevard, Santa Monica Boulevard, Melrose Avenue, La Cienega Boulevard, La Brea Avenue, Vine Street, Western Avenue, and Vermont Avenue. Several of these major commercial corridors run through the eastern portion of the Project Area, including Western Avenue, Vermont Avenue and Santa Monica Boulevard. Various medical complexes consisting of hospitals and medical facilities are centered around and near the Sunset Boulevard/Vermont Avenue intersection.



LEGEND:

Hollywood CPA

City of Los Angeles

N

W E

S

0 2,800 5,600 Feet

SOURCE: TAHA, 2018.

taha environmental planners

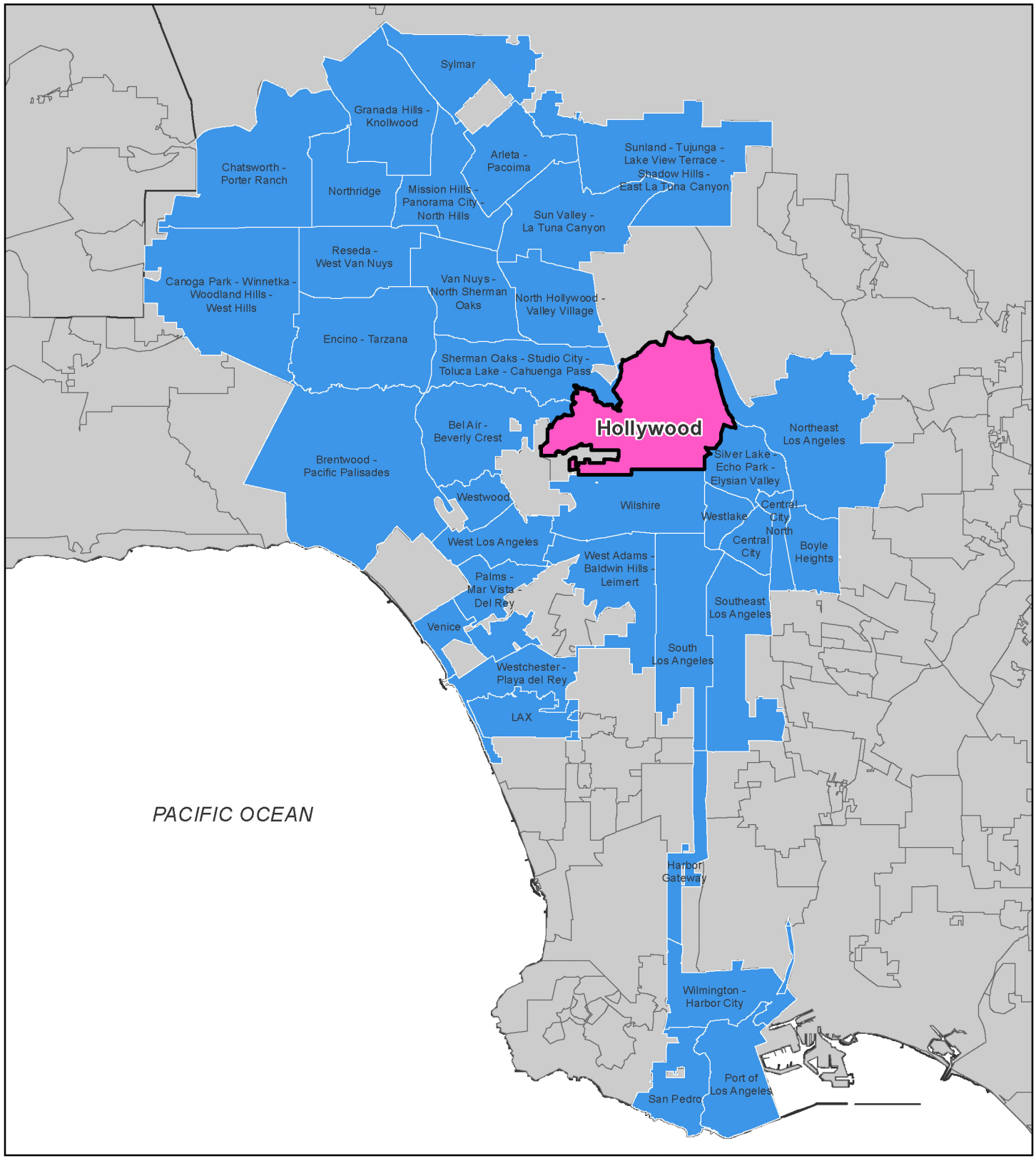
taha 2010-073

Hollywood Community Plan Update
Draft Environmental Impact Report

CITY OF LOS ANGELES

FIGURE 3-1

PROJECT AREA LOCATION



LEGEND:

Hollywood CPA | Other City of Los Angeles CPAs | Other Cities

N
W E
S

0 3 6 Miles

SOURCE: TAHA, 2018.

taha environmental planners
taha 2010-073

Hollywood Community Plan Update
Draft Environmental Impact Report
CITY OF LOS ANGELES

FIGURE 3-2

CITY OF LOS ANGELES
COMMUNITY PLAN AREAS

Existing Industrial. Hollywood has several industrial districts, and land designated for industrial uses represents approximately 2 percent of the Project Area, or 277 acres. The largest industrial area consists of a cluster of pre- and post-production media-related facilities located south of Santa Monica Boulevard between La Brea Avenue and Gower Avenue in the western portion of the CPA.

Existing Open Space. Nearly 38 percent of the Project Area is designated for open space, which also includes Runyon Canyon Park, Barnsdall Art Park, Hollywood Forever Cemetery, and Forest Lawn Memorial Park. Griffith Park makes up a majority of the 5,256 acres of open space within the Project Area and is the largest municipal park with an urban wilderness area in the country.

Existing Public Facilities. The Project Area also includes 677 acres of public facilities, which represents approximately 5 percent of the Project Area. Uses designated as public facility include public libraries, schools, colleges, police and fire stations, US-101, and city maintenance yards. The Los Angeles City College campus is located at the southeastern portion of the Project Area.

Existing Transportation System. The Project Area's transportation system includes a circulation network of freeways, highways and surface roadways; a public transit system; bicycle routes; and a pedestrian circulation system of sidewalks and crosswalks.

State Route 134 (SR-134) traverses through the Project Area near the northern Project Area boundary, and US-101 cuts across the Project Area from Melrose and Normandie Avenues in the south to Barham Boulevard and Cahuenga Boulevard in the Hollywood Hills. I-5 defines a large portion of the easterly boundary.

The street network is composed of arterial streets (Boulevards and Avenues), collectors, City-designated scenic highways, divided streets and local streets. Streets in the flatlands are laid out in a grid pattern, mainly oriented on primarily compass points. Streets in the hillsides wind through the canyons and follow topographic features.

Metro's Red Line subway provides high-speed local and regional transit connections both with the San Fernando Valley and downtown Los Angeles. Other public transit service within the Project Area consists primarily of local bus services linking riders to localized businesses and destinations. Services are provided by multiple transit operators, including Metro and Los Angeles Department of Transportation (LADOT) Downtown Area Short Hop (DASH) and Commuter Express; services headways can be as frequent as 15 minutes or less. A relatively dense network of buses provides local access as well as first/last-mile connections to the Red Line subway stations.

A network of bicycle facilities includes the Los Angeles River Bike Path, a Class I Bike Path, separated from vehicles; Class II Bike Lanes, which are exclusive lanes for bicycles identified by pavement markings; and Class III Bicycle Routes, which are travel lanes shared by bikes and cars, identified by signage and pavement markings. The bicycle paths and lanes are primarily located along or near the northern boundaries of the Project Area and the bicycle routes are primarily located in the flatlands.

3.3 GROWTH TRENDS

The Proposed Project plans for and guides anticipated growth and development. This section discusses how the City forecasted growth in population, housing and employment, and it discusses why the Southern California Association of Governments (SCAG) is the City's primary source for current and forecasted population, housing and employment numbers. It also describes the growth trends for the City of Los Angeles and the Project Area.

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (SCAG) GROWTH PROJECTIONS

SCAG is designated as a Metropolitan Planning Organization (MPO) responsible for carrying out federal and state statutory duties within its region, which encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles with over 18 million residents.

Federal and state laws require SCAG to develop regional plans for transportation, growth management, hazardous waste management and air quality[1]. SCAG is responsible for producing socio-economic estimates and projections at multiple geographic levels. The socio-economic estimates and projections are used for federal and state mandated long-range planning efforts, such as the Regional Transportation Plan (RTP). The RTP is a 20-year transportation plan for the region that addresses regional growth, air quality and other issues, based on an analysis of past and future regional trends.

Federal laws require that land use allocation in an RTP reflect development patterns most likely to be built in the Southern California region. While federal and state laws do not mandate consistency with the RTP, state law does require SCAG to identify and quantify housing needs for the region, prepare the Regional Housing Needs Assessment (RHNA), and for local agencies to update their Housing Elements to plan and zone to accommodate the agency's RHNA. SB 375 coordinates land use and transportation planning to reduce greenhouse gas (GHG) emissions and, to that end, requires SCAG to prepare a Sustainable Communities Strategy (SCS) as an integral part of the RTP. SB 375 also requires the RHNA process to be consistent with an SCS, and that RHNA must be coordinated every eight years (RTP is updated every four years).[2]

A function of SCAG, in preparing the RTP/SCS, is to forecast or prepare population, housing and employment projections in consultation with cities in the region. These projections are derived from a combination of sources and consider factors such as birth rates; migration rates; historical trends; household size; market and economic projections; existing and planned land uses; and consistency with relevant adopted local, regional and state land use policies and growth strategies. The development of the growth forecast is driven by collaboration between SCAG and local jurisdictions. The integration of the regional and local forecasts is achieved through joint efforts and collaboration among the various contributors.[3] The 2016-2040 RTP/SCS is the most recently adopted RTP/SCS.[4]

Many municipalities and government agencies (including public service providers and other City departments) rely on the same source, i.e., the most current SCAG RTP/SCS data, for purposes of planning, both for estimates of current population, housing and employment, as well as for projections of future population, housing, and employment. Use of such data is a consistent and best practice for local governments. It is also the Department of City Planning's practice to use SCAG RTP/SCS data as a benchmark or as a reference point for estimates and projections locally. For more information about SCAG, see Appendix B.

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[1]Government Code Section 65080(b)(2)(B); Part 450 of Title 23 of, and Part 93 of Title 40 of, the Code of Federal Regulations.

[2]Government Code Section 65080(b)(2)(B).

[3]SCAG's forecasting methodology and assumptions, see the *2016-2040 RTP/SCS, Demographics & Growth Forecast Appendix*, http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf.

[4]SCAG, *2016-2040 RTP/SCS*, http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx.

CITYWIDE POPULATION GROWTH PROJECTIONS

The City of Los Angeles is 469 square miles and had a 2010 population of approximately 3.8 million (estimated to be approximately four million in 2017). The population is anticipated to increase by 17 percent from the 2016 estimate to approximately 4.6 million persons by the year 2040, according to the SCAG 2016-2040 RTP/SCS (**Table 3-1**). Every four years, SCAG produces socioeconomic projections that are used by various City departments and agencies for their long-range planning efforts. The growth projection for the City of Los Angeles is based on several factors, including historical development trends, land values, and development costs, as well as smart growth strategies to direct development to areas in proximity to rail and major bus stations, community centers, regional centers, and downtown Los Angeles.

TABLE 3-1: PROJECTED POPULATION GROWTH FOR THE CITY

Geographic Planning Area	2016 Estimated Population /a/	2040 Projected Population /a/	Projected Population Growth (2016 – 2040) /a/
City of Los Angeles	3,931,000	4,609,000	678,000
South Valley	751,000	874,000	123,000
South Los Angeles	751,000	876,000	124,000
North Valley	716,000	795,000	80,000
Central	684,000	904,000	220,000
West Los Angeles	428,000	497,000	69,000
East Los Angeles	402,000	449,000	47,000
Harbor	200,000	214,000	14,000

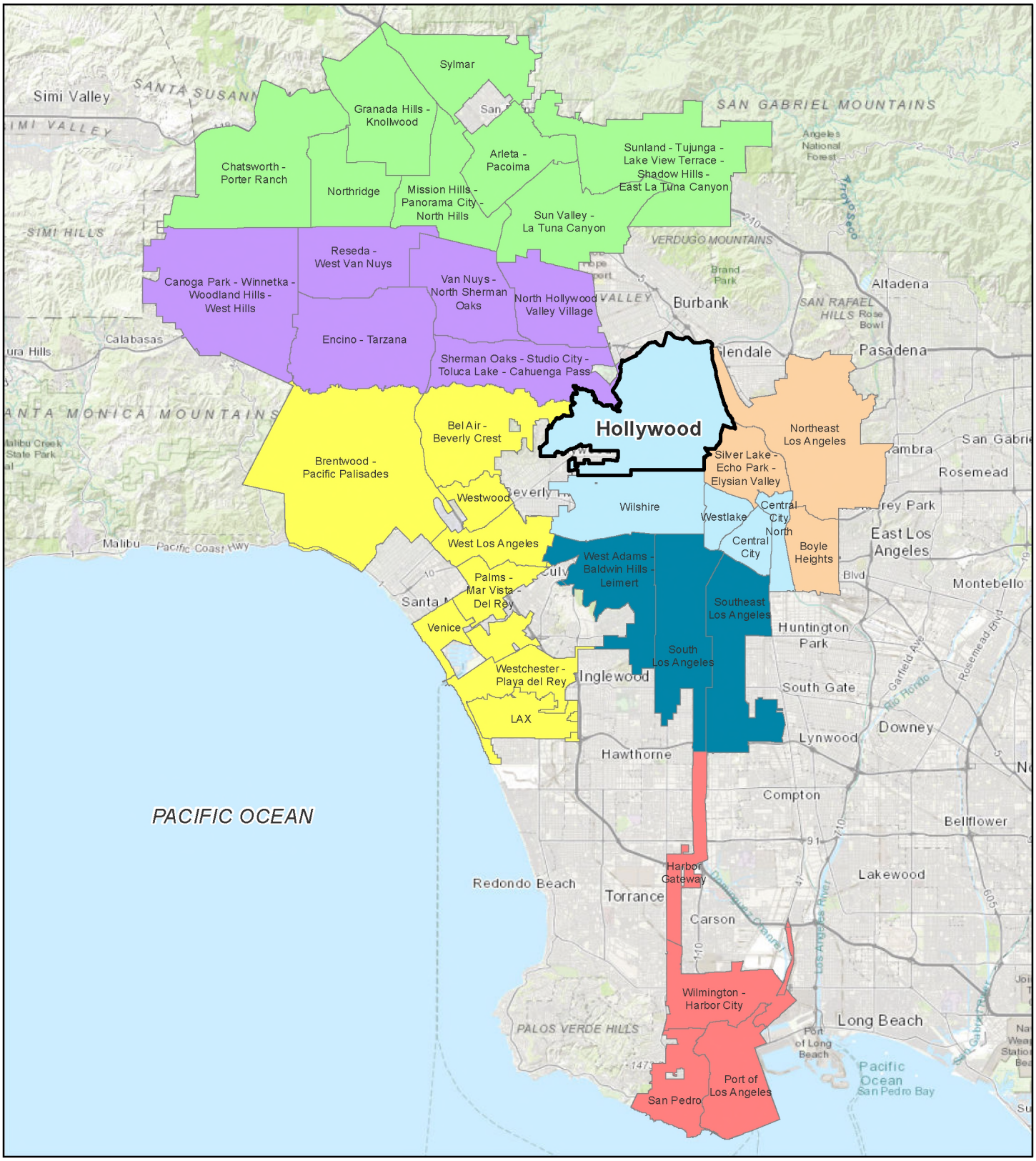
/a/ The 2016 estimated population and the 2040 projected population are based on SCAG's 2016-2040 RTP/SCS. Numbers are rounded to the nearest one thousand.

The City's 35 CPAs are divided into seven larger geographic areas for planning administration (**Figure 3-3**). Each of these geographic planning areas has an Area Planning Commission that reviews certain cases located within their planning area. The Project Area is located within the Central Los Angeles geography. According to the 2016-2040 RTP/SCS, the population in the Central Los Angeles geography, which includes the CPAs of Hollywood, Wilshire, Westlake, Central City, and Central City North, is anticipated to increase by approximately 220,000 by 2040. The Central Los Angeles geography represents approximately 32 percent of the anticipated population growth for the entire City (**Table 3-2**). **Tables 3-1** and **3-2** summarize projected population growth for the City of Los Angeles.

TABLE 3-2: PERCENTAGE OF CITYWIDE POPULATION AND PROJECTED GROWTH

Geographic Planning Area	% of Citywide 2016 Population /a/	% of Citywide 2040 Projected Population /a/	% Change of Citywide Projected Population Growth (2016 – 2040) /a/
City of Los Angeles	100%	100%	100%
South Valley	19%	19%	18%
South Los Angeles	19%	19%	18%
North Valley	18%	17%	12%
Central	17%	20%	32%
West Los Angeles	11%	11%	10%
East Los Angeles	10%	10%	7%
Harbor	5%	5%	2%

/a/ The 2016 estimated population and the 2040 projected population are based on SCAG's 2016-2040 RTP/SCS. Due to rounding, percentages may not add up to 100 percent.



SOURCE: TAHA, 2018.

taha 2010-073

Hollywood Community Plan Update
Draft Environmental Impact Report
CITY OF LOS ANGELES

FIGURE 3-3

CITY OF LOS ANGELES
GEOGRAPHIC PLANNING AREAS

The purpose of forecasting future population is to describe the likely future population based on current trends and to be able to plan for and respond to change. In general, projections help City departments to understand where current policies might lead and to determine whether those are leading the City towards its stated objectives consistent with federal, state, and local policies. They are also helpful or instructive to city departments in preparing long-range plans, such as community plan updates and infrastructure plans. The Department of City Planning (DCP) uses anticipated population growth or population projections as a benchmark, to determine the level of development that is needed to accommodate this future growth. Population growth is a fundamental consideration in making long-range land use planning decisions. However, it is important to note that these projections are calculations based in part on a number of assumptions and, as with any data reliant on assumptions, projections have limitations. For example, projections are often based on recent trends that may or may not continue as conditions change.

HOLLYWOOD CPA GROWTH PROJECTIONS

The State of California requires that cities plan for changes in demographics, including housing demand, population, and employment. If growth is anticipated, each city must accommodate a share of the region's projected growth. The Project Area represents approximately 5 percent of the City of Los Angeles land area (nearly 21.8 square miles out of 469 square miles) and 5 percent of the City's population. Over the next few decades, population within the Project Area is anticipated to increase by approximately 10 percent by year 2040, as identified by current SCAG projections in 2016 (see **Table 3-3**).[5]

TABLE 3-3: PROJECTED POPULATION GROWTH FOR THE PROJECT AREA

Area	Existing Population (2016)	% of Citywide Existing Population	2040 Projected Population	Projected Population Growth (2016-2040)	% of Citywide 2040 Projected Population	% Change in Projected Population Growth (2016-2040)
City of Los Angeles	3,931,000	100%	4,609,000	678,000	100%	17%
Project Area	206,000	5%	226,000	20,000	5%	10%

Note: Numbers are rounded to the nearest thousand.
SOURCE: SCAG, 2016-2040 RTP/SCS.

3.4 BASELINE CONDITIONS

CEQA requires an EIR to compare existing physical conditions ("baseline") to the physical conditions after implementation of a project. For purposes of the Proposed Plan, which is a long-range plan for growth and development, there is no expected direct effect from the Proposed Plan (such as for a construction project), but there are expected indirect effects from the reasonably expected development that will occur. To assess the impacts of the Proposed Plan requires determining reasonably expected development and identifying the current conditions. Both of these determinations rely in part on estimates of the current population, housing and employment, and the forecasted growth in population, housing and employment (see Section 3.3, Growth Trends, above for a discussion of the Project Area's forecasted growth).

[5]SCAG projections are based on certain assumptions about future trends, but development and demographic trends may change over a planning horizon period of more than two decades. SCAG's projection is an informed and modeled estimate of what is foreseeable at the time that the projection was prepared but the actual numbers may be higher or lower. Also, when new information or data become available with the passing of time, SCAG updates its estimates and projections.

CEQA Guidelines Section 15125(a) requires that an EIR include a description of the physical environmental conditions in the vicinity of a Proposed Project, as they exist at the time the Notice of Preparation (NOP) is published. This environmental setting normally constitutes the baseline physical conditions to which the lead agency compares the impacts from the project and determines the significance of impacts. The NOP for this EIR was published on April 29, 2016 (see Appendix A). Thus, the Draft EIR uses 2016 as the baseline existing conditions.

CEQA generally requires an analysis of the foreseeable impacts from a project against the existing environment or baseline conditions. However, there are some exceptions to this rule where that analysis would be misleading or not provide useful information for purposes of CEQA impacts from the project, and the lead agency provides a justification for using a future baseline (*Neighbors for Smart Rail v. Exposition Metro Line Construction Authority*). When this EIR does not analyze the impacts of the Proposed Plan against the existing environment, such as in the GHG analysis, a justification is provided for the use of the different baseline and/or analysis. A description of the methodology for analysis of impacts, including the use of a different baseline, is included in section 4.0, Environmental Analysis. It may also be noted that baseline is not always established by population and housing information. The subject of the baseline is related to the particular impact area under consideration. For example, a baseline for purposes of agricultural and aesthetic impacts is related to current legal status and/or the physical condition of land in the project area (e.g., land that is designated prime farmland or a state scenic highway, or the existing view of a valued scenic vista).

3.5 PROJECT OBJECTIVES

UNDERLYING PURPOSE OF THE PROPOSED PLAN

The underlying purpose of the Proposed Plan is to plan for and accommodate foreseeable growth in the Project Area, consistent with the growth strategies of the City as provided in the Framework Element, as well as the policies of SB 375 and the SCS.

PROJECT OBJECTIVES

In accordance with CEQA Guidelines Section 15124, the specific project objectives identified below support the underlying purpose of the Proposed Plan, assist the City as Lead Agency in developing a reasonable range of alternatives to evaluate in this EIR, and will ultimately aid the decision maker in preparing findings and, if necessary, a statement of overriding considerations.

The **primary objectives** of the Proposed Plan are as follows:

- Accommodate projected population, housing, and employment growth consistent with the growth strategies of the Framework Element, including:
  - Maximize development opportunities around existing transit systems to encourage sustainable land use while minimizing potential adverse impacts,
  - Direct growth to transit hubs and corridors,
  - Plan for increases to the housing supply,
  - Encourage a better balance of jobs and housing with mixed-use development,
  - Accommodate commercial uses for future employment opportunities, and
  - Focus growth into Framework identified Centers and corridors while preserving single-family neighborhoods, hillsides, and open space.
- Direct growth away from low-density neighborhoods; preserve single-family and low-density residential neighborhoods.

- Provide a range of employment opportunities; promote the vitality and expansion of Hollywood's media, entertainment, and tourism industry.
- Protect historical and cultural resources.

The **secondary objectives** of the Proposed Plan are as follows:

- Encourage and promote a variety of mobility options; make streets walkable.
- Improve the function and design of neighborhoods throughout the Project Area by preserving and strengthening the appearance of the overall Project Area to promote pedestrian-friendly environments, nurture neighborhood character, improve economic vitality, create identity, and integrate a combination of land uses to create positive visual experiences.
- Improve open space, parks and public spaces.
- Provide adequate public services and infrastructure.
- Encourage sustainable land use.
- Maintain Land Use and Zoning Consistency.

3.6 PROPOSED PROJECT LAND USE STRATEGY

The Proposed Plan incorporates principles set forth in the General Plan Framework, which are based on informed theories of planning and regional development for several decades, including Smart Growth, New Urbanism, and, more currently, Sustainable Development. The General Plan Framework policies encourage compact development in proximity to transit infrastructure and activity centers. A vision of concentrated, mixed-use development adjacent to transit corridors is promoted in order to conserve resources, protect existing residential neighborhoods and improve air quality by reducing the use of cars. The Proposed Plan's vision of concentrating growth around commercial centers and corridors supported by transit embodies the General Plan Framework principles.

The Proposed Plan includes updates to land use designations and zones that are intended to accommodate growth anticipated by the SCAG 2040 forecast. Growth is directed away from hillside areas and lower-density neighborhoods and primarily into the Regional Center, the entertainment and visitor-serving center of the Project Area, and other commercial corridors served by transit. The Project Area has been and remains a prime location for transit-oriented development. Billions of dollars of investment in Los Angeles transit infrastructure has provided and continues to provide opportunities for integrating transportation planning with land use planning, particularly in the Project Area.

The Proposed Plan would allow for a variety of housing and commercial opportunities near the Metro Red Line Stations and along major corridors and would preserve and promote light industrial land uses for employment opportunities, including entertainment and media-related jobs. The Project Area has numerous historical resources, and the Proposed Plan purposely excludes properties abutting Hollywood Boulevard between La Brea Avenue and Ivar Avenue from proposed changes.

Citywide discretionary review for projects that exceed thresholds for by-right development would continue to apply in Hollywood under the Proposed Plan. Examples of citywide discretionary review include Site Plan Review, conditional uses, zoning adjustments, and zone or height district changes. Additional review and approval would also continue to be required for development projects subject to historic preservation review.

In the Project Area, the idea of integrating land use and transportation planning is not new. The City's 1974 Centers Concept called for preserving stable single-family neighborhoods by directing growth away from those neighborhoods and into major centers with more intense development and activity, including employment, housing, retail services, and entertainment. These centers would be served by a regional rapid

transit system connecting multiple centers throughout the City. In the Centers Concept, the Project Area was part of the "Regional Core," where higher density population and employment was designated in the City. The Metro Rail, which includes five Red Line stations in the Project Area, is consistent with the Centers Concept by connecting designated Centers, supporting development at designated growth centers, and providing commercial services and jobs near established areas with concentrations of people. The Proposed Plan continues to advance planning goals, consistent with past and current planning objectives that promote transit use and a mix of development uses in designated growth areas.

The Proposed Plan also addresses priority planning issues at the regional and state levels, such as reduced GHG emissions and increased access to mobility options. Regional plans for transportation, growth management, hazardous waste management, and air quality are developed by SCAG as mandated by federal and state laws. The existing pattern of land use directs future growth around the Metro Red Line Stations and Metro Rapid bus lines where new residential and commercial development can be supported by transportation infrastructure and different types of land uses can be intermingled to reduce the length and number of vehicle trips. The Proposed Plan's strategic increase of development potential in transit-rich areas is consistent with the General Plan and achieves the General Plan Framework goals. The General Plan Framework proposes that growth be directed to "targeted growth areas" located in proximity to major rail and bus transit corridors and stations. The General Plan Framework aims for a spatial distribution of development that facilitates a reduction of vehicle trips. Mixed-use development around Metro stations and transit corridors offers residents, employees and visitors mobility choices that enable them to reduce the number and length of vehicle trips.

SCAG has adopted RTPs since 1976 but the Sustainable Communities and Climate Protection Act of 2008, also known as SB 375, began requiring SCAG to prepare an SCS as an integral part of its RTP. The SCS enables cities and counties of Southern California to achieve target levels of reduction in GHG emissions by 2020 and 2035. The 2012-2035 RTP/SCS emphasized sustainability and integrated planning of land use and transportation. It also embraced a vision encompassing three principles that collectively work together as the key to the region's future: mobility, economy, and sustainability. The adopted 2016-2040 RTP/SCS continues the vision set by the 2012-2035 RTP/SCS. The overarching strategy for the 2016-2040 RTP/SCS envisions growing more compact communities in existing urban areas with efficient public transit and safe mobility opportunities and preserving open space and natural lands. Major themes include integrating transportation investments and future land use patterns, striving for sustainability, providing more transportation choices, responding to demographic and housing market demand for smaller housing and a more walkable lifestyle, supporting economic growth with infrastructure, and improving public health.

The Proposed Plan follows the policies of compact infill development contained in the General Plan Framework and SCAG's RTP/SCS, which would facilitate mobility and housing choices that would reduce the use of cars and help the Southern California region reach GHG emission reduction targets established by SB 375.

3.7 PROPOSED PLAN REASONABLY EXPECTED DEVELOPMENT

The underlying purpose and one of the primary objectives of the Proposed Plan is to accommodate future growth in the Project Area. With the implementation of the Proposed Plan, the land use designations/intensities of the Project Area would be revised to accommodate population growth and housing and employment demand projected by SCAG through the year 2040. The Proposed Plan would also meet the other project objectives, including locating growth in transit centers and corridors. The Proposed Plan also considers the additional housing that could occur with housing incentive programs, such

as the TOC Guidelines, which incentivizes residential density and square footage in exchange for building more affordable housing within one-half mile radius of major transit stops. In addition, the potential for accessory dwelling units is also considered under the Proposed Plan.

To assess potential environmental impacts of the Proposed Plan, the reasonably expected development[6] that is expected to occur in 2040 as a result of the Proposed Plan was determined. The reasonably expected development of the Project Area was determined based on assumptions about the level of development that can be reasonably expected to occur during the life of the Proposed Plan (through the Plan horizon year of 2040, or approximately 20 years in to the future, coincident with the most recently adopted RTP/SCS). A key factor in determining reasonably expected development is the allocation of land and the distribution of uses to reflect development patterns most likely to be built, or that are reasonably expected to occur, including through implementation of the City's growth strategies that are consistent with the Framework Element and the SCS (e.g., locating density near transit and regional centers). This approach is consistent with the approach used by SCAG to comply with federal laws that require RTPs to reflect development patterns most likely to be built in the region.[7] The City's policy for Community Plans is to meet or exceed SCAG's expected projections.

The Proposed Plan exceeds SCAG's 2040 projections in part because of the additional incentive housing units and the accessory dwelling units expected. SCAG's 2040 projections, adopted in 2016, pre-dated the TOC Guidelines, which became effective in September 2017 per Measure JJJ, an initiative approved by voters. As a result, the SCAG projections, which were adopted before the TOC Guidelines went into effect, do not factor in the additional housing potential that may be built under the TOC Guidelines. Additionally, recent development projects near transit areas in the CPA post the Great Recession have been built, are under construction, have been approved, or are seeking entitlements, particularly in central Hollywood. This increased level of activity is analyzed in this EIR, which has increased the number of expected housing and population since the NOP was released in April 2016.

The City's reasonably foreseeable development of the Proposed Plan is based on the acreage of land designated for each type of land use (by General Plan Land Use designations); allowable densities and intensities in each designation; anticipated levels of development in the life of the Proposed Plan; and development constraints, such as topography, land acquisition and construction costs, and historic preservation regulations. Past building data demonstrates that only a percentage of the properties within the Project Area are anticipated to be redeveloped within the horizon year, typically 20 years, and not all sites are anticipated to be built to the maximum densities permitted by the land use designations and zoning for a variety of reasons, including economic conditions, market trends, financial lending practices, construction and land acquisition costs, physical site constraints and other General Plan policies or regulations. The City's methodology for determining the reasonably expected development is provided in Appendix B. A numerical range is provided to include development potential associated with affordable housing incentive programs, including the TOC Guidelines and accessory dwelling unit provisions governed by state law. In addition, a range is provided because the Proposed Plan does not prescribe exact numbers for development and conditions could change over the course of two decades. Development activity is fluid and each year the amount of development can go up or down. The lower numerical range provided in this EIR assumes there would be minimal filings of TOC and ADU cases, while the upper numerical range is based on development conditions where applicants are utilizing TOC and ADUs with more frequency. The upper numerical range was analyzed in this EIR, which captures a greater amount of difference in comparison to the lower numerical range, and represents a conservative assumption in regards to identifying the potential significant impacts from the Proposed Project.

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[6]The terms "reasonably foreseeable development," "reasonably expected development," and "reasonably anticipated development" are used interchangeably throughout the Draft EIR and should be interpreted to mean the same thing.

[7]23 Code of Federal Regulations (CFR) Section 450.306(b).

EXISTING PLAN AND PROPOSED PLAN

Although CEQA does not require the environmental analysis to compare the Proposed Plan to the Existing Plan, this comparison is provided in several places in the Draft EIR for informational purposes. It is not intended to provide analysis as to whether the Proposed Plan will cause a significant impact to the environment. As discussed above, for impact analysis, the impact is determined by comparing the Proposed Plan to the baseline conditions. Where the EIR provides information related to the Existing Plan (outside of the No Project alternative in the Alternative Analysis) it is provided for extra-CEQA informational purposes to highlight how the Proposed Plan updates the population, housing and employment in the context of reasonably anticipated development in the Project Area and to inform decision makers and the public regarding different potential impacts if the Existing Plan were to continue compared to the impacts of the Proposed Plan.

The Existing and Proposed Plan's reasonably expected development potential is compared in **Table 3-4**. The Proposed Plan would increase reasonably expected housing, population, and employment as compared to the Existing Plan. The Proposed Plan would accommodate more population, housing, and employment than SCAG's 2040 forecast. This is based on the Proposed Plan's land use designations, zoning, and policies.

TABLE 3-4: 2040 REASONABLY EXPECTED DEVELOPMENT OF THE HOLLYWOOD COMMUNITY PLAN COMPARED TO SCAG FORECAST

	2016 Baseline	Existing Plan Reasonably Expected Development /c/	Proposed Plan Reasonably Expected Development	SCAG 2040 Growth Forecast /c,d/
Housing /a,b/	104,000	113,000 – 121,000	121,000 – 132,000	113,000
Population	206,000	226,000 – 243,000	243,000 – 264,000	226,000
Employment	101,000	119,000	124,000 -127,000	119,000

/a/ SCAG provides estimates and forecasts for households, which is the equivalent of occupied housing units, not including vacancies. The estimated number of households in 2016 is approximately 99,000.

/b/ The Proposed Plan factors in additional units that can be expected from the City's housing incentives. It assumes all units are occupied.

/c/ Under the Existing Plan's lower range for Reasonably Expected Development and SCAG's 2040 Growth Forecast, the numbers are similar but the geographic distribution of housing, population, and employment in the Community Plan Area would be different.

/d/ The SCAG 2040 Growth Forecast does not factor in potential additional units from the City's TOC Guidelines, which were adopted in 2017 after the adoption of the SCAG 2016/2040 RTP/SCS.

Note: Numbers are rounded to the nearest thousand.

SOURCE: SCAG, 2016-2040 RTP/SCS; City of Los Angeles, 2016, 2018.

3.8 PROJECT DESCRIPTION

The Proposed Plan is part of the Department of City Planning's NCP Program. It is a comprehensive update of the Hollywood Community Plan, one of the City's 35 Community Plans. The Proposed Plan addresses changes that have occurred since the Hollywood Community Plan was last updated in 1988. It is composed of a series of documents, including text, maps, and diagrams. These documents have been published separately and can be found online at the Hollywood Community Plan Update 2 website: www.hcpu2.org; they are also included as Appendix C to this EIR.

The key components of the Proposed Plan include the following:

- **Community Plan**. Amendments to the text of the Hollywood Community Plan (the Draft Hollywood Community Plan) that lays out a long-range vision for the development of the Project Area and programs to achieve the vision.
- **Land Use Map**. Amendments to the Hollywood Community Plan land use map. The land use map shows the distribution of land use designations, and the range of zones allowed in each land use designation.
- **Zoning**. Zone changes represented by:
  a) A matrix for the Draft Land Use and Zone Change Maps, which contain information on existing and proposed zoning and land use.
  b) A matrix with details of the Qualified ("Q") Conditions and Development ("D") Limitations.
  c) Amendments to the SNAP Specific Plan.
  d) Adoption of a CPIO District with supplemental development standards, regulations, and procedures.
- **Mobility Plan.** Amendments to the enhanced networks maps in the Mobility Plan (MP) 2035.
- **Framework Element Map**. Amendment to the Framework Element's "Proposed Centers, Districts and Mixed-Use Boulevards" Maps, related to the distribution of proposed centers, districts and mixed-use boulevards.
- **Fee Study**. A nexus study and identification of potential transportation improvements to be partially funded by impact fees.

The Proposed Hollywood Community Plan includes a map of proposed land use designations in the Project Area (see **Figure 3-5**). Land use designations help guide development by establishing the intensity of different uses of land, such as residential, commercial, industrial and open space. Each land use designation has corresponding zones that regulate development, including uses, density and height. The map shows the general locations of the proposed land use designations in the Community Plan Area. The proposed changes would maintain a pattern of land use that directs future growth to already urbanized areas.

One of the ways the Proposed Plan's objectives are met is through proposed changes in land use designations and zoning regulations. These changes would allow for additional development potential, such as housing units or square footage for jobs, in selected areas of the Community Plan that are near transit infrastructure systems. Significant transit investments have occurred in Hollywood, which makes the CPA a desirable place that could provide more housing and jobs given its central location in the City of Los Angeles. Increasing density and development potential near transit stations is consistent with the Framework Element and SCAG's 2016-2040 RTP/SCS. One of the nine goals contained in the 2016-2040 RTP/SCS is to encourage land use and growth patterns that facilitate transit and active transportation. SCAG's land use strategies include focusing new growth around transit, improving mobility to complete short trips in mixed-use districts, and sustainable planning through increased densities and mixing different land uses. The Proposed Plan's strategic changes are consistent with the RTP/SCS. It would allow for infill development of additional residential units and job-producing uses in areas with existing transportation infrastructure located near Metro Red Line stops and along major corridors with transit. Locating jobs and housing near transit to reduce automobile reliance and improve mobility is also consistent with state mandates for sustainability. As a result, growth is directed away from low-density neighborhoods. The changes would also result in a pedestrian-friendly environment, protect historical resources, and address updates that have occurred since the last Plan Update.

As part of the Proposed Plan, certain areas of the Project Area are proposed to undergo changes to the land use designation and/or zoning by amending the land use map and/or the zoning map. These areas are referred to as Change Areas. In the remainder of the Project Area, the Proposed Plan would retain the existing General Plan land use designations and zoning. These are referred to as "Non-Change Areas." Future development in the Non-Change Area would be subject to the same regulations and standards as

they would have been subject to under the current land use designation and zoning. The Proposed Plan will include new and modified objectives, policies, and programs from those in the Existing Plan. These new and/or modified objectives, policies, and program in the Proposed Plan will be applicable to the entire Project Area, both Change Areas and Non-Change Areas. Future development subject to General Plan consistency findings and requirements will be subject to these modifications, even if it is in a Non-Change Area.

Consistent with the requirements of CEQA, this EIR analyzes impacts of reasonably expected development from the Proposed Plan, including impacts from expected development in Change Areas and reasonably expected development in Non-Change Areas. Existing Plan land use designations for the Project Area are shown in **Figure 3-4**. **Figure 3-5** show the Proposed Plan land use designations.

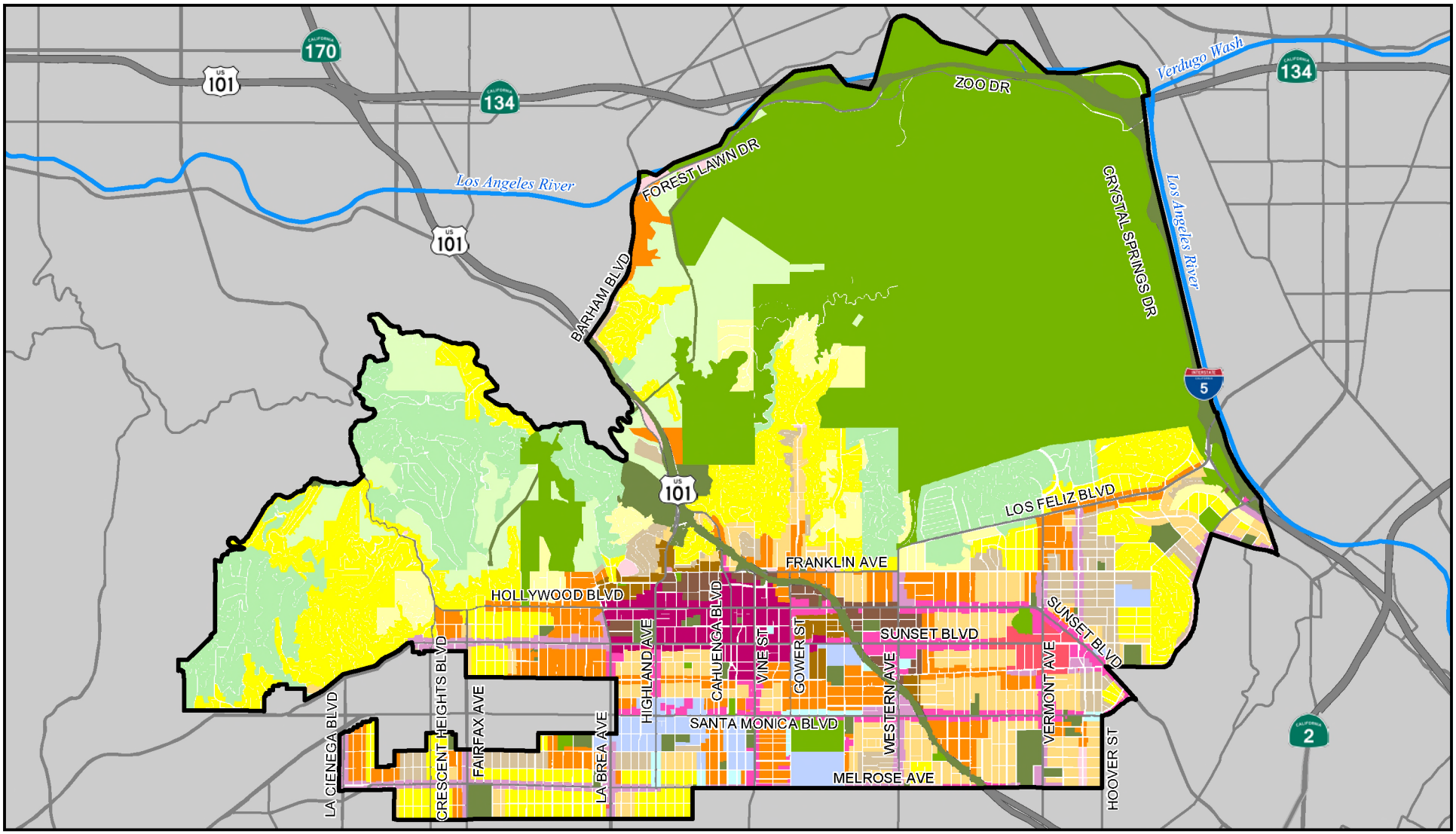
Most of the CPA is not changing land use designations/zoning under the Proposed Plan. Approximately 92 percent of the acreage in the Project Area is not proposed for any intensity, density, or use changes. The Non-Change Areas or Administrative Change Areas include single-family residential neighborhoods, hillside properties, low-scale multi-family residential areas, open space areas, and some commercial areas. With that said, these Non-Change Areas may still redevelop to more intense uses or density as allowed by current and Proposed Plan regulations. Future development in Non-Change Areas would continue to be subject to City regulations and standards as they currently exist and would be guided by policies and programs of the Proposed Plan.

The remaining eight percent of the total CPA acreage is proposed for change. Proposed changes in the Change Areas include new height limits, incentives for mixed-use development along selected commercial corridors with transit, and a number of administrative corrections or updates. Some changes would allow for additional development potential compared to what is existing and are categorized as Active Change Areas. But, not all zone changes, and land use designation amendments are intended to change the allowed uses, intensity or density of development in the CPA from the Existing Plan. Change Areas are also referred to as subareas in the Proposed Plan, and are identified by a number, and sometimes in conjunction with an alphabet letter (e.g., 4:1B) for administrative purposes.

The foreseeable indirect effects of proposed changes in the Change Areas vary based on the types of Change Areas involved. Change Areas are broken down into the following categories of changes: (1) Active Changes and (2) Administrative Changes. Administrative Changes are further broken down into types of Consistency Changes. The different types of Change Areas are described below.

Active Changes consists of a combination of General Plan land use amendments and/or zone changes that allow or may allow for an increase in development density, height limits, and/or uses than what currently exists. Active Change Areas are categorized into three types: Land Use Designation and Zone Changes, Industrial Preservation/Incentive, and SNAP Consistency. Proposed Land Use Designation and Zone Changes primarily include intensity increases for development near transit areas and mixed-use development along transit corridors, and density increases in multi-family residential areas near employment centers. Industrial Preservation/Incentive changes would allow a zone change that would promote existing light industrial areas for continued employment use in the future, especially for entertainment and media-related jobs. SNAP Consistency changes will update the underlying land use designation and/or zone of parcels in East Hollywood to reflect the already approved Vermont/Western Transit Oriented District Specific Plan, in effect since 2001.

Some of the proposed changes in the Change Areas may amend the land use designation or zoning but would be unlikely to result in or induce foreseeable changes to the existing environment. For example, some changes may simply bring the General Plan land use designation and zoning into conformance with the existing uses on a site. These changes are categorized as Administrative Change Areas.



LEGEND:

- Hollywood CPA
- Minimum Residential
- Very Low II Residential
- Low I Residential
- Low II Residential
- Low Medium I Residential
- Low Medium II Residential
- Medium Residential
- High Medium Residential
- High Residential
- Limited Commercial
- Highway-Oriented Commercial
- General Commercial
- Neighborhood Office Commercial
- Community Commercial
- Regional Center Commercial
- Commercial Manufacturing
- Limited Manufacturing
- Open Space
- Public Facilities

0 2,800 5,600 Feet

N W E S

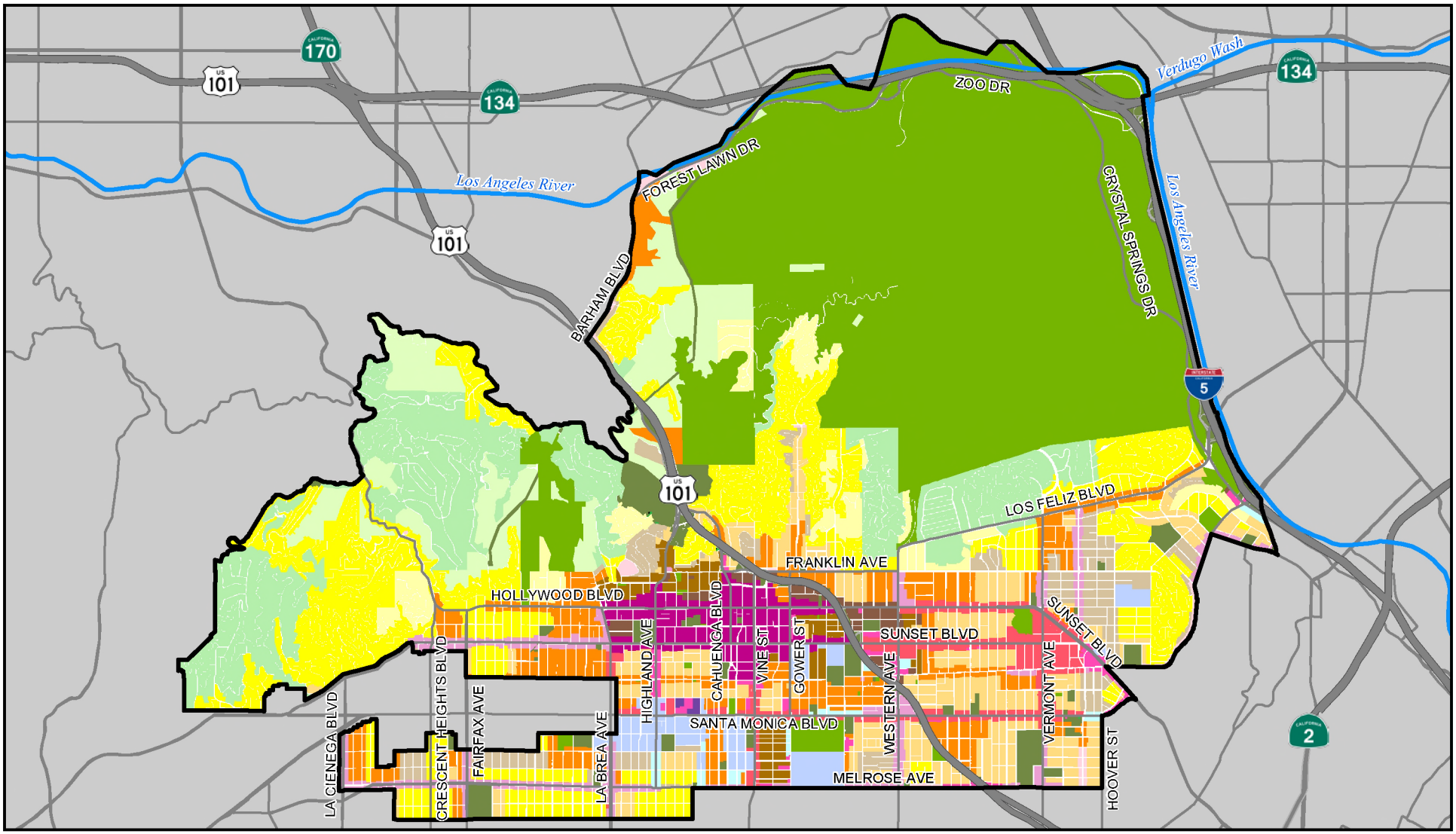
SOURCE: City of Los Angeles, 2018; TAHA, 2018.

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FIGURE 3-4

EXISTING GENERAL PLAN LAND USE



LEGEND:

- Hollywood CPA
- Minimum Residential
- Very Low II Residential
- Low I Residential
- Low II Residential
- Low Medium I Residential
- Low Medium II Residential
- Medium Residential
- High Medium Residential
- High Residential
- Limited Commercial
- Neighborhood Commercial
- General Commercial
- Community Commercial
- Regional Center Commercial
- Commercial Manufacturing
- Limited Industrial
- Hybrid Industrial
- Public Facilities
- Public/Quasi-Public Open Space
- Open Space
- Public Facilities - Freeways

N W E S

0 2,900 5,800 Feet

SOURCE: City of Los Angeles, 2018; TAHA, 2018.

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FIGURE 3-5

PROPOSED GENERAL PLAN LAND USE

Administrative Changes are land use designation and zoning consistency corrections that reflect existing uses and consist of 1) AB 283 parcels, 2) open space and public facilities parcels and 3) other selected parcels. The City attempted to correct known inconsistencies between land use designation and zoning in the 1980s through the AB 283 General Plan/Zoning Consistency Program. Technological improvements to the City's mapping programs have identified further necessary corrections of parcels affected by incorrect parcel boundaries, omissions of parcels, and other errors from the 1980s correction effort. Other proposed corrections are intended to change the land use designation and/or zoning to reflect the existing uses and scale of buildings on the selected parcels, which are already developed with buildings such as housing and schools or are parks. A limited number of amendments to the recently updated MP 2035 circulation element street designations are also proposed to correct errors or reflect updated information.

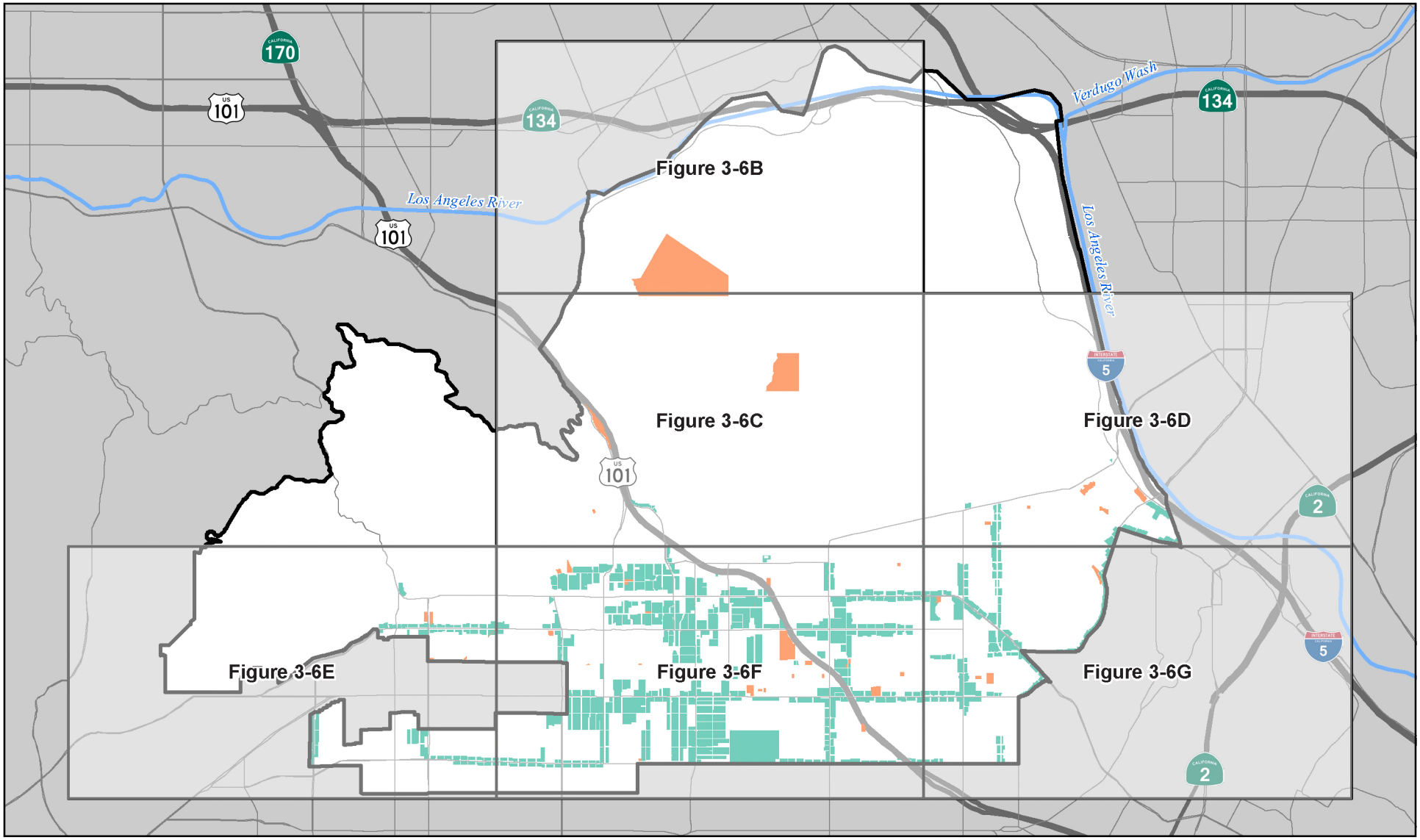
Figures 3-6a through **3-6g** identify all proposed subareas in the Project Area where land use and/or zone changes are proposed.

Table 3-5 summarizes the acreage subject to the proposed changes associated with the Proposed Plan. Of the total 13,962-acre Project Area, Change Areas consist of approximately 1,076 acres, or approximately 8 percent of the Project Area. Non-Change areas make up the remaining Project Area, or approximately 92 percent of the total acreage. The proposed CPIO District includes both Change Areas and Non-Change Areas. There are Non-Change Areas in the CPIO because the proposed changes are for design only and not to allowable use, density or intensity.

TABLE 3-5: SUMMARY OF PROPOSED CHANGES

Type of Change	Acreage	% of Total Change Area Acreage	% of Total Acreage in the Project Area
ACTIVE CHANGES			
Land Use Designation and Zone Changes	537	50%	
Industrial Preservation/Incentive	166	15%	6%
SNAP Consistency	160	15%	
ADMINISTRATIVE CHANGES			
Consistency Changes			
AB 283	6	<1%	
Open Space, Public Facilities	198	18%	2%
Other Consistency	10	<1%	
TOTAL CHANGE AREA ACREAGE /a/	**1,076**	**100%**	**8%**
TOTAL NON-CHANGE AREA ACREAGE	**12,886**		**92%**
TOTAL CPA/PROJECT AREA ACREAGE	**13,962**		**100%**

/a/ Change Areas are also referred to as Subareas in the EIR and Plan Update.
Note: Numbers are rounded to the nearest whole number in each category.
SOURCE: City of Los Angeles, 2018.



LEGEND:

Hollywood CPA | Active Change Areas | Administrative Change Areas

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0 3,000 6,000 Feet

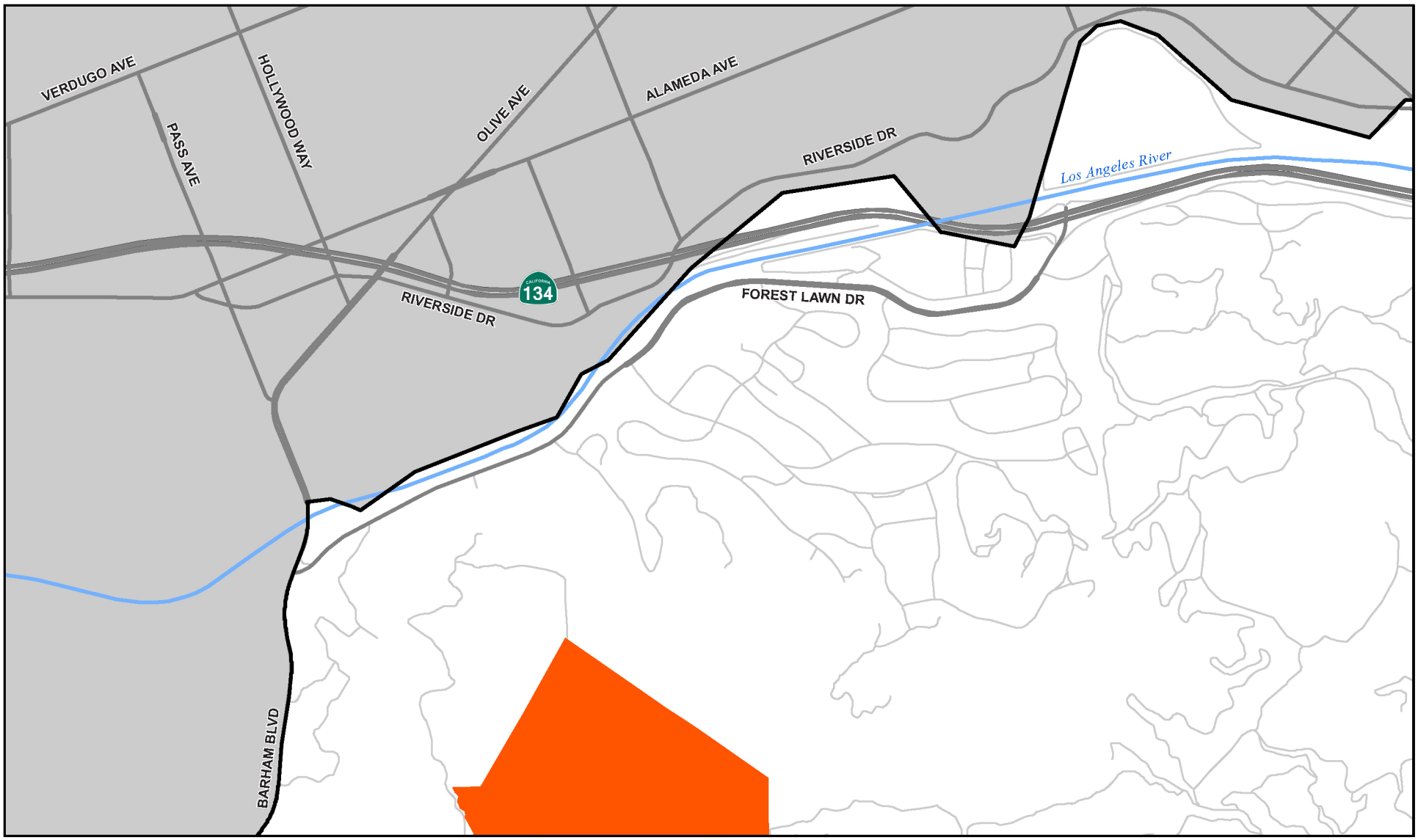
SOURCE: City of Los Angeles, 2018; TAHA, 2018.

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FIGURE 3-6A

INDEX MAP FOR
PROPOSED CHANGE AREAS



LEGEND:

Hollywood CPA | Active Change Areas | Administrative Change Areas

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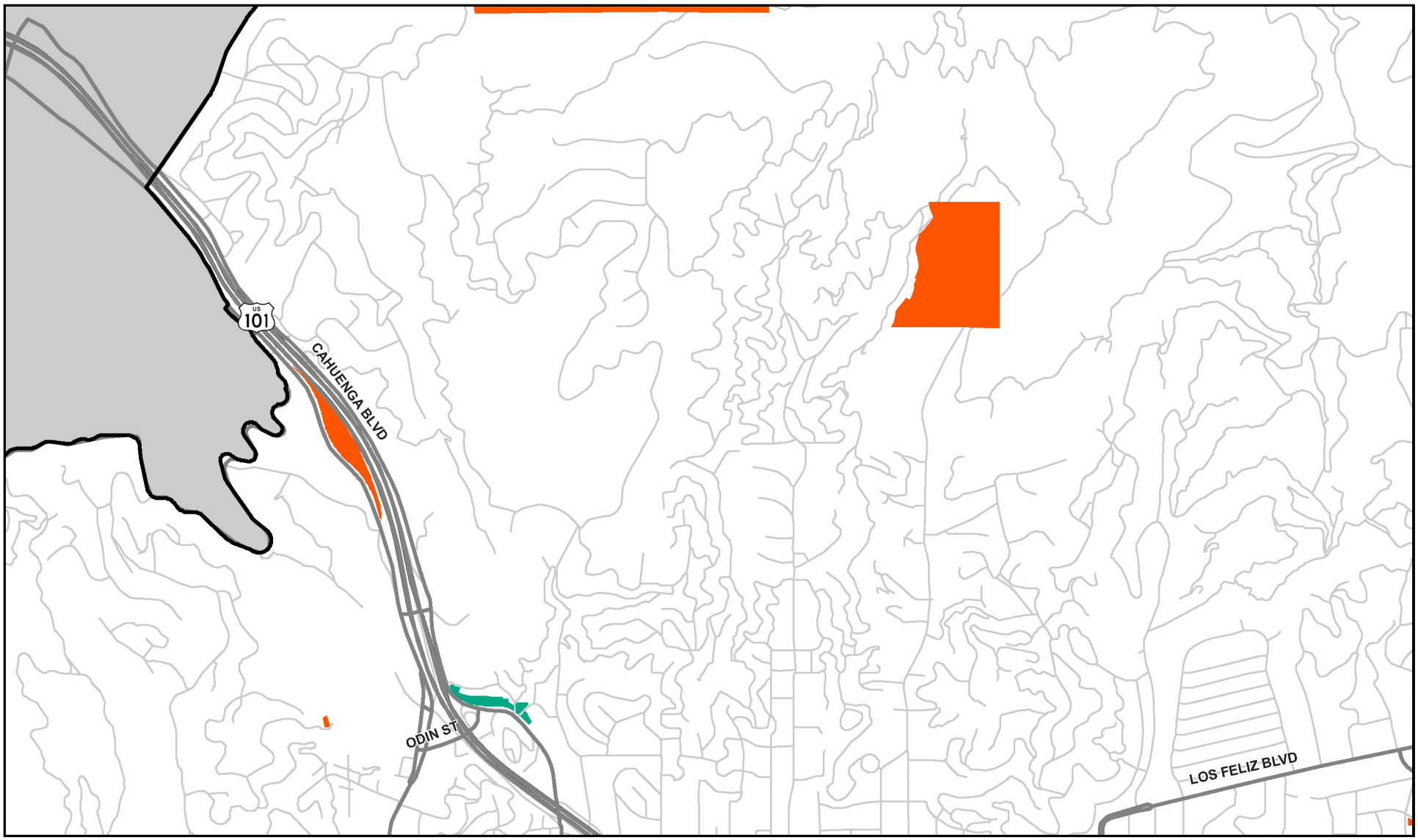
SOURCE: City of Los Angeles, 2018; TAHA, 2018.

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FIGURE 3-6B

PROPOSED CHANGE AREAS



LEGEND:

Hollywood CPA | Active Change Areas | Administrative Change Areas

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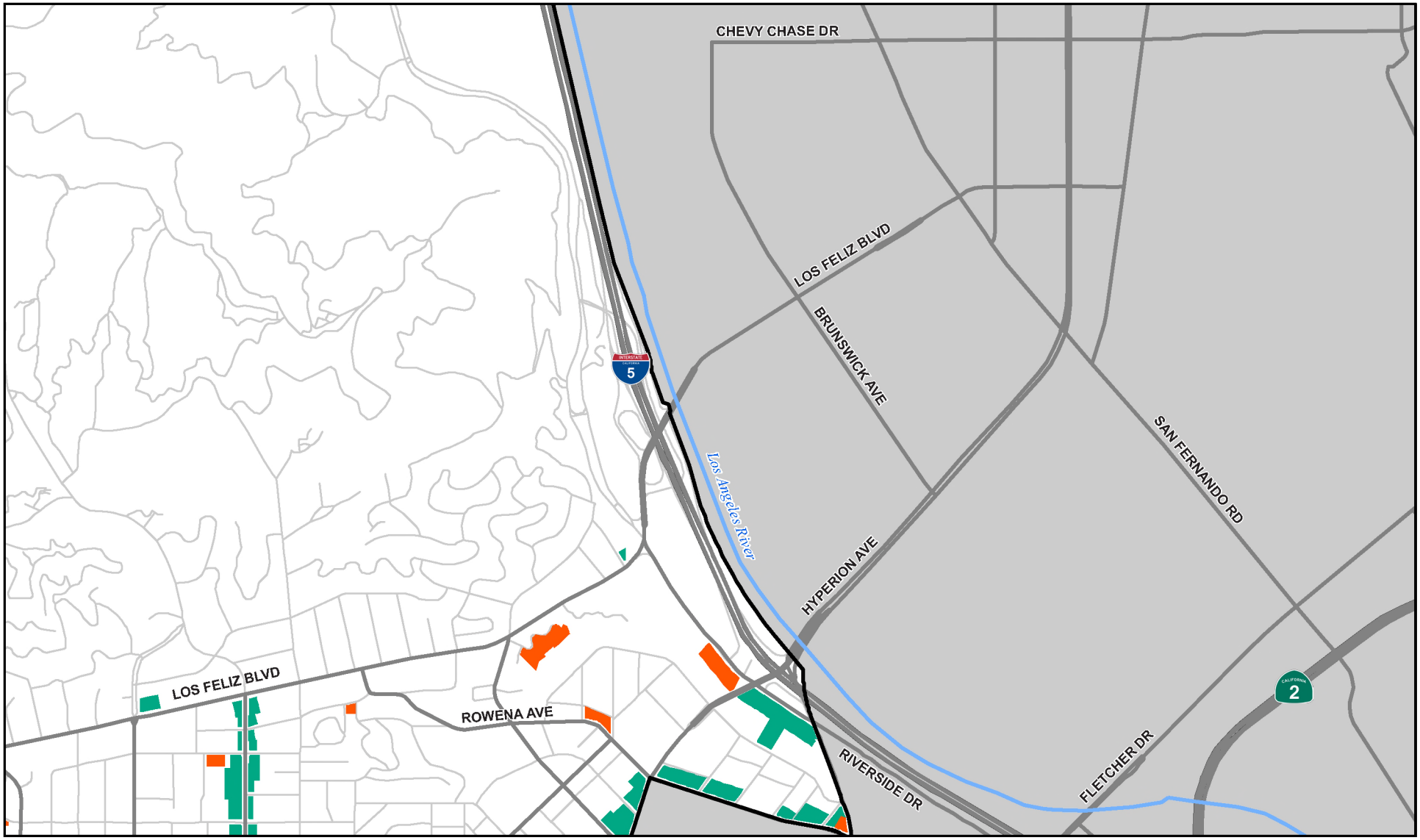
SOURCE: City of Los Angeles, 2018; TAHA, 2018.

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FIGURE 3-6C

PROPOSED CHANGE AREAS



LEGEND:

Hollywood CPA | Active Change Areas | Administrative Change Areas

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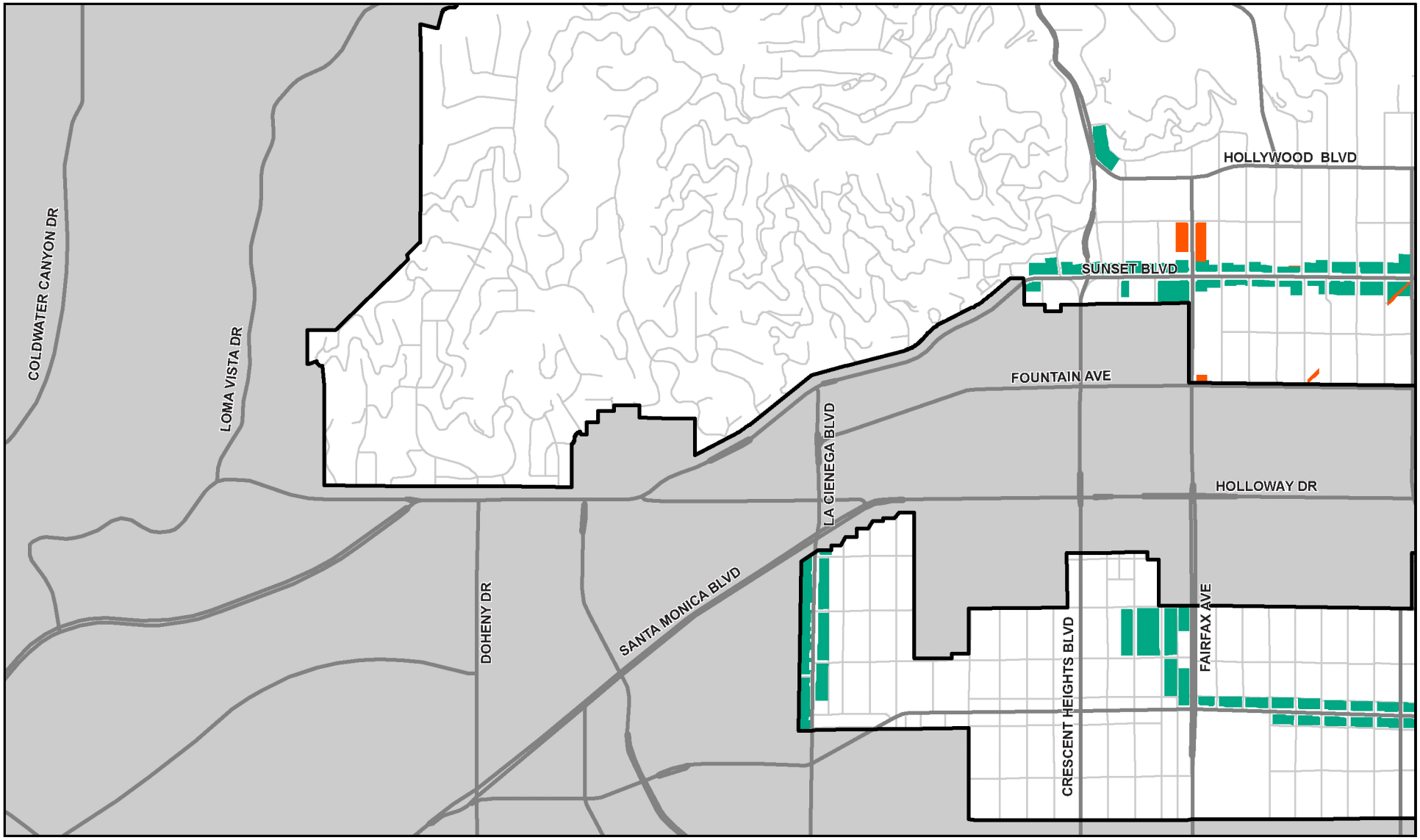
SOURCE: City of Los Angeles, 2018; TAHA, 2018.

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FIGURE 3-6D

PROPOSED CHANGE AREAS



LEGEND:

Hollywood CPA | Active Change Areas | Administrative Change Areas

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0 910 1,820 Feet

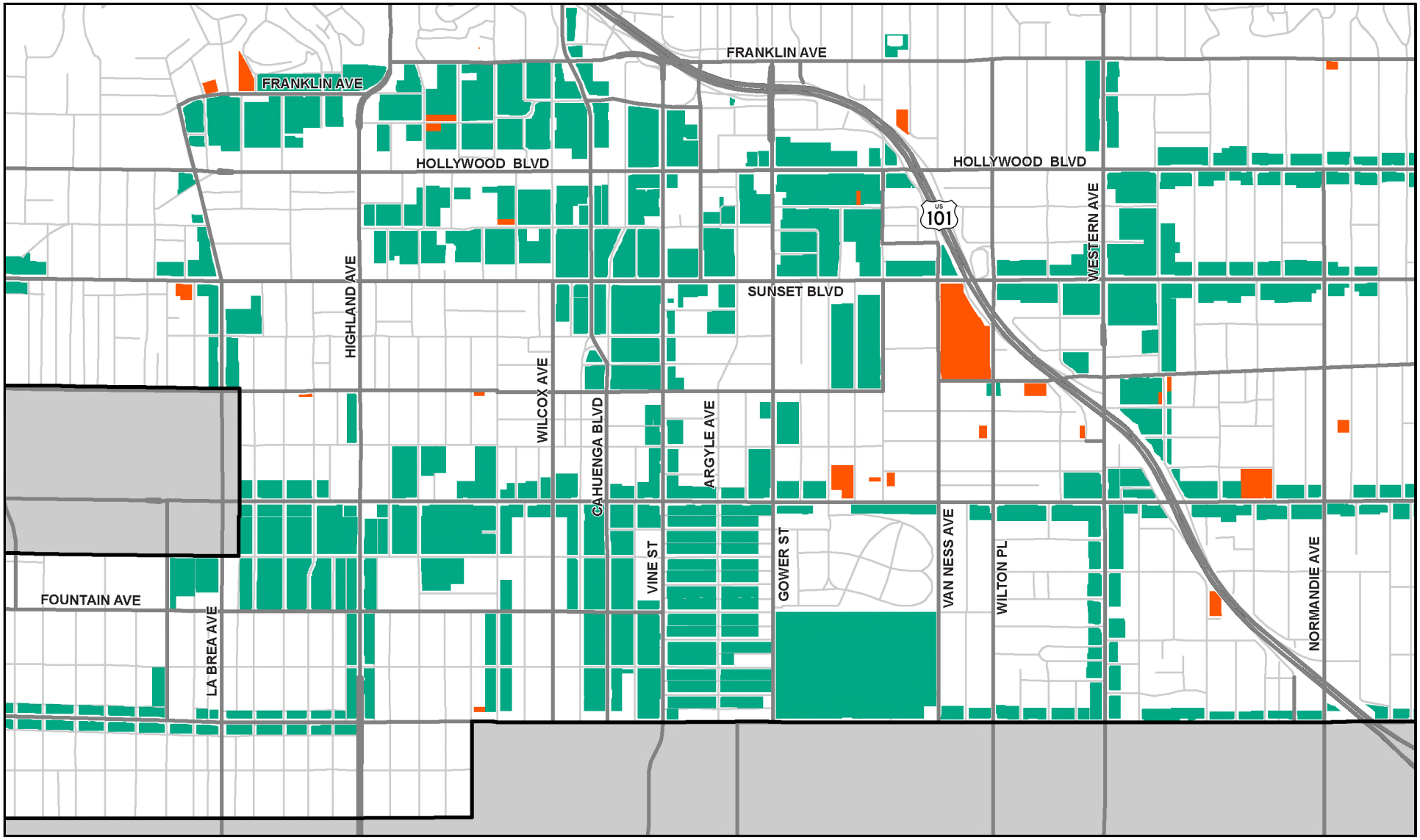
SOURCE: City of Los Angeles, 2018; TAHA, 2018.

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FIGURE 3-6E

PROPOSED CHANGE AREAS



LEGEND:

Hollywood CPA | Active Change Areas | Administrative Change Areas

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0 910 1,820 Feet

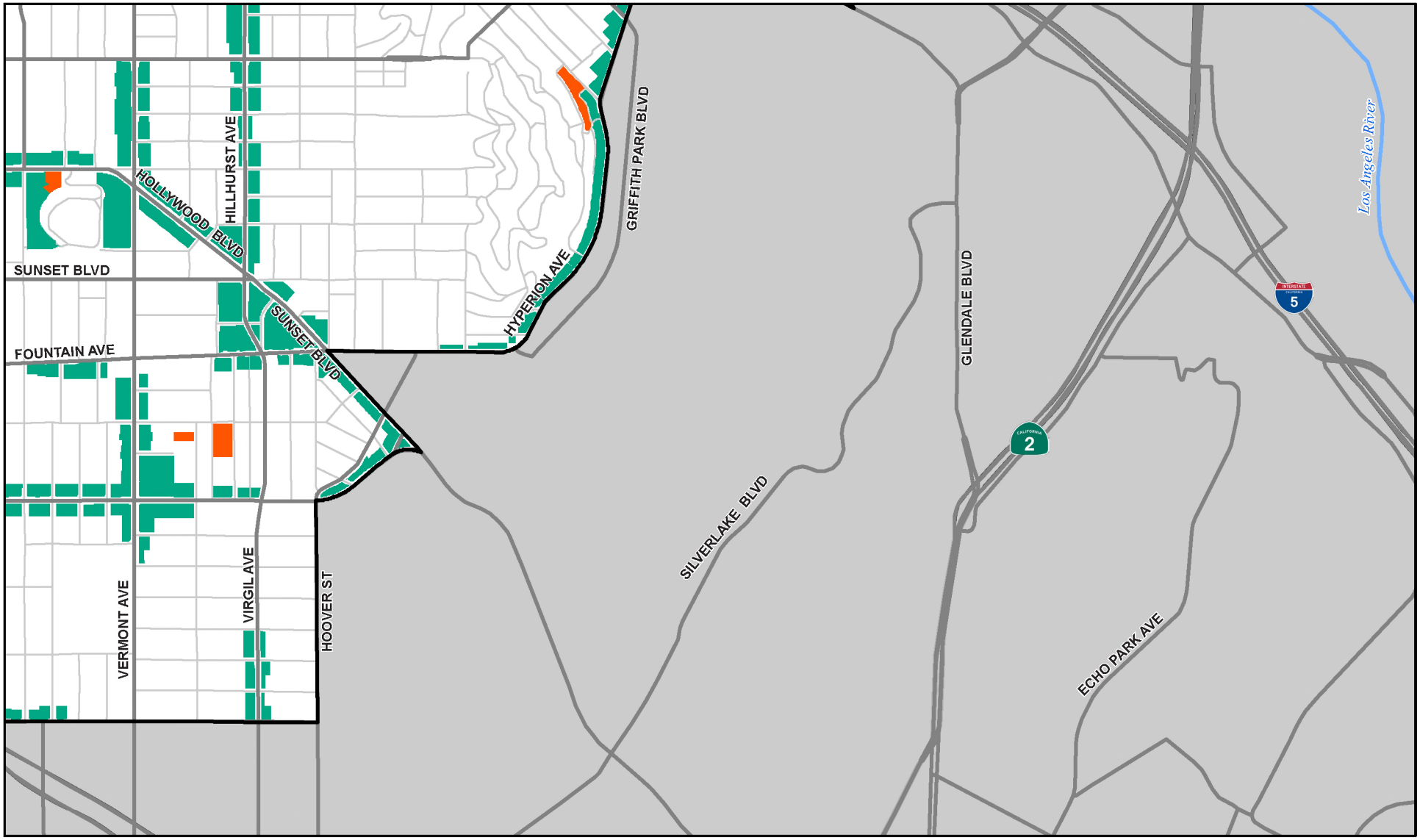
SOURCE: City of Los Angeles, 2018; TAHA, 2018.

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FIGURE 3-6F

PROPOSED CHANGE AREAS



LEGEND:

Hollywood CPA | Active Change Areas | Administrative Change Areas

SOURCE: City of Los Angeles, 2018; TAHA, 2018.

N W E S

0 910 1,820 Feet

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FIGURE 3-6G

PROPOSED CHANGE AREAS

PROPOSED LAND USES AND ZONING

Land uses within the Project Area can be divided into five categories: Residential, Commercial, Industrial, Public Facilities and Open Space. These land use categories are described in Section 3.2, Location and Existing Land Uses. Within these land use categories, every parcel is regulated by its land use designation, zoning, height district, and if applicable, "Q" Qualified Conditions and/or "D" Development Limitations. Together, the land use designation, zoning, and height district set parameters for development, in terms of permitted uses, intensity, density, and height. The "Qs" and "Ds" typically place restrictions on development, including use, density, height, and FAR. Parcels may be further regulated if located in one of the Project Area's Specific Plan areas, such as the SNAP, or a Historic Preservation Overlay Zone (HPOZ).

Proposed changes to land use designations, zoning, height district, "Qs" and "Ds" in the Residential, Commercial, Industrial, Public Facilities, and Open Space categories would implement project objectives. Changes in the Residential, Commercial, and Industrial categories would accomplish the primary objectives and many of the secondary objectives. Changes in the Public Facilities and Open Space would primarily implement the secondary objectives.

Proposed Plan changes to Active Change Areas that could result in foreseeable indirect environmental impacts are further discussed below, including both increased and decreased development potential. The Active Changes are described in the Commercial, Residential, and Industrial land use categories. All of the Change Areas in the Public Facilities and Open Space land use categories are for Administrative Changes and are discussed under the Consistency section.

Commercial. The CPA has seven existing commercial land use designations: Limited Commercial, Neighborhood Office Commercial, Neighborhood Commercial, Highway Oriented Commercial, General Commercial, Community Commercial and Regional Center. These designations vary from the least intense (Limited Commercial) to the most intense (Regional Center Commercial). Under the Proposed Plan, the Neighborhood Office Commercial designation would be consolidated with the Neighborhood Commercial designation, and the Highway Oriented Commercial designation would be updated to Community Commercial or General Commercial designation per the Framework Element. As a result, the CPA would have a total of five commercial land use designations. The proposed commercial Change Areas are distributed primarily in the Regional Center, along transit corridors with Community Commercial and Neighborhood Commercial designations, and a few other Neighborhood Commercial, General Commercial, and Limited Commercial areas to increase residential, commercial, and mixed-use development and/or maintain neighborhood compatibility and scale. In addition, one commercial area in the SNAP is proposed for a height reduction, which requires amendments to the specific plan.

Residential development is permitted in commercial land use designations and zones. New residential units as part of mixed-use developments are encouraged and anticipated to be built in the Active Change Areas.

Regional Center. A majority of the Regional Center subareas already have a Regional Center land use designation. Under the City's Framework Element, a Regional Center is a focal point of regional commerce, identity and activity. A Regional Center contains diverse uses such as corporate and professional offices, multi-family residential uses, retail commercial malls, restaurants, mixed-use buildings, government buildings, major health facilities, major entertainment and cultural facilities and supporting services. Generally, Regional Centers are characterized by buildings six to 20 stories or higher and are usually major transportation hubs. The proposed change is to allow for an increase in allowable FAR mostly through zone changes. The increase in allowable FAR would be attained if certain development conditions are met, such as building mixed-use projects or development incorporating a minimum or maximum amount of residential use or commercial use. Properties subject to historic review would continue to be subject to discretionary approval from the Office of Historic Resources when seeking an increase in allowable FAR.

Most of the increases in allowable FAR would occur through zone changes but a few subareas would also include land use designation changes. Several opportunity areas have been identified along major commercial corridors near transportation infrastructure. Changes to these subareas would extend the Regional Center land use designation east along Hollywood Boulevard and Sunset Boulevard from Gower Avenue to US-101. The extended Regional Center area has underutilized parcels that include surface parking lots. This area has seen considerable development activity in recent years indicating that it is a prime candidate for accommodating regulatory changes. In addition, an area located generally south of Selma Avenue and north of Sunset Boulevard, between Argyle Avenue and El Centro Avenue, has a Commercial Manufacturing land use designation but is surrounded by Regional Center parcels and located near the Hollywood/Vine Metro station. This underutilized area also includes surface parking. The Proposed Plan would also change the land use designation of this area to Regional Center.

Under existing regulations, Regional Center-designated parcels can apply for additional FAR, up to 6:1 FAR, with discretionary review. It is intended that the proposed Regional Center subareas would retain the ability to apply for 6:1 FAR with discretionary review.

Community Commercial, General Commercial and Neighborhood Commercial. Proposed changes to the Community Commercial, General Commercial, and Neighborhood Commercial subareas are primarily zone changes that would permit an increase in allowable FAR. The Proposed Plan proposes FAR increases generally through replacement of "D" Limitations and restoring Citywide FAR standards along commercial corridors or for implementing certain development conditions along commercial corridors served by transit. Previous FAR restrictions have limited development along commercial corridors to 0.5:1 FAR or 1:1 FAR. The restoration of the Citywide FAR standard would result in 1.5:1 FAR. Building mixed-use projects with pedestrian-friendly design along identified commercial corridors with transit would yield additional allowable FAR of 2.5:1 or 3:1. The Community Commercial changes in the SNAP is to reflect existing development regulations, except that a proposed change near Barnsdall Art Park would reduce the existing maximum height limit to 45 feet. Neighborhood Commercial uses are envisioned to be less intense than General Commercial uses and additional regulations are proposed, including height limits and prohibition of certain automotive commercial uses, such as auto repair. A few subareas can seek an increase in allowable FAR subject to additional discretionary review and are located near the western edge of the Regional Center primarily along La Brea Avenue.

Limited Commercial. Proposed changes to the Limited Commercial subareas would remove "D" Limitations to restore 1.5:1 FAR but set a height limit of 30 feet. In addition, certain automotive commercial uses would be prohibited in identified subareas located in the eastern edge of the Project Area.

See **Table 3-6** for a general summary of proposed commercial changes. See the Matrix/Map and subarea locations in Appendix D for detailed changes. Within the commercial subareas, various land use changes are proposed that would affect any one or a combination of the following: land use designation, zoning, and height district. Depending on the subarea, some of these changes would result in an increase in allowable FAR, new or reduced height limits, and pedestrian-friendly design regulations. Where increased FAR is proposed, additional development conditions are usually proposed.

TABLE 3-6: SUMMARY OF PROPOSED COMMERCIAL CHANGES

Proposed Land Use Designation	General Location	Summary of Proposed Changes
Regional Center	Subareas comprise approximately 139 acres distributed between Highland Ave. on the west, the US-101 to the east, Franklin Avenue to the north and Fountain Ave. to the south. These subareas are near the Metro Hollywood/Highland and Hollywood/Vine Red Line stations.	Generally, 3:1 FAR or 4.5:1 FAR; mixed-use development may be required for FAR increase to promote jobs and housing near transit. Other changes, as applicable by subarea: additional historic preservation review, height limits include 36 feet, 60 feet, 75 feet, and 150 feet for scale compatibility, no 100% residential development, and pedestrian-oriented design.
Community Commercial	Subareas comprise approximately 190 acres; approximately 117 acres are located in the SNAP boundary. The non-SNAP subareas are located on portions of the following major streets: La Brea Ave., Santa Monica Blvd., and Vine St. The SNAP subareas are located on portions of the following major streets: Hollywood Blvd., Sunset Blvd., Santa Monica Blvd., Vermont Ave., and Virgil Ave.	Generally, 2.5:1 FAR or 3:1 FAR outside of the SNAP. These FARs are generally only allowed for mixed-use development along major commercial corridors to promote jobs and housing near transit. Other changes as applicable by subarea: additional historic preservation review, pedestrian-oriented design, and decreased residential density. The SNAP subareas are generally located in Subarea B or Subarea C of SNAP and must follow existing SNAP regulations for FAR and height. A proposed height limit of 45 feet is proposed for a few parcels near Barnsdall Art Park for scale compatibility with an existing historical resource nearby.
General Commercial	Subareas comprise approximately 23 acres. The subareas are located on portions of the following major streets: Highland Ave., Gower St., Melrose Ave., Sunset Blvd., and Myra Ave.	Generally, 1.5:1 FAR or maintaining the existing FAR allowed. The 1.5:1 FAR change is to restore citywide FAR standards for commercial corridors and to spur economic development.
Neighborhood Commercial	Subareas comprise approximately 142 acres; approximately 27 acres are located in the SNAP boundary. The non-SNAP subareas are located on portions of the following major streets: La Cienega Blvd., La Brea Ave., Sunset Blvd., Fairfax Ave., Western Ave., Santa Monica Blvd., Melrose Ave., Hillhurst Ave., Virgil Ave., Hyperion Ave., and Rowena Ave. The SNAP subareas are located on portions of the following major streets: Vermont Ave., Hillhurst Ave., Fountain Ave., Western Ave., and Melrose Ave.	Mostly, 1.5:1 FAR, but 2.5:1 FAR or 3:1 FAR may be allowed. The higher FARs are generally only allowed for mixed-use development to promote housing and jobs on selected corridors near transit. Other changes, as applicable by subarea: height limits between 30 feet and 50 feet and transitional height for scale compatibility with the neighborhood, pedestrian-oriented design, and automotive use restrictions. The SNAP subareas are primarily located in Subarea B of SNAP and must follow existing SNAP regulations for FAR and height.
Limited Commercial	Subareas comprise approximately 16 acres; approximately four acres are located in the SNAP boundary. The non-SNAP subareas are located along the west side of Hyperion Ave. in the eastern edge of the Project Area, and on Melrose Ave. The SNAP subarea is located on Virgil Ave.	Generally, 1.5:1 FAR for economic growth and 30-foot height limit for neighborhood compatibility. Other changes, as applicable by subarea: pedestrian-oriented design and automotive use restrictions. There is one SNAP consistency subarea on Virgil Ave., which permits up to 2:1 FAR and 50 feet height.

Note: Numbers are rounded to the nearest whole number.
SOURCE: City of Los Angeles, 2018.

The following examples illustrate the types of proposed commercial changes:

- *Regional Center Example*: Subarea 4:1B would add development potential but would also add new restrictions to maintain compatibility with nearby historical resources. Subarea 4:1B is located near the Metro Hollywood/Highland and Hollywood/Vine stations. Currently, this subarea has Regional Center land use designation and C4-2D zoning with 2:1 FAR and no height restriction. The proposed zoning to C4-2D-CPIO would allow 3:1 FAR and restrict height to 75 feet. Properties subject to historic review will need discretionary approval from the Office of Historic Resources to exceed the existing 2:1 FAR. To exceed the 3:1 FAR and 75-foot height limit, additional discretionary review would be required. This subarea is located in the CPIO and new development would be subject to standards in the CPIO.
- *Commercial Corridor Examples*: The change to Subarea 19, located along portions of Santa Monica Boulevard and Vine Street, would increase the allowable FAR for mixed-use development and hotels and add pedestrian-oriented design regulations. Currently, the subarea has Highway Oriented Commercial land use designation and C2-1D zoning with 0.5:1 FAR and no height restriction. The land use change would update the nomenclature of the designation to Community Commercial and the proposed [Q]C2-2D zoning would allow 3:1 FAR for mixed-use projects with housing, and/or hotels. This is an example of a mixed-use incentive change along corridors served by transit. For future development, residential or commercial only, the FAR would remain at 0.5:1.

  Subarea 42:2, located along both sides of Western Avenue from south of Santa Monica Boulevard to Melrose Avenue, is another commercial corridor change. In this subarea, the allowable FAR for mixed-use development would increase but the residential density allowed would decrease. Pedestrian-oriented design regulations and transitional height would be required. Currently, the subarea has Neighborhood Office Commercial land use with C4-1D zoning and 1:1 FAR. The Proposed Plan would update the nomenclature of the land use designation to Neighborhood Commercial and the proposed [Q]C4-2D zoning would allow 2.5:1 FAR for mixed-use projects with housing, and/or hotels. The non-residential portion of a mixed-use project or hotel would be limited to 1.5:1 FAR. If a development project were commercial or residential only (excluding hotels), the FAR would be limited to 1.5:1. A new maximum height of 50 feet is proposed. Properties subject to historic review would need approval from the Office of Historic Resources to exceed the existing 1:1 FAR. The residential density proposed for this subarea would be reduced to 1 dwelling unit per 800 square feet of lot area.
- *Limited Commercial Example*: The change to subarea 13:1B, located in the eastern boundary of the Project Area, would be able to facilitate economic growth and promote compatibility with the neighborhood. The subarea would allow 1.5:1 FAR but set a new maximum height limit of 30 feet, and certain uses, such as auto repair and recycling uses, would be prohibited.

Residential. The Project Area has nine residential land use designations: Minimum Residential, Very Low II Residential, Low I Residential, Low II Residential, Low Medium I Residential, Low Medium II Residential, Medium Residential, High Medium Residential, and High Residential. The land use designations cover a range of housing densities, from single-family homes on large lots to multi-family high rises. The Active Change residential subareas are distributed in the Low Medium I Residential, Low Medium II Residential, Medium Residential, High Medium Residential, and High Residential land use designations. There are limited changes to the single-family land use designations. Subareas in the Low Medium I Residential, Low Medium II Residential, Medium Residential, and High Residential land use designations generally have changes that would reduce the allowable height permitted to better ensure compatibility of scale with the adjacent neighborhoods. Some High Medium Residential subareas north of the Regional Center would also generally maintain the existing scale and density but would have new design standards. Under the Proposed Plan, housing development potential would be expected to increase in some High Medium Residential subareas through an increase in allowable density from either one dwelling unit per 800 square feet of lot area or one dwelling unit per 600 square feet of lot area to one dwelling unit per 400 square feet of lot area. The land use designation of one multi-family residential area is changing to

allow for High Medium density because it is near employers, transit, and can help improve the jobs-housing balance in the area.

Table 3-7 provides a general summary of proposed residential changes. See the Matrix/Map and subarea locations in Appendix D for detailed changes. Within the residential subareas, various land use changes are proposed that would affect any one or a combination of the following: land use designation, zoning, and height district. Depending on the subarea, some of these changes would result in additional density or new height restrictions. An increase in allowable density may be accompanied by height limits, site plan design, and historic preservation review.

The following examples illustrate the types of proposed residential changes:

- *High Medium Residential Examples*: The proposed zone change for Subarea 22 would allow additional housing units than current zoning. It is located south of the Regional Center and near two studio campuses. Currently, the subarea has a High Medium Residential land use designation and the designation will not change. The existing zoning, [Q]R4-2, has a "Q" Condition that limits the residential density to 1 dwelling unit per 600 square feet of lot area. The height limit is currently 45 feet and it will not change. The proposed change is to allow 1 unit per 400 square feet of lot area, which is the density allowed in the R4 Zone. New projects on parcels in this subarea with historical resources would require discretionary approval from the Office of Historic Resources to exceed the existing density.

  Subarea 3:1A is an example of a High Medium Residential area where the existing density and height are not proposed for change. New design standards for driveways and parking are proposed.

- *High Residential Example*: Subarea 3:3 proposes a maximum height limit of 60 feet to maintain compatibility with the existing scale of the neighborhood and nearby historical resources. This subarea has an existing High Residential land use designation and [Q]R5-2 zoning but does not have a height restriction. The proposed zone changes to [Q]R5-2D would set the height limit to 60 feet. The existing "Q" Conditions, including limiting uses and density to R4 residential, would be retained.

Industrial. The Project Area has two industrial land use designations: Commercial Manufacturing and Limited Manufacturing. Under the Proposed Plan, there will be three industrial land use designations. Commercial Manufacturing will be maintained. The Limited Manufacturing designation would have a nomenclature change to Limited Industrial. The new designation would be Hybrid Industrial. Most of the subareas were identified for the purpose of preserving light industrial uses in order to maintain and promote jobs associated with the entertainment industry. Such uses include studios and media production, as well as entertainment support uses such as storage. A zone change from MR1 to M1 is proposed for selected Limited Industrial parcels south of Santa Monica Boulevard, which would allow more flexibility for additional employment generating uses. A "Q" (Qualified Condition) is being added to emphasize that residential development is still prohibited except for caretaker or watchman accessory dwelling units. A few of the industrial subareas, however, would allow more FAR than what is currently permitted. These incentive areas would allow additional FAR if targeted media-related industrial uses are incorporated on the site.

Table 3-8 provides a general summary of the proposed changes to the industrial land use designations. See the Matrix/Map and subarea locations for detailed changes. Within the industrial subareas, various land use changes are proposed that would affect any one or a combination of the following: land use designation, zoning, and height district. Depending on the subarea, some of these changes would result in additional uses allowed, increased FAR or new height restrictions. Certain development conditions, however, will need to be met in order to utilize the increased FAR, such as incorporating a certain amount of media-related industrial uses on the project site.

TABLE 3-7: SUMMARY OF PROPOSED RESIDENTIAL CHANGES

Proposed Land Use Designation	General Location	Summary of Proposed Changes
High Residential	Subareas comprise approximately 11 acres along Yucca St. and Fernwood Ave.	New height limit of 60 feet for parcels along Yucca St. to promote scale compatibility with area uses. The other change is to clarify the R4 zoning for parcels on Fernwood Ave. to make the zone consistent with the land use designation.
High Medium Residential	Subareas comprise approximately 125 acres; approximately six acres are located in the SNAP boundary. The non-SNAP subareas are located on portions of the following streets: Franklin Ave., Yucca St., Wilcox Ave., Leland Way, De Longpre Ave., El Centro Ave., Carlton Way, Gordon St., Bronson Ave., an area generally east of Vine Street/south of Santa Monica Blvd./west of Gower Ave./and north of Melrose Ave., Tamarind Ave. and Serrano Ave. The subarea in the SNAP is located on portions of the following streets: Serrano Ave., Carlton Way, and Harold Way.	Density varies, but primarily R4 density (1 dwelling unit per 400 square feet of lot area or maintaining an existing density of 1 dwelling unit per 600 square feet of lot area). Height limit generally between 30 feet and 75 feet for neighborhood compatibility; most subareas have a maximum height limit of 45 feet, but some parcels have no height restrictions. Other changes, as applicable by subarea: additional historic preservation approval for projects exceeding 1 dwelling unit per 600 square feet of lot area density. The subject SNAP subarea is located in SNAP Subareas A and C and must follow existing SNAP regulations for FAR and height.
Medium Residential	Subareas comprise approximately 12 acres. They are located along portions of the following streets: Willoughby Ave., Edinburgh Ave., Hayworth Ave., Waring Ave., Laurel Canyon Blvd./Hollywood Blvd., Yucca St. and Los Feliz Blvd.	Generally, R3 density (1 dwelling unit per 800 square feet of lot area). Height is limited to 45 feet or 30 feet depending on the subarea. Other changes, as applicable by subarea: site plan design, including height stepbacks, and massing.
Low Medium II Residential	Subareas comprise approximately 24 acres; approximately five acres are located in the SNAP boundary. The non-SNAP subareas are located along portions of the following streets: Waverly Dr., Cahuenga Blvd., Gower St., Beachwood Dr., Lexington Ave., Fountain Ave., La Mirada Ave., Serrano Ave., Lexington Ave., Virginia Ave., Selma Ave., Harold Way, and Labaig Ave. The SNAP subareas are located on portions of the following streets: Edgemont St. and Serrano Ave.	Density is either RD1.5 or RD2 (1 dwelling unit per 1,500 square feet of lot area or 1 dwelling unit per 2,000 square feet of lot area) depending on the parcel. Height is limited to 30 feet. The SNAP subareas are located in Subareas A and C of SNAP. A height limit of 45 feet is proposed for the one in SNAP Subarea C for scale compatibility. The one in SNAP Subarea A must follow existing SNAP regulations.
Low Medium I Residential	A subarea comprising approximately two acres on Formosa Ave.	The proposed change will make the land use designation consistent with the proposed R2 zoning and 30-foot height limit. R2 zoning allows two dwelling units on one lot.

Note: Numbers are rounded to the nearest whole number.
SOURCE: City of Los Angeles, 2018.

TABLE 3-8: SUMMARY OF PROPOSED INDUSTRIAL CHANGES		
Proposed Land Use Designation	**General Location**	**Summary of Proposed Changes**
Commercial Manufacturing	Subareas comprising approximately 20 acres located along portions of Seward Street, Santa Monica Blvd., Highland Ave., Mansfield Avenue, Waring Ave., Cahuenga Blvd., Cole Ave., and Riverside Dr.	Generally, maintains 1.5:1 FAR with 45 feet height limit for most subareas. The [Q] emphasizes that residential development is prohibited except for on-site caretaker or watchman accessory units.
Hybrid Industrial	One subarea comprising approximately 7 acres located along portions of Las Palmas Ave., Lexington Ave., Santa Monica Blvd., and Seward St.	3:1 FAR and residential use permitted if development projects incorporate at least 0.7:1 FAR of targeted media-related industrial uses to promote and expand media-related industrial jobs.
Limited Industrial	Subareas comprising approximately 153 acres located along portions of La Brea Ave., Formosa Ave., Santa Monica Blvd., Romaine St., Willoughby Ave., Sycamore Ave., Orange Drive, Mansfield Ave., Citrus Ave., Highland Ave., Willoughby Ave., Cole Ave., Cahuenga Blvd., Lillian Way, Hudson Ave., Wilcox Ave., Seward St, Las Palmas Ave., Citrus Ave., Waring Ave., Vine St., Gower St., Melrose Ave., and Van Ness Ave.	Generally, maintains 1.5 FAR for job preservation. A zone change to M1 is proposed for some subareas to allow a broader mix of employment-generating uses but retail and restaurants would be restricted to the ground floor and these individual premises would be limited to a maximum of 20,000 square feet. The [Q] emphasizes that residential development is prohibited except for on-site caretaker or watchman accessory units. There are two incentive subareas west of La Brea Ave. that would allow 3:1 FAR if development projects incorporate at least 0.7:1 FAR of targeted media-related industrial uses to promote and expand media-related industrial jobs.
Note: Numbers are rounded to the nearest whole number. **SOURCE**: City of Los Angeles, 2018.		

The following example illustrates the type of proposed industrial change:

- *Hybrid Industrial Example*: Subarea 17:3 is the Hybrid Industrial land use change that would preserve industrial media-related jobs yet provide opportunity for additional development, including housing. Currently, this subarea has a Limited Industrial land use designation and [Q]M1-1VL-SN zoning with an existing FAR of 1.5:1 and a height limit of 45 feet. The existing "Q" Condition limits commercial uses to uses allowed in the C4 zone. The Proposed Plan would change the land use designation and zoning to Hybrid Industrial and [Q]CM-2D-SN, respectively, which would allow 3:1 FAR with at least 0.7:1 FAR of targeted media-related uses incorporated into the development. Such uses include media production, studio equipment manufacturing, rental and storage, sound recording, and broadcast studios. The proposed "Q" Condition would prohibit 100 percent residential development projects. If a development project does not include at least 0.7 FAR of targeted media-related uses, the maximum FAR will continue to be 1.5:1. CM zoning allows residential density of 1 dwelling unit per 800 square feet of lot area.

Administrative Changes. The Proposed Plan includes some land use designation and zone changes that do not directly result in physical changes with impacts to the environment. These changes involve 1) correcting land use designation and/or zoning to reflect existing use or correcting land use and zoning mismatches, which are referred to as Consistency Changes, and 2) administrative naming updates to land use designations, which are referred to as Nomenclature Changes.

Consistency Changes. The land use designation and zoning must be consistent for each parcel. Each land use designation has a specific range of corresponding zones and, if the zoning of a parcel is not allowed by the land use designation, the land use designation and zoning for a parcel is considered inconsistent. If the zoning for a parcel is more restrictive than the corresponding zones associated with a land use designation, the issue of consistency has been satisfied. For example, a parcel that is zoned R1 (single family) and has a Medium Residential land use designation is not considered to be inconsistent.

Consistency changes are administrative and seek to correct land use designation and/or zoning to reflect existing use or correct land use and zoning mismatches. These changes are primarily corrections to existing public facilities or open space, as well as selected parcels requiring corrections based on existing development, including ones affected by AB 283. Thus, the development potential for the parcels with consistency changes is not expected to increase with the Proposed Plan because the parcels are either developed according to the land use designation and zone or are undeveloped open space. For example, Helen Bernstein High School is a public facility that opened in 2008. However, it still has industrial and residential land use designations and zoning, and the proposed consistency changes will correct the land use designation to Public Facility and the zoning to PF-1.

Consistency subareas account for approximately 20 percent of the proposed Change Area acreage, or 1 percent of the total project area acreage. **Table 3-9** summarizes the types of consistency changes that are proposed.

Open Space. The open space consistency changes are corrections to reflect the existing use and/or for consistency between the land use designation and zoning. The Project Area has two types of open space land use designations that primarily cover parks. Open Space is the main land use designation but there are a few parcels that have the Public/Quasi-Public Open Space land use designation.

Subarea 1:5 is a consistency change to reflect the existing open space use. The subarea is part of Griffith Park but has a Minimum Residential land use designation and RE40-1-H zoning. The consistency change is to Open Space land use designation and OS-1XL zoning.

TABLE 3-9: SUMMARY OF PROPOSED CONSISTENCY CHANGES		
Consistency Change Type	**General Summary**	**Summary of Proposed Changes**
AB 283 Consistency	Subareas comprising approximately 6 acres, primarily residential parcels.	AB 283 requires the City's zoning to be consistent with its general plan land use designations. These changes would make consistent existing inconsistencies that were missed or where mistakes were made in the City's AB 283 program. A less intense zone is proposed for consistency with the existing land use designation.
Open Space, Public Facilities	Subareas comprising approximately 198 acres, primarily portions of Griffith Park, other existing parks and community gardens, and schools/other public facilities.	Changes would reflect existing uses, such as parks and schools.
Other Consistency	Subareas comprising approximately 10 acres, primarily residential parcels.	Change would reflect existing uses and consistency between land use designation and zone.
Note: Numbers are rounded to the nearest whole number. **SOURCE**: City of Los Angeles, 2018.		

Subarea 70 is a change for consistency between land use designation and zoning. The subarea is also part of Griffith Park but has a Low I Residential land use designation. The change in land use designation is to Open Space. The existing OS-1XL zoning, which is consistent with the Open Space land use designation, will remain as is.

Public Facilities. The public facilities consistency changes are corrections to reflect the existing use and/or for consistency between the land use designation and zoning. The Project Area has two public facilities land use designations: Public Facilities and Public Facilities – Freeways. The Public Facilities land use designation is the main land use designation and covers institutional uses, including schools, libraries, fire stations and other government buildings. The Public Facilities – Freeways land use designation is for freeway use.

Subarea 22:1 is a consistency change to reflect the existing public facility use. The existing use in this subarea is Helen Bernstein High School. Currently, the subarea has a Limited Industrial land use designation with a [Q]CM-1 zone, and a Medium Residential land use designation with a R3-1 zone. The consistency change is to make the land use designation of the subarea Public Facilities.

Subarea 1:4 is a change to reflect existing use and consistency between land use designation and zoning. Currently, the subarea has both Public Facilities and Limited Commercial land use designations but should only have the Public Facilities land use designation since the existing use is a City-owned vehicle maintenance yard. Portions of the subarea are already zoned PF-1XL and the portions that are not would be corrected to PF-1XL zoning so that the entire subarea has a Public Facilities land use designation and PF-1XL zoning.

Nomenclature Changes. The Proposed Plan includes administrative naming updates to land use designations. Nomenclature changes would not result in a change in development potential and are not represented by subareas. Three nomenclature changes are proposed for the Project Area: 1) Neighborhood Office Commercial would be updated to Neighborhood Commercial, 2) Highway Oriented Commercial would be updated to Community Commercial or General Commercial, and 3) Limited Manufacturing would be updated to Limited Industrial.

SUMMARY OF NET CHANGE IN LAND USE

The net change in land use acreages as a result of the Proposed Plan is shown in **Table 3-10**. The proposed changes would primarily increase commercial and residential development potential in and near the Regional Center and along selected corridors near transit in the Project Area. The proposed decreases in development potential would be primarily focused on a few low to medium scale multi-family residential neighborhoods, and/or corridors abutting those neighborhoods to maintain the existing density and intensity of those neighborhoods.

TABLE 3-10: SUMMARY OF NET CHANGE IN LAND USE IN PROJECT AREA /a/

Land Use Designation & Subcategory	Existing Plan (Acres) /a/	Proposed Plan (Acres) /a/	Net Change (Acres) /a,b/
Residential	**6,904**	**6,717**	**-187**
Single-Family	4,702	4,528	-174/c/
Minimum	901	770	-131
Very Low II	1,463	1,463	0
Low I	389	353	-36
Low II	1,949	1,942	-7
Multi-Family	2,202	2,189	-13
Low Medium I	364	367	3
Low Medium II	788	801	13
Medium	837	784	-53
High Medium	97	158	61
High	116	79	-37
Commercial	**849**	**852**	**3**
Limited Commercial	48	44	-4
Highway Oriented/General	250	59	-191
Neighborhood	244	234	-10
Community	63	251	188
Regional Center	244	264	20
Industrial	**277**	**269**	**-8**
Commercial Manufacturing	37	38	1
Hybrid Industrial	0	7	7
Limited Industrial	240	224	-16
Public Facilities	**677**	**700**	**23**
Public Facilities	466	489	23
Public Facilities – Freeway	211	211	0
Open Space	**5,256**	**5,424**	**168**
Open Space	5,255	5,423	168
Public/Quasi Public	1	1	0
TOTAL	**13,962**	**13,962**	**0**

/a/ Total acreage for each land use designation reflects rounding to the nearest whole number, which results in a slight difference from 13,962 acres.
/b/ Acreage change between Existing Plan and Proposed Plan includes strategic subarea changes to land use designations, for consistency between land use designation and zoning, and to reflect existing uses.
/c/ The adjustments in the Single-Family residential land use category are to primarily revise the land use designation from Minimum Residential and Low I Residential to Open Space. These changes are located on parcels within Griffith Park, and the change will reflect existing use and consistency of land use designation and zoning.
/d/ The acreage change in the Community Commercial and General Commercial land use categories is to update the land use designation nomenclature from Highway Oriented Commercial to Community Commercial based on Framework land uses.
SOURCE: City of Los Angeles Department of City Planning, 2018.

EIR ANALYSIS OF CHANGE AREAS, ACTIVE CHANGE AREAS, AND NON-CHANGE AREAS

The EIR analyzes reasonably foreseeable impacts from the Proposed Plan as required by CEQA. As discussed previously, impacts from reasonably expected development are analyzed, including Change Areas and Non-Change Areas. As a general matter, impact analysis often does not distinguish between impacts related to Change Areas, Active Change Areas and Non-Change Areas. For example, an analysis as to whether the Proposed Plan could conflict with the South Coast Air Quality Management District's Air Quality Plan related to regional air quality requires analysis of all vehicle emissions from all growth throughout the Project Area (i.e., both in the Change Areas and Non-Change areas).

On the other hand, there are situations where the EIR may discuss and analyze impacts that are more likely in Active Change Areas, than Non-Change Areas or Administrative Change Areas, such as impacts that could occur as a result of increased heights, FARs and more intensive uses allowed in the Active Change Areas. That is, some impacts could occur as a result of the greater intensity of development or type of development that could occur in these particular areas of the Project Area (for example, increased development activity in one area might be more likely to result in impacts to construction noise, a localized impact).

PROPOSED PLAN MOBILITY NETWORK

The Proposed Plan encompasses the vision set forth in the City's Mobility Plan (MP) 2035. MP 2035 provides the framework for future community plan updates, to take a closer look at the transportation system in specific areas of the City and recommend more detailed implementation strategies to realize the MP 2035. The MP 2035 reflects policies and programs that lay the foundation for safe, accessible, and enjoyable streets for pedestrians, bicyclists, transit users, and vehicles throughout the City of Los Angeles, including the Proposed Plan. MP 2035 was adopted by the City in August 2015 and is compliant with the 2008 Complete Streets Act (AB 1358), which mandates that the circulation element of a city's General Plan be modified to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan.

The MP 2035 contains a variety of enhanced network goals within the Project Area, which includes the following networks:

- Bicycle Enhanced Network (BEN)
- Transit Enhanced Network (TEN)
- Neighborhood Enhanced Network (NEN)
- Vehicle Enhanced Network (VEN)

The enhanced network goals were reviewed in the context of the Proposed Plan, the street designation, and the roadway characteristics, such as available right-of-way and adjacent land uses. The following refinements to MP 2035 are reflected in the Proposed Plan:

- Melrose Avenue between Vermont Avenue and Hoover Street was converted from a BEN to a NEN due to the roadway width and available right-of-way along this portion of the corridor. West of Vermont Avenue, Melrose Avenue would remain as part of the BEN.
- Vermont Avenue between Los Feliz Boulevard and Hollywood Boulevard was re-categorized from a Comprehensive TEN to a Moderate TEN due to the character of the roadway along this portion of the corridor. The Moderate TEN treatment would provide mixed-flow bus and vehicular lanes instead of a bus only lane to preserve on-street parking for the adjacent commercial uses. South of Hollywood Boulevard, Vermont Avenue would remain as part of the Comprehensive TEN.

The Proposed Plan mobility network is illustrated in **Figure 3-7**. Since MP 2035 does not prescribe how the enhanced network treatments are implemented within each community plan, two treatment options for the enhanced networks are analyzed in this EIR. Treatment Option 1 generally prioritizes vehicle and transit capacity while Option 2 generally prioritizes the preservation of on-street parking. **Table 3-11** summarizes the two implementation scenarios that are analyzed in this EIR.

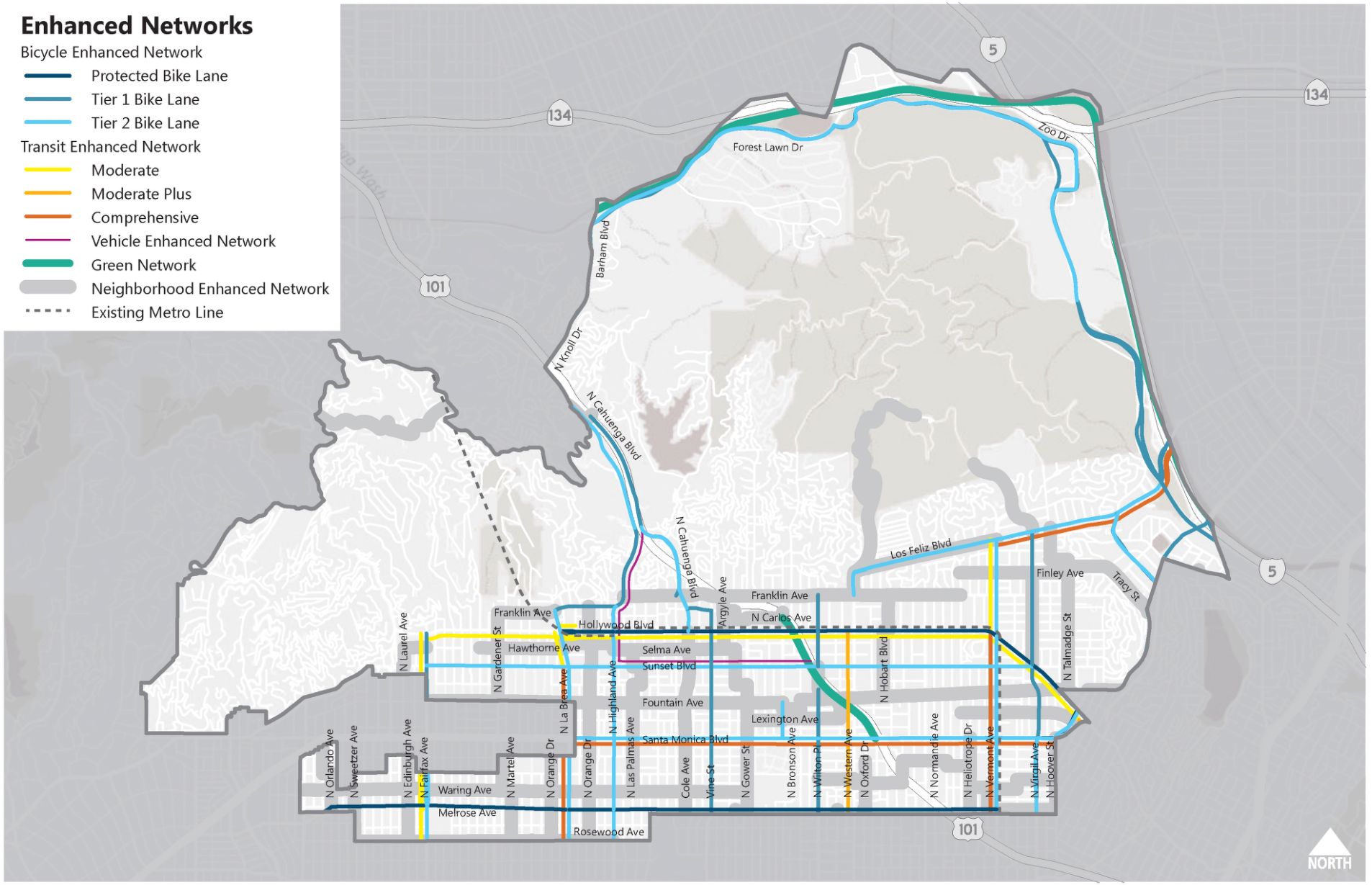
3.9 CONSTRUCTION SCHEDULE AND PHASING

The Proposed Plan is an update to an existing Community Plan that would guide development in the Project Area through 2040. No specifically planned development is proposed as part of the Proposed Plan. Therefore, the Proposed Plan has no construction schedule or phasing. The proposed Hollywood Community Plan Update is anticipated to be adopted in 2019 with implementation starting after adoption and continuing through 2040.

3.10 DISCRETIONARY ACTIONS AND APPROVALS

The following actions will be required in order to implement the Proposed Plan:

- Certification of the proposed Hollywood Community Plan Update EIR; and
- Adoption of the proposed Hollywood Community Plan Update and all related documents including:
  - Amendments to the General Plan, consisting of the Hollywood Community Plan text and land use map (including changes to the footnotes and map symbols);
  - Zone changes and height district changes;
  - Amendment to the Vermont/Western Transit Oriented District Specific Plan (SNAP);
  - Adoption of a Hollywood Community Plan Implementation Overlay (CPIO) District;
  - Amendments to the enhanced networks maps in the Mobility Plan 2035;
  - Amendments to the General Plan Framework Element and other Citywide Elements of the General Plan, as necessary; and
  - Amendments to all other relevant ordinances and actions as necessary to ensure consistency of regulations and implementation of the Community Plan amendments.



SOURCE: Mobility Plan 2035, 2016; Fehr & Peers, 2016.

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taha 2010-073

Hollywood Community Plan Update
Draft Environmental Impact Report
CITY OF LOS ANGELES

FIGURE 3-7

MOBILITY PLAN HOLLYWOOD

TABLE 3-11: HOLLYWOOD COMMUNITY PLAN MOBILITY TREATMENT OPTIONS

Roadway Segment	Enhanced Network Designation	Current Cross-Section	Proposed Plan	
			Treatment Option 1 ***Prioritize Vehicle/ Transit Capacity***	**Treatment Option 2** ***Prioritize On-Street Parking***
Los Feliz Blvd.: Vermont Ave. to Riverside Dr.	TEN: Comprehensive Treatments with Dedicated Bus Lane	Three vehicle lanes in each direction with peak period on-street parking restrictions (on-street parking and two vehicle lanes per direction in off-peak travel periods)	All-Day Bus Only Lanes; Two vehicle lanes in each direction	Peak Period Bus Only Lanes; On-Street Parking during off-peak travel periods; Two vehicle lanes in each direction
Hollywood Blvd.: Virgil Ave. to La Brea Ave.	BEN: Protected Bike Lanes TEN: Moderate Treatments with Shared Vehicle/Bus Lane	Two vehicle lanes in each direction with on-street parking	Protected Bike Lanes; Moderate TEN Treatments; Peak period parking restrictions with two vehicle lanes in each direction (on-street parking and one vehicle lane per direction in off-peak travel periods)	Protected Bike Lanes; Moderate TEN Treatments; All-day parking with one vehicle lane in each direction
Highland Ave. & Sunset Blvd.: Between US-101 Interchanges	VEN	Three vehicle lanes in each direction with peak period on-street parking restrictions (on-street parking and two vehicle lanes per direction in off-peak travel periods)	Three vehicle lanes in each direction with parking removal	Three vehicle lanes in each direction with peak period on-street parking restrictions (on-street parking and two vehicle lanes per direction in off-peak travel periods)
Santa Monica Blvd.: Madison Ave. to La Brea Ave.	TEN: Comprehensive Treatments with Dedicated Bus Lane (assumes roadway is widened to Modified Avenue I)	Two vehicle lanes in each direction with on-street parking	All-Day Bus Only Lanes; Two vehicle lanes in each direction	Peak Period Bus Only Lanes; On-Street Parking during off-peak travel periods; Two vehicle lanes in each direction
Melrose Ave.: La Cienega Blvd. to Highland Ave.	BEN: Protected Bike Lanes	Two vehicle lanes in each direction with on-street parking	Protected Bike Lanes; Peak period parking restrictions with two vehicle lanes in each direction (on-street parking and one vehicle lane per direction in off-peak travel periods)	Protected Bike Lanes; All-day parking with one vehicle lane in each direction
Fairfax Ave.: Rosewood Ave. to Hollywood Blvd.	TEN: Moderate Treatments with Shared Vehicle/Bus Lane	Two vehicle lanes in each direction with on-street parking	Moderate TEN Treatments; Two vehicle lanes in each direction with on-street parking	*Same as Scenario 1*
La Brea Ave.: Rosewood Ave. to Sunset Blvd.	TEN: Comprehensive Treatments with Dedicated Bus Lane	Three vehicle lanes in each direction with peak period on-street parking restrictions (on-street parking and two vehicle lanes per direction in off-peak travel periods)	All-Day Bus Only Lanes; Two vehicle lanes in each direction	Peak Period Bus Only Lanes; On-Street Parking during off-peak travel periods; Two vehicle lanes in each direction
La Brea Ave.: Sunset Blvd. to Hollywood Blvd.	TEN: Comprehensive Treatments with Dedicated Bus Lane (assumes roadway is widened to Modified Avenue I)	Two vehicle lanes in each direction (limited on-street parking on west side)	All-Day Bus Only Lanes; Two vehicle lanes in each direction	Peak Period Bus Only Lanes; On-Street Parking during off-peak travel periods; Two vehicle lanes in each direction

TABLE 3-11: HOLLYWOOD COMMUNITY PLAN MOBILITY TREATMENT OPTIONS

Roadway Segment	Enhanced Network Designation	Current Cross-Section	Proposed Plan	
			Treatment Option 1 ***Prioritize Vehicle/ Transit Capacity***	**Treatment Option 2** ***Prioritize On-Street Parking***
Vine St.: Franklin Ave. to Melrose Ave.	Tier 1 Bike Lanes	Two vehicle lanes in each direction with on-street parking	On-Street Bike Lanes; One vehicle lane in each direction with on-street parking	*Same as Scenario 1*
Wilton Pl.: Franklin Ave. to Melrose Ave.	Tier 1 Bike Lanes	Two vehicle lanes in each direction with peak period on-street parking restrictions (on-street parking and one vehicle lane per direction in off-peak travel periods)	Shared Vehicle/Bike Lane in each direction; All-Day on-street parking	*Same as Scenario 1*
Western Ave.: Melrose Ave. to Hollywood Blvd.	TEN: Moderate Plus with Dedicated Bus Lane	Two vehicle lanes in each direction with limited on-street parking	Peak Hour Bus Only Lanes and One vehicle lane in each direction (Shared vehicle/bus lanes during off-peak travel periods)	Shared vehicle/bus lanes all-day; Maintain existing on-street parking
Vermont Ave.: Melrose Ave. to Hollywood Blvd.	TEN: Comprehensive Treatments with Dedicated Bus Lane	Three vehicle lanes in each direction with peak period on-street parking restrictions (on-street parking and two vehicle lanes per direction in off-peak travel periods)	All-Day Bus Only Lanes; Two vehicle lanes in each direction	Peak Period Bus Only Lanes; On-Street Parking during off-peak travel periods; Two vehicle lanes in each direction
Vermont Ave.: Hollywood Blvd. to Los Feliz Blvd.	TEN: Moderate Treatments with Shared Vehicle/Bus Lane	Two vehicle lanes in each direction with on-street parking	Moderate TEN Treatments; Two vehicle lanes in each direction with on-street parking	*Same as Scenario 1*
Virgil Ave.: Melrose Ave. to Los Feliz Blvd.	Tier 1 Bike Lanes	One northbound lane and two southbound lanes with on-street parking	On-Street Bike Lanes; One vehicle lane in each direction with on-street parking *(This configuration has already been implemented between Melrose Ave. and Santa Monica Blvd.)*	*Same as Scenario 1*

SOURCE: Fehr & Peers, 2018.

4.0 ENVIRONMENTAL ANALYSIS

4.0.1 INTRODUCTION TO THE ANALYSIS

This chapter, Environmental Analysis, is the primary focus of this Draft EIR. The following Sections 4.1 to 4.16 contain discussions of the potential environmental effects of implementation of the Proposed Plan. Each environmental issue is considered in a separate section, which contains a discussion of the environmental settings for the CPA, the regulatory setting, the methodology and the thresholds of significance applicable to the environmental issue being analyzed. Each section also includes the project analyses, mitigation measures, conclusions regarding the level of significance after mitigation, and cumulative impacts for each of the environmental issues.

4.0.2 SCOPE OF IMPACTS

IMPACT ANALYSIS

In the following sections, the analysis considers the indirect impacts from the approval of the Proposed Plan.

- 4.1 Aesthetics
- 4.2 Agriculture and Forestry Resources
- 4.3 Air Quality
- 4.4 Biological Resources
- 4.5 Cultural Resources
- 4.6 Geology and Soils
- 4.7 Greenhouse Gas Emissions
- 4.8 Hazards and Hazardous Materials
- 4.9 Hydrology and Water Quality
- 4.10 Land Use and Planning
- 4.11 Mineral Resources
- 4.12 Noise and Vibration
- 4.13 Population, Housing and Employment
- 4.14 Public Services and Recreation
- 4.15 Transportation and Traffic
- 4.16 Utilities and Service Systems

4.0.3 FORMAT OF SECTIONS

The analysis of each environmental impact category is organized to include the following subsections:

EXISTING SETTING

This subsection includes a description of existing conditions that precede implementation of the Proposed Plan.

REGULATORY FRAMEWORK

This subsection includes an identification of applicable federal, state, and local regulations.

THRESHOLDS OF SIGNIFICANCE

This subsection identifies the criteria by which the components of the Proposed Plan are measured to determine if the Proposed Plan would cause a substantial or potentially substantial adverse change in the existing environmental conditions.

This EIR relies upon CEQA Guidelines Appendix G thresholds as the threshold of significance unless another is specifically identified in the EIR. The City may rely on thresholds of significance adopted by regulatory agencies, such as South Coast Air Quality Management District (SCAQMD), or those in the City's 2006 L.A. CEQA Thresholds Guide (also referred to as the Thresholds Guide), or any others deemed appropriate by the City, which are supported by substantial evidence. CEQA does not require that the City use its own adopted thresholds. Typically, the City's thresholds are more oriented to analyzing the impact of a specific development project and not of a long-range land use plan such as the Proposed Plan.

A recent court case, *California Building Industry Association v. Bay Area Air Quality Management District* (CBIA v. BAAQMD), confirmed the general principle that CEQA only requires that the project's effect on the environment be analyzed and not the reverse (i.e., the impact of existing environmental conditions on the Proposed Plan), except in limited circumstances including instances where the Proposed Plan might worsen or exacerbate existing environmental hazards. To the extent that any thresholds in Appendix G or otherwise call for analyzing impacts from the existing environment to the project, those thresholds will be interpreted to call for analyzing whether the exacerbation of existing conditions will impact the environment, consistent with CBIA v. BAAQMD.

Discussion in both thresholds and methodology subsections found in the sections associated with each individual impact area will provide further explanation of which thresholds are used. As to each environmental topic, the City has selected the thresholds that ensure as comprehensive an analysis of the potential environmental impacts from implementation of the Proposed Plan as possible, given the constraints of attempting to analyze a plan that will be implemented over 20 years or more.

Finally, all impact questions, except as indicated below, are interpreted to take into account the following mandatory findings of significance from CEQA Guidelines Section 15065(a):

> *(1) The project has the potential to substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of an endangered, rare or threatened species; or eliminate important examples of the major periods of California history or prehistory.* [Considered in Section 4.3 Biological Resources.]
>
> *(2) The project has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.* [Considered in impact analysis in Sections 4.1 through 4.16.]
>
> *(3) The project has possible environmental effects that are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.* [Considered in the cumulative analysis in each impact Sections 4.1 through 4.16.]

> *(4) The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly.* [Considered in all impact analysis Sections 4.1 through 4.16.]

METHODOLOGY

This subsection summarizes the methods, procedures and techniques used to estimate the impacts of the Proposed Plan.

As is described in the "Thresholds of Significance" discussion above, the methodology subsection also further clarifies which thresholds—Appendix G or the City Thresholds Guide or others—are used when describing the methods, procedures and techniques used to estimate the Proposed Plan's impacts. Generally, a methodology will discuss whether the environmental impacts being analyzed identify potential impacts that are localized (e.g., population, housing, employment; land use) or would generally affect the entire CPA or region (e.g., air quality or greenhouse gas emissions). Consequently, this subsection when relevant may describe the geographic extent to which the Proposed Project could potentially affect (i.e., impact area) for each environmental topic area. In some instances, like the cumulative analysis discussions, an analysis is prepared for the Project Area versus a broader geographic area beyond the boundaries of the Project Area, in order to assess potential impacts of the Proposed Plan on the identified impact area.

IMPACTS

This subsection includes an analysis of the effects of the Proposed Project against the baseline conditions to determine whether the project will result in significant impacts to the environment. As discussed in prior chapters, the baseline, unless expressly provided otherwise in this EIR, is the existing conditions at the time the NOP was published.

For each significant impact or potentially significant impact identified, this subsection also recommends appropriate and reasonable mitigation measures to avoid or minimize impacts to the extent feasible. In addition, this subsection includes a discussion of whether a significant and unavoidable impact would be reduced to a less-than-significant level after mitigation or would remain significant and unavoidable. Where an impact is initially identified as significant, available potentially feasible mitigation measures that would avoid or reduce the magnitude of the impact are described, along with the significance of the impact after application of those mitigation measures.

The Proposed Plan includes a range for reasonably expected development in the future. The analysis of the Proposed Plan is quantified by using metrics (i.e. housing, population, and employment numbers) for many of the impact areas. As discussed in Appendix B, the EIR identifies and analyzes a range for reasonably expected housing, population, and employment in the future. The purpose of the range is to address the unknown potential build-out under the Transit Oriented Communities Affordable Housing Incentive Program Guidelines (TOC) and the City's accessory dwelling unit (ADU) provisions. Wherever a range is not stated in a table, the upper numerical range of the reasonably expected development is the basis of analysis.

The following terms are used to describe the level of significance of impacts identified in the analysis:

No Impact

No Impact applies where an environmental issue is evaluated, and it is determined that the project would have no effect or impact in that category. No Impact answers need to be adequately supported by information which shows that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone).

Less-Than-Significant Impact

Less-Than-Significant Impact applies where the project creates only less than significant impacts that do not exceed the defined threshold of significance. CEQA Guidelines does not require mitigation for less-than-significant impacts.

Potentially Significant Impact

Potentially Significant Impact applies to an impact that may potentially exceed the defined threshold of significance. Potentially significant impacts can sometimes be reduced to a less than significant level through the implementation of feasible mitigation measures. If feasible mitigation measures are not available or would not reduce the magnitude of the impact below the threshold of significance, the impact would be deemed significant and unavoidable.

Significant and Unavoidable Impact

Significant and Unavoidable Impact applies to an impact that exceeds the defined threshold of significance and cannot be eliminated or reduced to a less-than-significant level through implementation of feasible mitigation measures.

The Impact Analysis discussion includes the following parts:

a. Discussion
Provides discussion presenting evidence that substantiates the impact conclusion.

b. Mitigation Measures
When an impact is initially identified as significant or potentially significant, feasible mitigation measures that would avoid or reduce the magnitude of impact are identified.

c. Significance of Impacts/Summary of Impacts After Mitigation
This subsection identifies the level of significance after mitigation. If the Proposed Project would have a potentially significant impact before mitigation, a discussion will be provided to determine whether the potentially significant impact would be reduced to a less-than-significant level after mitigation or would remain significant and unavoidable.

CUMULATIVE IMPACTS

This subsection includes an analysis of the cumulative impacts associated with the Proposed Plan. Pursuant to CEQA Guidelines Section 15130, an EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of the project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probably future projects. A finding of No Impact would also mean that the effect is not cumulatively considerable.

Cumulative impacts are the changes in the environment that result from the incremental impact of development of the Proposed Plan and other projects with related impacts. For example, traffic impacts of two nearby projects may be insignificant when analyzed separately but could have a significant impact when analyzed together.

CEQA Guidelines Section 15130 allows that the discussion of cumulative impacts shall reflect the severity of the impacts and the likelihood of occurrence, but the discussion need not provide as much detail as is provided for the effects attributable to the project alone.

CEQA Guidelines Section 15130 allows for two approaches to study cumulative impacts: using a list of past, current and probable future projects or relying on a summary of projections (growth forecasts) from adopted local, regional or statewide plans. As the Proposed Plans are community plan updates covering a large area of the City over a twenty plus year planning period, the cumulative impacts analysis in this EIR relies on the summary of projections method, utilizing the Southern California Association of Governments (SCAG) projections as discussed in Appendix B.

REFERENCES

This subsection identifies the sources and technical studies utilized in the preparation of this EIR. These reports are referenced throughout the document where appropriate.

4.1 AESTHETICS

This section provides an overview of aesthetics and evaluates the impacts associated with the Proposed Plan. Topics addressed include visual character, views and vistas, scenic resources, and light and glare.

REGULATORY FRAMEWORK

Regulations and plans applicable to the Proposed Plan are summarized below.

STATE

California Department of Transportation (Caltrans) State Scenic Highways. California's Scenic Highway Program was created by the Legislature in 1963. Its purpose is to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment. State laws governing the Scenic Highway Program are found in the Streets and Highways Code, Sections 260 through 263. A highway may be designated scenic depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view. Caltrans defines a State Scenic Highway as any freeway, highway, road, or other public right-of-way that traverses an area of exceptional scenic quality. Eligibility for designation as a State Scenic Highway is based on vividness, intactness, and unity of the roadway. The status of a proposed State Scenic Highway changes from eligible to officially-designated when the local governing body applies to Caltrans for scenic highway approval, adopts a Corridor Protection Program, and receives notification that the highway has been officially designated a State Scenic Highway. There are no designated state scenic highways in the Project Area.

Senate Bill 743 (SB 743) (Environmental Quality). On September 2013, Governor Brown signed into law SB 743, which instituted changes to California Environmental Quality Act (CEQA) when evaluating environmental impacts of projects in areas served by transit. While the thrust of SB 743 addressed a major overhaul on how transportation impacts are evaluated, it also limited the extent to which aesthetics impacts are evaluated under CEQA Guidelines. SB 743 (Public Resources Code [PRC] Section 21099 (d)(1)) exempts development projects located in Transit Priority Areas (TPAs), from review of aesthetic impacts under CEQA Guidelines. Specifically, this bill provides that aesthetic impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment.[1] A TPA is defined as an area within one-half mile of a major transit stop that is existing or planned. Section 21064.3 of the PRC defines a "major transit stop" as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

LOCAL

City of Los Angeles General Plan Framework, Conservation Element, and Mobility Plan (MP) 2035. The City of Los Angeles General Plan is a comprehensive, long-range declaration of purposes, policies and programs for the development of the City of Los Angeles. The General Plan Framework, Conservation Element and MP 2035 are elements of the City's General Plan. The General Plan Framework, adopted in December 1996 and amended in August 2001, is intended to guide the City's long-range growth and

[1]Public Resources Code Section 21099(a)(1) defines "employment center project" as a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a TPA.

development through the year 2010. The Framework Element planning policies regarding urban form, neighborhood design and the conservation of open space and other scenic resources are intended to improve community and neighborhood livability in the City of Los Angeles. The Framework Element Open Space and Conservation policies seek to conserve significant resources and use open space to enhance community and neighborhood character in the City.

The Conservation Element, adopted in 2001, includes a discussion of the existing landforms and scenic vistas in the City of Los Angeles. Objectives, policies, and programs included in this element are intended to ensure the protection of natural terrain and landforms, unique site features, scenic highways, and panoramic public views as City staff and decision-makers consider future land use development and infrastructure projects.

The MP 2035, adopted in 2016, provides an inventory of City-designated scenic highways. Scenic highways depicted within the City have special controls for protection and enhancement of scenic resources. The MP 2035 includes Scenic Highway Guidelines for those designated scenic highways for which there is no adopted scenic corridor plan.

Objectives, policies, and programs included in the General Plan Framework, Conservation Element and MP 2035 are intended to ensure the protection of natural terrain and landforms, unique site features, scenic highways, and panoramic public views as City staff and decision-makers consider future land use development and infrastructure projects. Applicable goals, objectives, and policies are shown in **Table 4.1-1**. See Section 4.8, Land Use and Planning for a discussion of land use consistency of aesthetics goals, objectives, and policies.

TABLE 4.1-1: RELEVANT GENERAL PLAN AESTHETICS GOALS, OBJECTIVES, AND POLICIES

Goal/Objective/Policy	Goal/Objective/Policy Description
GENERAL PLAN FRAMEWORK	
Goal 5A	A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and Citywide scales.
Objective 5.1	Translate the Framework Element's intent with respect to Citywide urban form and neighborhood design to the community and neighborhood levels through locally prepared plans that build on each neighborhood's attributes, emphasize quality of development, and provide or advocate "proactive" implementation programs.
Policy 5.1.1	Use the Community Plan Update process and related efforts to define the character of communities and neighborhoods at a finer grain than the Framework Element permits.
Objective 5.2	Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community or the region.
Policy 5.2.1	Designate centers and districts in locations where activity is already concentrated and/or where good transit service is, or will be provided.
Policy 5.2.2	Encourage the development of centers, districts, and selected corridor/boulevard nodes such that the land uses, scale, and built form allowed and/or encouraged within these areas allow them to function as centers and support transit use, both in daytime and nighttime. Additionally, develop these areas so that they are compatible with surrounding neighborhoods, as defined generally by the following building characteristics: • Buildings in neighborhood districts generally should be low rise (one- to two-stories), compatible with adjacent housing, and incorporate the pedestrian-oriented design elements defined in Policies 5.8.1 and 3.16.1 - 3.16.3. They should also be located along sidewalks with appropriate continuous storefronts. • The built form of regional centers will vary by location. In areas, such as Wilshire and Hollywood Boulevards, buildings will range from low- to mid-rise buildings, with storefronts situated along pedestrian-oriented streets. Regional centers should contain pedestrian-oriented areas and incorporate the pedestrian-oriented design elements defined in Policies 5.8.1 and 3.16.1 – 3.16.3.

TABLE 4.1-1: RELEVANT GENERAL PLAN AESTHETICS GOALS, OBJECTIVES, AND POLICIES	
	• Buildings located at activity nodes along mixed-use boulevards generally shall have the same characteristics as either neighborhood districts or community centers, depending on permitted land use intensities. Housing over ground floor storefronts or in place of commercial development shall be encouraged along mixed-use boulevards.
Objective 5.5	Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.
Policy 5.5.3	Formulate and adopt building and site design standards and guidelines to raise the quality of design Citywide.
Policy 5.5.4	Determine the appropriate urban design elements at the neighborhood level, such as sidewalk width and materials, street lights and trees, bus shelters and benches, and other street furniture.
Policy 5.5.6	Identify building and site design elements for commercial or mixed-use streets in centers that may include: the height above which buildings must step back; the location of the building base horizontal articulation; and other design elements.
Policy 5.5.7	Promote the undergrounding of utilities throughout the City's neighborhoods, districts, and centers.
Objective 5.6	Conserve and reinforce the community character of neighborhoods and commercial districts not designated as growth areas.
Policy 5.6.1	Revise community plan designations as necessary to conserve the existing urban form and community character of areas not designated as centers, districts, or mixed-use boulevards.
Objective 5.7	Provide a transition between conservation neighborhoods and their centers.
Policy 5.7.1	Establish standards for transitions in building height and for on-site landscape buffers.
Objective 5.8	Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.
Policy 5.8.1	Buildings in pedestrian-oriented districts and centers should have the following general characteristics: • An exterior building wall high enough to define the street, create a sense of enclosure, and typically located along the sidewalk; • A building wall more-or-less continuous along the street frontage; • Ground floor building frontage designed to accommodate commercial uses, community facilities, or display cases; • Shops with entrances directly accessible from the sidewalk and located at frequent intervals; • Well lit exteriors fronting on the sidewalk that provide safety and comfort commensurate with the intended nighttime use, when appropriate; • Ground floor building walls devoted to display windows or display cases; • Parking located behind the commercial frontage and screened from view and driveways located on side streets where feasible; • Inclusion of bicycle parking areas and facilities to reduce the need for vehicular use; and • The area within 15 feet of the sidewalk may be an arcade that is substantially open to the sidewalk to accommodate outdoor dining or other activities.
Policy 5.8.2	The primary commercial streets within pedestrian-oriented districts and centers should have the following characteristics: • Sidewalks: 15-17 feet wide (see illustrative street cross-sections). • Mid-block medians (between intersections): landscaped where feasible. • Shade trees, pruned above business signs, to provide a continuous canopy along the sidewalk and/or palm trees to provide visibility from a distance. • Pedestrian amenities (e.g., benches, pedestrian-scale lighting, special paving, window boxes, and planters).
Policy 5.8.4	Encourage that signage be designed to be integrated with the architectural character of the buildings and convey a visually attractive character.

TABLE 4.1-1: RELEVANT GENERAL PLAN AESTHETICS GOALS, OBJECTIVES, AND POLICIES	
CONSERVATION ELEMENT	
Land Form & Scenic Vista Objective	Protect and reinforce natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of present and future generations.
Land Form & Scenic Vista Policy	Continue to encourage and/or require property owners to develop their properties in a manner that will, to the greatest extent practical, retain significant existing land forms (e.g., ridge lines, bluffs, unique geologic features) and unique scenic features (historic, ocean, mountains, unique natural features) and/or make possible public view or other access to unique features or scenic views.
MOBILITY PLAN 2035	
Objective 11	Preserve and enhance access to scenic resources and regional open space.
Policy 11.1	Designate scenic highways and scenic byways which merit special consideration for protection and enhancement of scenic resources.
Policy 11.2	Provide for protection and enhancement of views of scenic resources along or visible from designated scenic highways through implementation of guidelines set forth in this 2035 Mobility Plan.
Policy 11.3	Consider aesthetics and scenic preservation in the design and maintenance of designated scenic highways and of those scenic byways designated in Community Plans.
Policy 11.4	Establish Scenic Corridor Plans, where appropriate, which set forth corridor boundaries and development controls in harmony with each corridor's specific scenic character.
Policy 2.16	Ensure that future modifications to any scenic highway do not impact the unique identity or characteristic of that scenic highway.
SOURCE: City of Los Angeles, *The Citywide General Plan Framework: An Element of the City of Los Angeles General Plan*, re-adopted 2001; City of Los Angeles, *Conservation Element of the City of Los Angeles General Plan*, adopted 2001; City of Los Angeles General Plan, *Mobility Plan 2035: An Element of the General Plan*, adopted 2015.	

City of Los Angeles Planning and Zoning Code and Building Regulations. Los Angeles Municipal Code (LAMC) Chapter 1 contains the Planning and Zoning Code, and Chapter 9 contains Building Regulations. The purpose of the Planning and Zoning Code is to designate and regulate the location, use, height and size of buildings. The Planning and Zoning Code regulates the aesthetics and visual quality of development projects. The Planning and Zoning Code, as well as the Building Regulations, includes development regulations specific to each zone and also addresses parking, landscaping, lighting, and a number of other topics that influence the aesthetics of a development project. The Planning and Zoning Code also includes design regulations that seek to affect the physical alteration of streets, intersections, alleys, pedestrian walkways, and landscaping.

The following are sections of the LAMC that regulates lighting:

- *Chapter 1, Article 2, Section 12.21 A5(k).* All lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any streets and any adjacent premises.
- *Chapter 1, Article 7, Section 17.08C.* Plans for street lighting system shall be submitted to and approved by the Bureau of Street Lighting.
- *Chapter 9, Article 3, Section 93.0117.* No exterior light source may cause more than two foot-candles (21.5 lux) of lighting intensity or generate direct glare onto exterior glazed windows or glass doors; elevated habitable porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units.
- *Chapter 9, Article 1, Section 91.6205(K)4.* Signs are prohibited if they contain flashing, mechanical and strobe lights in conflict with the provisions of Section 80.08.4 and 93.6215 of this code.
- *Chapter 9, Article 1, Section 91.6205M.* No sign shall be arranged and illuminated in such a manner as to produce a light intensity of greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

Other sections of the LAMC that regulate aesthetics and visual quality include, but are not limited to the following:

- *Chapter 1, Article 2, Sections 12.04-12.20.3.* These sections of the Planning and Zoning Code regulates the use, front yard setback, side yard setbacks, rear yard setback, building massing; and height limit depending on the zoning of the parcel.
- *Chapter I, Article 2, Section 12.21A.5.* This section of the LAMC establishes the parking stall dimensions, driveway location, driveway width, landscaping within parking areas, and lighting at parking areas.
- *Chapter 1, Article 2, Section 12.21.1.* No building or structure shall be erected or enlarged which exceeds the total floor area, the number of stories or the height limits specified for the district in which the building or structure is located.
- *Chapter 1, Article 2, Sections 12.42.A.2.* Applications for landscape approval shall contain a proposal for shading of walls of structures.
- *Chapter 1, Article 2, Section 12.42.B.2.* Applications for landscape approval shall contain a proposal for heat and glare reduction in vehicular use areas.
- *Chapter 1, Article 2, Section 12.42.D.2(b).* All cut and fill slopes in Hillside Areas shall be landform graded and landform planted to the maximum extent feasible when such techniques do not affect the stability of the graded slopes.
- *Chapter 1, Article 2, Section 12.42.D.2(c).* Planting of slopes shall take into consideration such factors as degree of slope, slope orientation, type of soil, rooting depth of plats, fire dangers, availability of water, original native communities, depth of soil, and other relevant design factors.
- *Chapter 1, Article 2, Section 12.42.D.2(d).* Non-native plants, when used, shall compliment native communities in growth habitat, foliage color, cultural requirements, and flowering behavior.

City of Los Angeles Baseline Hillside Ordinance. The Baseline Hillside Ordinance is part of the City's Planning and Zoning Code and applies to all properties zoned R1, RS, RE (9, 11, 15, 20, and 40), and RA and are designated as Hillside Area in the Department of City Planning Hillside Area Map, as defined in LAMC Section 12.03. It designates and regulates the setback, height, and size of residential buildings in the Hillside Area. Its purpose is to limit the scale of development within the residential zoned parcels within the hillside.

Planning Guidelines Landform Grading Manual. Landform grading refers to a contour grading method that creates artificial slopes with curves and varying slope ratios in the horizontal plane designed to simulate the appearance of surrounding natural terrain. The Planning Guidelines Landform Grading Manual was developed to promote hillside development that reflects the hillside environment as closely as possible. It incorporates design details and techniques that help to give manufactured hillsides a more natural-looking appearance. Design details and techniques include varying slope ratios, inconspicuous drainage devices, the preparation of a hillside maintenance plan, and landscaping that is consistent with the characteristics of the surrounding hillside.

Los Angeles Administrative Code (LAAC) Cultural Heritage Ordinance (Section 22.171). The provisions of the Cultural Heritage Ordinance are codified in Division 22, Chapter 9, Article 1 of the LAAC, commencing with Section 22.171. The Ordinance created a Cultural Heritage Commission and criteria for designating Historic-Cultural Monuments (HCM). HCMs, along with all other historically significant resources, are considered scenic resources. The designation of a historic building as an HCM requires that the resource be considered when analyzing the aesthetic impacts of a project and delays demolition by up to a year. See Section 4.5, Cultural Resources for a discussion of this Ordinance.

City of Los Angeles Historic Preservation Overlay Zone (HPOZ) Ordinance. In addition to the designation of individual sites as HCMs, the City of Los Angeles also has a separate ordinance and procedure for the designation of historic districts, or HPOZ. This Ordinance, which is found in LAMC Chapter I, Article 2, Section 12.20.3, is intended to recognize, preserve, and enhance buildings, structures, landscaping, natural features, and areas within the City having historic, architectural, cultural, or aesthetic significance in the interest of the health, economic prosperity, cultural enrichment, and general welfare of the people. See Section 4.5, Cultural Resources for a discussion of this Ordinance.

City of Los Angeles Tree Preservation Ordinance. Protected trees are considered aesthetic resources. The City of Los Angeles adopted an ordinance for the Preservation of Protected Trees (Ordinance No. 177,404; LAMC Chapter IV, Article 6) which became law on April 23, 2006. This Ordinance protects the following tree species:

- All native Oak tree species (*Quercus spp*), but excluding the Scrub Oak (*Quercus dumosa*)
- Western Sycamore (*Platanus racemosa*)
- California Bay (*Umbellularia californica*)
- California Black Walnut (*Juglans californica*)

This Ordinance applies to trees that are four inches or greater in diameter at 4.5 feet above ground, and on any lot size. Protected tree removal requires a removal permit by the City of Los Angeles Department of Public Works (LADPW). Any act that may cause the failure or death of a protected tree requires inspection by the LADPW Urban Forestry Division. In the event that the LADPW approves a tree removal, replacement of the tree is required with at least two trees of a protected variety. See Section 4.4, Biological Resources for a discussion of protected trees.

City of Los Angeles Citywide Design Guidelines. The City of Los Angeles has created Citywide Design Guidelines to carry out the common design objectives that maintain neighborhood form and character for residential, commercial, and industrial uses. The guidelines are intended for developers, architects, and advisory and decision-making bodies when evaluating development projects. Specific design regulations relating to individual communities can be found in the Community Plan Urban Design Chapter of each of the City's 35 Community Plans or special zoning designations, such as Specific Plans, Community Design Overlay Districts, designated historic properties, and historic districts. The Citywide Design Guidelines applies to all areas of the City, but it is particularly applicable to those areas within the city that do not currently have adopted design guidelines. As provided in the Citywide Design Guidelines, in cases where the Citywide Design Guidelines conflict with a provision in a Community Plan Urban Design Chapter or a special zoning designation, the community's specific requirements would prevail.

City of Los Angeles Specific Plans. Specific Plans are planning and zoning documents for a defined geographic region within the City. Specific Plans implement the General Plan by providing a special set of development standards applied to a particular area. Specific Plans customize LAMC regulations to plan the land use of specific geographic areas. The regulations contained within Specific Plans are in addition to those of the LAMC. Wherever a Specific Plan contains provisions requiring greater setbacks, greater restrictions on building height, more restrictions on commercial uses, or more restrictive lot coverage regulations as compared with provisions contained in the Planning and Zoning Code, the Specific Plan prevails and supersedes the other applicable provisions. Four Specific Plans are within the Project Area: the Mulholland Scenic Parkway Specific Plan, Hollywoodland Specific Plan, Vermont/Western Station Neighborhood Area Plan (SNAP), and the Paramount Pictures Specific Plan. These plans have specific development regulations for uses, building heights, and density/intensity to accomplish various purposes, including protecting the aesthetics and visual quality that are unique to the specific plan areas. For example, the Mulholland Scenic Parkway Specific Plan was created to preserve the parkway's scenic mountain, ocean, and city views and has regulations that restrict allowable uses, building heights, grading, and

lighting. Similarly, the Hollywoodland Specific Plan also has development regulations for allowable uses, building heights, and grading in part to protect the undeveloped ridgelines enclosing Hollywoodland.

Hollywood Signage Supplemental Use District (SUD). A portion of the Community Plan Area (CPA) is within the Hollywood Signage SUD. The Hollywood Signage SUD was formed to promote the continuing contribution of signage to the distinctive aesthetic of the district, as well as to control the blight created by poorly placed, badly designed signs. The Hollywood Signage SUD was adopted in 2004 and was last amended by Ordinance No. 181,340 in 2010. Specifically, permitted signage types include architectural ledge signs, awning signs, electronic message displays, information signs, marquee signs, monument signs, open panel roof signs, pedestrian signs, pillar signs, projecting signs, and/or skyline logos/icons, as well as certain temporary signs. Billboards and pole signs are not permitted, though legally nonconforming signs that predate the Hollywood Signage SUD may remain. The Hollywood Signage SUD also specifies the maximum permitted sign area and has regulations that address sign illumination.

EXISTING SETTING

SCENIC VIEWS AND VISTAS

The term views generally refer to visual access to, or the visibility of, a particular natural or man-made visual resource from a given vantage point or corridor. Focal views focus on a particular object, scene, setting, or feature of visual interest. Panoramic views, or vistas, provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are usually associated with vantage points looking out over urban or natural areas that provide a geographic orientation and view not commonly available. Examples of panoramic views might include an urban skyline, a valley, a mountain range, the ocean, or other water bodies. The City's General Plan Conservation Element defines scenic views or vistas as the panoramic public view access to natural features, including views of the ocean, striking or unusual natural terrain, or unique urban or historic features. Public access to these views is typically from parklands, publicly-owned sites, and public rights-of-way.

Scenic views from within the Plan Area include the Santa Monica Mountains, hillsides, and the urban skyline. The western half of the hillsides includes the Hollywood Hills and the eastern half includes Griffith Park, which contains the Hollywood Sign and the Griffith Observatory. Sweeping views of the Santa Monica Mountains, hillsides, and the urban skyline are considered panoramic and can be seen from designated vantage points, public hiking trails, and public rights-of-way. In addition, the well-known Hollywood Sign and the Griffith Observatory are two particular objects in the CPA that draw focal views. These two features of visual interest are better seen from higher elevation areas but can also be seen intermittently at lower elevations. Panoramic and focal views that are available within the Project Area are discussed in the following paragraphs.

Within the Project Area, it is generally difficult to see panoramic views from the "flatlands" due to the existing street grid pattern and built environment. Rather, panoramic vantage points are primarily located within hilly areas. The Project Area has two designated vantage points for panoramic views: the Jerome C. Daniel Overlook and the Universal City Overlook. The Jerome C. Daniel Overlook (previously the Olympics 1984 Overlook and currently also known as the Hollywood Bowl Scenic Overlook) is located above the Hollywood Bowl along Mulholland Drive, about one mile west of U.S. Route 101 (US-101). Visitors can take in views of the Hollywood Sign, the mountains, Griffith Observatory, the US-101, the urban skylines of Hollywood and downtown Los Angeles, the San Fernando Valley, and the Hollywood Bowl. On clear days, it may be possible to see the Pacific Ocean. These views also represent the scenic views available from various publicly accessible locations in the Hollywood Hills, Santa Monica

Mountains, and other hilly areas within the Project Area. However, the perspective and visibility may change depending on various factors, such as the hiking trail, elevation, bad air days, or weather.

Figure 4.1-1 represents a panoramic view that is available at the Jerome C. Daniel Overlook. The Project Area is shown in the foreground and middle ground views. The foreground view includes the hilly terrain of the Santa Monica Mountains. High-rise structures in the central part of Hollywood (Regional Center) are shown in the middle ground view. US-101 is shown in the foreground and middle ground views. A background view of the downtown Los Angeles skyline is also visible in this figure.

The Universal City Overlook is located on Mulholland Drive, about 0.1 miles east of Torreyson Place. From here, visitors can see panoramic views of mountains and Universal City. However, trees may obstruct or limit some views.

In addition to the above two designated vantage points, several other areas within the Project Area also provide panoramic scenic views, such as at Dante's View and Barnsdall Art Park, as well as some public rights-of-way and public trails throughout the Plan Area. At Dante's View, which is located within Griffith Park and a designated HCM (HCM #1091), visitors can see the Griffith Observatory, the hillsides in Griffith Park, and background views of the downtown Los Angeles skyline.

Barnsdall Art Park is situated on a hill in the urbanized portion of the Project Area and, therefore, provides panoramic scenic views of the Santa Monica Mountains, the Hollywood Sign, and Griffith Observatory. As shown in **Figure 4.1-2**, foreground and middle ground views of the Project Area are visible at this park.

The Hollywood Sign, located on the south-facing slope of the Santa Monica Mountains in Griffith Park and a designated HCM (HCM #111), is a focal view. The available public viewing locations vary throughout the Project Area. Views of the sign from north-south oriented streets are determined largely by the built form of the adjacent development and are intermittent. In some cases, primarily from east-west oriented streets, existing buildings and street trees block views of the sign from streets and properties. Views of the sign from higher elevations, such as from hiking trails or designated vantage points, are often in conjunction with wider vistas that include the Santa Monica Mountains as shown in **Figure 4.1-2**. In addition, views of the recognizable sign extend beyond the Project Area, as the sign is presently visible from freeways and other areas located at extended distances from the Project Area. **Figure 4.1-3** depicts views of the Hollywood Sign within the Project Area at Beachwood Drive, Gower Street, Western Avenue, and Sunset Boulevard. The Griffith Park Observatory, another designated HCM (HCM #168) is also a focal view. Compared to the Hollywood Sign, views of the Observatory are more limited because it can only be seen from selected areas within the Project Area. It also is usually seen in conjunction with wider vistas from higher elevations, as shown in **Figure 4.1-2**.

In addition, limited focal views of the Santa Monica Mountains and the hillsides within the Project Area are available along various north-south streets. However, most of the views to the Santa Monica Mountains and the hillsides are blocked by intervening buildings, street trees and, on some streets, overhead utility lines. In summary, public panoramic and focal scenic views are currently available in the Project Area, but the quality of the views vary significantly by location, elevation, and even bad air days. **Figure 4.1-4** depicts example views of the Santa Monica Mountains within the Project Area on Cahuenga Boulevard, Vine Street, El Centro Avenue, and Vermont Avenue.



SOURCE: TAHA, 2018.

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FIGURE 4.1-1

SCENIC VIEW FROM JEROME C. DANIEL OVERLOOK



SOURCE: TAHA, 2018.

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FIGURE 4.1-2

SCENIC VIEW FROM BARNSDALL ART PARK



1. View of the Hollywood Sign at Beachwood Dr. and Glen Holly St.



2. View of the Hollywood Sign at Gower St. and Carlos St.



3. View of the Hollywood Sign at Western Ave. and Marathon St.



4. View of the Hollywood Sign at Sunset Blvd. and Myra Ave.

SOURCE: TAHA, 2018.



1. View of Santa Monica Mountains on Cahuenga Blvd. at Sunset Blvd.



2. View of Santa Monica Mountains on Vine St. at Sunset Blvd.



3. View of Santa Monica Mountains on El Centro Ave. at Willoughby Ave.



4. View of Santa Monica Mountains on Vermont Ave. at Prospect Ave.

SOURCE: TAHA, 2018.

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FIGURE 4.1-4

VIEWS OF SANTA MONICA MOUNTAINS

VISUAL CHARACTER

The visual character of the Hollywood CPA is the overall image formed by various physical elements, including natural features and the built environment, such as topography, open space, the street grid, buildings, and major transportation infrastructure. Hollywood's visual character varies greatly by context depending on factors, such as geography and neighborhood. Its comprehensive image is a mosaic - no single theme forms the overall image. The CPA is an urban built environment that also contains an abundance of open space and hills at its northern extent.

Visual character can be subjective as filtered through the lens and judgment of individuals. Hollywood is a destination for regional and international visitors, but it is also the home and/or the workplace for tens of thousands of residents and employees. Words that people use to describe Hollywood include urban, dense, modern, but also historic, hilly, and secluded. The best word, however, for Hollywood's visual character is varied.

For the purposes of describing the visual character of the Project Area and to evaluate Project-related impacts on visual character, the Project Area has been divided into four different regions. For identification purposes, the regions were divided by the topography and US-101, which bisects the area. The four regions are as follows:

- Northwest Region: The hills west of US-101, and generally north of Franklin Avenue
- Northeast Region: The hills east of US-101, and generally north of Franklin Avenue and Los Feliz Boulevard
- West Region: The flatlands west of US-101, and generally south of Franklin Avenue
- East Region: The flatlands east of US-101, and generally south of Franklin Avenue and Los Feliz Boulevard

Summaries of the visual character in the four different regions of the Project Area are generally described below. The visual descriptions are based on public views, meaning what is visible from a sidewalk, roadway, or other public right-of-way.

The Proposed Plan seeks to direct anticipated development to specific parts of the Project Area, primarily in the West and East Regions. Since a majority of the Change Areas is located within the West and East Regions, the discussion of the existing visual character for specific Change Areas within the West and East Regions is separately described. The discussion of these specific Change Areas is particularly relevant to the environmental analysis later in this section of the EIR. The visual character of the specific Change Areas provides additional information to the regional descriptions.

Northwest Region

The Northwest Region primarily consists of the Santa Monica Mountains, which is the Project Area's most distinctive landform (see discussion of Scenic Resources, below, for further description of the Santa Monica Mountains within the Project Area). The hilly terrain has both undeveloped and developed lots. Undeveloped land includes open space, such as Runyon Canyon and Wattles Garden Park; land preserved by the Santa Monica Mountains Conservancy; and vacant lots that can be developed with low-density housing, primarily single-family residences. Developed land primarily consists of single-family homes on large lots, generally one and two stories, but some three-story and four-story houses are also built into the hillsides. Hollywood Hills and other single-family residential neighborhoods are located in this region. Low-density residential development is generally located in the lower foothills and canyons. The built environment also includes the Hollywood Bowl, the Yamashiro restaurant, and an elementary school. A few commercial buildings are located along Cahuenga Boulevard, north of Franklin Avenue. One City-designated residential historic district, Whitley Heights HPOZ, is located within the Northwest Region.

Many streets in this region are winding and are designated local streets. However, some collector roads are also located in this region. A portion of scenic Mulholland Drive is within the Northwest Region. The US-101 travels along the eastern edge of this region. **Figure 4.1-5** depicts the visual character of the Northwest Region.

Northeast Region

As with the Northwest Region, the Northeast Region primarily consists of the Santa Monica Mountains. Parkland and undeveloped open space areas are generally located on the upper slopes, while low-density residential development is generally located in the lower foothills and canyons. The Northeast Region generally encompasses Griffith Park, two cemeteries, and low-density residential neighborhoods. The predominant feature of the Northeast Region is Griffith Park, a regional park with large expanse of open space covering more than 4,000 acres. The regional park is mostly undeveloped and used for recreation. Although the park is mostly undeveloped, the developed portions of this park include the Griffith Observatory, the Greek Theatre, the Hollywood Sign, museums, and the Los Angeles Zoo. The Forest Lawn Memorial Park and Mount Sinai Memorial Park are also located within the Northeast Region. The developed portions of the Northeast Region include low-density hillside homes in the Hollywoodland, Oaks, and Los Feliz neighborhoods. The low-density residences are generally one to two stories. A number of multi-family residential buildings, generally several stories tall, are located along portions of Beachwood Drive, Los Feliz Boulevard, and Barham Boulevard. This region also contains one City-designated residential historic district – the Hollywood Grove HPOZ. Public facilities found within this region include the Hollywood Reservoir (Mulholland Dam) and schools. This region is bordered by three freeways: the US-101 travels along western boundary, SR-134 crosses the northern boundary, and I-5 generally travels along the eastern edge. Many streets are winding and are designated as local streets, but some collector roads are also located within this region. **Figure 4.1-5** depicts the visual character of the Northeast Region.

West Region

The West Region covers a largely urbanized area located adjacent to the City of West Hollywood, stretching east to US-101. Franklin Avenue forms its northern boundary, while portions of Rosewood Avenue and Melrose Avenue form the southern boundary. Due to the lack of hilly topography in the West Region, this region is in the "flatlands" portion of the Project Area where the street grid pattern runs north-south and east-west. Major north-south corridors include La Brea Avenue, Highland Avenue, Vine Street, and Western Avenue. The major east-west corridors are Hollywood Boulevard, Sunset Boulevard, and Santa Monica Boulevard. Two Metro Red Line subway stations (Hollywood/Highland and Hollywood/Vine) are located within this region.

The West Region has a mix of different uses, buildings of various massing and heights[2], historic districts, individual landmarks, and nondescript visual character. This region contains tourist attractions along Hollywood Boulevard, hotels, media/entertainment studios/offices and supporting uses, single-family residential neighborhoods, multi-family residential neighborhoods, schools, one- to two-story neighborhood commercial services, institutional uses and small parks. Distinctive historical landmarks are also found within this region. The landmarks include, but are not limited to the Walk of Fame, TCL (Grauman's) Chinese Theatre, Pantages Theatre, Crossroads, Hollywood Forever Cemetery and Capitol Records. Hollywood's historical resources are described more in Section 4.5, Cultural Resources, of this EIR. West of La Brea Avenue, multi-family residential buildings, single-family homes, and low-scale commercial buildings are located along Sunset Boulevard and Melrose Avenue.

[2]Hollywood has a mix of building heights. Low-rise buildings are generally one story to three stories. With the passing of time and technology, the height range of what is considered mid- and high-rise has evolved. Mid-rise buildings are now generally 4 to 12 stories tall. High-rise buildings are generally greater than 12 stories; however, the definition could depend on context.



SOURCE: TAHA, 2018.

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FIGURE 4.1-5

VISUAL CHARACTER OF NORTHWEST & NORTHEAST REGION

Single-family homes are generally one or two stories as are low-scale commercial buildings. Multi-family residential buildings vary more in height and are generally between two and six stories. Several schools and two City-designated residential historic districts (Spaulding Square HPOZ and Sunset Square HPOZ) are located within the West Region.

The Regional Center is located in the West Region, generally east of La Brea Avenue, south of Hollywood Boulevard, north of Sunset Boulevard, and west of Gower Street. Within the Project Area, the Regional Center has the most intense and dense uses, with historic buildings interspersed along Hollywood Boulevard. The Regional Center has high-rise, mid-rise, and low-rise buildings; surface parking lots; and pocket parks. Uses include office buildings, hotels, retail stores, apartment buildings, and institutions. The Hollywood Boulevard Commercial and Entertainment Industry National Register Historic District is in the Regional Center. The Regional Center has a strong commercial character with retail, office buildings, hotels, and media/entertainment/tourist uses but is becoming more mixed with recent residential and/or mixed-use developments, such as 1600 Vine, Sunset + Vine, the Camden, and Eastown. Many of the tallest buildings (greater than 100 feet) in the Project Area are generally clustered in the vicinity of Hollywood Boulevard and Highland Avenue, Hollywood Boulevard and Vine Street, and along Sunset Boulevard and Hollywood Boulevard. Some of the tallest buildings (between 10 stories and 25 stories) are the CNN building, Sunset Media Center office building, mixed-use Instrata Sunset Vine Tower, Loews Hotel, Taft building, Lofts @ Hollywood and Vine, L. Ron Hubbard building, W Hollywood Residences, Dream Hotel, and Roosevelt Hotel. The newest taller buildings include the Hollywood Proper Residences (23 stories) on El Centro Avenue, Sunset Gordon Tower (22 stories), and Icon office tower (14 stories) on Sunset Boulevard.

The buildings in the Regional Center form a mosaic of different ages, heights, and styles due to the history of Hollywood's development. The 1905 City Charter prohibited buildings over 150 feet and capped building height to 13 stories. The height limit was later repealed by voters in 1957. In the 1970s, the City designated Hollywood as a high-density activity center connected to transit, and the first Hollywood Community Plan (1973) embraced this vision of growth. In the 1980s, voters reduced the scale of buildings along commercial corridors in the City, and the 1988 Hollywood Community Plan reflects decreased development potential requiring more discretionary review of larger scale projects. The Regional Center continued to evolve with new development projects. When Hollywood's economy declined in the 1980s, the Hollywood Redevelopment Agency approved a redevelopment plan with incentives and regulations for the Regional Center and its surrounding areas. The 1988 Hollywood Community Plan states that this "center area shall function 1) as the commercial center for Hollywood and surrounding communities and 2) as an entertainment center for the entire region." The 1988 Plan also states that mixed-use is especially encouraged here. The Framework Element also recognizes Hollywood as a major destination and employment center for the City, indicating the long-standing view of Hollywood as an important and evolving urban center. The opening of the Metro stations spurred redevelopment at the intersections of Hollywood Boulevard/Highland Avenue and Hollywood Boulevard/Vine Street, resulting in transit-oriented development, most noticeably the Hollywood and Highland entertainment complex, as well as the W Residences and Hotel at Hollywood and Vine.

Several high-density multi-family residential neighborhoods located between Franklin Avenue and the Regional Center are mostly built out. Many of the multi-family residential buildings are three to six stories but a few are much taller, such as the historic Fontenoy and Montecito apartment buildings. In this area, a mix of residential buildings expresses the aesthetic values and styles of different time periods, from the early 1900s to today.

South of the Regional Center is a very mixed built environment, including limited industrial, multi-family residential, and low-scale commercial uses. Two large landmarks found south of the Regional Center include the Hollywood Forever Cemetery and the Paramount Pictures campus. A small portion of this area is single-family residential, including a portion of the Hancock Park HPOZ and the Melrose Hill HPOZ.

The multi-family residential buildings are generally two to three stories, with some one-story residences mixed in. In this area, entertainment/media-related studios and supporting uses are found along a portion of Santa Monica Boulevard, which also has auto repair shops, small performing arts theaters with 99 seats or fewer, and other commercial uses. Tall utility poles and overhead wires are typically found in the industrial areas. Several commercial corridors, such as Western Avenue and Vine Street, have mainly low-scale (one or two stories) commercial buildings and strip malls with a few taller buildings mixed in. Many of the industrial buildings have little to no setback from the streets, while some industrial properties have surface parking lots facing the streets. Entertainment-related buildings vary widely in massing and height. Some are small, one-story buildings while others are one story but have taller floor to ceiling heights to accommodate studio needs. This area has mom-and-pop entertainment-related businesses, as well as larger campuses, such as Paramount Pictures, Sunset Gower Studios, and Hollywood Center Studios. **Figure 4.1-6** depicts the visual character of the West Region.

Change Areas within the Regional Center and Vicinity

The Regional Center is located generally east of La Brea Avenue, south of Hollywood Boulevard, north of Sunset Boulevard, and west of Gower Street. Many of the Change Areas in the Regional Center are located around and between the Metro Hollywood/Highland and Hollywood/Vine Stations. These Change Areas are generally located south of Hollywood Boulevard, between Highland Avenue and Gower Street, north of Sunset Boulevard. A few additional ones are located south of Sunset Boulevard, between Wilcox Avenue and El Centro Avenue, north of Fountain Avenue. The Change Areas near the Metro Hollywood/Vine Station also include selected areas north of Hollywood Boulevard, between Wilcox Avenue and Argyle Avenue. The Proposed Plan also has Change Areas located east of Gower Street adjacent to the Regional Center. These selected areas are along Hollywood Boulevard and Sunset Boulevard from Gower Street to the US-101 and would extend the existing Regional Center under the Proposed Plan. The existing commercial and residential buildings in the Regional Center are generally low-rise (1 to 3 stories) and mid-rise (4 to 10 stories). High-rise towers, such as the Sunset Media Tower, are infrequent. Additional high-rise buildings have been approved but have not been built during the preparation of this EIR. Several surface parking lots are also found in this area, including in the area east of Gower Street, which is generally low-rise in scale, although some newer, taller projects have been built in recent years.[3] Some buildings are more than 50 years old, while others are less than five years old. This area has no single unified theme or design.

Change Areas in Commercial Corridors Outside of the Regional Center. These commercial corridors include portions of Santa Monica Boulevard, Vine Street, the western portion of Sunset Boulevard, the northern portion of La Brea Avenue, the northern portion of La Cienega Boulevard, selected eastern and western portions of Melrose Avenue, and the southern portion of Western Avenue.

These corridors primarily have commercial uses and the typical building is about two stories tall, although one-story buildings are also frequently seen. There are also buildings that are three to five stories, but they are less common. Santa Monica Boulevard, due to its length, has the most varied building heights. Some multi-family buildings are found along these corridors but are not the dominant use. Commercial uses include gas stations, auto repair shops, neighborhood-serving services, restaurants, retail, and offices. Many buildings have no front setbacks while some properties have surface parking lots facing the street.

[3]These projects include the Metropolitan Lofts, MetWest Apartments, Sunset Gordon tower, Emerson College, and the Icon office tower, all along Sunset Boulevard.



SOURCE: TAHA, 2018.

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FIGURE 4.1-6

VISUAL CHARACTER OF WEST REGION

Change Areas in Multi-Family Residential Neighborhoods. Most of the multi-family residential neighborhoods with Change Areas are located in a few areas. These multi-family residential neighborhoods include 1) the area north of the Metro Hollywood/Highland Station, between La Brea Avenue and Wilcox Avenue, immediately north of the Regional Center, and generally south of Franklin Avenue; 2) near US-101; and 3) east of Vine Street near Hollywood Forever Cemetery and Paramount Pictures. Although the facades and ages of the buildings vary by location, most buildings are low-rise. These multi-family residential areas include a mix of one-story houses, duplexes, several low-scale units on a lot, and multi-family residential buildings.

The area to the north of the Regional Center is a varied, multi-family neighborhood. This neighborhood is largely developed and contains individual, historical buildings mixed in with middle-aged buildings and recently built complexes. This area also includes a few hotels, the Magic Castle, and the First Methodist Church of Hollywood. Most buildings are several stories tall. Some newer buildings are five stories, but a few older buildings, including the historic Fontenoy Apartments and the Hollywood Ardmore, are taller.

The area near the US-101 is largely developed and includes historical residences that are part of the Selma-Labaig Historic District, which is listed in the California Register of Historical Resources. The homes in the Selma-Labaig historic district are generally one-story bungalows; some lots have one house, while others have two. Other residential buildings in the surrounding area are not unified in theme, and include larger, newer multi-family buildings up to four stories tall, as well as two-story apartment buildings and one-story bungalows.

The area east of Vine Street and south of Santa Monica Boulevard contains multi-family buildings that are mostly two stories. However, some one-story buildings and a few three-story buildings are also mixed into this neighborhood. This area is largely developed.

Change Areas in Limited Industrial and Entertainment/Media-Related Uses. The limited industrial area that primarily consists of entertainment/media-related uses is known as the Media District. This area is generally located south of Santa Monica Boulevard, east of La Brea Avenue, west of Vine Street, and north of Melrose Avenue. This area has a concentration of media- and entertainment-industry uses and supporting uses, such as prop houses, storage, and equipment vendors. This area has small-scale studios, as well as the Hollywood Center Studios. The buildings are generally low-rise (one to three stories) in the change areas. A few taller buildings, such as the historic 11-story Hollywood Storage on Highland Avenue, as well as surface parking lots, are found within this area. Additionally, the Paramount Pictures campus, located outside the Media District, is also included as a change area. The buildings on the Paramount lot are varied, and some are screened and not visible to the public.

East Region

The area east of US-101 is largely urbanized. Most of the terrain in the East Region is relatively flat, with hilly terrain in the Los Feliz neighborhood at the eastern end of this region. The region consists of mostly multi-family residential uses, with single-family residential uses in the eastern edge, in the Los Feliz neighborhood. This area also has a concentration of hospitals and medical uses, a variety of commercial buildings along corridors, motels, hotels, the Prospect Studios, schools, other public facilities, and Barnsdall Art Park. Excluding the hilly Los Feliz neighborhood, the area south of Franklin Avenue is primarily in the flatlands, and the street grid pattern runs north-south and east-west. Three Metro Red Line subway stations (Hollywood/Western, Vermont/Sunset, and Vermont/Santa Monica) are located in the East Region. The major north-south corridors are Western Avenue and Vermont Avenue. Hollywood, Sunset, and Santa Monica Boulevards are the major east-west corridors.

This region is largely developed with multi-family residential buildings, hospitals, educational facilities, commercial uses, and institutional uses. Some surface parking lots are also found within this region. Many of the multi-family residential buildings are two or three stories but can range up to six stories depending on the location. Multi-family residential units are found within apartment buildings, are located on properties that have several multi-family residential structures or are part of mixed-use developments. The SNAP, a transit-oriented Specific Plan, covers a large portion of the East Region. The taller buildings in this region are mid-rises, such as the cluster of hospitals (Kaiser Permanente, Children's Hospital Los Angeles, and Hollywood Presbyterian Medical Center) near the Santa Monica Boulevard/Vermont Avenue intersection, and the buildings on the Scientology campus.

The buildings on the commercial corridors can range from two to six stories but many are two to three stories, including motels and hotels. The East Region has some mixed-use buildings with retail on the ground floor and residential units above. Many buildings along the commercial corridors have no front setbacks, but some properties have surface parking lots facing the street, such as strip malls. A number of public facilities, such as the Rowena Reservoir, Los Angeles Community College, and institutional uses are located in this region. **Figure 4.1-7** depicts the visual character of the East Region.

Specific Change Areas within East Region

Vermont/Western Station Neighborhood Area Plan (SNAP). SNAP promotes mixed-use development near the three Metro stations, preserves existing low-scale residential neighborhoods, supports the hospital core near the corner of Sunset Boulevard and Vermont Avenue, and supports improving neighborhood services for residents. Portions of the SNAP are considered Change Areas. The transit-oriented Specific Plan, with boundaries shaped like a number "7", covers much of the East Region. The southern portion of SNAP is in the adjacent Wilshire Community Plan. Within the Project Area, SNAP's northern boundary is generally along Franklin Avenue. The US-101 to Sunset Boulevard generally forms the northwest boundary; the SNAP boundary generally follows Sunset Boulevard before heading south along Edgemont Street to Melrose Avenue. The eastern boundary is generally along Hillhurst Avenue/Virgil Avenue. The topography within SNAP is mostly flat, with the exception of Barnsdall Art Park, which sits on top of a hill. The uses and buildings within SNAP are representative of the ones described in the East Region – assorted commercial along the corridors, multi-family residential, institutional, educational, and a cluster of hospitals. Buildings in the SNAP, excluding the major hospitals, are generally two to six stories in height.

Commercial Corridors outside of SNAP. Santa Monica Boulevard, Hillhurst Avenue, Sunset Boulevard, Hyperion Avenue, and Rowena Avenue generally have a mix of neighborhood-serving commercial uses, including restaurants, retail, and offices. Buildings are generally one or two stories tall. Many buildings have no front setbacks while some properties have surface parking lots facing the street. Some multi-family residential buildings that are three stories or taller are located along Hyperion Avenue, which also has a concentration of auto repair businesses.

SCENIC RESOURCES

Scenic resources contribute to the visual character of a given area. It includes natural or urban features. Natural features can include open space, native or ornamental vegetation/landscaping; topographic or geologic features; and natural water sources. Urban or built features include structures of architectural/historical significance or visual prominence, public plazas or art, and landscaped medians.



SOURCE: TAHA, 2018.

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FIGURE 4.1-7

VISUAL CHARACTER OF EAST REGION

Natural Features

Landforms and Geology. The Project Area's most distinctive and dominant physical landform is the Santa Monica Mountain range, located north of Franklin Avenue, in the northern portion of the Project Area. Public views of the mountains can be seen from both within and outside the Project Area, including along I-5, SR-134, and various public rights-of-way. Within the Project Area, I-5 and SR-134 traverse along or near the easterly and northerly edges of the Santa Monica Mountains, respectively.

Open Space. The most prominent open space with natural features in the Project Area is Griffith Park, a regional park with more than 4,000 acres. Other undeveloped open space areas are also located within the Santa Monica Mountains. Griffith Park is on the eastern side of the Santa Monica Mountain range. Griffith Park can be identified from afar by locating Griffith Observatory or the Hollywood Sign. Trails within Griffith Park provide views of the park and the Santa Monica Mountain range. Close-in foreground views of Griffith Park are available from adjacent streets and sidewalks.

Surface Water Bodies. Surface water bodies within the Project Area include the Los Angeles River, Lake Hollywood, and Rowena Reservoir. The Los Angeles River flows through a concrete channel and runs adjacent to the eastern boundary and within or adjacent to the northern boundary of the Project Area. The river has a bicycle and walking trail alongside it. Views of the river are typically limited to close-in foreground views from adjacent streets and sidewalks. The Project Area has two reservoirs: Lake Hollywood and Rowena. Lake Hollywood, an artificial lake, is located in the Northeast Region and is situated within the Santa Monica Mountains, east of US-101. Rowena Reservoir, an artificial lake, is located in the East Region. Due to its more prominent size and location within the Santa Monica Mountains, Lake Hollywood has more public visibility than the Rowena Reservoir.

Urban/Built Features

Prominent Structures. The Project Area contains many structures of architectural/historical significance or visual prominence in the Project Area. Many buildings in the Project Area with architectural significance and/or visual prominence are historical resources. These buildings include several iconic structures, including the Capitol Records Building (HCM #857), the Griffith Observatory (HCM #168), TCL (Grauman's) Chinese Theatre (HCM #55), Pantages Theatre (HCM #193), Chateau Marmont (HCM #151), and the Hollywood Bowl, a state historical resource. The Project Area has one of the highest concentrations of designated historical resources in the City of Los Angeles. These resources include properties listed in the National Register of Historic Places, California Register of Historical Resources, and locally designated HCMs. The Project Area has six HPOZs. Historical resources are discussed in more detail in Section 4.5, Cultural Resources, of this Draft EIR. Public views of historical resources are typically limited to close foreground views from adjacent streets and sidewalks, although a few resources can be viewed from a distance. Historical resources are located throughout the Project Area, but many are west of the US-101, such as along Hollywood Boulevard.

In addition to historical resources, the Project Area also includes other prominent buildings, such as various modern mid- and high-rise structures. These structures include the new Live Proper Residences, Dream Hotel, Emerson College Los Angeles Center (ELA), the Sunset Media Center, the Hollywood & Highland retail/entertainment complex, the W Hollywood Residences, and the cluster of hospitals in the East Region.

Landscaped Parkways and Roadway Medians. Landscaped parkways with mature trees are primarily found throughout the non-hillside portions of the Project Area. Two notable landscaped parkways include the cedar trees along the parkway of Los Feliz Boulevard and the avocado trees located on the 4400 block of Avocado Street. These two landscaped parkways are HCMs. In the Project Area, only a few streets have landscaped medians, including Highland Avenue, Hillhurst Avenue north of Los Feliz Boulevard,

Vermont Avenue north of Los Feliz Boulevard, Huxley Street, Crystal Springs Drive, and Franklin Avenue between Talmadge Street and St. George Street.

Scenic Highways. No California-designated scenic highways or scenic parkways (or proposed state scenic highways or parkways) are located within the Project Area. Additionally, no state-designated scenic highways in proximity to the Project Area provide views of the Project Area. The nearest state-designated scenic highway is State Route (SR)-2 north of the Interstate (I)-210 through the Angeles National Forest, approximately 5.9 miles northeast of the Project Area.

Seven City-designated scenic highways are within or adjacent to the Project Area, including two streets along the northerly Project Area boundaries. City-designated scenic highways, according to the City's MP 2035, are either 1) arterial streets or state highways that traverse areas of natural scenic quality in undeveloped or sparsely developed areas of the city or 2) arterial streets that traverse urban areas of cultural, historical or aesthetic value which merit protection and enhancement. **Table 4.1-2** lists and describes the City-designated scenic highways that are within or along the boundaries of the Project Area.

TABLE 4.1-2: CITY-DESIGNATED SCENIC HIGHWAYS WITHIN OR ADJACENT TO THE PROJECT AREA

City-Designated Scenic Highways	Location in Relation to Project Area	Description
Barham Blvd. (between US-101 to Forest Lawn Dr.)	Along Project Area Northern Boundary	Dramatic pass with northerly valley views
Forest Lawn Dr. (between Barham Blvd. to Griffith Park Dr.)	Within Project Area	Winding road past Hollywood Hills; gateway to Griffith Park
Highland Ave. (south of Melrose Ave.)	Within Project Area	Landscaped median, significant palm trees
Laurel Canyon Blvd. (north of Hollywood Blvd.)	Within Project Area	Winding cross mountain road through rustic area
Los Feliz Blvd. (between Western Ave. to Riverside Dr.)	Within Project Area	Hillside and city views
Mulholland Dr. (west of US-101)	Along Project Area Northern Boundary	Panoramic views
Riverside Dr. (south of Los Feliz Blvd.)	Within Project Area	Essential link to "chain of parks" concept

SOURCE: City of Los Angeles General Plan, *Mobility Plan 2035: An Element of the General Plan*, adopted 2015.

LIGHT AND GLARE

Light. Nighttime illumination of varying intensities is characteristic of most urban and suburban land uses including those in the Project Area. Nighttime lighting is necessary to provide and maintain safe, secure, and attractive environments. However, these lights have the potential to produce spillover light and glare, and if designed incorrectly, could be considered unattractive or could be annoying or obtrusive to residents. Light that falls beyond the intended area is referred to as nighttime spillover light or light trespass. Nighttime spillover light can adversely affect light sensitive uses at nighttime, especially residences.

Within the flatlands portion of the Project Area, a high level of ambient nighttime light exists due to its urbanized nature. Nighttime artificial lighting sources in this area include street, security, and way finding outdoor lighting; vehicle headlights; and interior building illumination. These artificial lighting sources result in a range of low to high ambient nighttime light levels, depending on the specific location. Exterior nighttime lighting is the most prominent within the Regional Center of the Project Area as this area experience high activity levels at night. Exterior lighting in this area is used to illuminate buildings, parking facilities, pedestrian walkways, roadways, and signage.

Street lights, particularly at intersections, illuminate a majority of the streets in the Project Area. The bulk of the existing street lights within the Project Area are on approximately 40-foot-tall street light poles. Ornamental pedestrian-level lighting is provided on some corridors, such as portions of Wilcox Avenue and Cahuenga Boulevard.

Nighttime lighting is more limited in the Santa Monica Mountains and the eastern end of the Project Area. In the developed portions of the Santa Monica Mountains and the eastern end of the Project Area, nighttime artificial lighting sources include pedestrian-scaled street lights, security and decorative wall lighting at residential homes, vehicle headlights, and interior building illumination. Generally, no artificial lighting sources are available in the undeveloped portion of the Santa Monica Mountains.

Ambient light levels or illumination is measured in foot-candles (fc). A fc is a unit of measure or the intensity of light falling in one square foot of surface area equal to one lumen per square foot. **Table 4.1-3** describes the fc range of various types of light.

TABLE 4.1-3: FOOT-CANDLE VALUES OF COMMON LIGHT SOURCES

Illumination Source	Foot-Candles (lux/fx)
Full Daylight	1,000
Full Moon	0.1
Office Lighting	70-150
Street Lighting	0.6-1.6

SOURCE: City of Los Angeles, *Department of Public Works Bureau of Street Lighting Design Standards and Guidelines*, 2007.

Table 4.1-4 details the LADPW's Bureau of Street Lighting Design Standards and Guidelines for road types existing in the city. The recommended level of roadway luminance is dependent on roadway type, level of pedestrian activity, and the reflective properties of the roadway. The most stringent standards are imposed when there is a high probability of pedestrian and vehicle conflicts. Pavement surfaces for a roadway are specified using an R1 through R4 classification system.

TABLE 4.1-4: CITY OF LOS ANGELES ILLUMINATION STANDARDS FOR ROADWAY LIGHTING

Road	Pedestrian Conflict	Pavement Classification		
		R1 (lux/fc)	R2 & R3 (lux/fc)	R4 (lux/fc)
Major (renamed Boulevards)	High	12.0/1.2	17.0/1.7	15.0/1.5
	Medium	9.0/0.9	13.0/1.3	11.0/1.1
	Low	6.0/0.6	9.0/0.9	8.0/0.8
Collector (renamed Avenues)	High	8.0/0.8	12.0/1.2	10.0/1.0
	Medium	6.0/0.6	9.0/0.9	8.0/0.8
	Low	4.0/0.4	6.0/0.6	5.0/0.5
Local	High	6.0/0.6	9.0/0.9	8.0/0.8
	Medium	5.0/0.5	7.0/0.7	6.0/0.6
	Low	3.0/0.3	4.0/0.4	4.0/0.4

Note: R1, R2, R3, and R4 are industry standard pavement classifications where R1 is the most reflective and R4 is the least reflective.
SOURCE: City of Los Angeles, *Department of Public Works Bureau of Street Lighting Design Standards and Guidelines*, 2007.

The existing street light illumination levels along various roadway corridors within the Project Area are described in **Table 4.1-5**. In general, the current illumination levels of the Project Area do not exceed standard illumination levels. Within the CPA, illumination levels due to street lights between intersections are lower than those at intersections, regardless of light spilling from lighting within adjacent buildings. The average street light illumination levels along the commercial corridors of the Project Area generally range from 1.36 to 2.36 fc, With the exception of the I-5, US-101, and SR-134 corridors, Hollywood Boulevard has the highest average street light illumination level in the Project Area.

TABLE 4.1-5: STREET LIGHT ILLUMINATION LEVELS IN THE PROJECT AREA

Corridor	Street Light Illumination /a/	
	Average Foot-candles (fc)	Range Foot-candles (fc)
EAST-WEST CORRIDORS		
Forest Lawn Dr. between Barham Blvd. and Zoo Dr.	0.49	<0.01 – 2.32
Zoo Dr. between Forest Lawn Dr. and LA Zoo	0.03	<0.01 – 1.74
Los Feliz Blvd. between Riverside Dr. and Hillhurst Ave.	0.96	<0.01 – 2.57
Los Feliz Blvd. between Vermont Ave. and Western Ave.	1.69	0.05 – 2.74
Franklin Ave. between Hillhurst Ave. and La Brea Ave.	1.44	<0.01 – 5.45
Hollywood Blvd. between Sunset Blvd. and Fairfax Ave.	2.36	0.09 – 7.9
Sunset Blvd. between Fountain Ave. and La Brea Ave.	1.62	0.23 – 4.08
Fountain Ave. between Virgil Ave. and Hyperion Ave.	1.02	<0.01 – 2.66
Fountain Ave. between Sunset Blvd. and La Brea Ave.	1.10	<0.01 – 3.59
Santa Monica Blvd. between Virgil Ave. and La Brea Ave.	1.57	0.12 – 3.92
Melrose Ave. between Virgil Ave. and Vermont Ave.	1.28	0.45 – 2.09
Melrose Ave. between Virgil Ave. and La Cienega Blvd.	1.36	0.04 – 6.32
NORTH-SOUTH CORRIDORS		
Barham Blvd. between Cahuenga Blvd. and Forest Lawn Dr.	0.78	<0.01 – 2.12
La Brea Ave. between Franklin Ave. and Melrose Ave.	1.76	0.22 – 6.60
Beachwood Dr. between Westshire Dr. and Franklin Ave.	0.13	<0.01 – 2.00
Cahuenga Blvd. between Barham Blvd. and Franklin Ave.	1	<0.01 – 4.87
Cahuenga Blvd. between Franklin Ave. and Melrose Ave.	1.48	0.01 – 5.42
Highland Ave. between Franklin Ave. and Melrose Ave.	1.65	0.13 – 7.63
Wilton Pl. between Franklin Ave. and Melrose Ave.	1.03	<0.01 – 3.32
Western Ave. between Los Feliz Blvd. and Melrose Ave.	1.65	<0.01 – 4.11
Vermont Ave. between Los Feliz Blvd. and Melrose Ave.	1.72	0.12 – 3.48
Hillhurst Ave. between Los Feliz Blvd. and Santa Monica Blvd.	1.31	0.04 – 2.49
Virgil Ave. between Fountain Ave. and Melrose Ave.	1.08	0.42 – 2.04
Virgil Ave. between Santa Monica Blvd. and Melrose Ave.	1.11	0.19 – 3.29
Hyperion Ave. between Fountain Ave. and Waverly Dr.	0.98	0.01 – 3.02

/a/ Street light illumination was based on a lighting survey that was conducted from 10:00 p.m. to 1:00 a.m. on November 25 and 28, 2016 using a data-logging light meter and geographic positioning software (GPS). The light meter was placed horizontally atop of a sports utility vehicle (approximately 6.5 feet above the ground) in a manner that would not be influenced by on-coming vehicle headlights. The data-logging meter was set to record illumination levels at 60-second intervals and the vehicle was driven at an average speed of 25 miles per hour near the centerline of major streets within the Project Area. Lighting levels were recorded approximately every 2,200 feet and were logged by time of day. The GPS tracking software was activated and synchronized with the time of day of the light meter. The data was downloaded to Google Earth to visually identify the locations and the associated time of day when the vehicle was driven at that specific location. The GPS location and light levels (by time of day) were reconciled to identify the lighting level at a specific geographic location along the surveyed streets. Based on the compiled data, the average lighting level was calculated from all the recorded measurements along a specific street segment. Over 7,000 sample light reading measurements were collected during the lighting survey.

SOURCE: TAHA, 2016.

A portion of the CPA is within the Hollywood Signage SUD, which was formed to promote the continuing contribution of signage to the distinctive aesthetic of the district, and to also control the blight created by poorly placed, badly designed signs. Additional signage is allowed and encouraged in the Hollywood Signage SUD, which could result in higher illumination than other parts of the CPA. However, the SUD requires that illuminated signs are located or screened so as to minimize direct light sources onto any exterior wall of a residential unit, and into a window of a commercial building. Externally lit signs are required to be shielded from public view.

Glare. Glare is a common phenomenon in Southern California primarily due to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, resulting in a large concentration of reflective surfaces. Glare can result from sunlight reflecting off glass, as well as plastic awnings or other structural fixtures of buildings located on adjacent streets in the Project Area. The majority of existing structures within the Project Area are composed of non-reflective materials, such as concrete, wood, stucco and plaster. However, a few commercial buildings within the Project Area contain a substantial amount of glass. During the daytime, parked vehicles can also produce a large source of glare from sunlight being reflected off windshields and other surfaces. Nighttime glare can occur from a variety of light sources including street lights, lighting of sports and entertainment events and lighting of commercial and residential structures.

SHADE AND SHADOWS

Shading refers to the effect of shadows cast upon adjacent areas. The consequences of shadows upon land uses may be positive, including cooling effects during warm weather, or negative such as the loss of natural light necessary for solar energy purposes or the loss of warming influences during cool weather. Shadows are cast in a clockwise direction from west/northwest to east/northeast from approximately 7:00 a.m. to 3:00 p.m. or later depending on the time of the year: Summer Solstice (June 21), Spring/Fall Equinoxes (March 20 and September 22), and Winter Solstice (December 21). Generally, the shortest shadows are cast during the Summer Solstice and then grow increasingly longer until the Winter Solstice. During the Winter Solstice, the sun appears lower in the sky and shadows are at their maximum coverage lengths. Shadows cast during the Winter Solstice represent the greatest potential shade and shadow impacts.

Shadow effects depend on several factors, including local topography, the height and massing of buildings, and existing uses. Due to the relatively dense arrangement of existing commercial, industrial, and residential buildings within the developed portions of the Project Area, shadow effects already exist in the Project Area. Mid-rise and high-rise buildings cast longer shadows than low-rise buildings. Within the Project Area, taller buildings are generally located in the Regional Center and the effects of shadows cast in this area affecting public spaces where people gather for long periods are minimal.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, the Proposed Plan would have a significant impact related to aesthetics if it would:

- Have a substantial adverse effect on a scenic vista;
- Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway;
- Substantially degrade the existing visual character or quality of the site and its surroundings; and/or
- Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

METHODOLOGY

This impact discussion will consider impacts from inside and outside the plan area where the visual resources identified in the existing setting may be affected by the Proposed Plan. This impact section will analyze impacts from reasonably expected development of the Proposed Plan.

Under SB 743, residential, mixed-use, and employment center projects in a TPA are exempt from aesthetic impacts analysis. Most development that is reasonably foreseeable in the TPAs of the Proposed Plan would be residential, mixed use, or an employment center and would therefore, as a matter of law, not have aesthetic impacts under CEQA Guidelines. It would seem reasonable to assume that the Proposed Plan should not have foreseeable aesthetic impacts for these qualifying projects. With that said, the relevant language of SB 743, codified at PRC Section 21099(d), does not expressly apply to projects adopting a land use plan. Therefore, conservatively this EIR will consider aesthetic impacts from the implementation of the Proposed Plan in all areas of the plan, including TPAs and including development that would qualify for SB 743 exemption for aesthetics.

The evaluation of aesthetic impacts is a subjective exercise, both in identifying valued aesthetic resources and identifying significant impacts to valued aesthetic resources. Considerations for determining impacts under the various categories of aesthetic resources and impact thresholds are discussed below.

SCENIC VISTAS

This aesthetics analysis takes into account public scenic views of the Project Area from varying vantage points, as well as public scenic views from the Project Area of visual features such as open spaces, mountain ranges, and distinctive focal views (e.g., the Hollywood Sign). For the purposes of the CEQA analysis, significant impacts to views typically consist of the loss or obstruction of a valued public view or changes in the character of the view that detract from a valued public view. The assessment method would identify whether such viewpoints exist within the Project Area and whether the content of the view would be adversely affected by the Proposed Plan. The loss of a private view would not be an impact for purposes of this analysis. The City does not protect private views. Changes to private views from development are expected in an urban environment over time as buildings are changed or added to a particular area.

VISUAL CHARACTER

The concept of visual character is not explicitly defined in the CEQA Guidelines or the City's Thresholds Guide. Visual character can be defined in terms of the overall impression formed by the relationship between perceived visual elements of the built, urban environment existing in the Project Area.

Significant impacts to the visual character of an area is generally based on the removal of features with aesthetic value, the introduction of contrasting urban features into a local area, and the degree to which the elements of the Proposed Plan detract from the visual character of an area. Analysis of impacts to visual character is subjective in its very nature. The qualities that create aesthetic value will vary from person to person. Some observers may see benefits in changes to the visual character, while other observers would find them discordant.

IMPACTS

IMPACT 4.1-1 Would implementation of the Proposed Plan have a substantial adverse effect on a scenic vista? **Less than significant impact.**

The City's General Plan Conservation Element defines scenic vistas as the panoramic public view access to natural features, including views of the ocean, striking or unusual natural terrain, or unique urban or historic resources." The panoramic public views in the Hollywood CPA are of the Santa Monica Mountains, the hillsides (e.g. Hollywood Hills), and the urban skyline. The Project Area has several public vantage points from which these views can be seen. Additionally, as discussed in the environmental setting above, scenic views may also be focal on a valued aesthetic resource, such as views of the Hollywood Sign.

The Project Area has several publicly accessible locations that provide scenic vistas. Of these publicly accessible locations, two are designated public vantage points, both of which are in the Hollywood Hills: the Jerome C. Daniel Overlook and the Universal City Overlook. As described in the Existing Setting, the view from the Jerome C. Daniel Overlook is panoramic and includes the Hollywood Bowl, Santa Monica Mountain range, the Hollywood Sign, Griffith Observatory, and the urban skylines of Hollywood and downtown Los Angeles in the distance, and the Hollywood Bowl. The skyline includes both mid-rise buildings and high-rise buildings, as well as historical resources and recently built towers. On clear days, it may be possible to see the Pacific Ocean. The Universal City Overlook provides a panoramic view of Universal City, an unincorporated area in Los Angeles County outside of the CPA, and of mountains. In addition, both overlooks have views of the San Fernando Valley. The panoramic views from these two designated public vantage points generally represent the public scenic views available in various publicly accessible locations in the Santa Monica Mountain range and hills within the Project Area, such as Dante's View, Barnsdall Art Park, and public rights-of-way and public trails in and around the Plan Area. However, the quality of the views can vary based on various factors, such as specific location, elevation, obstruction from trees, bad air days, and weather.

Although public views inside the Plan Area of the mountains, hillsides, and of the Hollywood Sign can be seen at lower elevations from the flatlands, the views are not panoramic due to the street grid pattern, flat terrain, and built environment. The views from public streets are from a distance and generally along north-south corridors, which often have buildings and trees that limit views.

A substantial adverse effect on scenic vistas would occur if implementation of the Proposed Plan would result in the loss and/or significant obstruction of scenic views or change the character of the view that detract from a valued public view. Significant obstruction or diminishment of scenic vistas would occur if the Proposed Plan introduces development that contrasts enough with the view so that it is permanently affected or if public access to the public vantage points is lost. The City does not protect private views and the loss of a private view would not be an impact for purposes of this analysis.

The Proposed Plan would not result in a loss of scenic vistas. In general, the Proposed Plan does not propose or anticipate any substantial change to the Santa Monica Mountains that would result in the loss or obstruction of scenic views or change the character of the view of the Santa Monica Mountains. The Proposed Plan also does not propose or anticipate any substantial change to properties with an Open Space land use designation, such as within the Santa Monica Mountains and at Barnsdall Art Park. A majority of the Santa Monica Mountains and hillsides have either an Open Space land use designation or a low density single-family residential land use designation. Uses that are permitted within an Open Space designated area are generally limited to recreational uses. Future development occurring during the lifetime of the Proposed Plan within Open Space designated properties are expected to be consistent with the types of low intensity recreational uses that are found in the Santa Monica Mountains, Griffith Park, and other Open Space designated areas. Additionally, the Proposed Plan does not anticipate development in the upper

slopes of the mountains. The Hollywood Sign and Griffith Observatory are in Griffith Park, which would be maintained as a regional park for recreational use. The Hollywood Bowl is a public facility, and the Proposed Plan is not making changes to the site. The Proposed Plan does not propose any development at the two designated overlooks, Dante's View or Barnsdall Art Park and does not propose any policies that would restrict public access to these viewpoints. Views from public rights-of-way and public trails, including around the hillsides, are expected to generally be maintained as limited new development or greater intensity development is expected in these areas. Additionally, implementation of the Proposed Plan would serve to protect and preserve natural resources and natural features of the environment; to provide outdoor recreation opportunities and advance the public health and welfare; to encourage the management of public lands in a manner which protects environmental characteristics; and to encourage the maintenance of open space uses on all publicly-owned park and recreation land and on open space public land which is essentially unimproved.

Vacant parcels with low density single-family residential land use designations within the Santa Monica Mountains and foothills (i.e., Minimum Residential, Very Low II Residential, Low I Residential, and Low II Residential) could be developed during the lifetime of the Proposed Plan. Additionally, existing single-family residential structures in the hillsides could gain additions or be redeveloped. The Proposed Plan has stricter subdivision controls and limits density for hillside properties that are located on a natural slope that exceeds 15 percent. New structures within the hillside residential areas would be expected to be consistent with the height and massing of existing structures. Thus, views of the Santa Monica Mountains are not expected to significantly change in character with implementation of the Proposed Plan. Additionally, the low-density structures within the Santa Monica Mountains are not expected to obstruct scenic views that are currently available within publicly accessible locations in the Santa Monica Mountain.

The urban skyline in Hollywood is a composite of buildings that span various architectural styles from the last century and recent decades. The development in the central portion of the Hollywood CPA, generally the Regional Center, is the main contributor to the form of the skyline. The existing varied skyline includes slender towers that are glassy, historic buildings that are 13 stories or less in height (such as office buildings), hotels, and mid-rise buildings.[4] **Figure 4.1-1** provides a view of the urban skyline within the central portion of the Project Area from the Jerome C. Daniel Overlook. The varied skyline within the Regional Center is also shown in this figure. Under the Proposed Plan, new buildings would be interspersed with existing ones, and views of the varied skyline would not be removed or lost. In addition, the Proposed Plan would not alter existing street alignments so existing views of the Santa Monica Mountains along public streets and sidewalks that run north-south in the flatlands would not be lost.

Additional development resulting in physical changes in the CPA could occur under the Proposed Plan. Although physical changes could occur in both the Change and Non-Change Areas, the areas that would experience the most change would be primarily within the Change Areas, particularly in the Regional Center near the Metro Red Line Station and along commercial corridors near transit. Underutilized parcels, including surface parking lots, could be developed and existing low-rise buildings could be replaced with taller buildings. Additionally, more mixed-use buildings, generally multi-family housing above ground-floor commercial, could be built under the Proposed Plan. However, the changes to massing, form, and height are expected to be incremental and gradual, as it takes time for development projects to be proposed, approved and financed. Past building data demonstrates that not all properties are built to the maximum development permitted. Reasons include economic conditions and market trends, financial lending practices, construction and land acquisition costs, physical site constraints, and other General Plan policies or zoning regulations.

[4]Between 1905 to approximately 1957, the City of Los Angeles limited the maximum height of buildings to 13 stories.

The Proposed Plan would facilitate additional development potential in order to accommodate anticipated growth. Based on the proposed changes to land use designation and/or zoning, more mid-rise buildings could be built along the major commercial corridors. Additionally, more mid-rise and high-rise buildings could be built in the Regional Center.

In the Regional Center, additional development near the two Metro Red Line Stations would be allowed. Certain subareas, or Change Areas, in the Regional Center would be allowed a floor area ratio (FAR) of 3:1 near the Metro Hollywood/Highland Station, and some subareas also would have a new height limit of 75 feet. Several subareas near the Metro Hollywood/Vine Station would be allowed 4.5:1 FAR. Subareas with a proposed 4.5:1 FAR could see new high-rise buildings. Parcels with larger FARs, such as 4.5:1, have more floor area for buildings and the design, massing, and height of these development projects can range from being short and boxy to tall and slender. The Proposed Plan would also extend the Regional Center land use designation along both sides of Hollywood Boulevard and the north side of Sunset Boulevard from Gower Street east to the US-101. Mixed-use development in the extension area along Hollywood Boulevard would get 3:1 FAR; the extension area on Sunset would have 4.5:1 FAR. In addition, the Proposed Plan would allow additional development potential on selected commercial corridors and incentivizes mixed-use development along major commercial corridors. The buildings are expected to be low rise along existing low-scale commercial corridors with proposed 1.5:1 FAR, such as Hillhurst Avenue or Hyperion Avenue, which have proposed height limits of 36 feet and 30 feet, respectively. The Proposed Plan would allow four-story buildings in the western portion of Melrose Avenue between Fairfax Avenue and Highland Avenue, instead of today's mostly two-story buildings. Along major commercial corridors, such as portions of Santa Monica Boulevard, Vine Street, and Western Avenue, the incentivized FAR for mixed-use development would be 2.5:1 or 3:1 depending on the location. This proposed change would generally be expected to result in more mixed-use buildings that are mid-rise in height, replacing existing low-rise buildings.

The general physical changes that could occur under the Proposed Plan, as described above, have the potential to change the visual appearance of Hollywood's urban skyline. However, the changes would not cause significant obstruction or significant diminishment of the existing skyline. The existing view of the skyline from the Jerome C. Daniel Overlook, which generally represent the types of scenic views that are publicly available within the Project Area, has a few main components: background view of the varied downtown Los Angeles skyline, middle ground view of the varied Hollywood skyline in the West Region of the Hollywood CPA (west of US-101), middle ground view of the relatively low-scale skyline of the East Region (east of US-101), and foreground view of the Hollywood Bowl.

Due to the sizable distance between the downtown Los Angeles skyline and the Hollywood skyline, changes to the Hollywood skyline would not block the downtown silhouette. Newer projects in the Project Area, such as the Icon office tower (14 stories), the Kimpton Everly Hotel (14 stories), Proper Residences (23 stories), and the Sunset Media Center tower (22 stories), are taller buildings that are clearly identifiable from the overlook due to their height and/or distinctive design but are about six miles away from downtown. New development of similar height and scale that could be built in the Regional Center under the Proposed Plan would add to the silhouette of the Hollywood skyline but would not significantly obstruct views of the downtown Los Angeles skyline. The existing Hollywood skyline has been changing in recent years with new development projects on the ground, as mentioned above, and would continue to change with the Proposed Plan. The potential mid-rises and high-rises that could occur under the Proposed Plan would not be a significant contrast to existing development. Potential development within the Regional Center is generally expected to be similar to the types of uses that currently exist in the Regional Center and includes mixed-use development, office buildings, multi-family residential buildings, and hotels. The Regional Center already has a mix of uses, building heights, and building styles that span the decades, and this medley would continue in the future under the Proposed Plan. Therefore, the potential development that could occur under the Proposed Plan could blend in with the existing buildings or have a distinctive profile but

would not be a significant contrast to the existing outline of buildings defined against the background of the sky.

New development along the commercial corridors could narrow or partially obstruct some of the available views of the mountains, hillsides and valued focal scenic views of the Hollywood Sign but the development would be expected to occur within existing lot lines, and views from public rights-of-way would generally remain. Some views at particular spots may be obstructed from new development under the Proposed Plan, but as such views are generally intermittent in the flatlands it would not be considered a significant impact. The Proposed Plan proposes relatively few changes in the East Region. These changes generally include a few FAR increases and FAR incentives along selected commercial corridors, and future development is generally expected to be low-scale and mid-rise (two to six stories). In general, it is expected that the Change Areas would experience the most physical change in the CPA. Non-Change Areas may still be redeveloped to more intense uses or density than built today as allowed by the current land use designations and zoning. While these areas may experience increased development as individual lots get developed or redeveloped over time (e.g., a vacant lot developed with a low-rise structure), it is not foreseeable that these Non-Change Areas would experience a significant increase to density, intensity, height, or mix of uses as development or redevelopment in the Non-Change Areas would be expected to be consistent in size and scale to the surrounding area. As such, future development within the Non-Change Areas is not expected to significantly change the character of the existing skyline or significantly obstruct existing scenic views. Additionally, the Proposed Plan would not restrict public access to the existing vantage points that provide panoramic views of the mountains and skyline.

In conclusion, physical change would likely occur and could change some existing views of scenic vistas in the Hollywood CPA. However, the degree of change is subjective depending on the sensitivity of the viewer. Some viewers may be more aware of change and more sensitive to any massing or height increases, while others note the changes but do not consider them to be adverse or substantial. For example, the skyline in Hollywood today has changed since 1988, when the existing Hollywood Community Plan was last adopted. Some people may appreciate the new, taller buildings interspersed with historical buildings and find the change appealing. Others may not agree. Based on the above discussion, the Proposed Plan could change the Hollywood skyline with new development, new single-family residences could be built in the foothills, and Non-Change Areas could be developed or redeveloped, and this may narrow existing scenic views from public rights-of-ways and public spaces. However, the changes that could occur during the lifetime of the Proposed Plan would not have a substantial adverse impact on scenic vistas. **The impact is *less than significant.***

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

IMPACT 4.1-2 Would implementation of the Proposed Plan substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? **No impact.**

No state scenic highways are located within the Project Area. As previously mentioned in "Existing Setting," the Project Area has seven City-designated scenic highways (see **Table 4.1-2**). A discussion of how the Proposed Plan would affect the scenic character of the City-designated scenic highway is provided

under Impact 4.1-3. As no state scenic highways are located within the Project Area, the Proposed Plan is not expected to damage scenic resources within a state scenic highway. Therefore, there is ***no impact***.

Mitigation Measures

No mitigation measures are required.

Significance of Impact after Mitigation

No impact.

IMPACT 4.1-3 Would implementation of the Proposed Plan substantially degrade the existing visual character or quality of the site and its surroundings? **Less than significant impact.**

The following analysis is organized by the regions described in the Existing Setting. An overview of the foreseeable visual character of the region under the Proposed Plan is provided, followed by visual character descriptions of the specific Change Areas under the Proposed Plan. The Proposed Plan has a number of consistency subareas that reflect the existing use and correct the land use designation and/or zone classification. For example, the land use designation of a few schools will be updated to Public Facilities. The consistency subareas are considered and included in the overview description.

Within the Project Area, Change Areas would experience the most change in visual character. Although Non-Change Areas may be redeveloped with more intense uses or density when allowed by current and proposed land use designations and zoning than what currently exists (e.g., a surface parking lot getting developed with a low-rise office building or a two-story multi-family building replacing a one-story duplex), it is not foreseeable that these Non-Change Areas will experience a significant increase to density, intensity, heights or mix of uses that would affect the visual character of the existing environment. Development or redevelopment in the Non-Change Areas are generally expected to be consistent in size and scale to the surrounding area and would be consistent with the visual character of the area. Future development in these areas would continue to be subject to City zoning regulations and would be guided by policies and the design standards and guidelines associated with the Proposed Plan. As such, significant changes to the visual character in Non-Change Areas are not foreseeable as a result of the Proposed Plan.

Northwest and Northeast Regions (combined due to similarity of land uses)

Overview

The predominant land uses in the Northwest and Northeast Regions of the CPA are undeveloped open space (Santa Monica Mountains, Griffith Park) and developed parcels with one- to four-story single-family houses in the Hollywood Hills and the northern portion of Los Feliz. Generally, the lots are larger in the Los Feliz residential neighborhood than in the Hollywood Hills. A few multi-family residential, low-scale commercial, and public facilities areas are also located in these regions.

For the most part, the Proposed Plan does not propose land use designation or zone changes, except for consistency corrections, in the northern regions of the CPA.[5] Under the Proposed Plan, Griffith Park will continue to be a regional park for recreational use. Future development occurring during the lifetime of the Proposed Plan within open space areas are expected to be consistent with the types of low intensity recreational uses that are found in the Santa Monica Mountains. Additionally, the Proposed Plan does not anticipate development in the upper slopes of the Santa Monica Mountains. Single-family residences,

[5]Two Active Change Areas, identified as 2 and 2:1, are located north of Franklin Avenue on Cahuenga Boulevard.

generally located in the lower foothills and canyons, would remain the predominant developed use. Residential development could continue to occur on vacant lots but stronger subdivision controls under the Proposed Plan would limit hillside development. Under the Proposed Plan, residential development in the hillsides would be limited to the Minimum Residential land use designation when the site has average natural slopes greater than 15 percent, which means that the density would be limited to one single-family house per 40,000 square feet of lot area when the slope exceeds 15 percent.

Redevelopment could also occur when existing buildings are replaced with new ones but the City has development regulations and restrictions, including for height. For example, one of the multi-family residential areas along Beachwood Drive north of Franklin Avenue has a 1XL height district. This height district permits buildings up to 30 feet tall. In the future, an existing one-story building could be demolished and replaced with a three-story building. This area has an existing mix of one-story to three-story buildings. Replacing one-story residential buildings with three-story residential buildings is allowed by the zone, and such a change would still be consistent with the visual character of the area. In addition, not all properties are expected to be redeveloped by the year 2040, the horizon year of the Proposed Plan. Development in the hillside may be subject to Specific Plans, depending on the location of the parcel. The Hollywoodland and Mulholland Scenic Parkway Specific Plans provide development regulations for use, height, and design. As a result of maintaining existing land use designations, zoning, and development regulations, the overall development pattern in the Northwest and Northeast Regions under the Proposed Plan would be similar to the existing visual character.

Commercial Change Areas

Excluding Change Areas with consistency corrections, the Proposed Plan would increase the FAR of two small commercial subareas (identified as Subareas 2 and 2:1) to 1.5:1 on Cahuenga Boulevard north of Franklin Avenue. Currently, these subareas are developed with one-story and two-story commercial buildings and have surface parking lots. These properties, under the Proposed Plan, could be redeveloped. However, 1.5:1 FAR generally still produces low-scale buildings that are consistent with the surrounding uses.

Summary

In summary, changes to the visual character of the northern regions of the Hollywood CPA would be ***less than significant***.

West Region

Overview

The West Region of the CPA is in the flatlands. It is a varied visual area that is mostly developed, with a wide range of various uses, building massing, and building age. As previously described, this area includes commercial development, residential uses, entertainment and tourism uses, public transportation, public facilities, a cemetery, and has low-rise buildings, mid-rises, and some high-rises.

Under the Proposed Plan, a similar pattern of development and visual character would continue to occur. Generally, infill development or redevelopment would be expected over time but not all properties would change by 2040. Development activity is most active in the West Region. Some surface parking lots may be developed with projects and existing buildings could be demolished and replaced by new ones. Some of the new buildings would be taller or bigger than existing ones but they are subject to development regulations, such as FAR. Many parcels have regulations for FAR and height, and these regulations will remain under the Proposed Plan. One exception is the western portion of Melrose Avenue, generally between Fairfax Avenue and Highland Avenue. The Proposed Plan will maintain the FAR regulations but will raise the allowable building height from 30 feet to 45 feet. Transitional height requirements for properties abutting residential zones will still apply. Many residential areas in this region have height limits

that would result in low-rise structures for single-family residential and low-to-medium density multi-family residential uses. Infill or redevelopment of parcels in such areas must continue to follow regulations for height, FAR, and density. Therefore, the pattern of development is generally maintained. In other areas of the West Region, including the Regional Center, other commercial corridors, limited industrial areas, and higher density multi-family residential areas, development varies in visual character today and would continue to be varied in the future with implementation of the Proposed Plan. In areas where there are limits on development, such as height, the neighborhood scale would be generally maintained. Areas that have FAR limits but not height limits have more varied appearances that tend to produce mid-rise and high-rise buildings, which is the case today, and this mixed visual environment would continue.

As discussed, anticipated development changes in the West Region would be varied but would still reflect the existing pattern of development. Change Areas within the West Region would likely see more visual change under the Proposed Plan due to changes in land use or zoning, as described below. However, these changes would be consistent with the visual character of an urban environment that already has a variety of mid-rise and high-rise buildings.

Community Plan Implementation Overlay

The Proposed Plan would add pedestrian-oriented design regulations to commercial-zoned subareas in the West Region that are within the proposed Community Plan Implementation Overlay District (CPIO) boundary for new development. The CPIO boundary encompasses the Regional Center and surrounding parcels.

Change Areas in the Regional Center and from Gower Street to US-101. The Proposed Plan would increase development potential by increasing the FAR of specific parcels near the Metro stations in the Regional Center. The Proposed Plan would also extend the Regional Center land use designation east of Gower Street to the US-101 (i.e., proposed extension area), which could lead to the replacement of underutilized parcels, such as surface parking lots, and low-rise buildings with new structures. The heights of new structures would vary, depending on the lot size, the FAR of the parcel, and if a height limit is proposed. Some Change Areas in the Regional Center, for example, would have height limits ranging from 36 feet to 150 feet. Other Change Areas do not have height limits, but it can be expected that more mid-rise buildings and high-rise buildings would be built under the Proposed Plan, which allows 3:1 FAR and 4.5:1 FAR for some parcels in the Regional Center. Recently built development projects in the Regional Center include mid-rise and high-rise structures.[6] As a result, the Proposed Plan would augment the existing skyline with buildings of varying heights in the Regional Center. Uses that exist today are reasonably expected as well in the future – mixed-use projects, hotels, office buildings, retail, restaurants, and entertainment and tourism attractions. Although more mid-rise and high-rise structures would be introduced in this area with implementation of the Proposed Plan, mid-rise and high-rise structures currently exist within the Regional Center and the proposed extension area. The density in this area is relatively high compared to the rest of the Project Area. New structures that would be constructed under the Proposed Plan would be consistent with the varied height that is generally found in this area and is not expected to significantly alter the overall visual character of these areas.

Change Areas in Commercial Corridors Outside of the Regional Center. The Change Areas in the commercial corridors outside the Regional Center could have more mixed-use buildings and hotels that are mid-rises under the Proposed Plan, which incentivizes FAR for mixed-use projects and hotels. If a new development project consists of only residential or commercial, the incentive would not apply. The actual heights of structures would vary, depending on the lot size, the FAR, and if there is a height limit proposed

[6]Recently built development projects include NeueHouse Hollywood (six stories); Eastown (six stories); Camden Hollywood (seven stories); an office building at 1601 S. Vine Street (eight stories); Dream Hotel (10 stories); Kimpton Everly Hotel (14 stories); Sunset Gordon Tower (22 stories); Hollywood Proper Residences (23 stories); and Argyle House (18 stories).

in the Change Area. The height of new structures in some of the lower-scale commercial corridors that are near residential neighborhoods would have restrictions of 30 feet, 36 feet, 45 feet or 50 feet. The lower-scale commercial corridors would have FAR of 1.5:1 or less. Thus, the height of new development in these areas would be consistent with the height of the existing uses in these areas. Under the Proposed Plan, FAR incentives for mixed-use corridors would increase the FAR to 3:1 or 2.5:1, which generally leads to mid-rise structures. However, residential- or commercial-only development projects could continue to be built, which would be lower in scale, and not all properties would be redeveloped by 2040. In general, though, it is foreseeable that the height of some new buildings could be similar to existing ones, and new buildings for mixed-use development projects or hotels could be taller, depending on the FAR of the commercial corridor. The newer taller buildings could be prominent against existing low- and mid-rise development, however, taller buildings in urban environments in proximity to transit are not undesirable or significantly adverse. In general, such increases in development intensity along commercial corridors served by transit are considered appropriate. While such changes may not be welcomed by all, they do not represent a substantial adverse impact to the overall visual character of this urban environment.

Multi-Family Residential Neighborhoods with Change Areas

The visual character of the few multi-family residential neighborhoods with Change Areas under the Proposed Plan is expected to resemble the existing scale and pattern of development. The two multi-family neighborhoods north of the Regional Center, divided by Highland Avenue, will retain the existing density, intensity, and height for the most part. The proposed changes here are for design-related improvements, such as limiting driveways, and not for density or intensity. North of Franklin Avenue, the proposed maximum height of parcels in subarea 3:1D would be reduced to 30 feet to reflect the existing building height. East of Highland Avenue in subarea 3:3, the new proposed maximum height would be 60 feet, which would be consistent with the newer, five-story apartment buildings on the ground today.

For the area near US-101 west of Bronson Avenue, the Proposed Plan would implement a new height limit (30 feet) that reflects the heights of existing buildings in the Selma-Labaig Historic District. In the adjacent areas, the Proposed Plan would allow for increased density but maintains the existing 45-foot height limit. Visually, the building exteriors would be of similar scale to the newer, four-story buildings already built.

For the multi-family residential area east of Vine Street and south of Santa Monica Boulevard, the Proposed Plan would increase density and add new site plan design requirements. The maximum height of buildings in this area would increase to 45 feet only if height stepbacks are incorporated in the building design. Otherwise, the maximum height would be 35 feet, which is 5 feet more than the existing 30-foot height limit for the area. Under the Proposed Plan, the visual appearance of this area would improve with the new design requirements, but the scale would still be in range of today's mostly two- to three-story buildings.

Limited Industrial Change Areas for Entertainment/Media-Related Uses

Under the Proposed Plan, the goal for Limited Industrial land use designation parcels is to preserve them for entertainment and studio and related support uses that allow for the retention of industry jobs. The preservation areas will continue to emphasize the continued use of these parcels for employment, maintain the existing 1.5:1 FAR allowed but would permit additional limited industrial uses with a proposed zone change from MR1-1 to [Q]M1-1. The M1 zone is consistent with the existing Limited Manufacturing land use designation, which is not changing under the Proposed Plan, and new uses allowed would not be inconsistent with the uses that exist today. The Proposed Plan identifies a portion of Santa Monica Boulevard ("Theatre Row") for the preservation and promotion of small-equity theaters. New auto-repair and related automotive uses would be prohibited to reduce the existing concentration of such uses. Although surface parking lots of industrial zoned parcels could be developed, or existing uses could be redeveloped, the types of uses and the scale of development would be expected to remain similar over time. A majority of the FAR in this area is 1.5:1, which generally produces low-rise buildings. New limited industrial uses

would not be expected to change the form of new buildings, which would continue to be limited to 1.5:1 FAR. In addition, some parcels have 45-foot height limits that will remain in place under the Proposed Plan.

Mid-rise buildings are expected in a few Limited Industrial Change Areas. These Change Areas include the three targeted-media incentive areas and along Vine Street corridor. In these areas, the FAR could be 3:1, which generally leads to the development of mid-rise buildings. The Proposed Plan's goal for the Paramount Pictures property, a Change Area, is to retain and expand studio-related industrial uses on-site but also to implement site plan design regulations and height limits. With the exception of the Paramount Pictures property, the proposed changes would be generally consistent with the existing urban scale or within two to three stories of existing buildings. The additional few stories in height when compared to the existing buildings in these areas do not represent a significant change in visual character.

Summary

In summary, changes to the visual character of the West Region of the Hollywood CPA would be ***less than significant***.

East Region

Overview

The East Region of the Project Area has a mix of uses, with primary uses being multi-family residential and assorted commercial. Commercial uses tend to be low-scale, such as neighborhood-serving businesses with surface parking lots or commercial uses in a strip mall. The East Region also has a noticeable presence of single-family houses in the hilly Los Feliz residential neighborhood, hospitals, motels/hotels on the commercial corridors, Barnsdall Art Park, and public facilities. Buildings, excluding hospitals, are generally two to six stories in height.

Under the Proposed Plan, a similar pattern of development is expected and would resemble the existing visual character. New infill development or redevelopment would be expected over time. Some surface parking lots may be developed with structures and some existing buildings could be demolished and replaced by new ones. The new buildings could be taller or bigger than existing ones, but the buildings must meet development regulations. Many parcels in the East Region have regulations for FAR and height, and these regulations will remain under the Proposed Plan. Many residential areas have low-rise height limits for single-family houses and low-to-medium density multi-family buildings. Parcels that fall within the SNAP are subject to development regulations such as FAR, height, uses, and design. A significant portion of the East Region is within SNAP's boundaries and would continue to be subject to SNAP's specific regulations and design standards. SNAP promotes mixed-use development near the three Metro stations within its boundaries, preserves existing low-scale residential neighborhoods, and supports the hospital core area along with improving neighborhood services for residents. Therefore, the overall pattern of infill development or redevelopment and visual character would be expected to be maintained over time in the East Region.

Specific Change Areas within East Region

Under the Proposed Plan, the recommendations in the East Region would be to 1) maintain development regulations that are consistent with SNAP by updating the Hollywood Community Plan, 2) change one SNAP area that would reduce the height limit allowed, and 3) allow additional development potential on commercial corridors outside the SNAP (Santa Monica Boulevard, Hillhurst Avenue, Sunset Boulevard, Hyperion Avenue, and Rowena Avenue). Although the SNAP Specific Plan went into effect in 2001, the Hollywood Community Plan has not yet been updated to reflect the Specific Plan regulations. As a result, some parcels within the SNAP have land use designation and/or zoning that do not reflect the Specific Plan's regulations. Under the Proposed Plan, land use designation and/or zone changes will be made to be

consistent with SNAP. These changes are administrative in nature and would not allow additional FAR, height or density different from the Specific Plan. In effect, development would continue to be generally two to six stories in height, excluding hospitals.

Excluding the consistency updates, the Proposed Plan would amend one area of the SNAP. It would reduce an existing height limit near Barnsdall Art Park, which contains a historical resource. The Proposed Plan would lower the maximum height limit of surrounding areas near the park to approximately 45 feet.

Outside of the SNAP, the Proposed Plan would increase the development potential of various parcels along commercial corridors (Hillhurst Avenue, Hyperion Avenue, Melrose Avenue, Rowena Avenue, and Sunset Boulevard). A proposed 1.5:1 FAR for properties in the Change Areas along these commercial corridors outside of SNAP would restore the citywide standard FAR for such commercial zones. The proposed change would accommodate economic growth while buildings would still be expected to be low scale in appearance. New building height limits are also proposed for some Change Areas. A height limit of 30 feet is proposed in the Change Areas along Hyperion Avenue and Rowena Avenue, and a height of 36 feet is proposed in the Change Areas along Hillhurst Avenue. Existing buildings along the commercial corridors outside of SNAP are generally one or two stories tall. Under the Proposed Plan, new auto-repair and related automotive uses and recycling uses along portions of Hyperion and Rowena Avenues would be prohibited to reduce the existing concentration of such uses. On Hillhurst Avenue, the Proposed Plan would require pedestrian-oriented design standards, which would augment the corridor. The street would have low-scale restaurants, retail, multi-family residential buildings, and mixed-use. As a result of a 1.5:1 FAR and/or height limits, the built environment would still be expected to have low-scale buildings.

Along Santa Monica Boulevard, a major commercial corridor, a mix of low-scale buildings and mid-rise buildings could result under the Proposed Plan, depending on whether the mixed-use incentive is activated by individual projects. Here, the proposed FAR for mixed-use or hotels would be 2.5:1. Residential or commercial-only projects could continue to be built at the existing FAR (1.5:1), which would be low scale, and not all properties would redevelop. Pedestrian-oriented design standards would be required along Santa Monica Boulevard under the Proposed Plan. In general, it can be expected that the scale of new buildings would be similar to existing ones or a few stories taller for mixed-use projects. These changes do not represent a significant change in visual character along Santa Monica Boulevard.

The Proposed Plan also includes changes to a few multi-family residential parcels along Serrano Avenue, between Sunset Boulevard and US-101, and one area along Waverly Drive.[7] The Proposed Plan would reduce the land use designation and zoning of the parcels along Serrano Avenue to reflect the existing use and scale, and this street is already developed with multi-family buildings. Parcels along Serrano Avenue, south of Fountain Avenue, have an existing mix of one- and two-story residential buildings. North of Fountain Avenue, the Change Areas on Serrano Avenue exhibit an existing mix of one-, two- and three-story residential buildings. The Proposed Plan would allow low-density multi-family residential buildings to be developed in the Change Area on Waverly Drive. This Change Area is currently developed with a low-scale multi-family residential building and a single-family house. With implementation of the Proposed Plan, new development along Serrano Avenue and Waverly Drive are expected to be consistent with the scale of the existing structures in these areas, and the visual character would not change under the Proposed Plan.

Overall, the specific Change Areas in the East Region are expected to result in new development that consists of low-rise and mid-rise structures with implementation of the Proposed Plan. New structures occurring during the lifetime of the Proposed Plan are expected to be consistent with the existing scale of development.

[7]The Change Area on Waverly Drive is identified as subarea 13:3C.

Summary

In summary, changes to the visual character of the East Region would be ***less than significant***.

Scenic Resources

Natural Features

The Proposed Plan does not seek to increase development potential within or near the natural features in the Project Area. The portion of the Project Area that contains distinct and prominent geologic or topographic features is primarily found in the undisturbed open space areas within the Santa Monica Mountains. The Proposed Project does not include components that would alter the natural geologic or topographic features within the Santa Monica Mountains. The majority of the undisturbed open space in the Santa Monica Mountains is in Non-Change Areas, has an Open Space land use designation, and is zoned OS for open space. No Active Change Areas are proposed within the Santa Monica Mountains, and other areas with natural features (i.e., Los Angeles River, Lake Hollywood, and Rowena Reservoir). Development within Open Space designated areas would be generally limited to low intensity recreational uses. The Proposed Plan would not allow residential or non-recreational uses to be developed in Open Space land use designation areas, such as Griffith Park. During the lifetime of the Proposed Plan, new or expansion of recreational uses could occur in Griffith Park. Additionally, the Los Angeles River could be improved with recreational facilities and revitalized with natural features, such as native vegetation and landscaping. Vacant lots with low density single-family residential land uses designations in the hillsides could be developed with single-family houses but development would be limited by factors including topography, slope, and lot size. The Proposed Plan would limit density for hillside properties that are located on a natural slope that exceeds 15 percent. Under the Proposed Plan, residential development in these hillside areas would be limited to one single-family house per 40,000 square feet of lot area when the slope exceeds 15 percent. Additionally, the City's Baseline Hillside Ordinance limits the scale of development in residential zoned properties in the hillside areas, including limitations on residential floor area and the amount of allowable grading based on lot size. Thus, development that could occur during the lifetime of the Proposed Plan would not substantially degrade the existing visual character of natural features within the Project Area.

Urban/Built Features

As discussed earlier, the existing visual character of urban or built features in Hollywood is varied in terms of building ages, uses, heights, and massing. As discussed in Existing Setting, newer infill development projects have been built or are being built adjacent to or near iconic structures, some of which are historic, and are changing the visual setting near such buildings.[8] There is a growing mix of modern, sleek, glassy buildings near historic buildings in the Regional Center. Under the Proposed Plan, more infill projects with a variety of architectural styles, massing and heights would be expected to be built over time. Some people may conclude that these new buildings will contribute positively to Hollywood's visual character, while others may find the change less favorable. The Regional Center already has two Metro stations and a mix of employment, residential, and visitor-serving uses. But, there are still underutilized parcels that can be developed, and the Proposed Plan directs development potential to specific parcels instead of throughout the entire Regional Center. Much of the Hollywood Boulevard Commercial and Entertainment District is not in a Change Area under the Proposed Plan. As a result, it is expected that new infill projects would occur in selected areas of the Regional Center identified for additional development potential under the Proposed Plan and not in the historic district, which will have lower development potential and more

[8]A new 18-story residential development, the Argyle House, is located at the corner of Argyle Avenue and Yucca Street northeast of the Capitol Records building site. Eastown, a mixed-use mid-rise development, opened in 2016 just east of the Pantages Theatre. A mixed-use seven-story project is under construction next to the historic Earl Carroll Theatre on Sunset Boulevard near Vine Street.

development regulations. Changes to the visual character of the Hollywood Boulevard Commercial and Entertainment District for the most part would not be expected to be substantial or degrading. Outside the Regional Center, the existing visual character adjacent to or near other iconic structures in Non-Change Areas of Hollywood would also be expected to change little, such as near Griffith Observatory or the Hollywood Bowl. Therefore, in general, foreground views and the visual character near some iconic structures could change under the Proposed Plan and particular views from public sidewalks and streets could be affected. However, the changes as a whole would not be considered substantially adverse, although some people would prefer to maintain the existing setting.

In addition, prominent structures that are not yet historic today may gain historic recognition during the life of the Proposed Plan, while new infill development projects are added. The Proposed Plan does not propose aesthetics changes or add development potential within the existing HPOZs. New development within HPOZs would be subject to HPOZ regulations, which would limit changes to scale and character of the HPOZs.

The proposed CPIO would include a regulation for demolition delay, which would require public noticing within a set radius for all demolition permits for buildings that are 45 years or greater on parcels with commercial zoning. The CPIO would also require that a replacement project be approved prior to issuance of the demolition permit and that renovation of designated resources comply with the Secretary of the Interior's Standards. The CPIO boundary encompasses the Regional Center and surrounding parcels.

In summary, the Project Area currently has a range of building types and styles in its built environment, and new development occurring during the lifetime of the Proposed Plan would not be expected to substantially degrade this varied visual character.

The Proposed Plan does not seek and would not be anticipated to increase development potential along the seven City-designated scenic highways that are located within the Project Area (see **Table 4.1-2**, above) or the two landscaped parkways that are HCMs along Los Feliz Boulevard and the 4400 block of Avocado Street. Additionally, the Proposed Plan does not include components that would change or be expected to change the visual character of these City-designated scenic highways and landscaped parkways. If individual properties are redeveloped or developed along these streets, the properties would be expected to resemble the scale of the existing surrounding properties. Therefore, the existing visual character would not be substantially degraded.

Shade/Shadow

As discussed in Existing Setting, shadow effects already exist in the CPA, especially in areas with taller buildings. With implementation of the Proposed Plan, new, taller buildings could be built in the Regional Center, along commercial corridors, and in some industrial areas. The taller buildings could potentially increase shade effects along public spaces, such as public rights-of–way (i.e., sidewalks and roadways) or parks. These shade effects are characteristics that are commonly found in an urban environment. The increased shade effects also can be considered beneficial, particularly during warmer seasons and sunny days, by providing cooling and cover from high heat days. Additionally, shade effects could make an urban environment more pedestrian friendly. Thus, the potential increase in shade and shadows are not expected to substantially degrade the existing visual character or quality of the CPA.

Summary

In summary, changes to the visual character of scenic resources in the Project Area would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

IMPACT 4.1-4 Would implementation of the Proposed Plan create a new source of substantial light or glare that could adversely affect day- or nighttime views in the Project Area? **Less than significant impact -- lighting. Less than significant impact with mitigation -- glare.**

Light and glare impacts are typically associated with outdoor artificial light during the evening and nighttime hours. Glare may also be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. The aesthetic analysis as it related to light and glare evaluates whether the Proposed Plan would create a significant increase in light and glare. The following analysis is provided to analyze impacts for those areas in Change and Non-Change Areas.

Lighting. A high level of ambient nighttime light is common to urbanized areas of the City of Los Angeles. As described in the Existing Setting, above, nighttime lighting is limited in the hillside portions of the Project Area. In the residential areas of the Santa Monica Mountains and the eastern end of the Project Area, nighttime artificial lighting sources include pedestrian-scaled street lights, security and decorative wall lighting at residential homes, vehicle headlights, and interior building illumination. Generally, no artificial lighting sources are available in the undeveloped portion of the Santa Monica Mountains) of the Project Area. No Active Change Areas are proposed within the Santa Monica Mountains and the hillsides. The Administrative Changes that are proposed in the Santa Monica Mountains would involve land use designation and/or zoning corrections to reflect the existing use and/or are for consistency between the land use designation and zoning. The proposed Administrative Changes in the undeveloped open space areas of the Santa Monica Mountains would preserve the area for natural resources and natural features. Additionally, the Proposed Project would maintain the low-density residential uses in the mountains. As such, the Proposed Plan is not anticipated to result in future development in the undeveloped portion of the Santa Monica Mountains. Single-family residential houses could be developed or redeveloped over time in the existing hillside neighborhoods but lighting in these areas would be expected to remain relatively unchanged compared to existing conditions.

Existing sources of nighttime lighting in the more developed portions of the Project Area include street, security, and wayfinding outdoor lighting, vehicle headlights, and interior building illumination. This relatively high level of ambient light currently reduces the visibility of the nighttime sky. **Table 4.1-5**, describes the existing street illumination levels along various roadway corridors within the Project Area. At present, the street illumination levels in the Project Area's commercial corridors are generally consistent with, and in some cases below, LADPW's Bureau of Street Lighting Design Standards and Guidelines and are on average between 0.03-2.36 fc. Within the Project Area, illumination levels due to street lights between intersections are typically lower than those at intersections, regardless of light spilling from lighting within adjacent buildings.

The Proposed Plan allows for increased development density, intensity, and building heights within Active Change Areas. With these increases, it could be reasonably anticipated that illumination from new development (e.g., security lighting, parking lot lighting, ornamental lighting, pedestrian scale lights, lighting from ground floor storefronts and signs) would increase illumination. Where increased

development is expected to occur as the result of implementation of the Proposed Plan, it could be anticipated that lighting would be increased at mid-block for pedestrian safety, security, and ornamental lighting. It is anticipated that future development under the Proposed Plan, particularly development projects of substantial scale, would result in the introduction of lighting in areas where currently lighting levels are low or where lighting levels along sidewalks is interrupted by darkened or shadowed areas. With implementation of the Proposed Project, additional sources of nighttime lighting associated with increased development potential, can be anticipated. While increased illumination is anticipated from sidewalk lighting, and from commercial and residential windows in mixed use and single-use stand-alone projects, these effects would be incremental.

The LAMC contains specific regulations with respect to lighting. LAMC Section 12.21 A.5(k) (amended by Ordinance No. 171,858) states that all lights used to illuminate parking areas shall be designed, located and arranged so as to reflect the light away from any street and any adjacent premises. Additionally, any new lighting would be designed to conform to applicable standards including LAMC Sections 93.0117 and 12.21 A.5(k), which pertains to outdoor lighting affecting residential property (no more than two foot-candles of lighting intensity from a light source is allowed on adjacent residential property). All new development would be required to be consistent with these LAMC regulations to reduce impacts from light. In addition, General Plan Framework Policies 5.5.3, 5.5.4, and 5.8.1 call for the formulation of building and site design standards, determination of appropriate urban design elements, and lighting commensurate with intended nighttime use. Compliance with the LAMC would ensure that light impacts of future development occurring under the Proposed Plan in the Change and Non-Change Areas to ***less than significant***.

Glare. Glare is a common phenomenon in the Project Area primarily due to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region. The majority of existing structures within the Project Area are composed of non-reflective materials such as concrete, wood, stucco and plaster. A few structures have mostly glass facades. Chapter 3, Article 3, Section 93.0117 of the LAMC regulates glare for residential uses. Specifically, no exterior light source of a proposed development project may cause more than 2 fc of lighting intensity or generate direct glare onto exterior glazed windows or glass doors; elevated habitable porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas; or any other property containing a residential unit or units. New development occurring during the lifetime of the Proposed Plan would generally be expected to use building materials that are consistent with the building materials commonly used in the Project Area, which primarily consist of architectural finishes that would not produce substantial glare. However, it is possible that some development could be constructed with highly reflective materials and larger buildings with extensive glazing could cause discomfort or have disruptive impacts from glare. Therefore, glare impacts would be ***potentially significant.***

Mitigation Measure

AE1 For any new construction on a building requiring site plan review, prior to the issuance of any building permits, the applicant shall submit plans and specifications for all exterior building materials to the Department of City Planning and the Department of Building and Safety for review and approval. Glass as part of the external façade of buildings shall be no more reflective than necessary to comply with Green Building Code or other state or local UV requirements.

Significance of Impacts after Mitigation

Less than significant.

CUMULATIVE IMPACTS

The geographic context for cumulative analysis of aesthetic impacts is generally localized to the Project Area. For purposes of this analysis, the context for scenic views and vistas in the Project Area includes the geographic area within and outside the Project Area that would have views of and across the Project Area. The geographic context for cumulative impacts with regards to visual character, scenic resources, lighting, and glare would be within the geographic context of the Project Area. The cumulative analysis accounts for all anticipated cumulative growth within these geographic areas including growth from approved projects that are not yet built, other community plans, the Los Angeles County General Plan and the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

SCENIC VISTAS

The Project Area is bordered by the City of Burbank to the north, the Northeast Los Angeles CPA to the east, the Silver Lake – Echo Park – Elysian Valley CPA to the southeast, the Wilshire CPA to the south, and the City of West Hollywood, the Bel Air – Beverly Crest CPA, the Sherman Oaks – Studio City – Toluca Lake – Cahuenga Pass CPA, and unincorporated Los Angeles County to the west. Public vantage points in the Project Area, including the Jerome C. Daniel Overlook and the Universal City Overlook, are primarily situated within the Santa Monica Mountains. These public vantage points provide panoramic views of the Project Area and the Los Angeles region. For example, the Jerome C. Daniel Overlook provides southeast panoramic views of the urban skylines of Hollywood in the foreground and middle ground and Downtown Los Angeles in the background. Looking southwest, views include the Cities of West Hollywood and Beverly Hills, and Century City. From the Universal City Overlook looking southwest, views include the Universal City skyline, the City of Burbank, the San Fernando Valley, the San Gabriel Mountains and the Verdugo Hills. Panoramic views from Dante's View include foreground views of the Griffith Observatory and the hillsides in Griffith Park, as well as background views of the downtown Los Angeles skyline. Future developments along commercial corridors in adjacent communities and cities outside of the Project Area, whether they are mid-rise or high-rise developments, could change the skyline visible from these public vantage points. Some observers at these public vantage points could see the change in skyline as an improvement by creating new visual focal points, while others may see the more densely built skyline as a negative change. The short-range views from these public vantage points are not anticipated to change. While the Proposed Plan would allow greater building heights than what currently exists in certain areas, the scenic vistas available from these public vantage points (i.e., panoramic views of the mountains and the Los Angeles Region) would not be obstructed or significantly changed by taller structures within the Project Area. The varied Hollywood skyline would remain. Therefore, the Proposed Plan's impact on scenic vistas would be less than significant and would not be cumulatively considerable.

VISUAL CHARACTER

The existing visual character of the geographic area is urban for cumulative impacts. Impacts on visual character would be generally limited to the community in which the new development would be located. Within the CPA, a number of projects were approved in recent years and are expected to be built, in combination with future development under the Proposed Plan during the lifetime of the Proposed Plan. A few projects are already under construction while others have not yet started any building activity.[9] These

[9]Projects under construction include Southblock (seven stories); The Rise Hollywood (seven stories); AVA Hollywood (up to seven stories); the Epic office building (13 stories), the Thompson Hotel (11 stories), the Godfrey hotel (eight stories), the Modera apartments (six stories), a mixed-use project near Hollywood Boulevard and Highland Avenue (six stories); and Academy on Vine (one 20-story tower and other mid-rise and low-rise buildings). Approved projects also include the Whisky hotel (seven-stories), the Hollywood Ivar Gardens hotel (21 stories); a mid-rise mixed-use project on Santa Monica Boulevard between Orange Drive and Mansfield Avenue; and Palladium (two towers approved for up to 350 feet in height).

projects are representative of the types of uses, building massing, and building heights that could occur under the Proposed Plan, and therefore, these projects would be consistent with the overall visual character of the CPA. Future development associated with the Proposed Plan would primarily affect the visual character within the Project Area. New development in adjacent communities that are located in the immediate vicinity of the Project Area boundaries could potentially change the visual character of that area. However, the effects would be localized. The Proposed Plan does not propose changes that would cause new development along the Project Area boundaries to significantly vary in height, massing, and scale when compared to the existing uses in these areas. Thus, new development along and near the Project Area boundaries is expected to be consistent with the visual character of the surrounding area.

The Project Area has no state-designated scenic highways in the Project Area or vicinity; the Project would have no impact on state-designated scenic highways. There are seven City-designated scenic highways in the Project Area. Five of the City's scenic highways are completely within the Project Area, while two are located along the Project Area's northern boundaries (see **Table 4.1-2**). Barham Boulevard is along the boundaries of the Project Area and the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass CPA. Mullholland Drive is located along the boundaries of the Project Area, the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass CPA, and the Bel Air-Beverly Crest CPA. Future development in these CPAs is not expected to affect the visual character of the two City-designated scenic highways since the scenic highways are located adjacent to low-density residential areas or undisturbed open space areas. Additionally, the Proposed Plan does not include components that would change the scenic features associated with scenic highways. Future development occurring under the Proposed Plan would not result in the damage of a City-designated scenic highway and would not change the scenic features associated with these scenic highways.

As discussed in Section 4.5, Cultural Resources, it is possible that future development within the Project Area could result in demolition and/or significant alteration to some of the hundreds of historical resources that are found within the Project Area. Implementation of the Proposed Plan in combination with other projects (other community plans leading to redevelopment) located throughout the City of Los Angeles could contribute to the loss of historical resources in the City. The existing visual character of the Project Area and its adjacent communities is varied in terms of building ages, uses, heights, and massing. Future development is not expected to substantially degrade this varied visual character.

In summary, the Proposed Plan's impact on visual character would be less than significant and would not be cumulatively considerable.

LIGHT AND GLARE

Development of cumulative projects in the Project Area, adjacent CPAs, and adjacent cities (i.e., the Cities of Burbank, Glendale, West Hollywood, and Beverly Hills) could incrementally increase ambient nighttime lighting in this cumulative geographic area. The LAMC contains specific regulations with respect to light and glare. LAMC Section 12.21 A.5(k) states that all lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any street and any adjacent premises. Additionally, the Cities of Burbank, Glendale, West Hollywood, and Beverly Hills Zoning Codes also require lighting of development to be directed away from surrounding properties and public rights-of-way. Any new lighting within the Project Area, adjacent CPAs, and adjacent cities would be designed to conform to applicable lighting standards contained within the respective cities' zoning codes. With respect to ambient lighting, the Project Area contains a sign district, as does neighboring West Hollywood. These districts acknowledge and even encourage increased signage, creating an aesthetic character and ambience that is consistent with a unique visitor serving area. In this case, lighting is not viewed as an impact but as a desired result. With respect to glare, new development outside of the Project Area is likely to use building materials that are consistent with the building materials that are commonly used in that community or city. Implementation of Mitigation Measure **AE1** would ensure that new development associated with the

Proposed Plan would not generate excessive glare that would affect day or nighttime visibility. With implementation of Mitigation Measure **AE1**, the Proposed Plan's impact on light and glare would be less than significant and would not be cumulatively considerable.

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4.2 AGRICULTURE AND FORESTRY RESOURCES

This section provides an overview of agriculture and forestry resources and evaluates impacts associated with the Proposed Plan. Topics addressed include farmland, agricultural land, timberland, and forest land. This section was prepared utilizing the information from the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP), California Department of Forestry and Fire Protection (CAL FIRE) Forest and Range Assessment Project (FRAP), City of Los Angeles General Plan Framework Element, and Chapter 1 of the City of Los Angeles Municipal Code (LAMC) – Zoning Code.

REGULATORY FRAMEWORK

Regulations and plans applicable to the Proposed Plan are summarized below.

FEDERAL

There are no federal policies related to agriculture and forestry resources that are applicable to the Hollywood Community Plan Area (CPA).

STATE

California Land Conservation Act of 1965 (Williamson Act). The Williamson Act (Government Code Sections 51200-51297.4) is the state's primary program for the conservation of agricultural land. The Williamson Act creates an arrangement whereby private landowners voluntarily restrict their land to agricultural and compatible open space uses under a rolling ten-year contract. In return, parcels are assessed for property tax purposes at a rate consistent with their actual use, rather than their potential market value.

Farmland Security Zone Act. The Farmland Security Zone Act (Government Code Sections 51296-51297.4) allows a landowner that is already under a Williamson Act contract to apply for Farmland Security Zone status. Contracts under the Farmland Security Zone Act are sometimes referred to as the "Super Williamson Act Contracts" and allow a further 35 percent reduction in taxable value of the land. These contracts renew automatically every year for a 20-year period.

California Department of Conservation Farmland Mapping and Monitoring Program (FMMP). Farmland maps are compiled by the California Department of Conservation's Farmland Mapping and Monitoring Program (DOC FMMP), pursuant to the provisions of Section 65570 of the California Government Code. The FMMP, maintained by the DOC, assesses the location, quality, and quantity of agricultural land in the state. These maps utilize data from the United States Department of Agriculture (USDA) Natural Resources Conservation Services (NRCS) soil surveys and represent an inventory of agricultural resources. The DOC has a minimum mapping unit of 10 acres. Any parcels smaller than 10 acres are absorbed into the surrounding classification. The maps use eight classification categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, Grazing Land, Urban and Built Up Land (Urban), and Other Land.[1] The top four are regarded as "Important Farmland."

California Land Evaluation Site Assessment (LESA) Model. The LESA was developed by the federal Natural Resources Conservation Service to assist state and local officials with making sound decisions regarding land use. LESA was subsequently adapted by the DOC for use in California. LESA analyzes

[1]California Department of Conservation, Division of Land Resource Protection, *A Guide to the Farmland Mapping and Monitoring Program*, 2004, http://www.conservation.ca.gov/dlrp/fmmp/Documents/fmmp_guide_2004.pdf.

soil resource quality, project size, water resource availability, surrounding protected resource lands, and surrounding agricultural lands. LESA includes a numeric threshold for determining significance of impacts under CEQA on conversion of mapped farmland to non-agricultural uses.

Forest Practice Act. The Forest Practice Act was enacted in 1973 to ensure that logging is done in a manner that will preserve and protect fish, wildlife, forests, and streams. It is enforced by CAL FIRE. CAL FIRE ensures that private landowners abide by these laws when harvesting trees. Compliance with the Forest Practice Act applies to all commercial harvesting operations.

LOCAL

City of Los Angeles General Plan Framework Element (Framework Element). The Framework Element of the General Plan is intended to guide the City's long-range growth and development. The Framework Element responds to state and federal mandates to plan for the City's future. The Framework's Infrastructure and Public Services chapter establishes Citywide planning policies regarding forestry resources. There are no policies or goals in the Framework Element related to agricultural uses, farm production, or timberland. Applicable goals, objectives, and policies are shown in **Table 4.2-1**.

TABLE 4.2-1: RELEVANT GENERAL PLAN AGRICULTURE AND FORESTRY RESOURCES GOALS, OBJECTIVES, AND POLICIES

Goal/Objective/Policy	Goal/Objective/Policy Description
FRAMEWORK - INFRASTRUCTURE AND PUBLIC SERVICES CHAPTER	
Objective 9.43	Improve City tree selection, placement and maintenance.
Policy 9.43.4	Revise removal standards to address horticultural problems, aforestration, and reforestration.

SOURCE: City of Los Angeles, *The Citywide General Plan Framework, An Element of the City of Los Angeles General Plan*, re-adopted 2001.

City of Los Angeles Municipal Code (LAMC). The LAMC provides the set of detailed requirements that implement General Plan policies at the level of the individual parcel. Chapter 1 of the LAMC is the Zoning Code, which present standards for different uses and identify which uses are allowed in the various zoning districts of the jurisdiction. Within the City of Los Angeles, agricultural uses are permitted in areas zoned A1, A2, and RA.

The City of Los Angeles protects certain native trees, as well as heritage trees. For a discussion of those ordinances and potential project impacts on those trees, see Section 4.4, Biological Resources.

EXISTING SETTING

AGRICULTURAL RESOURCES AND FARMLAND

There is no land in or adjacent to the Project Area that is in use for agricultural purposes or that is identified as Important Farmland or under Williamson Act. There is land zoned in the Project Area that would permit agricultural uses. However, none of that agriculturally zoned land is in use for agricultural purposes.

The Project Area consists primarily of residential, commercial, industrial, open space and public facilities land uses. Vegetation within the developed portion of the Project Area consists largely of non-native ornamental trees, grasses, and shrubs that are typical of urban landscaping. Vegetation within the undeveloped hillsides in the northern portion of the Project Area consists of native and non-native vegetation. Native vegetation found within the hillsides include chaparral, mixed scrub, matilija poppies, prickly pear, coast live oaks, Southern California black walnut, western sycamores, oak-sycamore riparian,

oak woodland and walnut woodland chaparral, and oak/walnut woodland. Non-native plants that are found in this area include pine, eucalyptus, silk oak, Mexican fan palms, castor bean, giant reed, mustard, wild oats, tree tobacco, tocalote, grasses, and annual sunflowers.[2]

A review of the maps compiled by the DOC FMMP indicates that the Project Area consists of land that is not enrolled in a Williamson Act contract; does not have parcels that contain Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance; and is identified as an "urbanized area."[3]

The Project Area contains several areas that are zoned for agricultural use with A1 zoning, as shown in **Figure 4.2-1**. This A1 zoning designation permits a variety of uses, in addition to agricultural uses. The areas within the CPA that are zoned A1 include Hollywood Forever Cemetery (zoned A1-1XL), Forest Lawn – Hollywood Hills (zoned A1-1XL), Mt. Sinai Memorial Park (zoned A1-1XL-H), and a portion of the Los Angeles River and the area adjacent to the river along the northern boundaries of the Project Area between Barham Boulevard and Bob Hope Drive (zoned A1-1XL-RIO). The portion of the Los Angeles River that is zoned A1-1X-RIO is contained within a concrete-lined channel as part of the Los Angeles flood control, and the areas adjacent to the river also zoned A1-1XL-RIO consist of undeveloped open space. None of these A1-zoned properties are used for agricultural purposes, and the Proposed Plan would not rezone these properties. OS zoned land also allows agricultural uses. None of the OS zoned land in the Project Area is in use for agricultural purposes.

Several community gardens are located within the Project Area. Community gardens are not considered agricultural land, but open space or recreational space.

FORESTRY RESOURCES AND TIMBERLAND

California Public Resources Code (PRC) Section 12220(g) defines *forest* as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits." In addition, PRC Section 4526 defines *timberland* as "land…which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees." California Government Code Section 51104 defines a timberland production zone as "an area which has been zoned pursuant to Sections 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses; and *timber* as trees maintained for eventual harvest for forest product purposes (not including nursery stock)."

Although portions of the undeveloped Santa Monica Mountains (including Griffith Park) within the Project Area have the potential to meet the forest land definition under PRC Section 12220(g), CAL FIRE has not identified any of the land within the Project Area as forest land.[4] Additionally, there is no timberland or land zoned for forest or timberland production in or adjacent to the Project Area. Some land in the Project Area is designated Open Space and zoned OS, which allows for forest land. However, none of this OS zoned land is maintained or used for timber production.

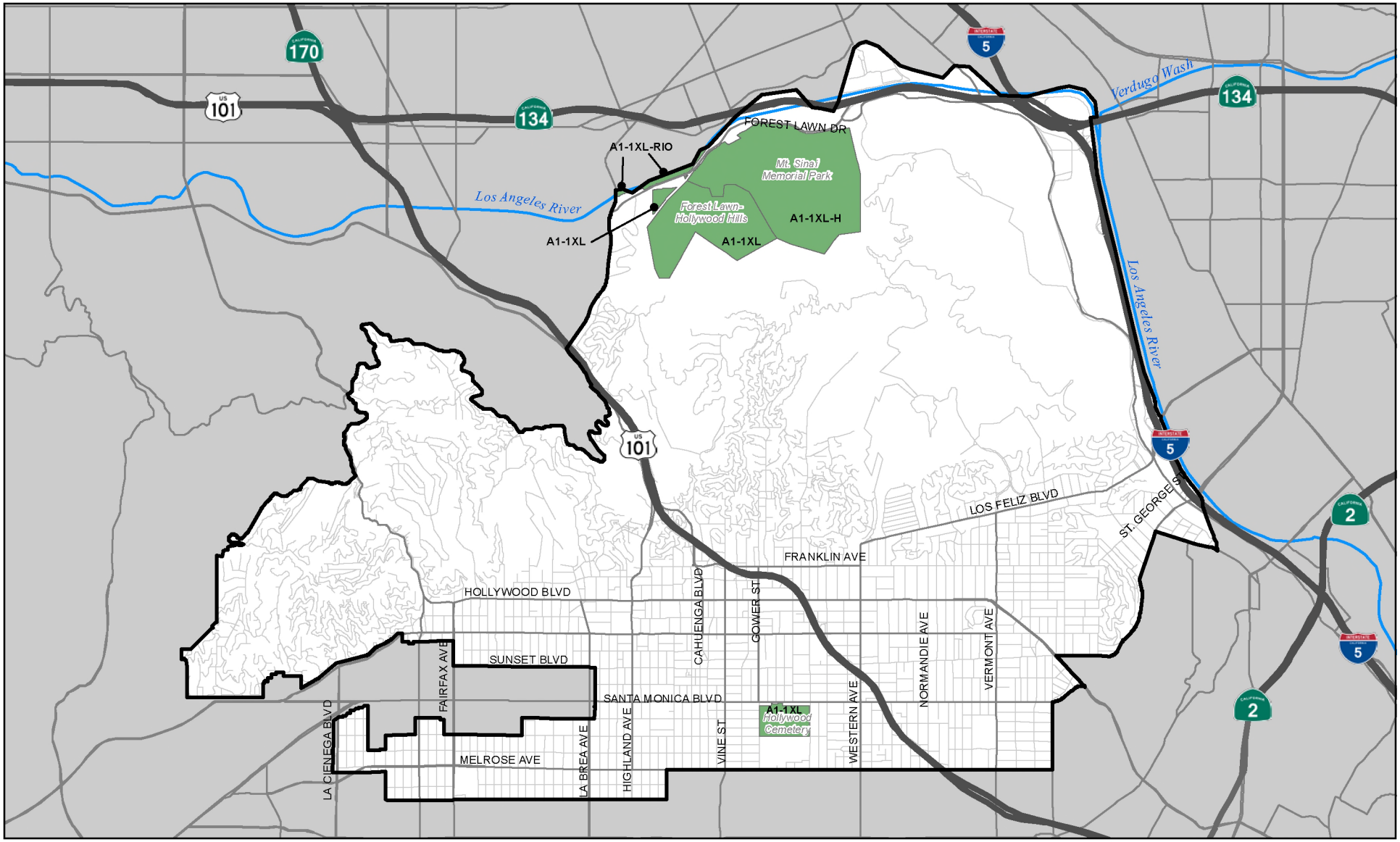
See Section 4.4, Biological Resources, of this EIR for a discussion on protected trees and heritage trees.

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[2]U.S. Department of the Interior National Park Services, *Santa Monica Mountains*, https://www.nps.gov/samo/learn/nature/plants.htm, accessed on November 22, 2016; Cooper Ecological Monitoring, Inc., *Draft Griffith Park Wildlife Management Plan*, April 10, 2008; Cooper Ecological Monitoring, Inc., Griffith Park Plant List, October 2007.

[3]State of California Department of Conservation, Farmland Mapping and Monitoring Program, *California Important Farmland Finder*, http://maps.conservation.ca.gov/ciff/ciff.html, accessed November 14, 2016.

[4]California Department of Forestry and Fire Protection, *Forest and Range Assessment Project, Land Cover Map*, 2006.



LEGEND:

Hollywood CPA Agriculturally Zoned Land

SOURCE: City of Los Angeles Geohub; TAHA, 2016.

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W E
S

0 3,000 6,000 Feet

taha environmental planners
taha 2010-073

Hollywood Community Plan Update
Draft Environmental Impact Report
CITY OF LOS ANGELES

FIGURE 4.2-1

AGRICULTURALLY ZONED LAND

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, the Proposed Plan would have a significant impact related to agriculture and forestry resources if it would:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping Monitoring Program of the California Resources Agency, to non-agricultural uses;
- Conflict with existing zoning for agricultural use or a Williamson Act contract;
- Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined in Public Resources Code Section 4526), or timberland-zoned Timberland Production (as defined Government Code Section 51104(g));
- Result in the loss of forest land or conversion of forest land to non-forest use; and/or
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

METHODOLOGY

This section was prepared utilizing information from the DOC FMMP, and the City's General Plan and LAMC - Zoning Code. The Proposed Plan is evaluated in terms of whether implementation of the Proposed Plan would result in the permanent loss of, or loss of access to agriculture and forestry resources occurring within the Project Area.

The LESA is used as a way to assess impacts on agriculture and farmland by rating the relative quality of land resources based upon specific measurable features, such as soil quality, project size, and water resource availability. This model is not used in this analysis since none of the land within the Project Area is used for agricultural purposes.

In regards to forestry resources, this analysis uses the CAL FIRE FRAP maps to determine whether the Project Area contains any forest land. Because no forest lands are located within the Project Area, the forest carbon measurement methodology provided in the Forest Protocols, as adopted by the California Air Resources Board, was not used to assess impacts on forestry resources.

IMPACTS

IMPACT 4.2-1 Would implementation of the Proposed Plan convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping Monitoring Program of the California Resources Agency, to non-agricultural uses? **No impact.**

According to the DOC's FMMP, the Project Area is an "urbanized area" and does not contain Prime Farmland, Unique Farmland, Farmland of Statewide Importance or important farmlands. ***No impact*** would occur.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

No impact.

IMPACT 4.2-2 Would implementation of the Proposed Plan conflict with existing zoning for agricultural use, or a Williamson Act contract? **No impact.**

The Project Area does not contain any properties that are under a Williamson Act contract. As discussed above, Hollywood Forever Cemetery, Forest Lawn – Hollywood Hills, Mt. Sinai Memorial Park, and a portion of the Los Angeles River along the northern boundaries of the Project Area between Barham Boulevard and Bob Hope Drive are the only areas within the Project Area that are zoned A1 for agricultural purposes. These areas are not used for agricultural purposes and are not under a Williamson Act contract. The Proposed Plan will not rezone this property. Additionally, the OS zoned properties in the Project Area are not currently in use for agricultural purposes. The OS zoned properties will also not be rezoned.

The Proposed Plan, including the reasonably expected development from the Proposed Plan, does not have the potential to conflict with zoning for agricultural uses or a Williamson Act contact. ***No impact*** would occur.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

No impact.

IMPACT 4.2-3 Would implementation of the Proposed Plan conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC Section 12220(g)), timberland (as defined in PRC Section 4526), or timberland-zoned Timberland Production (as defined in Government Code Section 511049(g))? **No impact.**

There is no land in the Project Area zoned for timberland or timberland zoned Timberland Production under state law. There is land in the City zoned OS (Open Space) which allows land to be used for "natural resource preserves for the managed production of resources, including, but not limited to, forest lands…." This land is not used for managed production of resources and is not expected to be used for such purposes in the future.

The OS land is located in the hillsides in the northern portion of the Project Area, which contain Southern Cottonwood Willow Riparian Forest, Southern Sycamore Alder Riparian Woodland, Southern Coast Live Oak Riparian Forest, and California Walnut Woodland. These woodland areas are primarily located within and adjacent to Griffith Park, between Mount Sinai Memorial Park and Forest Lawn – Hollywood Hills, and along the Los Angeles River at the northern boundaries of the Project Area. These areas are not being re-designated or rezoned with the Proposed Plan. The Proposed Plan will, in fact, increase the amount of land included in the Open Space land use designation and the OS zoning.

Based on the above, the Proposed Plan, including the reasonably expected development of the Proposed Plan, will not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. ***No impact*** would occur.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

No impact.

IMPACT 4.2-4 Would implementation of the Proposed Plan result in the loss of forest land or conversion of forest land to non-forest use? **No impact.**

CAL FIRE has not identified any of the land within the Project Area as forest land. The woodland areas within the undeveloped Santa Monica Mountains portion of the Project Area are zoned for Open Space. The by-right uses for Open Space zones include parks, trails, children's play areas, child care facilities, picnic facilities, habitat protection sites, and public water supply reservoirs. Although the Proposed Plan does not propose any changes that are inconsistent with the Open Space zone and would not preclude the undeveloped portions of the Santa Monica Mountains from being developed with uses that are permitted by the Zoning Code or approved through the discretionary review process, development is not expected to occur within the woodland areas. Implementation of the Proposed Plan would serve to protect and preserve natural resources and natural features of the environment; to encourage the management of public lands in a manner which protects environmental characteristics; and to encourage the maintenance of open space uses on all publicly-owned park and recreation land and on open space public land which is essentially unimproved. Therefore, no impacts related to the conversion of forest land to non-forest use would occur. ***No impact*** would occur.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

No impact.

IMPACT 4.2-5 Would implementation of the Proposed Plan involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use? **No impact.**

As discussed above in Impacts 4.2-1 through 4.2-4, the Proposed Plan, there is no farmland or forest land in or adjacent to the Project Area. Therefore, the reasonably expected development of the Proposed Plan would not convert farmland to non-agricultural use or convert forest land to non-forest use. ***No impact*** would occur.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

No impact.

CUMULATIVE IMPACTS

As noted above, the Project Area does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance, land being used for agricultural purposes, or land under a Williamson Act contract. A small number of areas are zoned for, although not used for, agriculture. This A1 zoning would not change under the Proposed Plan.

While the Project Area has large open space areas, which contain a number of trees, these areas are used as open space and are not identified as forest land by CAL FIRE and are not defined as timberland or zoned for Timberland Production. Therefore, the Proposed Plan would not result in a cumulatively considerable contribution to a significant impact on agriculture and forestry resources.

REFERENCES

California Department of Conservation, Division of Land Resource Protection, A *Guide to the Farmland Mapping and Monitoring Program,* 2004, http://www.conservation.ca.gov/dlrp/fmmp/Documents/fmmp_guide_2004.pdf.

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U.S. Department of the Interior National Park Services, *Santa Monica Mountains*, https://www.nps.gov/samo/learn/nature/plants.htm, accessed on November 22, 2016.

4.3 AIR QUALITY

This section provides an overview of air quality and evaluates the construction and operational impacts associated with the Proposed Plan. This analysis focuses on air pollution from two perspectives: daily emissions and pollutant concentrations. "Emissions" refer to the quantity of pollutants released into the air, measured in pounds per day (ppd). "Concentrations" refer to the amount of pollutant material per volumetric unit of air, measured in parts per million (ppm) or micrograms per cubic meter ($\mu g/m^3$).

The following provides background information on the pollutants discussed in this section.

POLLUTANTS AND EFFECTS

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

Carbon Monoxide (CO). CO is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft and trains. In urban areas, such as the Project Area, automobile exhaust accounts for the majority of CO emissions. CO is a non-reactive air pollutant that dissipates relatively quickly, so ambient CO concentrations generally follows the spatial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions; primarily wind speed, topography and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and February.[1] The highest levels of CO typically occur during the colder months of the year when inversion conditions are more frequent. In terms of health, CO competes with oxygen, often replacing it in the blood, thus reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can be dizziness, fatigue, and impairment of central nervous system functions.

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

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

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

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

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

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

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

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

Toxic Air Contaminants (TACs). TACs, also referred to as hazardous air pollutants (HAPs), are generally defined as those contaminants that are known or suspected to cause serious health problems, but do not have a corresponding ambient air quality standard. TACs are also defined as an air pollutant that may increase a person's risk of developing cancer and/or other serious health effects; however, the emission of a toxic chemical does not automatically create a health hazard. Other factors, such as the amount of the chemical, its toxicity and how it is released into the air, the weather, and the terrain, all influence whether the emission could be hazardous to human health. TACs are emitted by a variety of industrial processes, such as petroleum refining, electric utility and chrome plating operations; some commercial operations, such as gasoline stations and dry cleaners; and motor vehicle exhaust. TACs may exist as PM_{10} and $PM_{2.5}$ or as vapors (gases). TACs include metals, other particles, gases absorbed by particles, and certain vapors from fuels and other sources.

The emission of toxic substances into the air can be damaging to human health and to the environment. Human exposure to these pollutants at sufficient concentrations and durations can result in cancer, poisoning, and rapid onset of sickness, such as nausea or difficulty in breathing. Other less measurable effects include immunological, neurological, reproductive, developmental, and respiratory problems. Pollutants deposited onto soil or into lakes and streams affect ecological systems and eventually human health through consumption of contaminated food. The carcinogenic potential of TACs is a particular public health concern because many scientists currently believe that there is no "safe" level of exposure to carcinogens. Any exposure to a carcinogen poses some risk of contracting cancer.

The public's exposure to TACs is a significant public health issue in California. The Air Toxics "Hotspots" Information and Assessment Act is a state law requiring facilities to report emissions of TACs to air districts. The program is designated to quantify the amounts of potentially HAPs released, the location of the release, the concentrations to which the public is exposed, and the resulting health risks.

The California Air Toxics Program (AB 2588) identifies over 200 TACs, including the 188 TACs identified in the federal Clean Air Act (CAA). The U.S. Environmental Protection Agency (USEPA) has assessed this expansive list of toxics and identified 21 TACs as Mobile Source Air Toxics (MSATs). MSATs are compounds emitted from highway vehicles and non-road equipment. Some toxic compounds are present in fuel and are emitted to the air when the fuel evaporates or passes through the engine unburned. Other toxics are emitted from the incomplete combustion of fuels or as secondary combustion products. Metal air toxics also result from engine wear or from impurities in oil or gasoline. USEPA also extracted a subset of these 21 MSAT compounds that it now labels as the six priority MSATs: benzene, formaldehyde, acetaldehyde, diesel particulate matter (DPM)/diesel exhaust organic gases, acrolein, and 1,3-butadiene. While these six MSATs are considered the priority transportation toxics, USEPA stresses that the lists are subject to change and may be adjusted in future rules. USEPA has issued a number of regulations that will dramatically decrease MSATs through cleaner fuels and cleaner engines. According to an Federal Highway Administration (FHWA) analysis, even if the number of vehicle miles traveled (VMT) increases by 64 percent, reductions of 57 percent to 87 percent in MSATs are projected from 2000 to 2020.

The California-specific transportation air quality analysis model, EMFAC, is designed to model MSATs at the project-level. Health effects from MSATs/TACs, i.e., cancer risks and chronic non-cancer risks from on-road traffic, have been associated primarily with DPM, benzene, and 1,3-butadiene. EMFAC can be used to estimate DPM, benzene, and 1,3-butadiene emissions. In addition to DPM, benzene, 1,3-butadiene, acetaldehyde, carbon tetrachloride, hexavalent chromium, paradichlorobenzene, formaldehyde, methylene chloride, and perchloroethylene pose the greatest existing ambient TAC risk, for which data are available, in California. DPM poses the greatest health risk among these ten TACs mentioned. Based on receptor modeling techniques, the South Coast Air Quality Management District (SCAQMD) estimated that DPM accounts for 84 percent of the total regional risk.

To date, the most comprehensive regional study of air toxics is the Multiple Air Toxics Exposure Study (MATES-IV) conducted by SCAQMD. The monitoring program measured more than 30 air pollutants, including both gases and particulates. The monitoring study was accompanied by a computer modeling study in which SCAQMD estimated the risk of cancer from breathing toxic air pollution throughout the region based on emissions and weather data. MATES-IV found that the cancer risk in the region from carcinogenic air pollutants ranges from about 900 in a million to 1,500 in a million, with an average regional risk of about 1,200 in a million.

Diesel Particulate Matter (DPM). According to the 2006 California Almanac of Emissions and Air Quality, the majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being particulate matter from the exhaust of diesel-fueled engines. DPM differs from other TACs in that it is not a single substance, but rather a complex mixture of hundreds of substances.

Diesel exhaust is composed of two phases, gas and particle, and both phases contribute to the health risk. The gas phase is composed of many of the urban hazardous air pollutants, such as acetaldehyde, acrolein, benzene, 1,3-butadiene, formaldehyde and polycyclic aromatic hydrocarbons. The particle phase is also composed of many different types of particles by size or composition. Fine and ultrafine diesel particulates are of the greatest health concern, and may be composed of elemental carbon with adsorbed compounds such as organic compounds, sulfate, nitrate, metals and other trace elements. Diesel exhaust is emitted from a broad range of diesel engines; the on-road diesel engines of trucks, buses and cars and the off-road diesel engines that include locomotives, marine vessels and heavy duty equipment. Although DPM is emitted by diesel-fueled internal combustion engines, the composition of the emissions varies depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emission control system is present.

The most common exposure to DPM is breathing the air that contains DPM. The fine and ultra-fine particles are respirable (similar to $PM_{2.5}$), which means that they can avoid many of the human respiratory system defense mechanisms and enter deeply into the lung. Exposure to DPM comes from both on-road and off-road engine exhaust that is either directly emitted from the engines or lingering in the atmosphere.

Diesel exhaust causes health effects from both short-term or acute exposures, and long-term chronic exposures. The type and severity of health effects depends upon several factors including the amount of chemical exposure and the duration of exposure. Individuals also react differently to different levels of exposure. There is limited information on exposure to just DPM but there is enough evidence to indicate that inhalation exposure to diesel exhaust causes acute and chronic health effects.

Acute exposure to diesel exhaust may cause irritation to the eyes, nose, throat and lungs. It may also cause some neurological effects, such as lightheadedness. Acute exposure may also elicit a cough or nausea, as well as exacerbate asthma. Chronic exposure to DPM in experimental animal inhalation studies has shown a range of dose-dependent lung inflammation and cellular changes in the lung and immunological effects. Based upon human and laboratory studies, there is considerable evidence that diesel exhaust is a likely carcinogen. Human epidemiological studies demonstrate an association between diesel exhaust exposure and increased lung cancer rates in occupational settings. Because children's lungs and respiratory systems are still developing, they are also more susceptible than healthy adults to fine particles. Exposure to fine particles is associated with increased frequency of childhood illnesses and can also reduce lung function in children. For the average Californian, 70 percent of cancer risk from breathing toxic air pollutants stem from diesel exhaust particles.

USEPA's National Scale Assessment uses several types of health hazard information to provide a quantitative "threshold of concern" or a health benchmark concentration at which it is expected that no adverse health effects occur at exposures to that level. Health effects information on carcinogenic, short- and long-term non-carcinogenic end points are used to establish selective protective health levels to

compare to the modeled exposures levels. Unfortunately, the exposure response data in human studies are considered too uncertain to develop a carcinogenic unit risk for USEPA's use. A Reference Concentration (RFC) is used as a health benchmark protective of chronic non-carcinogenic health effects but it is for diesel exhaust and not specifically set for DPM. The RFC for diesel exhaust, which includes DPM, is 5 $\mu g/m^3$. This value is similar to, but less than, the National Ambient Air Quality Standards (NAAQS) established for $PM_{2.5}$, which is 15 $\mu g/m^3$.

Unlike other TACs, no ambient monitoring data are available for DPM because no routine measurement method currently exists. However, California Air Resources Board (CARB) has made preliminary concentration estimates based on a PM exposure method. This method uses the CARB emissions inventory's PM_{10} database, ambient PM_{10} monitoring data, and the results from several studies to estimate concentrations of DPM.

REGULATORY FRAMEWORK

The federal Clean Air Act (CAA) governs air quality in the United States. In addition to being subject to the requirements of CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). At the federal level, the CAA is administered by the USEPA. In California, the CCAA is administered by CARB at the state level and by the air quality management districts and air pollution control districts at the regional and local levels.

This section focuses on criteria pollutant, ozone precursor, and toxic air contaminant emissions. The regulations created to control these pollutants often indirectly control GHG emissions (e.g., engine regulations). The reverse is also accurate that regulations designed to control GHG emissions often indirectly control criteria pollutant, ozone precursor, and toxic air contaminant emissions. Refer to Section 4.7, Greenhouse Gas Emissions, of this Draft EIR for regulations related to GHG emissions.

FEDERAL

U.S. Environmental Protection Agency (USEPA). The CAA governs air quality, and the USEPA is responsible for enforcing the CAA. The USEPA is also responsible for establishing the NAAQS, which are required under the 1977 CAA and subsequent amendments. NAAQS have been established for seven major air pollutants: CO, NO_2, O_3, $PM_{2.5}$, PM_{10}, SO_2, and Pb. These air pollutants are referred to as criteria pollutants. The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are summarized in **Table 4.3-1**. The USEPA has classified the Los Angeles County portion of the South Coast Air Basin (Basin) as a nonattainment area for O_3, $PM_{2.5}$, and Pb.

The USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. The USEPA has jurisdiction over emission sources outside state waters (e.g., beyond the outer continental shelf) and establishes various emission standards, including those for vehicles sold in states other than California. Automobiles sold in California must meet stricter emission standards established by CARB.

The USEPA adopted multiple tiers of emission standards to reduce emissions from non-road diesel engines (e.g., diesel-powered construction equipment) by integrating engine and fuel controls as a system to gain the greatest emission reductions. The first federal standards (Tier 1) for new non-road (or off-road) diesel engines were adopted in 1994 for engines over 50 horsepower, to be phased-in from 1996 to 2000.

TABLE 4.3-1: STATE AND NATIONAL AMBIENT AIR QUALITY STANDARDS AND ATTAINMENT STATUSES FOR LOS ANGELES COUNTY

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O_3)	1-hour Average	0.09 ppm (180 µg/m^3)	Nonattainment	--	--
	8-hour Average	0.070 ppm (137 µg/m^3)	n/a	0.070 ppm (137 µg/m^3)	Nonattainment
Respirable Particulate Matter (PM_{10})	24-hour Average	50 µg/m^3	Nonattainment	150 µg/m^3	Maintenance
	Annual Average	20 µg/m^3	Nonattainment	--	--
Fine Particulate Matter ($PM_{2.5}$)	24-hour Average	--	--	35 µg/m^3	Nonattainment
	Annual Average	12 µg/m^3	Nonattainment	12.0 µg/m^3	Nonattainment
Carbon Monoxide (CO)	1-hour Average	20 ppm (23 mg/m^3)	Attainment	35 ppm (40 mg/m^3)	Maintenance
	8-hour Average	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Maintenance
Nitrogen Dioxide (NO_2)	1-hour Average	0.18 ppm (338 µg/m^3)	Attainment	100 ppb (190 µg/m^3)	Maintenance
	Annual Average	0.030 ppm (57 µg/m^3)	Attainment	53 ppb (100 µg/m^3)	Maintenance
Sulfur Dioxide (SO_2)	1-hour Average	0.25 ppm (655 µg/m^3)	Attainment	75 ppb (196 µg/m^3)	Attainment
	24-hour Average	0.04 ppm (105 µg/m^3)	Attainment	--	--
Lead (Pb)	30-day Average	1.5 µg/m^3	Attainment	--	--
	Calendar Quarter	--	--	0.15 µg/m^3	Nonattainment

Note: n/a = not available
SOURCE: CARB, *Air Quality Standards and Area Designations*, 2016.

On August 27, 1998, the USEPA introduced Tier 1 standards for equipment under 37 kW (50 horsepower) and increasingly more stringent Tier 2 and Tier 3 standards for all equipment with phase-in schedules from 2000 to 2008. The Tier 1 through 3 standards were met through advanced engine design, with no or only limited use of exhaust gas after-treatment (oxidation catalysts). Tier 3 standards for NO_X and hydrocarbon are similar in stringency to the 2004 standards for highway engines. However, Tier 3 standards for particulate matter were never adopted. On May 11, 2004, the USEPA signed the final rule introducing Tier 4 emission standards, which were phased-in between 2008 and 2015. The Tier 4 standards require that emissions of particulate matter and NO_X be further reduced by about 90 percent. Such emission reductions are achieved through the use of control technologies—including advanced exhaust gas after-treatment—similar to those required by the 2007 to 2010 standards for highway engines.

STATE

California Air Resources Board (CARB). In addition to being subject to the requirements of CAA, air quality in California is also governed by more stringent regulations under the CCAA. In California, CCAA is administered by CARB at the state level and by the air quality management districts and air pollution control districts at the regional and local levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for meeting the state requirements of the CAA, administering the CCAA, and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the state to endeavor to achieve and maintain the CAAQS. The CAAQS are generally more stringent than the corresponding federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. CARB regulates mobile air

pollution sources, such as motor vehicles. CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications, which became effective in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The state standards are summarized in **Table 4.3-1**.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment. Under the CCAA, the non-desert Los Angeles County portion of the Basin is designated as a nonattainment area for O_3, $PM_{2.5}$, and PM_{10}.

Toxic Air Contaminant (TAC) Regulations. CARB's statewide comprehensive air toxics program was established in the early 1980s. The Toxic Air Contaminant Identification and Control Act created California's program to reduce exposure to air toxics. Under the Toxic Air Contaminant Identification and Control Act, CARB is required to use certain criteria in the prioritization for the identification and control of air toxics. In selecting substances for review, CARB must consider criteria relating to "the risk of harm to public health, amount or potential amount of emissions, manner of, and exposure to, usage of the substance in California, persistence in the atmosphere, and ambient concentrations in the community" [Health and Safety Code Section 39666(f)]. The Toxic Air Contaminant Identification and Control Act also requires CARB to use available information gathered from the Air Toxics "Hot Spots" Information and Assessment Act program to include in the prioritization of compounds.

California has established a two-step process of risk identification and risk management to address the potential health effects from air toxic substances and protect the public health of Californians. In the first step (identification), CARB and the Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified as a TAC in California. During this process, CARB and the OEHHA staff draft a report that serves as the basis for this determination. CARB staff assesses the potential for human exposure to a substance and the OEHHA staff evaluates the health effects. After CARB and the OEHHA staff hold several comment periods and workshops, the report is then submitted to an independent, nine-member Scientific Review Panel (SRP), who reviews the report for its scientific accuracy. If the SRP approves the report, they develop specific scientific findings, which are officially submitted to CARB. CARB staff then prepares a hearing notice and draft regulation to formally identify the substance as a TAC. Based on the input from the public and the information gathered from the report, CARB decides whether to identify a substance as a TAC. In 1993, the California Legislature amended the Toxic Air Contaminant Identification and Control Act by requiring CARB to identify 189 federal HAPs as state TACs.

In the second step (risk management), CARB reviews the emission sources of an identified TAC to determine if any regulatory action is necessary to reduce the risk. The analysis includes a review of controls already in place, the available technologies and associated costs for reducing emissions, and the associated risk.

The Air Toxics "Hot Spots" Information and Assessment Act (Health and Safety Code Section 44360) supplements the Toxic Air Contaminant Identification and Control Act by requiring a statewide air toxics inventory, notification of people exposed to a significant health risk, and facility plans to reduce these risks. The Hot Spots Act also requires facilities that pose a significant health risk to the community to reduce their risk through a risk management plan.

California's Diesel Risk Reduction Program. CARB identified particulate emissions from diesel-fueled engine TACs in August 1998. Following the identification process, CARB was required by law to determine if there is a need for further control, which led to the risk management phase of the program.

For the risk management phase, CARB formed the Diesel Advisory Committee to assist in the development of a risk management guidance document and a risk reduction plan. With the assistance of the Diesel Advisory Committee and its subcommittees, CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles and the Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines. The Diesel Advisory Committee approved these documents on September 28, 2000, paving the way for the next step in the regulatory process: the control measure phase.

During the control measure phase, specific statewide regulations designed to further reduce DPM emissions from diesel-fueled engines and vehicles have and continue to be evaluated and developed. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art technology requirements or emission standards to reduce DPM emissions.

California Public Resources Code (PRC) Section 21151.8. The PRC contains provisions to protect the environmental health of California's students by restricting the certification of an EIR or approval of a negative declaration for a project involving the purchase of a school site or the construction of a new elementary or secondary school by a school district. The following conditions must be met for project approval:

a) The environmental impact report or negative declaration determines that the site is not a current or former hazardous waste disposal site or solid waste disposal site, and if so, that the site has been remediated to an environmentally safe level.

b) The environmental impact report or negative declaration must identify both permitted and nonpermitted facilities within the air pollution district's authority including, but not limited to, freeways and busy traffic corridors, large agricultural operations, and railyards, within one-fourth of a mile of the proposed school site, that might reasonably be anticipated to emit hazardous emissions or handle hazardous or extremely hazardous substances or waste.

c) The environmental impact report or negative declaration must determine that the health risks from the facilities or other pollution sources do not and will not constitute an actual or potential endangerment of public health to persons who would attend or be employed at the proposed school. For a school site with a boundary that is within 500 feet of the edge of the closest traffic lane of a freeway or other busy traffic corridor, the environmental document must analyze and demonstrate that, based on appropriate dispersion modeling and after consideration of any potential mitigation measures, the air quality at the proposed site is such that neither short-term nor long-term exposure poses significant health risks to pupils.

REGIONAL

Southern California Association of Governments (SCAG). While Southern California is a leader in reducing emissions and ambient levels of air pollutants are improving, the SCAG region continues to have the worst air quality in the nation. On April 7, 2016, SCAG adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The RTP/SCS outlines a strong commitment to reduce emissions from transportation sources to comply with Senate Bill (SB) 375. Goals of the 2016–2040 RTP/SCS to reduce air pollution include adding density in proximity to transit stations, and encouraging mixed-use development and active transportation (i.e., non-motorized transportation such as walking and bicycling). SCAG promotes the following policies and actions related to active

transportation to help the region confront congestion and mobility issues and, consequently, improve air quality:

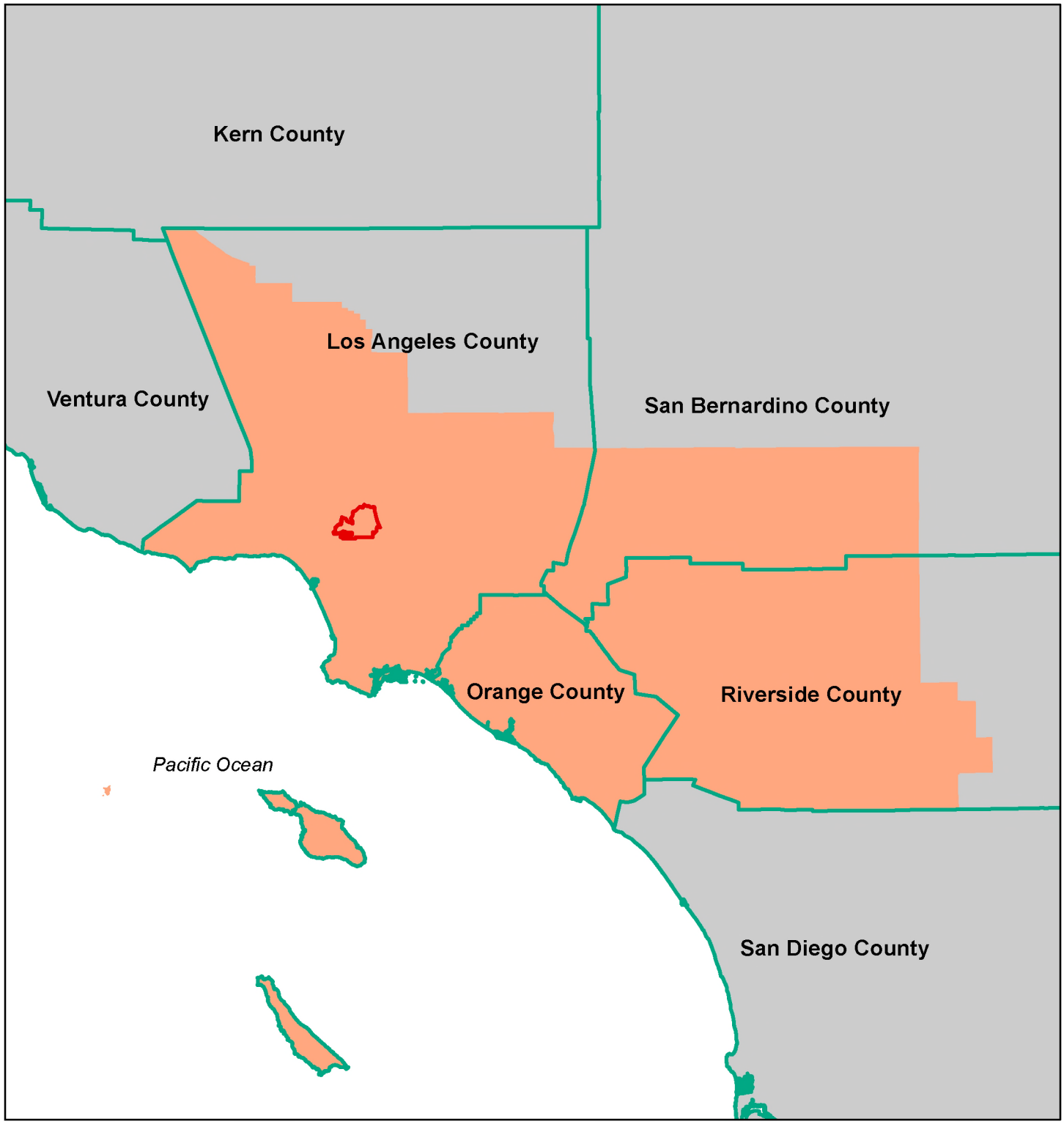
- Implement Transportation Demand Management (TDM) strategies including integrating bicycling through folding bikes on buses programs, triple racks on buses, and dedicated racks on light and heavy rail vehicles;
- Encourage and support local jurisdictions to develop "Active Transportation Plans" for their jurisdiction if they do not already have one;
- Expand the Compass Blueprint program to support member cities in the development of bicycle plans;
- Expand the Toolbox Tuesday's program to encourage local jurisdictions to direct enforcement agencies to focus on bicycling and walking safety to reduce multimodal conflicts;
- Support local advocacy groups and bicycle-related businesses to provide bicycle-safety curricula to the general public;
- Encourage children, including those with disabilities, to walk and bicycle to school;
- Encourage local jurisdictions to adopt and implement the proposed SCAG Regional Bikeway Network; and
- Support local jurisdictions to connect all of the cities within the SCAG region via bicycle facilities.

South Coast Air Quality Management District (SCAQMD). The 1977 Lewis Air Quality Management Act created SCAQMD to coordinate air quality planning efforts throughout Southern California. This Act merged four county air pollution control agencies into one regional district to better address the issue of improving air quality in Southern California. This Act was renamed the Lewis-Presley Air Quality Management Act in 1988. SCAQMD is the agency principally responsible for comprehensive air pollution control in the region. Specifically, the SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain the CAAQS and NAAQS in the district. SCAQMD has jurisdiction over an area of 10,743 square miles consisting of Orange County; the non-desert portions of Los Angeles, Riverside, and San Bernardino counties; and the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin. The Basin portion of SCAQMD's jurisdiction covers an area of 6,745 square miles. The Basin includes all of Orange County and the non-desert portions of Los Angeles (including the Project Area), Riverside, and San Bernardino counties. The Basin is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto Mountains to the north and east; and the San Diego County line to the south (**Figure 4.3-1**).

Programs that were developed by SCAQMD to attain and maintain the CAAQS and NAAQS include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.

All projects in the SCAQMD jurisdiction are subject to SCAQMD rules and regulations, including, but not limited to the following:

- Rule 401 Visible Emissions – This rule prohibits an air discharge that results in a plume that is as dark or darker than what is designated as No. 1 Ringelmann Chart by the United States Bureau of Mines for an aggregate of three minutes in any one hour.
- Rule 402 Nuisance – This rule prohibits the discharge of "such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of people or the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property."



SOURCE: AQMD GIS Maps; TAHA, 2016.

taha 2010-073

Hollywood Community Plan Update
Draft Environmental Impact Report
CITY OF LOS ANGELES

FIGURE 4.3-1

SOUTH COAST AIR BASIN

- Rule 403 Fugitive Dust – This rule requires that future projects reduces the amount of particulate matter entrained in the ambient air as a result of fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions from any active operation, open storage pile, or disturbed surface area.
- Rule 1113 Architectural Coatings – This rule limits VOC in architectural coatings used in the SCAQMD jurisdiction. These limits are application-specific and are updated as availability of low-VOC products expands.
- Rule 1168 Adhesive and Sealant Applications – This rule reduces emissions of VOCs and eliminates emissions of chloroform, ethylene dichloride, methylene chloride, perchloroethylene, and trichloroethylene from the application of adhesives, adhesive bonding primers, adhesive primers, sealants, sealant primers, or any other primers.
- Regulation XIII New Source Review – This regulation contains Rules 1300 through 1325, which set forth pre-construction review requirements for new, modified, or relocated facilities, to ensure that the operation of such facilities does not interfere with progress in attainment of the NAAQS, and that future growth within SCAQMD is not unnecessarily restricted. The specific air quality goal of this regulation is to achieve no net increases from new or modified permitted sources of nonattainment air contaminants or their precursors.

Air Quality Management Plan (AQMP). All areas designated as nonattainment under the CCAA are required to prepare plans showing how the area would meet the state air quality standards by its attainment dates. AQMP is the SCAQMD plan for improving regional air quality. It addresses CAA and CCAA requirements and demonstrates attainment with state and federal ambient air quality standards. The AQMP is prepared by SCAQMD and SCAG. The AQMP provides policies and control measures that reduce emissions to attain both state and federal ambient air quality standards by their applicable deadlines. Environmental review of individual projects within the Basin must demonstrate that daily construction and operational emissions thresholds, as established by the SCAQMD, would not be exceeded. The environmental review must also demonstrate that individual projects would not increase the number or severity of existing air quality violations.

The 2012 AQMP was adopted in December 2012 and continues the progression toward clean air and compliance with state and federal requirements. It includes a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, on- and off-road mobile sources and area sources. The 2012 AQMP includes demonstration of attainment of the federal 24-hour $PM_{2.5}$ standard by 2014 in the Basin through adoption of all feasible measures while incorporating current scientific information and meteorological air quality models. It also updates the USEPA approved 8-hour O_3 control plan with new commitments for short-term NO_X and VOC reductions. The 2012 AQMP also addresses several state and federal planning requirements. The 2012 AQMP builds upon the approach taken in the 2007 AQMP, for the attainment of federal PM and O_3 standards, and highlights the significant amount of reductions needed and the urgent need to engage in interagency coordinated planning to identify additional strategies, especially in the area of mobile sources, to meet all federal criteria pollutant standards within the timeframes allowed under the CAA.

The 2016 AQMP, which was adopted in March 2017, incorporates updated growth projections from the SCAG 2016–2040 RTP/SCS. The 2016 AQMP represents a thorough analysis of existing and potential regulatory control options, includes available, proven, and cost-effective strategies, and seeks to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gases and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. The 2016 AQMP includes both stationary and mobile source strategies to ensure that rapidly approaching attainment deadlines are met and that public health is protected to the maximum extent feasible. The 2016 AQMP acknowledges that the most significance air quality challenge in the Basin is to reduce NO_X emissions sufficiently to meet the upcoming ozone standard deadlines.

LOCAL

Clean Up Green Up Ordinance. The City of Los Angeles adopted a Clean Up Green Up Ordinance (Ordinance Number 184,245) on April 13, 2016, which among other provisions, includes provisions related to ventilation system filter efficiency in mechanically ventilated buildings.[2] This Ordinance added Sections 95.314.3 and 99.04.504.6 to the Los Angeles Municipal Code (LAMC) and amended Section 99.05.504.5.3 to implement building standards and requirements to address cumulative health impacts resulting from incompatible land use patterns. Section 99.04.504.6, which became effective June 4, 2016, mandates that regularly occupied areas in mechanically ventilated buildings within 1,000 feet of a freeway be provided with air filtration media for outside and return air that meet a Minimum Efficiency Report Value (MERV) of 13. This Ordinance requires that these filters be installed prior to occupancy, and recommendations for maintenance with filters of the same value shall be included in the operation and maintenance manual. The only exception to Section 99.04.504.3 applies to existing mechanical equipment. Additionally, Section 99.05.504.3 states that regularly occupied areas in all mechanically ventilated buildings shall be provided with air filtration media for outside and return air that meets a MERV of 8. An exception is provided for existing mechanical equipment and for new ventilation units meeting certain 2013 California Energy Code requirements. These additions to the LAMC are designed to address cumulative health impacts in highly polluted areas resulting from incompatible land use patterns within the City of Los Angeles.

City of Los Angeles General Plan Air Quality Element. The principal objective of the Air Quality Element of the General Plan is to aid the region in attaining the state and federal ambient air quality standards while continuing economic growth and improvement in the quality of life afforded to City residents.[3] The Air Quality Element also documents how the City will implement local programs contained in the General Plan. Goals, objectives, and policies of the Air Quality Element applicable to the Proposed Plan are listed in **Table 4.3-2**.

EXISTING SETTING

AIR POLLUTION CLIMATOLOGY

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

The Basin experiences frequent temperature inversions. Temperature typically decreases with height. However, under inversion conditions, temperature increases as altitude increases, thereby preventing air close to the ground from mixing with the air above it. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere. This interaction creates a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and NO_2 react under strong sunlight, creating smog.

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[2]City of Los Angeles Department of City Planning, *Ordinance Number 184,245 Clean Up Green Up, Council File No. 15-1026*, adopted April 13, 2016.

[3]City of Los Angeles, *General Plan Air Quality Element,* 1992.

TABLE 4.3-2: RELEVANT GENERAL PLAN AIR QUALITY GOALS, OBJECTIVES, AND POLICIES	
Goal/Objective/Policy	**Goal/Objective/Policy Description**
AIR QUALITY ELEMENT	
Goal 1	Good air quality and mobility in an environment of continued population growth and healthy economic structure.
Objective 1.1	It is the objective of the City of Los Angeles to reduce air pollutants consistent with the regional AQMP, increase traffic mobility, and sustain economic growth.
Objective 1.3	It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.
Policy 1.3.1	Minimize particulate matter emissions from construction sites.
Goal 3	Efficient management of transportation facilities and system infrastructure using cost effective system management and innovative demand management techniques.
Objective 3.2	It is the objective of the City of Los Angeles to reduce vehicular traffic during peak periods.
Policy 3.2.1	Manage traffic congestion during peak periods.
Objective 3.3	It is the objective of the City of Los Angeles to install Automated Traffic Surveillance and Control Systems, utilize channelization of streets and other capital programs commensurate with the City's portion of regional goals.
Policy 3.3.1	Implement best available system management techniques and transportation management and mobility action plans to improve the efficiency of existing transportation facilities, subject to availability of funding.
Goal 4	Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.
Objective 4.1	It is the objective of the City of Los Angeles to include the regional attainment of ambient air quality standards as a primary consideration in land use planning.
Policy 4.1.1	Coordinate with all appropriate regional agencies the implementation of strategies for the integration of land use, transportation, and air quality policies.
Policy 4.1.2	Ensure that project level review and approval of land use development remain at the local level.
Policy 4.2.1	Revise the City's General Plan/Community Plans to achieve a more compact, efficient urban form and to promote more transit-orientated development and mixed-use development.
Objective 4.2	It is the objective of the City of Los Angeles to reduce vehicle trips and vehicle miles traveled associated with land use patterns.
Policy 4.2.2	Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.
Policy 4.2.3	Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.
Policy 4.2.4	Require that air quality impacts be a consideration in the review and approval of all discretionary projects.
Policy 4.2.5	Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.
Objective 4.3	It is the objective of the City of Los Angeles to ensure that land use plans separate major sources of air pollution from sensitive receptors such as schools, hospitals, and parks.
Policy 4.3.1	Revise the City's General Plan/Community Plans to ensure that new or relocated sensitive receptors are located to minimize significant health risks posed by air pollution sources.
Policy 4.3.2	Revise the City's General Plan/Community Plans to ensure that new or relocated major air pollution sources are located to minimize significant health risks posed by air pollution sources.
SOURCE: City of Los Angeles, *General Plan Air Quality Element*, November 24, 1992.	

Light, daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland, toward the mountains. During the fall and winter, air quality problems are created due to CO and NO_2 emissions. CO concentrations are generally worse in the morning and late evening (around 10:00 p.m.). In the morning, CO levels are relatively high due to cold temperatures and the large number of cars traveling. High CO levels during the late evenings are a result of stagnant atmospheric conditions trapping CO in the area. Since CO emissions are produced almost entirely from automobiles, the highest CO concentrations in the Basin are associated with heavy traffic. NO_2 concentrations are also generally higher during fall and winter days.

LOCAL CLIMATE

The mountains and hills within the Basin contribute to the variation of rainfall, temperature, and winds throughout the region. The average wind speed, as recorded at the Central Los Angeles Meteorological Station, is approximately 5.3 miles per hour with calm winds occurring approximately 25 percent of the time. Wind in the vicinity of the Project Area predominately blows from the west-southwest.[4] The annual average temperature recorded in the Project Area is 65.4°F.[5] Total precipitation averages approximately 15 inches annually. Precipitation occurs mostly during the winter and relatively infrequently during the summer.[6]

AIR MONITORING DATA

The SCAQMD monitors air quality conditions at 38 locations throughout the Basin. Recorded concentrations of air pollutants at each station are used to characterize air quality in Source Receptor Areas (SRAs). The 38 SRAs are divided based on predominant land use types and local meteorological patterns. The Project Area is predominantly situated within SRA 1, Central Los Angeles County. A relatively small fraction of the western portion of the Project Area extends into SRA 2, Northwest Coastal Los Angeles County, and a small northeastern portion of the Project Area extends into SRA 7, East San Fernando Valley. The portion of the Project Area extending into SRA 7 lies to the north of Cahuenga Peak and includes undeveloped open space areas of Griffith Park; a golf course, as well as the Mount Sinai Memorial Parks and Mortuaries property. The Proposed Plan would preserve this area as open space. Air monitoring activities at the SRA 7 monitoring station in Burbank were discontinued by the SCAQMD in 2014 and air monitoring data from that station recorded prior to 2014 is not pertinent to characterizing air quality conditions where reasonably expected development is expected to occur under the Proposed Plan.

Based on local topography and meteorological patterns, typical air quality conditions in the Project Area are represented most accurately by concentrations of air pollutants measured at the SRA 1 monitoring station, Los Angeles – North Main Street, which is located approximately 3.5 miles southeast of the Project Area boundary (**Figure 4.3-2**). Meteorological conditions within the Project Area, including the small portion of the Project Area that is within SRA 2, are most similar to those in SRA 1 as they are less influenced by sea breeze from the Pacific Ocean, which plays a role in local atmospheric dispersion near the coast within SRA 2—the monitoring station for which is situated approximately 5 miles west of the Project Area boundary at the West Los Angeles Veteran's Administration Hospital.

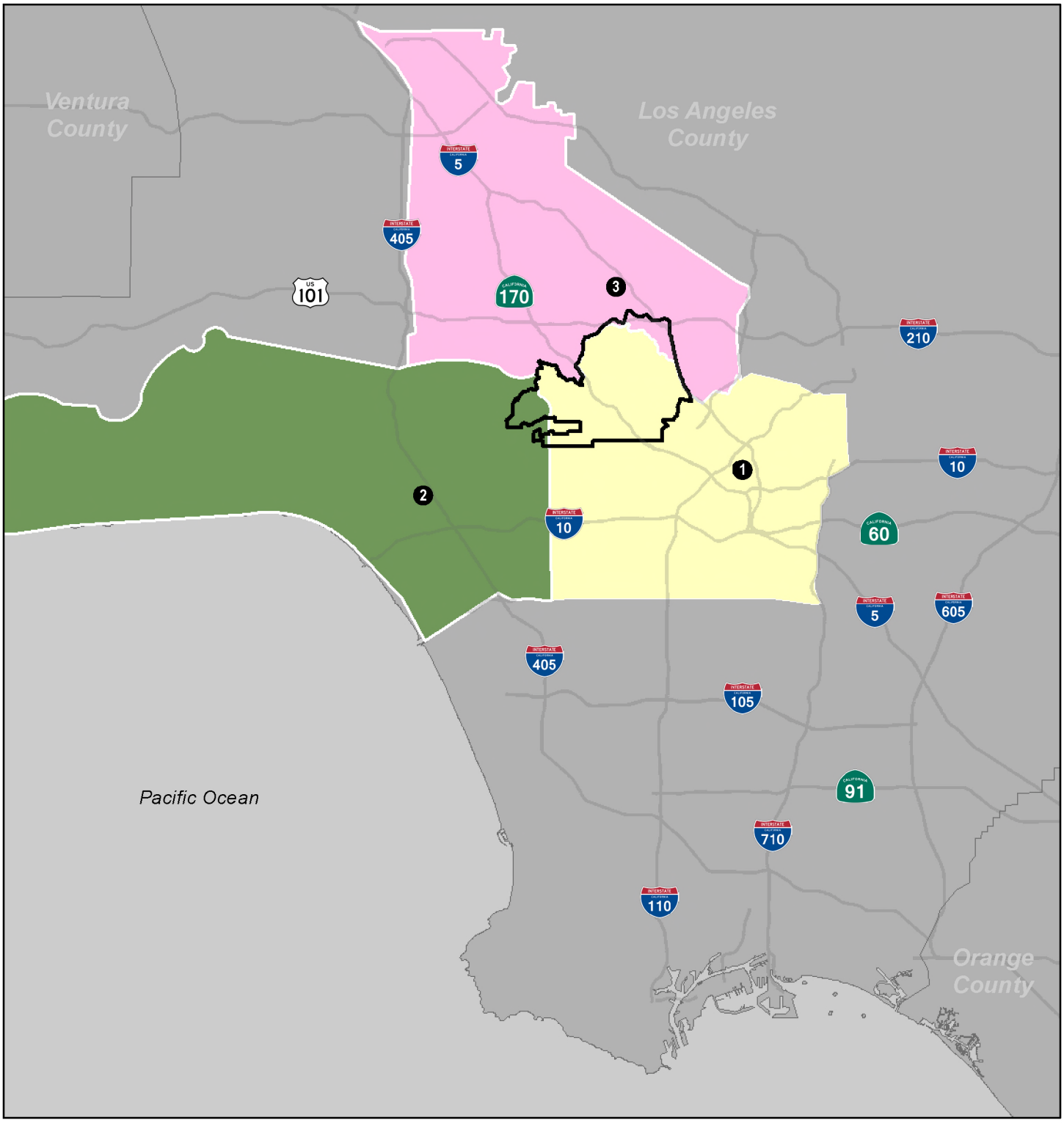
The North Main Street Monitoring Station measures concentrations of O_3, PM10, PM2.5, and NO2. The SCAQMD recently suspended monitoring of CO and SO2 throughout the Basin after numerous years of demonstrated attainment through concentrations measured substantially below the air quality standards.

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[4]SCAQMD, *SCAQMD Meteorological Data for AERMOD,* http://www.aqmd.gov/home/library/air-quality-data-studies/meteorological-data, accessed on September 7, 2016.

[5]Western Regional Climate Center, *Local Climate Data Summaries for the Western U.S. – Los Angeles,* http://www.wrcc.dri.edu, accessed on September 7, 2016.

[6]*Ibid.*



LEGEND:

- Hollywood CPA
- SRA 1 - Central Los Angeles County
- SRA 2 - Northwest Coastal Los Angeles County
- SRA 7 - East San Fernando Valley
- 1 SRA 1 Monitoring Station - Los Angeles North Main Street
- 2 SRA 2 Monitoring Station - West Los Angeles VA Hospital
- 3 SRA 7 Monitoring Station - Burbank (Station Closed in 2014)

N W E S

0 4 8 Miles

SOURCE: CARB, 2004; TAHA, 2017.

taha environmental planners
taha 2010-073

Hollywood Community Plan Update
Draft Environmental Impact Report
CITY OF LOS ANGELES

FIGURE 4.3-2

AIR QUALITY MONITORING STATIONS

Table 4.3-3 presents the monitored air quality data at the North Main Street Monitoring Station from 2013 to 2015. As shown in **Table 4.3-3**, O_3, PM_{10}, and $PM_{2.5}$ standards were exceeded at various times over the three year period.

TABLE 4.3-3: PROJECT AREA AMBIENT AIR QUALITY DATA

Pollutant	Standards	Maximum Concentrations and Frequencies of Exceeded Standards		
		2013	2014	2015
Ozone (O_3)	Maximum 1-hr Concentration (ppm)	0.081	0.113	0.104
	Days > 0.09 ppm (State 1-hr standard)	0	3	2
	Maximum 8-hr Concentration (ppm)	0.069	0.094	0.074
	Days > 0.070 ppm (State 8-hr standard)	0	6	6
	Days > 0.070 ppm (National 8-hr standard)	0	6	6
Respirable Particulate Matter (PM_{10})	Maximum 24-hr Concentration (µg/m3)	74.5	86.8	88.5
	Days > 50 µg/m3 (State 24-hr standard)	20	38	30
	Days > 150 µg/m3 (Federal 24-hr standard)	0	0	0
	Annual Average Concentration (µg/m3)	35.3	30.2	27.0
	Exceed State Annual Standard (20 µg/m3)	Yes	Yes	Yes
Fine Particulate Matter ($PM_{2.5}$)	Maximum 24-hr Concentration (µg/m3)	54.8	65.0	70.3
	Days > 35 µg/m3 (National 24-hr standard)	1	6	7
	Annual Average Concentration (µg/m3)	18.9	12.4	12.5
	Exceed State Annual Standard (12 µg/m3)	Yes	Yes	Yes
	Exceed Federal Annual Standard (12.0 µg/m3)	Yes	Yes	Yes
Nitrogen Dioxide (NO_2)	Maximum 1-hr Concentration (ppm)	0.090	0.082	0.079
	Days > 0.18 ppm (State 1-hr standard)	0	0	0
	Days > 0.100 ppm (National 1-hr standard)	0	0	0

SOURCE: CARB, Air Quality Data Statistics, *Top 4 Summary*, http://www.arb.ca.gov/adam/topfour/topfour1.php, accessed on September 8, 2016; SCAQMD, *Historical Data by Year*, http://aqmd.gov/home/library/air-quality-data -studies/historical-data-by-year, accessed on September 8, 2016.

SCAQMD also operates and maintains an air monitoring network for toxic air contaminants (TACs). The MATES-IV program measured concentrations of more than 30 air pollutants, including both gases and particulates, at 10 fixed sites throughout the Basin.[7] The monitoring study was accompanied by a computer modeling exercise in which the SCAQMD estimated the risk of cancer from breathing toxic air pollution throughout the region based on emissions and weather data. MATES-IV found that the annual average carcinogenic risk in the Basin declined from 1,194 in a million in 2005 to 418 in a million in 2012. The highest carcinogenic risk of about 2,500 in a million was found near the Ports of Los Angeles and Long Beach. The existing ambient carcinogenic risk near central Los Angeles is slightly over 1,200 in a million.

Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. CARB has identified the following population groups who are most likely to be affected by air pollution: children less than 14 years of age, adults over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. Land uses where these population groups are likely to spend a substantial amount of time are considered sensitive receptors.

[7] SCAQMD, *MATES-IV Final Report, Multiple Air Toxics Exposure Study in the South Coast Air Basin*, May 2015.

According to SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers and retirement homes.

The Project Area contains numerous land uses that are considered sensitive receptors, including residential uses, playgrounds, and institutional facilities, such as schools (including the Los Angeles City College), religious centers, and medical facilities. The predominant current land use in the Project Area is residential. Low density single-family residential uses are predominately concentrated within the hillsides to the north and east of the Project Area, as well as the southeastern portion of the Project Area (south of Waring Avenue). Multi-family residential uses are located throughout the flatland portions of the Project Area. Various medical complexes consisting of hospitals and medical facilities are centered around and near the Sunset Boulevard/Vermont Avenue intersection. In addition, there are sensitive receptors outside the boundaries of the Project Area which may be impacted by the Project due to their proximity to it.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the CEQA Guidelines, the Proposed Plan would have a significant impact if it would:

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

SCAQMD THRESHOLDS

SCAQMD has developed specific CEQA regional and localized significance thresholds (LSTs) to assess air quality impacts associated with individual development projects. LSTs vary depending on the air monitoring areas, or source receptor areas, in which a development project is located. The Project Area is predominantly located within SRA 1, Central Los Angeles County, with the western portion extending into SRA 2, Northwest Coastal Los Angeles County. Due to the density of development within the Project Area, the LST values for SRAs 1 and 2 are some of the most protective in the Basin for regulating localized emissions and preventing exposure of sensitive receptors to substantial pollutant concentrations. The regional and local construction significance thresholds for individual projects within the Project Area are shown in **Table 4.3-4**. The LST values for development projects with lot sizes ranging from less than one acre up to 5 acres in SRAs 1 and 2 are displayed in the table.[8] As appropriate, analysis of individual projects within the Project Area must address the appropriate threshold based on the location of the project, the size of the project site, and the proximity of sensitive receptors. Conservatively, **Table 4.3-4** presents the LST values for development sites within 25 meters of sensitive receptors.

[8]LSTs for SRA 7 are not presented since future development within the Project Area is not anticipated to occur within the SRA 7 portion of the Project Area, as this portion of the Project Area consists of undeveloped open space, a golf course, and a cemetery. The Proposed Plan intends to preserve open space and recreational areas within the Project Area.

TABLE 4.3-4: SCAQMD DAILY CONSTRUCTION EMISSIONS THRESHOLDS

Criteria Pollutant /a/	Regional Threshold (Pounds Per Day)	On-Site Localized Thresholds (Pounds Per Day) /b/					
		SRA 1			SRA 2		
		1 Acre	2 Acre	5 Acre	1 Acre	2 Acre	5 Acre
Volatile Organic Compounds (VOC)	75	--	--	--	--	--	--
Nitrogen Oxides (NO_X)	100	74	108	161	103	147	221
Carbon Monoxide (CO)	550	680	1,048	1,861	562	827	1,531
Sulfur Oxides (SO_X)	150	--	--	--	--	--	--
Respirable Particulates (PM_{10})	150	5	8	16	4	6	13
Fine Particulates ($PM_{2.5}$)	55	3	5	8	3	4	6

/a/ SCAQMD has adopted a significance threshold of three pounds per day for lead. The construction projects under the Proposed Plan do not include sources of lead emissions, and a discussion of air quality impacts from lead emissions is excluded from the air quality impact analyses.
/b/ Localized significance thresholds are based on a 25 meter receptor distance because most of the Project Area is densely developed.
SOURCE: SCAQMD, *SCAQMD Air Quality Significance Thresholds,* 2015; SCAQMD, *Final Localized Significance Threshold Methodology, Appendix C – Mass Rate LST Look-Up Tables*, revised October 21, 2009.

The regional operational significance thresholds for individual projects within the Project Area are shown in **Table 4.3-5**. These quantitative thresholds are considered when making a significance determination using the CEQA Guidelines Appendix G thresholds, above, as appropriate. Localized analyses for individual development projects are typically limited to industrial and commercial land uses that involve considerable on-site heavy duty vehicle traffic or employ stationary sources of substantial air pollutant emissions.

TABLE 4.3-5: SCAQMD DAILY OPERATIONAL EMISSIONS THRESHOLDS

Criteria Pollutant /a/	Regional Threshold (Pounds Per Day)	On-Site Localized Thresholds (Pounds Per Day) /b/					
		SRA 1			SRA 2		
		1 Acre	2 Acre	5 Acre	1 Acre	2 Acre	5 Acre
Volatile Organic Compounds (VOC)	55	--	--	--	--	--	--
Nitrogen Oxides (NO_X)	55	74	108	161	103	147	221
Carbon Monoxide (CO)	550	680	1,048	1,861	562	827	1,531
Sulfur Oxides (SO_X)	150	--	--	--	--	--	--
Respirable Particulates (PM_{10})	150	2	2	4	1	2	3
Fine Particulates ($PM_{2.5}$)	55	1	2	2	1	1	2

/a/ SCAQMD has adopted a significance threshold of three pounds per day for lead. The operation projects under the Proposed Plan do not include sources of lead emissions, and a discussion of air quality impacts from lead emissions is excluded from the air quality impact analyses.
/b/ Localized significance thresholds are based on a 25 meter receptor distance because most of the Project Area is densely developed.
SOURCE: SCAQMD, *SCAQMD Air Quality Significance Thresholds,* 2015; SCAQMD, Final Localized Significance Threshold Methodology, Appendix C – Mass Rate LST Look-Up Tables, revised October 21, 2009.

Furthermore, SCAQMD is tasked with managing exposure of sensitive receptors to air toxics and carcinogenic risk. According to SCAQMD methodology, health effects from carcinogenic air toxics are described in terms of individual cancer risk. "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. SCAQMD has stated that the incremental cancer risk should not exceed 10 persons in one million, and the chronic and acute risks should not exceed a calculated Hazard Index value of 1.0. The SCAQMD quantitative thresholds are considered when making a significance determination using the CEQA Guidelines Appendix G thresholds, above, as appropriate.

METHODOLOGY

The terminology and methodology used to evaluate the significance of potential impacts to air quality in the Project Area resulting from the implementation of the Proposed Project are described below. As air quality is evaluated on a regional basis, the following analysis addresses the Project Area as it pertains to the Los Angeles County portion of the Basin. For purposes of this analysis, the CEQA Guidelines Appendix G criteria are used, supplemented by the thresholds identified in the current SCAQMD guidance where appropriate. Air quality impacts resulting from implementation of the Proposed Plan are assessed at the programmatic level as information on specific development projects is not known for the Project Area as a whole.

SCAQMD *CEQA Air Quality Handbook* states that the air quality assessment should be as comprehensive as possible at a programmatic level. In the absence of SCAQMD programmatic thresholds, the EIR scrutinizes broad air quality implications of the Proposed Project and examines the Proposed Plan's consistency with the 2016 AQMP. Consistency with this plan would ensure that the Proposed Plan would comply with regional and local air quality goals. The analysis also broadly examines short-term construction emissions, long-term operational emissions, localized pollutant concentrations, TACs, and odors. Common sources of construction emissions include heavy-duty off-road construction equipment exhaust, fugitive dust, and architectural coatings. Sources of operational emissions include the use of consumer products, motor vehicle trips attracted to or generated by a land use, and on-site combustion of natural gas. Typically, specific information on construction activity for individual projects is not available when assessing construction impacts at the programmatic level. As such, a best-effort approach to disclose all reasonably foreseeable impacts based on available information is used consistent with the requirements of CEQA Guidelines. To this end, the analysis of construction impacts is based on estimated construction scenarios, as described below.

Construction emissions were estimated for equipment exhaust emissions and truck trips for a number of example individual construction projects. Equipment emission factors were obtained from off-road mobile source emission factors provided by SCAQMD and based on CARB data.[9] Equipment was assumed to operate for eight hours per day. Truck emission factors were obtained using EMFAC2014 and trucks were assumed to travel 40 miles per day, with a one-way distance of 20 miles to the disposal site. Fugitive dust and architectural coating emissions are qualitatively discussed because it would be speculative to quantify lot acreage and the size of buildings to be coated. These example projects account for four scales of intensity with respect to equipment usage and truck trips, as itemized below.

- Two pieces of heavy-duty equipment and 25 truck trips per day;
- Four pieces of heavy-duty equipment and 50 truck trips per day;
- Eight pieces of heavy-duty equipment and 100 truck trips per day; and
- Ten pieces of heavy-duty equipment and 150 truck trips per day.

These equipment inventories and truck volumes are representative of a reasonable range of construction activity intensity for individual projects based on previous development in the City of Los Angeles. Maximum daily regional and localized emissions were quantified for these construction scenarios and assessed in the context of SCAQMD thresholds of significance pertaining to air quality. The analysis of construction projects under implementation of the Proposed Plan assumes a baseline of zero for daily criteria pollutants emissions.

[9]SCAQMD, *Off-road Mobile Source Emission Factors*, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/off-road-mobile-source-emission-factors, accessed on May 25, 2016.

The implementation of the Proposed Plan would generate mobile source emissions and area source emissions associated with increased development. Mobile source emissions were estimated using VMT data provided in the traffic and transportation studies prepared for the Proposed Plan and vehicle emission rates from the EMFAC2014 model. The VMT data included speed information, which allowed the analysis to account for changes in traffic flow under the build scenarios. Additional sources of air pollutant emissions associated with land use development include natural gas, electricity, and water use, and VOCs from consumer products and cleaning supplies. These emissions were estimated based on the methodology used in the California Emissions Estimator Model (CalEEMod) and data presented in Section 4.16, Utilities and Service Systems, of this EIR.

This discussion of air quality addresses impacts for the entire Project Area. No distinction is made between Change and Non-Change Areas because potential emissions and concentrations of pollutants are a direct function of both transportation activity and construction activity throughout the Project Area.

IMPACTS

IMPACT 4.3-1 Would implementation of the Proposed Plan conflict with or obstruct implementation of the applicable air quality plan? **Less than significant impact.**

The air quality plans applicable to the Project Area are the 2016–2040 RTP/SCS and the 2016 AQMP. As mentioned in the Regulatory Framework, the primary objectives of the RTP/SCS that are aimed at reducing air pollution consist of adding density in proximity to transit stations, and encouraging mixed-use development and active transportation. Detailed review of the Proposed Plan's consistency with the RTP/SCS is provided in Sections 4.7, Greenhouse Gas Emissions, 4.10, Land Use and Planning and 4.15, Transportation and Traffic. As discussed in these sections, the Proposed Plan is consistent with goals and policies of the RTP/SCS.

The AQMP was prepared to accommodate growth, to reduce the high levels of pollutants within areas under the jurisdiction of SCAQMD, to return clean air to the region, and to minimize the impact on the economy. Consistency with the AQMP can be assessed by determining how a project accommodates increases in population or employment.[10] The population and employment assumptions used by SCAQMD to estimate regional emissions in the AQMP are obtained from SCAG projections for cities and unincorporated areas within the SCAMQD's jurisdiction. As discussed in Chapter 3.0, Project Description, the Department of City Planning (DCP) uses SCAG projections as a benchmark when updating the community plans. The Proposed Plan would not result in the City exceeding SCAG 2040 population or employment projections (SCAG adopts their forecasts at the jurisdictional level). Refer to Section 4.13, Population, Housing, and Employment, for a detailed discussion of how City population and housing reasonably foreseeable development forecasts are consistent with the SCAG projections and therefore the AQMP. Therefore, the Proposed Plan would not exceed the assumptions in the AQMP.

The Final 2016 AQMP was adopted in March 2017 and represents the most updated regional blueprint for achieving federal air quality standards and healthful air.[11] The Final 2016 AQMP adapts previously conducted regional air quality analyses to account for the recent unexpected drought conditions, and presents a revised approach to demonstrated attainment of the 2006 24-hour $PM_{2.5}$ NAAQS for the Basin. Additionally, the Final 2016 AQMP relied upon a comprehensive analysis of emissions, meteorology, atmospheric chemistry, regional growth projections, and the impact of existing control measures to evaluate

[10]Criteria for determining consistency with the AQMP are defined in the SCAQMD CEQA Air Quality Handbook.

[11]SCAQMD, *Final 2016 AQMP,* http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan, March 2017.

strategies for reducing NO_X emissions sufficiently to meet the upcoming ozone deadline standards. Directly applicable to reasonably foreseeable development under the Proposed Plan, the Final 2016 AQMP proposes robust NO_X reductions from commercial cooking and residential and commercial appliances, as well as commercial space heating. Individual projects within the Project Area will be required to comply with all new regulatory measures set forth by the SCAQMD.

As discussed in Section 4.10, Land Use and Planning, of this EIR, the Proposed Plan would be consistent with applicable goals of the 2016-2040 RTP/SCS. Specifically, the Proposed Plan would incentivize new development opportunities around existing transit systems, direct growth to transit hubs and corridors, encourage mixed-use development, encourage and promote a variety of mobility options, such as making streets walkable, and promote pedestrian-friendly environments. These objectives are consistent with the RTP/SCS and the AQMP, as well as the City's adopted General Plan Framework Element. Therefore, impacts related to conflicting with or obstructing implementation of the applicable air quality plans under the Proposed Plan would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

IMPACT 4.3-2 Would implementation of the Proposed Plan violate any air quality standard or contribute substantially to an existing or projected air quality violation? **Significant and unavoidable impact for construction for NO_X, $PM_{2.5}$, and PM_{10} and operations for VOC.**

Construction

Regional Emissions. Construction activity has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the project site. Fugitive dust emissions would primarily result from demolition and site preparation (e.g., grading) activities. NO_X emissions would primarily result from the use of construction equipment. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release VOC. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

As mentioned in the Regulatory Framework, above, SCAQMD's Rule 403 Fugitive Dust is a control requirement for preventing, mitigating and controlling the release of airborne particulate matter (dust) emissions from earth moving activities. It is mandatory for all construction projects in the Basin to comply with Rule 403 or face violations that would incur fines. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site, and maintaining effective cover over exposed areas. Compliance with Rule 403 would reduce $PM_{2.5}$ and PM_{10} dust emissions associated with construction activities by approximately 61 percent.[12]

[12]SCAQMD, *Overview – Fugitive Dust Mitigation Measure Tables*, April 2007.

Table 4.3-6 shows the estimated average daily construction emissions associated with the four sample construction activity scenarios that include different equipment use and truck trips. These scenarios are representative of reasonable construction activity intensities for future development projects within the Project Area. Projects of greater scale will require more equipment and hauling of demolished or displaced material, which would result in higher emissions on a daily basis. The SCAQMD air quality thresholds of significance were established for mass daily emissions, and **Table 4.3-6** compares the emissions from these hypothetical construction scenarios to the applicable SCAQMD regional thresholds of significance. Results of the emissions modeling demonstrate that daily emissions of NO_X from heavy-duty diesel equipment and trucks during construction activities could exceed the SCAQMD regional thresholds under reasonably expected conservative circumstances for large projects requiring substantial quantities of material excavation and export.

TABLE 4.3-6: ESTIMATED AVERAGE DAILY CONSTRUCTION EMISSIONS

	Pounds Per Day					
Example Scenarios - Daily Activity /a/	**VOC**	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
2 Heavy-Duty Equipment, 25 Truck Trips	3	28	11	<1	1	1
4 Heavy-Duty Equipment, 50 Truck Trips	5	55	23	<1	2	1
8 Heavy-Duty Equipment, 100 Truck Trips	10	**110**	46	<1	3	3
10 Heavy-Duty Equipment, 150 Truck Trips	12	**149**	58	<1	4	4
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**Yes**	**No**	**No**	**No**	**No**

/a/ Equipment exhaust was estimated using OFFROAD and eight hour per day of operation. Truck emissions were estimated using EMFAC and a trip length of 20 miles.
SOURCE: TAHA, 2018.

Ministerial projects are reasonably expected to be too small to result in significant air quality impacts during construction activities (they would be expected to use fewer than eight pieces of heavy duty equipment on site each day and to result in fewer than 100 truck trips per day.)

Additional sources of criteria pollutant and O_3 precursor emissions that would be associated with construction activities include area source off-gassing of VOC from architectural coating and paving activities. Health effects of inhalation of VOCs may include eye, nose, throat irritation, headaches, loss of coordination, nausea, damage to liver, kidney, and central nervous system. The City of Los Angeles Department of Building and Safety has established VOC content limits for architectural coatings as part of the 2017 Los Angeles Green Building Code.[13] Compliance with the Los Angeles Green Building Code is mandatory for new development projects within the City of Los Angeles, and implementation of the VOC content limits for architectural coatings substantially reduces the likelihood that off-gassing emissions from painting, finishing, and paving activities would exceed applicable SCAQMD air quality significance thresholds. SCAQMD has also published Rules 1113 and 1186 that limit VOC content in architectural coating applications. The use of architectural coatings with low VOC content would eliminate the potential for daily VOC emissions to exceed the applicable SCAQMD threshold.

Based on all of the above implementation of the Proposed Plan would result in a ***potentially significant impact*** related to *regional emissions* of NO_X from heavy duty construction equipment and haul trucks. The potentially significant NO_x emissions associated with construction activities identified above could result in degradation of air quality and adverse health effects to sensitive receptors in close proximity to construction sites. USEPA

[13]City of Los Angeles Department of Building and Safety, *2017 Los Angeles Green Building Code VOC and Formaldehyde Limits,* January 2017.

has conducted extensive research into potential public health concerns associated with exposure to elevated concentrations of criteria pollutants and O_3 precursors. For example, high concentrations of NO_2, which has been assessed as NO_X, can cause breathing difficulties.[14] Construction activities capable of generating NO_x emissions that exceed the SCAQMD regional air quality significance thresholds could potentially result in an air quality violations that could constitute a public health concern.

Localized Emissions. In addition to regional thresholds, SCAQMD has developed specific CEQA LSTs to assess construction and operational air quality impacts associated with individual development projects. The LST values are specific to the SRA in which the individual project is located and based on proximity to the nearest sensitive receptor(s). A localized construction analysis would be speculative given the lack of a construction location and construction activities under the Proposed Plan. However, it is reasonable to assume that some individual projects within the Project Area would involve construction activity adjacent to sensitive receptors (e.g., residences and schools).

As a conservative exercise, maximum daily emissions from on-site sources during construction activities were quantified and compared to the lowest applicable LST values for individual projects within the Project Area. Under certain circumstances, localized unmitigated equipment emissions combined with fugitive dust emissions generated by the construction of future development occurring under the Proposed Plan could potentially exceed the LSTs for NO_X, $PM_{2.5}$, and PM_{10} (**Table 4.3-7**). Fugitive dust emissions would be reduced by compliance with SCAQMD Rule 403 for activities requiring earthwork and material movement, such as demolition, grading, and excavation, although potentially not to a level of less than significant without further mitigation. Based on this, implementation of the Proposed Plan could result in a ***potentially significant impact*** related to localized construction emissions (NO_X, $PM_{2.5}$, and PM_{10}).

TABLE 4.3-7: ESTIMATED MAXIMUM DAILY ON-SITE CONSTRUCTION EMISSIONS

	Pounds Per Day			
Example Scenarios - Daily Activity /a/	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**
2 Heavy-Duty Equipment	17	10	1	1
4 Heavy-Duty Equipment	34	21	1	1
8 Heavy-Duty Equipment	68	42	3	3
10 Heavy-Duty Equipment	**86**	52	**>4**	**>3**
Minimum LST Value – Hollywood	**74**	**562**	**4**	**3**

/a/ Equipment exhaust was estimated using OFFROAD and eight hour per day of operation. Truck emissions were estimated using EMFAC and a trip length of 20 miles.
SOURCE: TAHA, 2018.

Operation

Under the Proposed Plan, long-term regional emissions within the Project Area would be generated by mobile sources (motor vehicle exhaust) and area sources, such as consumer products and natural gas combustion. Emissions from motor vehicle exhaust were estimated using VMT data for Existing Conditions, the future without project conditions in 2040 (i.e., Future [2040] No Project/Existing Plan), and two treatment options under the 2040 Proposed Plan condition.[15]

[14]USEPA, *Six Common Pollutants – Nitrogen Oxides*, https://www3.epa.gov/airquality/nitrogenoxides/, accessed on September 22, 2016.

[15]See Chapter 3.0, Project Description and Section 4.15, Transportation and Traffic for a discussion of the two treatment options.

Table 4.3-8 below displays the estimated regional daily VMT associated with all vehicle trips having origins or destinations within the Project Area for each of the four aforementioned conditions. The increases in VMT can be attributed to ambient regional growth, as well as the increases in households and employment within the Project Area resulting from implementation of the Proposed Plan, which are described in Section 4.13, Population, Housing, and Employment. The daily VMT estimates were utilized in conjunction with stationary source utility demand to assess regional operational air pollutant emissions generated by the Proposed Plan.

TABLE 4.3-8: PROJECT AREA TRIPS ESTIMATED DAILY VEHICLE MILES TRAVELED

Scenario	Passenger Vehicle VMT	Truck VMT	Total VMT
Existing Conditions	5,422,640	200,872	5,623,513
Future (2040) No Project/Existing Plan	5,439,834	268,579	5,708,413
Proposed Plan Treatment 1 (2040)	5,610,828	291,284	5,902,112
Proposed Plan Treatment 2 (2040)	5,609,557	291,329	5,900,885

SOURCE: Fehr & Peers, 2018.

Additional sources of air pollutant emissions associated with land use development include natural gas, electricity, and water use, and VOCs from consumer products and cleaning supplies. Stationary source emissions within the Project Area are generated by the use of consumer products and natural gas in both residential and non-residential land uses. Regional survey data was utilized to estimate operational emissions from stationary sources within the Project Area under existing conditions, the Future (2040) No Project/Existing Plan, and the Proposed Plan based on land uses. **Table 4.3-9** presents estimates of the residential households, existing square footage of non-residential development, and non-residential reasonably foreseeable development for the Project Area. Estimates of daily regional operational emissions were calculated using the values presented in **Table 4.3-9** and emissions factors obtained from survey data contained in the appendix files to CalEEMod 2016.3.1.

TABLE 4.3-9: PROJECT AREA LAND USE SUMMARY

Scenario	Number of Households	Commercial Reasonably Expected Development (sq. ft.)	Industrial Reasonably Expected Development (sq. ft.)	Public Facilities Reasonably Expected Development (sq. ft.)
Existing Conditions	99,000	26,837,000	8,700,000	12,369,000
Future (2040) No Project/Existing Plan	121,000	31,640,000	10,258,000	14,583,000
Proposed Plan (2040)	132,000	35,749,000	8,647,000	12,936,000

SOURCE: City of Los Angeles, Department of City Planning, 2018.

Mobile vehicle trip data and reasonably foreseeable development estimates presented in **Tables 4.3-8** and **4.3-9**, above, were used to generate estimates of daily regional emissions. **Table 4.3-10** shows regional emissions under Existing Conditions, the Future (2040) No Project/Existing Plan, and the Proposed Plan. Mobile source emissions presented are those quantified under Treatment Option 2, as this condition is more conservative and assumes a greater number of daily VMT. **Table 4.3-10** also presents a comparison of regional operational emissions under the Proposed Plan relative to existing conditions, which serve as the baseline for air quality assessment at the plan level, and relative to the Future (2040) No Project/Existing Plan for informational disclosure.

TABLE 4.3-10: ESTIMATED PROJECT AREA REGIONAL OPERATIONAL EMISSIONS

Scenario	Daily Emissions (Pounds per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
EXISTING CONDITIONS						
Mobile Sources	822	4,112	20,333	53	677	304
Area Sources	3,375	503	261	3	40	40
Total	**4,197**	**4,615**	**20,594**	**56**	**717**	**344**
FUTURE (2040) NO PROJECT/EXISTING PLAN						
Mobile Sources	292	1,134	5,892	31	634	260
Area Sources	4,091	597	303	4	48	48
Total	**4,383**	**1,731**	**6,195**	**35**	**682**	**308**
PROPOSED PLAN (2040)						
Mobile Sources (Treatment Option 2/a/)	305	1,217	6,109	34	658	269
Area Sources	4,364	635	317	4	51	51
Total	**4,669**	**1,852**	**6,426**	**38**	**709**	**320**
NET DAILY EMISSIONS/b/						
Change from Existing Conditions	***472***	***(-2,763)***	***(-14,168)***	***(-18)***	***(-8)***	***(-24)***
SCAQMD Regional Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	**Yes**	**No**	**No**	**No**	**No**	**No**
SCAQMD Regional Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	Yes	Yes	No	No	No	No

/a/ Mobile source emissions presented are those quantified under Treatment Option 2, as this condition is more conservation and assumes a greater number of daily VMT.

/b/ Net emissions refer to the difference in emissions between Proposed Plan and existing conditions; Negative values expressed in parentheses.

SOURCE: TAHA, 2018.

While emissions from mobile sources are generally expected to decrease over time as a result of statewide emissions reductions measures, the anticipated ambient growth in residential housing and non-residential reasonably expected development under the Proposed Plan would result in increased use of consumer products and natural gas. The Proposed Plan would increase stationary source emissions when compared to existing conditions. However, stationary source emissions would be offset by the decrease in mobile source emissions for NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$. Reasonably expected development within the Project Area would increase the use of consumer products, which is the predominant contributor to operational VOC emissions. The use of consumer products varies considerably by land use type and is typically analyzed on a project-specific scale.

When compared to existing conditions, the operational conditions under the Proposed Plan could result in daily emissions of VOC that would exceed SCAQMD regional significance thresholds due to heavily expanded use of consumer products. However, it should be noted that CARB continually applies increasingly stringent regulations on sources of ozone precursors statewide, and it is likely that the emissions presented in this document represent conservative estimates of emissions from reasonably expected development. Nevertheless, for purposes of this analysis, impacts related to regional operational emissions under the Proposed Plan are considered ***potentially significant*** for VOC.

With regards to mobile sources, as shown in **Table 4.3-10**, future daily regional emissions under implementation of the Proposed Plan are generally expected to decrease relative to existing emissions. This trend is primarily attributed to programmed improvements in vehicular engine efficiency technologies and fuel pollutant concentrations, as well as fleet turnover and the addition of more alternative fuel vehicles, that are projected to occur between existing conditions and 2040 resulting from more stringent statewide

regulations promulgated by the CARB.[16] As an example, EMFAC2014 accounts for regulations enacted through California's Advanced Clean Cars (ACC) Program, which affects light-duty vehicles of model years 2017 through 2025 and includes controls on precursors of smog, soot, and global warming compounds, as well as mandated requirements for the incorporation of greater numbers of zero-emission vehicles. Additionally, the state Truck and Bus Regulation requires heavy-duty commercial vehicles to be retrofit with diesel particulate filters (DPF) or replaced with trucks having 2007 or 2010 standard engines by 2023. These CARB-mandated programs will effectively improve average fleetwide emissions into the future.

Historically, mobile source-related CO concentrations at high-volume (e.g. congested) intersections have been linked to health concerns according to USEPA and SCAQMD. According to the *2004 Revision to the California State Implementation Plan for Carbon Monoxide*, requirements for cleaner vehicles, equipment, and fuels have cut peak CO levels in half since 1980 despite growth. A Federal Attainment Plan for Carbon Monoxide (CO Plan) was approved by the District Governing Board on November 12, 1992 and submitted to the USEPA.[17] The CO Plan was designed to demonstrate the attainment of the NAAQS by 2000. In 2001, the Basin met both the federal and state 8-hour CO standards for the first time at all monitoring stations. CO attainment was also demonstrated in the 2003 AQMP.

The busiest intersection evaluated in the attainment demonstration was located at Wilshire Boulevard and Veteran Avenue (located outside the Project Area), which has a daily traffic volume of approximately 100,000 vehicles per day. The 2003 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day, or approximately 40,000 vehicles during the peak hour based on a 10 percent peak hour ratio.[18] With implementation of the Proposed Plan, no intersection within the Project Area would experience peak hour volumes exceeding 15,000 vehicles per hour.[19] Additionally, regional air quality and mobile source emission standards have improved substantially since the original attainment demonstration, and ultimately even more than 40,000 vehicles as initially analyzed in the 2003 AQMP would have to travel through an intersection on an hourly basis in order to potentially create a CO hot spot capable of exceeding ambient air quality standards. Therefore, the Proposed Plan has no potential to generate localized CO concentrations at intersections that exceed the state CO standards.

Based on the analyses presented above, it is unlikely that implementation of the Proposed Plan would violate an air quality standard or contribute substantially to an existing or projected air quality violation, for all but VOC. The collective use of consumer products throughout the Project Area under reasonably foreseeable development has the potential to exceed the SCAQMD regional operational threshold for VOC emissions. As the Proposed Plan may exceed the SCAQMD regional thresholds for VOC, impacts related to regional operational emissions under the Proposed Plan would be ***potentially significant*** .

Conclusion

During construction activities under the Proposed Plan, daily emissions of NO_X from heavy-duty diesel equipment and haul trucks could exceed the SCAQMD regional and localized thresholds under reasonably expected circumstances for large projects. Additionally, fugitive dust generation from earthmoving activities could result in localized emissions of NOx, PM_{10} and $PM_{2.5}$ from on-site sources exceeding applicable SCAQMD LST values depending upon the proximity of sensitive receptors and the anticipated equipment inventory. Therefore, without mitigation, implementation of the Proposed Plan would result in a ***potentially***

[16]CARB Mobile Source Analysis Branch, *EMFAC2014 Volume III – Technical Documentation*, May 2015.
[17]SCAQMD, *Federal Attainment Plan for Carbon Monoxide*, 1992.
[18]City of Los Angeles, *7500 Sunset Boulevard Project Draft Environmental Report*, July 2016.
[19]Project traffic data; see Section 4.15, Transportation and Traffic and Appendix J.

significant impact related to regional emissions for NO_X as well as localized construction emissions for NO_X and PM_{10} and $PM_{2.5}$.

During operational activities under the Proposed Plan, long term emissions of regulated air pollutants would be generated by vehicular traffic and stationary sources such as combustion of natural gas and consumer products use. While emissions from mobile sources are generally expected to decrease over time as a result of statewide emissions reductions measures, the anticipated ambient growth in residential housing and non-residential reasonably expected development under the Proposed Plan would result in increased use of consumer products and natural gas. VOC emissions would increase relative to Existing Conditions, and VOC emissions may collectively exceed SCAQMD regional thresholds throughout the Project Area. Therefore, without mitigation, implementation of the Proposed Plan would result in a ***potentially significant impact*** related to the combination of operational VOC emissions from mobile and stationary source emissions even when taking into account improvements in vehicle exhaust emissions restrictions.

Mitigation Measures

AQ1 The City shall require all projects that are in a CPIO District subarea or are discretionary to include in the agreements with contractors and subcontractors the following, or equivalent, best management practices in contract specifications:

- All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the USEPA Tier 4 emission standards, where available. In the event that Tier 4 engines are not available for any off-road equipment larger than 100 horsepower, that equipment shall be equipped with a Tier 3 engine, or an engine that is equipped with retrofit controls to reduce exhaust emissions of NO_X and DPM to no more than Tier 3 levels unless certified by engine manufacturers or the on-site air quality construction mitigation manager that the use of such devices is not practical for specific engine types. For purposes of this condition, the use of such devices is "not practical" for the following, as well as other, reasons:
  - There is no available retrofit control device that has been verified by either the CARB or USEPA to control the engine in question to Tier 3;
  - The construction equipment is intended to be on site for five days or less; or
  - Relief may otherwise be granted from this requirement if a good faith effort has been made to comply with this requirement and that compliance is not practical for technical, legal, economic or other reasons.
- All construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- Construction contractors shall use electricity from power poles rather than temporary gasoline or diesel power generators, as feasible, or solar where available.
- Construction contractors shall use pre-painted construction materials, as feasible.
- Construction contractors shall provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- Construction contractors shall provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site, as feasible.
- Construction contractors shall reroute construction trucks away from congested streets or sensitive receptor areas, as feasible.
- Construction contractors shall appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM_{10} generation.

Significance of Impacts after Mitigation

As indicated above, construction projects with more than eight heavy duty pieces of equipment on-site and operating eight hours per day and over 100 daily truck trips would be expected to exceed SCAQMD regional thresholds of significance; projects with over eight heavy duty pieces of equipment operating eight hours per day would be expected to exceed SCAQMD LST. As noted above, projects that would require this level of equipment use/truck trips would be expected to be larger than the threshold for site plan review and would require discretionary review.

For construction impacts, the imposition of Mitigation Measure **AQ1** would result in a 50 to 90 percent reduction in NOx and PM emissions from diesel-powered off-road construction equipment relative to Tier 3 engines, which are typically used as the industry standard. The requirement of engines meeting Tier 4 emissions standards is becoming more common as the equipment is more widely available. For instance, Los Angeles County Metropolitan Transportation Authority (Metro) requires the use of Tier 4 engines in all of their construction projects. However, on-road heavy-duty haul trucks are not regulated under the same off-road emissions standards, and the City cannot feasibly require all construction-related on-road trucks operating within City limits to adhere to more stringent engine emissions standards. Additionally, it is infeasible to speculate the magnitude of emissions associated with simultaneous construction of multiple projects throughout the Project area. Therefore, it is conservatively concluded that regional impacts from construction would remain potentially ***significant and unavoidable***.

There are no mitigation measures identified for operational impacts related to VOC, but as noted above it is anticipated that state regulations will continue to be imposed that would continue to reduce sources of VOC.

Significant and unavoidable impact (construction) – emissions exceeding the regional threshold for NO_X and related to exceeding the localized thresholds for NO_X, $PM_{2.5}$, and PM_{10}.

Significant and unavoidable impact (operation) – VOC emissions exceeding the regional threshold.

IMPACT 4.3-3 Would implementation of the Proposed Plan result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? **Significant and unavoidable impact**.

As shown in **Table 4.3-2**, the Basin is currently designated nonattainment for multiple criteria pollutants. Emissions generated by the Proposed Plan combined with past, present, and reasonably probable future projects could impede attainment efforts or result in locally significant pollutant concentrations. Therefore, the Proposed Plan combined with past, present, and reasonably probable future projects could result in a cumulative impact. SCAQMD has not established quantitative thresholds for cumulatively considerable contributions to regional emissions for criteria pollutants. SCAQMD Air Quality Handbook advises that for both construction and operational activities, if a project exceeds the identified project-level significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. As indicated under Impact 4.3-2, the Proposed Plan could generate regional construction and operational emissions that exceed SCAQMD significance thresholds resulting in a significant impact that would also add to cumulative impacts in the region.

As shown above under Impact 4.3-2, implementation of the Proposed Plan would result in significant regional and local construction emissions. The Proposed Plan would accommodate the development of hundreds of thousands of square feet of residential and non-residential uses. Continued development in the Los Angeles Subregion, in conjunction with developments in other communities in the City of Los Angeles and in the Basin, would increase pollutant emissions and degrade air quality. The reasonably foreseeable development of the Proposed Plan could result in regionally ***potentially significant impacts*** during construction and operation that would add to impacts from reasonably foreseeable development in the Los Angeles Subregion. Therefore, without mitigation, implementation of the Proposed Plan would result in a ***potentially significant impact*** related to a cumulatively considerable net increase of any criteria pollutant for which the region is designated non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors).

The potential for cumulative impacts is addressed in more detail in the Cumulative Impacts section below.

Mitigation Measures

Mitigation Measure **AQ1** would reduce the project's contribution to the cumulative impact as a result of construction emissions but not below a level of significance. As discussed above, there are no mitigation measures to reduce operational emissions.

Significance of Impacts after Mitigation

Significant and unavoidable impact.

IMPACT 4.3-4 Would implementation of the Proposed Plan expose sensitive receptors to substantial pollutant concentrations? **Significant and unavoidable impact for construction and less than significant impact for operation.**

Regarding health risks from existing emissions sources, the California Supreme Court ruling in *California Building Industry Association vs. Bay Area Air Quality Management District* (December 17, 2015) held that "agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project's future users or residents. But when a proposed project's risks exacerbate those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users. In those specific instances, it is the project's impact on the environment – and not the environment's impact on the project – that compels an evaluation of how future residents or users could be affected by exacerbated conditions." Assessing health risks from existing land uses equates to assessing the environment's impact on the project. The California Supreme Court ruled that this analysis would not be consistent with CEQA. Individual development projects under the Proposed Plan would be responsible for assessing localized air pollutant emissions and the potential for substantial exposure of nearby sensitive receptors to substantial pollutant concentrations.

Construction

The greatest potential for exposure to substantial pollutant concentrations and TAC emissions during construction would be DPM emissions associated with heavy-duty equipment operations and truck traffic during construction activities. According to the SCAQMD methodology, health effects from carcinogenic air toxics are described in terms of individual cancer risk. "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. SCAQMD has stated that the incremental cancer risk should not exceed an incremental increase of 10 excess cancer cases per million, and the chronic and acute non-carcinogenic risks should not exceed a calculated Hazard Index (HI) value of 1.0.

The California Office of Environmental Health Hazard Assessment (OEHHA) published a guidance manual in 2015 to assist the preparation of health risk assessments (HRA) for carcinogenic and non-carcinogenic exposures to air toxics in accordance with the Air Toxics Hot Spots Information and Assessment Act.[20] The 2015 OEHHA HRA guidelines provide methodologies for assessing various types of environmental exposures to toxic contaminants, including inhalation exposures. The 2015 OEHHA HRA guidance relied upon a comprehensive review of the most up-to-date scientific literature to formulate the recommended exposure estimation methodologies. The OEHHA guidance acknowledges that children are especially susceptible to the effects of toxic air contaminant exposure, and incorporated age sensitivity factors (ASFs) and age-specific daily breathing rates (DBRs) to account for the differences in sensitivity to carcinogens during early life exposure. OEHHA recommends a default ASF of 10 for the age range between the third trimester of pregnancy through two years, and an ASF of three for ages two through 15 years.

As a conservative measure to characterize maximum potential exposures of sensitive receptors to carcinogenic risks, residential exposures are assumed to begin at birth and exposures of children at schools is anticipated to begin at the lowest educational grade level. The OEHHA guidance provides recommended DBR values that are specific to the age of the receptor and the type of activity in which the receptor would be engaged during exposure, which are evaluated on a case-by-case basis. SCAQMD has not adopted guidelines to implement the 2015 OEHHA HRA guidelines for construction and indicated it is currently considering how to implement the guidelines. The City has only found one Air District, the San Joaquin Valley Air Pollution Control District that has adopted guidelines to implement the 2015 OEHHA HRA guidelines. BAAQMD is undergoing a process to implement the guidelines as well.

The specific location of future construction activity within the Project Area was not known when the air quality analysis was completed, and therefore many variables related to characterizing potential exposures to air toxics during construction activities could not be determined, such as proximity to the emissions sources and duration of exposure. A construction health risk analysis would be speculative given the lack of a construction location and construction activities. However, it is reasonable to assume that some level of construction activity would occur adjacent to sensitive receptors (e.g., residences and schools). The significant construction emissions identified in Impact 4.3-2, above, could result in adverse health effects to sensitive receptors. As such, it is likely that intense construction activities (e.g., from development projects that involve a high volume of haul trucks) would exceed the health risk significance thresholds due to equipment and truck exhaust emissions. This is considered a ***potentially significant*** impact related to substantial pollutant concentrations during construction activities.

Operation

Residential and commercial land uses typically do not generate TAC emissions that would expose people to substantial pollutant concentrations. Industrial land uses anticipated in the Project Area include studios and media production, as well as entertainment support uses, such as storage. The majority of these proposed land uses are not typically associated with TAC emissions. In addition, the use of toxic compounds by an industrial use would be strictly regulated through SCAQMD permitting process, which includes detailed health risk assessments, when applicable. New industrial sources of emissions are subject to SCAQMD Regulation XIII (New Source Review). Under this rule, hazardous facilities are legally subject to provisions that require public notice and modeling analysis to determine and, if necessary, mitigate, the downwind impact prior to permit issuance. Refer to Section 4.10, Land Use and Planning for additional discussion related to land use compatibility and existing conditions. Specific new industrial sources of emissions are not reasonably foreseeable and would be subject to SCAQMD Regulation XIII (New Source Review). Compliance with SCAQMD permitting process and Regulation XIII would ensure

[20]OEHHA, *Guidance Manual for Preparation of Health Risk Assessments*, February 2015.

that new land uses would not generate TAC emissions that exceed the SCAQMD significance thresholds at sensitive land uses.

With regards to operational CO hot spot concentrations due to mobile source emissions, implementation of the Proposed Plan would not result in peak hour vehicle volumes at any intersection within the Project Area exceeding 15,000 vehicles per hour. Even if this peak hour volume were sustained throughout the entire day, maximum daily vehicular traffic at the busiest intersection within the Project Area would not exceed 360,000 vehicles. Based on a worst-case traffic scenario at the most congested intersection within Los Angeles County in 2002, the SCAQMD 2003 AQMP determined that CO air quality standards could not be violated at an intersection unless the daily traffic volumes exceeded 400,000 vehicles, since 100,000 daily vehicles resulted in a maximum 1-hour CO concentration of 4.6 ppm, which less than quarter of the applicable standard 1-hour CO standard of 20 ppm.[21]

In 2016, the traffic volume for the most congested intersection in Los Angeles County did not exceed the 1-hour CO standard of 20 ppm. In 2015, the maximum 1-hour CO concentration measured by the SCAQMD within the Los Angeles County portion of the Basin was 4.4 ppm, which represents only 22 percent of the applicable standard value, and the maximum 8-hour CO concentration was 3.3 ppm, which represents only 33 percent of the applicable standard value.[22] The SCAQMD did not measure a single instance of CO concentrations exceeding either the 1-hour or 8-hour standard at any location throughout the Basin in 2015, even in areas with the most congested traffic conditions. Taking into account more stringent emissions standards promulgated by CARB in recent years, and cleaner burning fuels and more efficient vehicles in the future, the Proposed Project would not result in the exposure of sensitive receptors to substantial CO concentrations from mobile source emissions within the Project Area.

Additionally, future development projects within the Project Area would be required to comply with the city's Clean Up Green Up Ordinance, which among other provisions, included provisions related to ventilation system filter efficiency in mechanically ventilated buildings. In addition, the Proposed Project would be required to comply with PRC Section 21151.8, which requires assessment of hazardous pollutants within 0.25 miles of a new elementary or secondary schools. This legal requirement within the PRC protects staff and students of new schools from significant health risks from exposure to TACs. Compliance with existing regulations would ensure that impacts related to sensitive receptor exposure to substantial pollutant concentrations would be ***less than significant***.

Conclusion

Implementation of the Proposed Plan could result in a ***potentially significant impact*** related to substantial pollutant concentrations during construction activities.

Compliance with existing regulations would ensure that impacts related to sensitive receptor exposure to substantial pollutant concentrations during operational activities associated with future development within the Project Area would be ***less than significant***.

Mitigation Measures

Refer to Mitigation Measure **AQ1**, above, related to the reduction of construction emissions. Mitigation Measure **AQ1** would reduce TAC emissions generated by various construction activities, including equipment operation. For example, Tier 4 engines with horsepower ratings between 175 and 750 generate 90 percent less exhaust emissions, including particulate matter, than Tier 2 or Tier 3

[21]SCAQMD, *Final 2003 AQMP Appendix V – Modeling and Attainment Demonstrations*, August 2003.
[22]SCAQMD, *Final 2016 Air Quality Management Plan*, March 2017.

engines.[23] Development projects will additionally be required to comply with standards established by a variety of federal, state and regional regulations discussed in the Regulatory Framework. However, a reduction in emissions below the SCAQMD significance thresholds cannot be demonstrated in the absence of specific project details that are necessary to assess impacts. It is possible that a construction project within the Project Area could generate emissions that would exceed the significance thresholds despite Mitigation Measure **AQ1**.

Significance of Impacts after Mitigation

Significant and unavoidable impact (construction).

Less than significant (operation).

IMPACT 4.3-5 Would implementation of the Proposed Plan create objectionable odors affecting a substantial number of people? **Less than significant impact.**

Construction Odors

Potential sources that could emit odors during construction activities include equipment exhaust and paving and painting activities. Such odors are localized, generally confined to the immediate area surrounding a construction site and transitory in nature. In addition, odors associated with construction activities are not those typically associated with odor complaints. Construction activities within the Project Area would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary duration. Construction activity would not cause a significant odor nuisance. Therefore, impacts related to construction odors under the Proposed Plan would be ***less than significant***.

Operational Odors

According to the SCAQMD *CEQA Air Quality Handbook*, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. Under the Proposed Plan, industrial areas would continue to be developed with industrial uses, including media-related industrial uses, and not operations that are associated with odor complaints. On-site trash receptacles would have the potential to create adverse odors. Consistent with the Mayor's Clean Streets LA Program, trash receptacles would be located and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.. Restaurant uses that may generate odors would be similar to existing uses within the Project Area and would be subject to the provisions of SCAQMD Rule 402 related to the prevention of public nuisance odors affecting a substantial number of people. Therefore, impacts related to operational odors under the Proposed Plan would be ***less than significant***.

Conclusion

Construction and operational activities associated with future development within the Project Area would not cause a significant odor nuisance. Therefore, odor impacts would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

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[23]USEPA, *Nonroad Diesel Engines General Information*, https://www.epa.gov/vehicles-and-engines#info, accessed on May 25, 2016.

Significance of Impacts after Mitigation

Less than significant.

CUMULATIVE IMPACTS

AQMP CONSISTENCY

The AQMP consistency analysis has been provided in Impact 4.3-1. As discussed therein, the Proposed Plan would be consistent with the 2016-2040 RTP/SCS. Specifically, the Proposed Plan would encourage transit use and the use of non-motorized transportation, such as biking and walking. The AQMP was prepared to accommodate growth, to reduce the high levels of pollutants within areas under the jurisdiction of SCAQMD, to return clean air to the region, and to minimize the impact on the economy. Consistency with the AQMP can be assessed by determining how a project accommodates increases in population or employment. The population and employment assumptions used by SCAQMD to estimate regional emissions in the AQMP are obtained from SCAG projections for cities and unincorporated areas within the SCAQMD's jurisdiction. The Proposed Plan would not exceed the SCAG population or employment projections for the City as a whole. Therefore, implementation of the Proposed Plan would be consistent with the AQMP. Impacts related to conflicting with or obstructing implementation of the AQMP would be less than significant and ***would not be cumulatively considerable***.

POLLUTANT EMISSIONS

In order to assess cumulative impacts of emissions, SCAQMD recommends that projects be evaluated to determine whether they would be consistent with AQMP performance standards and project-specific emissions thresholds. In the case of the Proposed Plan, air pollutant emissions would be considered to be cumulatively considerable if the new sources of emissions exceed SCAQMD project-specific emissions thresholds. The cumulative context for consideration of most air quality impacts is the Basin. The context for localized significance thresholds is within 500 meters of the project site per SCAQMD LST guidance.

Construction Emissions. As discussed in Impacts 4.3-2, construction activities could result in significant impacts related to regional and localized emissions, along with TAC concentrations. Because construction activities are of limited duration and in a limited area, it is unlikely that construction being undertaken now would overlap with construction under the Proposed Plan. However, without a specific construction schedule, timing and emission levels cannot be accurately estimated. Therefore, future construction under the Proposed Plan is considered a potentially significant impact at the project level. Implementation of Mitigation Measure **AQ1** would reduce regional and local emissions generated by various construction activities, including equipment operation, truck trips, and painting. It is possible that construction activities associated with individual development projects within the Project Area could generate emissions that would exceed the significance thresholds despite Mitigation Measure **AQ1**. Because SCAQMD indicates that projects that are significant at a project level must also be determined to be significant at a cumulative level, this would result in a significant and unavoidable cumulative impact related to regional and localized emissions for NOx, $PM_{2.5}$, and PM_{10}, along with TAC concentrations. Thus, impacts related to regional and localized emissions — along with TAC concentrations — would be significant, *cumulatively considerable* and would add to significant cumulative impacts.

The Proposed Plan would accommodate the development of hundreds of thousands of square feet of development (see **Table 4.3-8**). Future development within the Project Area, in conjunction with developments in other communities in the City of Los Angeles and in the Basin, will increase pollutant emissions and degrade air quality. The Proposed Plan could result in a regionally significant and

unavoidable impact during construction that would add to impacts associated with reasonably foreseeable development in the Los Angeles County subregion of the Basin. Therefore, without mitigation, implementation of the Proposed Plan may result in a significant impact related to a net increase of NO_X localized particulate matter emissions ($PM_{2.5}$, and PM_{10}) for which the project region is currently non-attainment under applicable federal and state ambient air quality standards. In addition, although not significant for the Proposed Plan, construction activity would generate VOC emissions that would contribute to total regional O_3 precursor emissions. Therefore, NO_X emissions associated with construction activities under the Proposed Plan would be *significant, cumulatively considerable* and would add to significant cumulative impacts.

Operational Emissions. As indicated under Impact 4.3-2, the Proposed Plan would generate regional operational emissions that exceed the SCAQMD significance thresholds for VOC due to the expanded use of consumer products in household and commercial applications. The Proposed Plan would not result in localized CO concentrations that violate the State CO standards. Operational conditions under the Proposed Plan would exceed the SCAQMD air quality significance threshold for VOC, impacts and would add to regional emissions of these pollutants. Operational emissions of VOC under the Proposed Plan would be *significant, cumulatively considerable* and would add to significant cumulative impacts.

POLLUTANT CONCENTRATIONS ON SENSITIVE RECEPTORS

Construction Emissions. As discussed in Impacts 4.3-2 and 4.3-4, construction activities could result in significant impacts related to regional and localized emissions, along with TAC concentrations. Because construction activities are of temporary duration and confined to a limited area, it is unlikely that ongoing construction activity under existing conditions would persist into the future such that it would coincide with construction activity under the Proposed Plan. However, without a specific construction schedule, timing and emission levels cannot be accurately estimated. As construction of individual development projects within the Project Area could potentially result in emissions that exceed the SCAQMD thresholds, future construction under the Proposed Plan is considered a potentially significant impact at the project level. Implementation of Mitigation Measure **AQ1** would reduce regional and local emissions generated by various construction activities, including equipment operation, truck trips, and painting.

It is possible that construction of individual development projects within the project area could generate emissions that would exceed the significance thresholds despite implementation of Mitigation Measure **AQ1**. SCAQMD indicates that projects that are significant at a project level must also be determined to be significant at a cumulative level; this would result in a significant and unavoidable cumulative impact related to regional and localized emissions, along with TAC concentrations. Thus, impacts related to sensitive receptors exposure to substantial pollutant concentrations during construction, along with TAC concentrations, would be *significant, cumulatively considerable* and would add to significant cumulative impacts.

Operational Emissions. The Proposed Plan would not exacerbate existing conditions related to TAC concentrations (see Impact 4.3-4). Specific new industrial sources of emissions are not reasonably foreseeable and would be subject to SCAQMD Regulation XIII (New Source Review). Permit issuance for hazardous facilities under the Proposed Plan would be handled on a case-by-case basis, and the emissions modeling analysis would be project-specific. Each development project would be responsible for demonstrating compliance with the air quality thresholds of significance devised by SCAQMD that are designed to protect public health and prevent exposures to substantial pollutant concentrations. Additionally, future development projects within the Project Area would be required to comply with PRC Section 21151.8 and the City's provisions related to ventilation system filter efficiency in mechanically ventilated buildings, as well as provide air filtration media in new residential uses within 1,000 feet of freeways in accordance with the Clean Up Green Up Ordinance (No. 184245). Therefore, impacts related

to sensitive receptors exposure to substantial pollutant concentrations during operational activities would be less than significant and *would not be cumulatively considerable*.

Odors. While construction activity can emit odors, construction activity has not been identified as a source of odor complaints. Accordingly, future development occurring under the Proposed Plan would not cause a construction-related odor nuisance. As discussed in Impact 4.3-5, the Project Area is not anticipated to be developed with land uses that are typically associated with odor complaints as a result of the Proposed Plan. On-site trash receptacles would have the potential to create adverse odors. Consistent with the Mayors Clean Streets LA Program, trash receptacles would be located and maintained in a manner that promotes odor control. Therefore, impacts related to objectionable odors would be less than significant and *would not be cumulatively considerable*.

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4.4 BIOLOGICAL RESOURCES

This section provides an overview of biological resources within the areas that could potentially be affected by the Proposed Plan and evaluates impacts associated with the Proposed Plan. Topics addressed in this section include habitats and sensitive species; Significant Ecological Areas (SEAs); wetlands, streams, and riparian habitat; wildlife movement; Habitat Conservation Plans (HCPs); and other applicable plans, policies, and ordinances related to biological resources.

REGULATORY FRAMEWORK

Regulations and plans applicable to the Proposed Plan are summarized below.

FEDERAL

Federal Endangered Species Act (FESA). The FESA and subsequent amendments provide for the conservation of endangered and threatened species, and the ecosystems upon which they depend. Section 7 of the FESA requires federal agencies to aid in the conservation of listed species, and to ensure that the activities of federal agencies will not jeopardize the continued existence of listed species or adversely modify designated critical habitat. Under FESA, the U.S. Fish and Wildlife Services (USFWS) and the National Oceanic and Atmospheric Administration (NOAA) are responsible for administration of the FESA and have regulatory authority over federally listed species.

Clean Water Act (CWA). At the federal level, the CWA (33 United States Code [USC] Section 1344) is the primary law regulating wetlands and waters. The U.S. Army Corps of Engineers (USACE) and the U.S. Environmental Protection Agency (USEPA) regulate the discharge of dredged or fill material into waters of the United States, including wetlands, under Section 404 of the CWA (33 USC 1344). Waters of the United States are defined in Title 33 Code of Federal Regulations (CFR) Part 328.3(a) and include a range of wet environments such as lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds. The lateral limits of jurisdiction in those waters may be divided into three categories—territorial seas, tidal waters, and nontidal waters—and is determined depending on which type of waters is present (Title 33 CFR Part 328.4(a), (b), (c)). Activities in waters of the United States regulated under Section 404 include fill for development, water resource projects (e.g., dams and levees), infrastructure developments (e.g., highways and airports), and mining projects. Section 404 of the CWA requires a federal license or permit before dredged or fill material may be discharged into waters of the United States, unless the activity is exempt from Section 404 regulation (e.g., certain farming and forestry activities).

Section 401 of the CWA (33 USC 1341) requires any applicant for a federal license or permit to conduct any activity that may result in a discharge of a pollutant into waters of the United States to obtain a certification from the state in which the discharge originates or would originate, or, if appropriate, from the interstate water pollution control agency having jurisdiction over the affected waters at the point where the discharge originates or would originate. The discharge would be required to comply with the applicable effluent limitations and water quality standards. A certification obtained for the construction of any facility must also pertain to the subsequent operation of the facility. The responsibility for the protection of water quality in California rests with the State Water Resources Control Board (State Water Board) and its nine Regional Water Quality Control Boards (Water Boards).

Migratory Bird Treaty Act (MBTA). The MBTA (16 USC 703 et seq.), Title 50 CFR Part 10 includes provisions for the protection of migratory birds, including the non-permitted take of migratory birds, under the authority of the USFWS and the California Department of Fish and Wildlife (CDFW). MBTA protects over 800 species, including geese, ducks, shorebirds, raptors, songbirds, and many common species. MBTA decrees that all migratory birds and their parts (including eggs, nests and feathers) are fully protected. Under this Act, taking, killing, or possessing migratory birds is unlawful. Projects that are likely to result in the taking of birds protected under the MBTA (through construction activities occurring during nesting season) will require the issuance of take permits from USFWS. Activities that would require such a permit would include, but not be limited to, the destruction of migratory bird nesting habitat during the nesting season when eggs or young are likely to be present. Under this Act, surveys are required to determine if nests would be disturbed and, if so, a buffer area with a specified radius around the nest would be established so that no disturbance or intrusion would be allowed until the young had fledged and left the nest. If not otherwise specified in the permit, the size of the buffer area would vary with species and local circumstances (e.g., presence of busy roads), and would be based on the professional judgment of the monitoring biologist.

Fish and Wildlife Coordination Act. The Fish and Wildlife Coordination Act (16 USC Sections 661–667e, March 10, 1994, as amended 1946, 1958, 1978, and 1995) requires that whenever waters or channel of a stream or other body of water are proposed or authorized to be modified by a public or private agency under a federal license or permit, the federal agency must first consult with the USFWS and/or National Oceanic and Atmospheric Administration (NOAA) Fisheries Service and with the head of the agency exercising administration over the wildlife resources of the state where construction would occur (in this case the CDFW), with a view to conservation of birds, fish, mammals and all other classes of wild animals and all types of aquatic and land vegetation upon which wildlife is dependent.

STATE

California Endangered Species Act (CESA). The CDFW is responsible for the administration of the CESA. For projects that affect both a state and federal listed species, compliance with the FESA will satisfy the CESA if the CDFW determines that the federal incidental take authorization is "consistent" with the CESA. Projects that result in a take of a California listed species require a take permit under the CESA. The federal and state acts lend protection to species that are considered rare enough by the scientific community and trustee agencies to warrant special consideration, particularly with regard to protection of isolated populations, nesting or den locations, communal roosts, and other essential habitat. Unlike the FESA, CESA prohibits the take of not just listed endangered or threatened, but also candidate species (species petitioned for listing).

The CESA defines an endangered species as:

> *...a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant which is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease.*

A threatened species is defined as:

> *...a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that, although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the absence of the special protection and management efforts required by this chapter. Any animal determined by the commission as rare on or before January 1, 1985 is a threatened species.*

Candidate species are defined as:

> *...a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that the commission has formally noticed as being under review by the department for addition to either the list of endangered species or the list of threatened species, or a species for which the commission has published a notice of proposed regulation to add the species to either list.*

Candidate species may be afforded temporary protection as though they were already listed as threatened or endangered at the discretion of the Fish and Game Commission. Unlike the FESA, CESA does not include listing provisions for invertebrate species. Article 3, Sections 2080 through 2085, of the CESA addresses the taking of threatened or endangered species by stating:

> *...no person shall import into this State, export out of this State, or take, possess, purchase, or sell within this State, any species, or any part or product thereof, that the commission determines to be an endangered species or a threatened species, or attempt any of those acts, except as otherwise provided.*

Under the CESA, "take" is defined as, "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." Additionally, some sensitive mammals and birds are protected by the state as Fully Protected Mammals or Fully Protected Birds, as described in the California Fish and Game Code, Sections 4700 and 3511, respectively.

Migratory Bird Protection - California Fish and Game Code (CFGC). According to CFGC Section 3503 it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird [except English sparrows (*Passer domesticus*) and European starlings (*Sturnus vulgaris*)]. Sections 3503.5 prohibit the taking, possession or destruction of the nest of any birds in the orders *Falconiformes* and *Strigiformes* (birds-of-prey). Section 3513 essentially overlaps with the MBTA, prohibiting the take or possession of any migratory nongame bird. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered "take" by CDFW.

Porter-Cologne Water Quality Control Act. Waters of the United States are defined by the Porter-Cologne Water Quality Control Act as "any surface water or groundwater, including saline waters, within the boundaries of the state." The State Water Board protects all waters in its regulatory scope, but has special responsibility for isolated wetlands and headwaters. These water bodies have high resource value, are vulnerable to filling, and may not be regulated by other programs, such as CWA Section 404. Waters of the state are regulated by the State Water Board under the State Water Quality Certification Program, which regulates discharges of dredged and fill material under CWA Section 401 and the Porter-Cologne Water Quality Control Act. Projects that require a USACE permit, or fall under other federal jurisdiction, and have the potential to impact Waters of the United States are required to comply with the terms of the Water Quality Certification Program. If a proposed project does not require a federal license or permit, but does involve activities that could result in a discharge of harmful substances to Waters of the United States, the Water Boards have the option to regulate such activities under its state authority in the form of Waste Discharge Requirements or Certification of Waste Discharge Requirements.

California Native Plant Protection Act (NPPA). The California Native Plants Society (CNPS), a nonprofit plant conservation organization, publishes and maintains an Inventory of Rare and Endangered Vascular Plants of California. NPPA prohibits the taking, import or sale of rare, threatened or endangered plant species, except as exempted by the act. Even where exemptions apply, where CDFW has notified a property owner of the presence of such a plant, the property owner must notify CDFW before destroying the plant. This requirement provides an opportunity for the state to salvage the plant.

Natural Community Conservation Act (NCCA). The NCCA (Fish and Game Code Division 3, Chapter 10, Sections 2800 et seq.) was enacted in 1991. NCCA is administered by CDFW. The goal of this Act is to identify and secure habitat areas for protection of biodiversity. Habitat areas are identified by CDFW, and plans are prepared for habitat protection. When a development project is proposed, a determination is made concerning the potential impacts of the project on biodiversity and the best means of avoiding or mitigating them. NCCA allows local, state or federal agencies to enter into agreements with public and private entities to implement a "natural community conservation plan" (NCCP), e.g., habitat and species protection within a specified geographic area. Participation in an NCCP does not exempt a development project from CEQA. Mitigation measures pursuant to CEQA may, as an alternative, include participation in an NCCP in order to reduce the burden for on-site mitigation.

Santa Monica Mountains Conservancy Act. The Santa Monica Mountains Conservancy Act (Public Resources code Sections 33000 – 33215) was enacted in 1979 by AB 1312. The act established the Santa Monica Mountains Conservancy. The conservancy's mission is to strategically buy back, preserve, protect, restore, and enhance treasured pieces of Southern California to form an interlinking system of urban, rural and river parks, open space, trails, and wildlife habitats that are easily accessible to the general public. The conservancy aims to preserve, protect, and enhance the open spaces in the mountains within Los Angeles and Ventura counties with a guiding principle of maintaining a network of cross-freeway habitat linkages and wildlife corridors that keep the mountain ranges biologically inter-connected and provide enough habitat to support larger mammals.

LOCAL

Los Angeles County Significant Ecological Areas (SEAs). SEAs are officially designated areas identified by Los Angeles County for their biological value. Los Angeles County defines SEAs as ecologically important land and water systems that support valuable habitat for plants and animals, and are often integral to the preservation of rare, threatened or endangered species and the conservation of biological diversity in the County.[1] These areas are classified as one or more of the following: (a) habitats for rare and endangered species of plants and animals, (b) restricted natural communities – ecological areas that are scarce on a regional basis, (c) habitats restricted in distribution in the county, (d) breeding or nesting grounds, (e) unusual biotic communities, (f) sites with critical wildlife and fish value, and (g) relatively undisturbed habitats. SEAs within the Los Angeles County region are shown in the Los Angeles County Department of Regional Planning's Significant Ecological Areas and Coastal Resource Areas Policy Map.

City of Los Angeles Municipal Code (LAMC) Tree Preservation Ordinance (LAMC Chapter IV, Article 6, Section 46). The City of Los Angeles passed an ordinance for the Preservation of Protected Trees (Ordinance No. 177,404) which became law on April 23, 2006. This Ordinance applies to protected trees that are located on public and private properties.

This Ordinance protects the following tree species:

- All native Oak tree species (*Quercus spp*)
- Western or California Sycamore (*Platanus racemosa*)
- California Bay (*Umbellularia californica*)
- Southern California Black Walnut (*Juglans californica*)

[1]County of Los Angeles, *General Plan*, 2015.

This Ordinance applies to trees that are four inches or greater in diameter at 4.5 feet above ground, and on any lot size. Protected tree removal requires a removal permit by the City of Los Angeles Department of Public Works (LADPW). Any act that may cause the failure or death of a protected tree requires inspection by the LADPW's Urban Forestry Division.

Heritage Trees. The City of Los Angeles has identified a collection of trees with historical, commemorative, or horticultural significance to maintain and preserve on City properties, including parks. Heritage trees are not required to be one of the protected tree types covered by the Tree Preservation Ordinance. The list of heritage trees is maintained by the City of Los Angeles Department of Recreation and Parks and can be viewed on NavigateLA.[2] As heritage trees are located on City parks and recreational facilities, as well as public rights-of-way, Department of Recreation and Parks is responsible for the maintenance and protection of these trees from injury. The list of heritage trees remains open for new designations and provides information to Department of Recreation and Parks staff regarding the importance of their actions while planning activities near heritage trees. Within the Project Area, heritage trees are located in public parks, recreational facilities, parkways, and roadway medians.

City of Los Angeles General Plan Framework and Conservation Elements. The City's General Plan is a comprehensive, long range declaration of purposes, policies and programs for the development of the City of Los Angeles. The Citywide General Plan Framework Element (Framework Element) is intended to guide the City's long-range growth and development. Chapter 6, Open Space and Conservation of the Framework Element, includes goals, objectives, and policies for the provision, management, and conservation of the City's open space resources, including Significant Ecological Areas (SEAs), wildlife corridors, and natural animal ranges.

The Conservation Element of the General Plan addresses endangered species, habitats, wildlife corridors, and wetlands occurring in the City and identifies policies intended to protect, restore, and enhance these biological resources. Goals, objectives, and policies are shown in **Table 4.4-1**.

TABLE 4.4-1: RELEVANT GENERAL PLAN BIOLOGICAL RESOURCES GOALS, OBJECTIVES, AND POLICIES

Goal/Objective/Policy	Goal/Objective/Policy Description
FRAMEWORK ELEMENT-CHAPTER 6 OPEN SPACE AND CONSERVATION	
Goal 6A	An integrated Citywide/regional public and private open space system that serves and is accessible by the City's population and is unthreatened by encroachment from other land uses.
Objective 6.1	Protect the City's natural settings from the encroachment of urban development, allowing for the development, use, management, and maintenance of each component of the City's natural resources to contribute to the sustainability of the region.
Policy 6.1.1	Consider appropriate methodologies to protect significant remaining open spaces for resource protection and mitigation of environmental hazards, such as flooding, in and on the periphery of the City, such as the use of tax incentives for landowners to preserve their lands, development rights exchanges in the local area, participation in land banking, public acquisition, land exchanges, and Williamson Act contracts.

[2]City of Los Angeles, Bureau of Engineering Department of Public Works, *NavigateLA*, http://navigatela.lacity.org/navigatela/, 2016.

TABLE 4.4-1: RELEVANT GENERAL PLAN BIOLOGICAL RESOURCES GOALS, OBJECTIVES, AND POLICIES	
Goal/Objective/Policy	**Goal/Objective/Policy Description**
Policy 6.1.2	Coordinate City operations and development policies for the protection and conservation of open space resources, by: a. Encouraging City departments to take the lead in utilizing water re-use technology, including graywater and reclaimed water for public landscape maintenance purposes and such other purposes as may be feasible; b. Preserving habitat linkages, where feasible, to provide wildlife corridors and to protect natural animal ranges; and c. Preserving natural viewsheds, whenever possible, in hillside and coastal areas.
Policy 6.1.3	Reassess the environmental importance of the County of Los Angeles designated Significant Ecological Areas (SEAs) that occur within the City of Los Angeles and evaluate the appropriateness of the inclusion of other areas that may exhibit equivalent environmental value.
Policy 6.1.4	Conserve, and manage the undeveloped portions of the City's watersheds, where feasible, as open spaces which protect, conserve, and enhance natural resources.
Policy 6.1.5	Provide for an on-site evaluation of sites located outside of targeted growth areas, as specified in amendments to the community plans, for the identification of sensitive habitats, sensitive species, and an analysis of wildlife movement, with specific emphasis on the evaluation of areas identified on the Biological Resource Maps contained in the Framework Element's Technical Background Report and Environmental Impact Report.
Policy 6.1.6	Consider preservation of private land open space to the maximum extent feasible. In areas where open space values determine the character of the community, development should occur with special consideration of these characteristics.
Policy 6.1.7	Encourage an increase of open space where opportunities exist throughout the City to protect wild areas such as the Sepulveda Basin and Chatsworth Reservoir.
CONSERVATION ELEMENT – ENDANGERED SPECIES	
Policy 1	Continue to require evaluation, avoidance, and minimization of potential significant impacts, as well as mitigation of unavoidable significant impacts on sensitive animal and plant species and their habitats and habitat corridors relative to land development activities.
Policy 2	Continue to administer city-owned and managed properties so as to protect and/or enhance the survival of sensitive plant and animal species to the greatest practical extent.
Policy 3	Continue to support legislation that encourages and facilitates protection of endangered, threatened, sensitive and rare species and their habitats and habitat corridors.
CONSERVATION ELEMENT – HABITATS	
Policy 1	Continue to identify significant habitat areas, corridors and buffers and to take measures to protect, enhance and/or restore them.
Policy 2	Continue to protect, restore, and/or enhance habitat areas, linkages and corridor segments, to the greatest extent practical, within City owned or managed sites.
Policy 3	Continue to work cooperatively with other agencies and entities in protecting local habitats and endangered, threatened, sensitive, and rare species.
Policy 4	Continue to support legislation that encourages and facilitates protection of local native plant and animal habitats.
SOURCE: City of Los Angeles, *The Citywide General Plan Framework, An Element of the City of Los Angeles General Plan*, re-adopted 2001; City of Los Angeles, *City of Los Angeles General Plan Conservation Element*, adopted 2001.	

EXISTING SETTING

HABITATS AND SENSITIVE SPECIES

Wildlife Habitats. Although the Project Area is mostly urbanized, the hillside area in the northern portion of the Project Area (including Griffith Park) is largely undeveloped. This northern hillside area is part of the Santa Monica Mountain Range and lies within the California Floristic Province, which is a zone of Mediterranean-type climate and has high levels of plant endemism characteristics of these regions. The Santa Monica Mountains that lie within and to the west of the Project Area contain natural terrain with native and non-native vegetation that serve as a habitat for California wildlife. Native vegetation found within these areas include chaparral, oak-sycamore riparian, oak woodland and walnut woodland, mixed scrub (such as coastal sage brush, California buckwheat, California encelia and white sage), matilija poppies, prickly pear, manzanita, yucca, whipplei, toyon, sumac, California sagebrush, milkweed, monkey flower, saltbush, currant, coast live oaks, Southern California black walnut, western sycamores, and a variety of wildflowers. Chaparral is the most widespread plant community in this portion of the Project Area because chaparral readily regenerates after fires. Mixed scrub is the second most widespread plant community in the area. Non-native plants that are found in this area include pine, eucalyptus, silk oak, Mexican fan palms, castor bean, giant reed, mustard, wild oats, tree tobacco, tocalote, grasses, and annual sunflowers.

Although most of the Santa Monica Mountains within and to the west of the Project Area are undeveloped, the developed areas primarily consist of single-family residential uses and open space recreational areas. Within the Project Area, the open space recreational areas within the Santa Monica Mountains include trails, picnic areas, a zoo, golf courses, outdoor amphitheaters, and cemeteries. Vegetation in the developed portions of the Santa Monica Mountains includes lawns, horticultural shrubs, horticultural trees, and other ornamental landscaping. Suitable habitats for wildlife are predominately found in the undeveloped portions of the Santa Monica Mountains within and to the west of the Project Area. However, plant communities from the developed portions of the Mountains also provide food and shelter for wildlife found in these areas. These wildlife species have adapted to urban areas and include, but are not limited to, raccoons, rabbits, skunk, squirrels, coyotes, crows, ravens, and owls. For those species that are sensitive to human activity and habitat disturbance, urban development in the surrounding areas is inhospitable.[3]

Many wildlife species can be found in the Santa Monica Mountains within and adjacent to the Project Area, including but not limited to deer, coyote, raccoon, fox, opossum, skunk, squirrel, bats, hawks, owls, bobcats, mountain lions, salamanders, frogs, lizards, and snakes. This area is also an important stopover for migrating birds and provides habitat for wintering birds.

In addition to the Santa Monica Mountains, the Los Angeles River flows just outside the Project Area to the east and flows within and just outside of the Project Area to the north. The Los Angeles River provides a variety of habitats, including for amphibians and nesting habitat for many bird species. The portion of the Los Angeles River that flows within and adjacent to the Project Area is contained within a concrete-lined channel. A narrow band of willow riparian habitat has developed along the bed of the Los Angeles River in two areas where the water table was too high to cement the river bottom: 1) near the I-5/SR-134 interchange (within the Project Area) and 2) downstream of Colorado Boulevard (near the Project Area). Wholly dependent on runoff from water treatment plants upstream, this permanently wet, partially-submerged habitat has a canopy of mid-sized willows and a dense understory of reeds and non-native weeds, notably the noxious giant cane (*Arundo donax*). Natural communities along the river include the Southern Willow Scrub, Southern Mixed Riparian Forest, and Southern Cottonwood-Willow Riparian

[3]Cooper Ecological Monitoring, Inc., *Draft Griffith Park Wildlife Management Plan*, April 10, 2008.

Forest. Wetland species like western toad, two-striped gartersnake, and song sparrow has been found in the willow scrub, while the cement channel floor supports flocks of migrant and wintering shorebirds, especially the blacknecked stilt. Bird species that can be found within this portion of the Los Angeles River include herons, egrets, ducks and migrating geese. These species have also been observed at golf course water features within Griffith Park.[4]

The open space areas within the urbanized portion of the Project Area (south of the Santa Monica Mountains) include parks, recreational fields, community gardens, and a cemetery. These open space areas include crops, ornamental trees, turf grasses, and/or other ornamental plant species. The vegetation found within the urbanized portions of the Project Area provide suitable habitat for some wildlife species adapted to urban environments. Relict native trees and small patches of relict native vegetation may potentially occur in these areas, but functioning native communities are precluded, as development of these facilities has converted any substantial native habitat that may have formerly existed to managed landscapes. Urban development in and around the non-Santa Monica Mountain portion of the Project Area has occurred over the years and has greatly impacted natural vegetation in the urbanized portion of the Project Area. Diversity of species is expected to be low in the urbanized areas within and surrounding the Project Area. Any wildlife species that utilize the open space areas in this portion of the Project Area are mostly those adapted to living in an urban environment, such as birds, insects and squirrels. Native plant species are also mainly limited to those preserved within public parks.

Sensitive Natural Communities and Special Status Species. A sensitive natural community, including a sensitive plant community, is one that is considered rare within the region by regulatory agencies, supports sensitive species or serves as a wildlife corridor. A special status species is a plant or animal species listed as endangered, threatened, candidate, or as some other special status by federal, state, or local agencies, or by one or more special interest groups recognized by the CDFW, such as CNPS. CDFW and the California Natural Diversity Database (CNDDB) were consulted to determine if any sensitive species could occur within the Project Area. CNDDB is a computerized database that identifies past occurrences of plants, animals, and communities listed by CDFW and USFWS as rare, threatened, endangered (i.e., "listed species"), or otherwise considered species of special concern.

Table 4.4-2 presents special status animal and plant species listed on the CNDDB as having occurred within the Project Area and vicinity in the past. As shown in **Table 4.4-2**, a total of 10 special status animal species, 10 special status plant species, and four sensitive plant communities are listed in the CNDDB as being reported to occur within the Project Area.

SIGNIFICANT ECOLOGICAL AREAS (SEAS)

The City and County of Los Angeles planning departments have identified SEAs within Los Angeles County that contain critical habitats (or sensitive natural communities) for special status species. The City's General Plan Conservation Element recognizes SEAs as significant habitats identified by Los Angeles County as important for the preservation and maintenance of biodiversity. Los Angeles County defines SEAs as ecologically important land and water systems that support valuable habitat for plants and animals, and are often integral to the preservation of rare, threatened or endangered species and the conservation of biological diversity in the County.[5]

[4]Cooper Ecological Monitoring, Inc., *Draft Griffith Park Wildlife Management Plan*, April 10, 2008.

[5]County of Los Angeles, *General Pl*an, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, 2015.

TABLE 4.4-2: SENSITIVE SPECIES KNOWN TO OCCUR IN THE PROJECT AREA

Scientific Name	Common Name	Habitat	Federal Status /a/	State Status /b/	CDFW /c/	CNPS /d/
ANIMALS						
Vireo bellii pusillus	least Bell's vireo	Summer resident of Southern California in low riparian in vicinity of water or in dry river bottoms; below 2,000 ft.	Endangered	Endangered	None	n/a
Anniella pulchra pulchra	silvery legless lizard	Sandy or loose loamy soils under sparse vegetation.	None	None	SSC	n/a
Neotoma lepida intermedia	San Diego desert woodrat	Coastal scrub of Southern California from San Diego County to San Luis Obispo County.	None	None	SSC	n/a
Athene cunicularia	burrowing owl	Open, dry annual or perennial grasslands, deserts & scrublands characterized by low-growing vegetation.	None	None	SSC	n/a
Taxidea taxus	American badger	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils.	None	None	SSC	n/a
Empidonax traillii extimus	southwestern willow flycatcher	Riparian woodlands in Southern California.	Endangered	Endangered	None	n/a
Aimophila ruficeps canescens	southern California rufous-crowned sparrow	Resident in Southern California coastal sage scrub and sparse mixed chaparral.	None	None	WL	n/a
Eumops perotis californicus	western mastiff bat	Many open, semi-arid to arid habitats, including conifer & deciduous woodlands, coastal scrub, grasslands, chaparral, etc.	None	None	SSC	n/a
Lasiurus cinereus	hoary bat	Prefers open habitats or habitat mosaics, with access to trees for cover & open areas or habitat edges for feeding.	None	None	None	n/a
Carolella busckana	Busck's gall moth	Coastal dunes; coastal scrub	None	None	None	n/a
PLANTS						
Atriplex parishii	Parish's brittlescale	Vernal pools, chenopod scrub, playas.	None	None	n/a	1B.1
Horkelia cuneata var. puberula	mesa horkelia	Chaparral, cismontane woodland, coastal scrub.	None	None	n/a	1B.1
Calochortus clavatus var. gracilis	slender mariposa-lily	Chaparral, coastal scrub, valley and foothill grassland.	None	None	n/a	1B.2
Berberis nevinii	Nevin's barberry	Chaparral, cismontane woodland, coastal scrub, riparian scrub.	Endangered	Endangered	n/a	1B.1

TABLE 4.4-2: SENSITIVE SPECIES KNOWN TO OCCUR IN THE PROJECT AREA

Scientific Name	Common Name	Habitat	Federal Status /a/	State Status /b/	CDFW /c/	CNPS /d/
Dudleya multicaulis	many-stemmed dudleya	Chaparral, coastal scrub, valley and foothill grassland.	None	None	n/a	1B.2
Pseudognaphalium leucocephalum	white rabbit-tobacco	Riparian woodland, cismontane woodland, coastal scrub, chaparral.	None	None	n/a	2B.1
Symphyotrichum defoliatum	San Bernardino aster	Meadows and seeps, cismontane woodland, coastal scrub, lower montane coniferous forest, marshes and swamps, valley and foothill grassland.	None	None	n/a	1B.2
Astragalus brauntonii	Braunton's milk-vetch	Chaparral, coastal scrub, valley and foothill grassland.	Endangered	None	n/a	1B.1
Calystegia felix	lucky morning-glory	Meadows and seeps, riparian scrub.	None	None	n/a	3.1
Calochortus plummerae	Plummer's mariposa-lily	Coastal scrub, chaparral, valley and foothill grassland, cismontane woodland, lower montane coniferous forest.	None	None	n/a	4.2
PLANT COMMUNITIES						
Southern Cottonwood Willow Riparian Forest	Southern Cottonwood Willow Riparian Forest	Riparian forest	None	None	n/a	None
Southern Coast Live Oak Riparian Forest	Southern Coast Live Oak Riparian Forest	Riparian forest	None	None	n/a	None
California Walnut Woodland	California Walnut Woodland	Cismontane woodland	None	None	n/a	None
Southern Sycamore Alder Riparian Woodland	Southern Sycamore Alder Riparian Woodland	Riparian forest	None	None	n/a	None

/a/ United States legal status under the Federal Endangered Species Act.
/b/ State of California legal status.
/c/ California Department of Fish and Wildlife designation and applies to animals only.
SSC = species of special concern.
WL = watch list
/d/ California Native Plant Society rare plant rank status applies to plants only.
1B.1 = rare, threatened or endangered in California and elsewhere; seriously threatened in California.
1B.2 = rare, threatened or endangered in California and elsewhere; fairly threatened in California.
2B.1 = rare, threatened or endangered in California but more common elsewhere; seriously threatened in California.
3.1 = seriously threatened in California
4.2 = Plants of limited distribution; fairly threatened in California
n/a = not applicable
SOURCE: California Department of Fish and Wildlife, *California Natural Diversity Database (CNDDB)*, https://www.wildlife.ca.gov/Data/CNDDB/Maps-and-Data, November 2016.

These areas are classified as one or more of the following:

- Habitats for rare and endangered species of plants and animals,
- Restricted natural communities - ecological areas that are scarce on a regional basis,
- Habitats restricted in distribution in the county,
- Breeding or nesting grounds,
- Unusual biotic communities,
- Sites with critical wildlife and fish value, and
- Relatively undisturbed habitats.

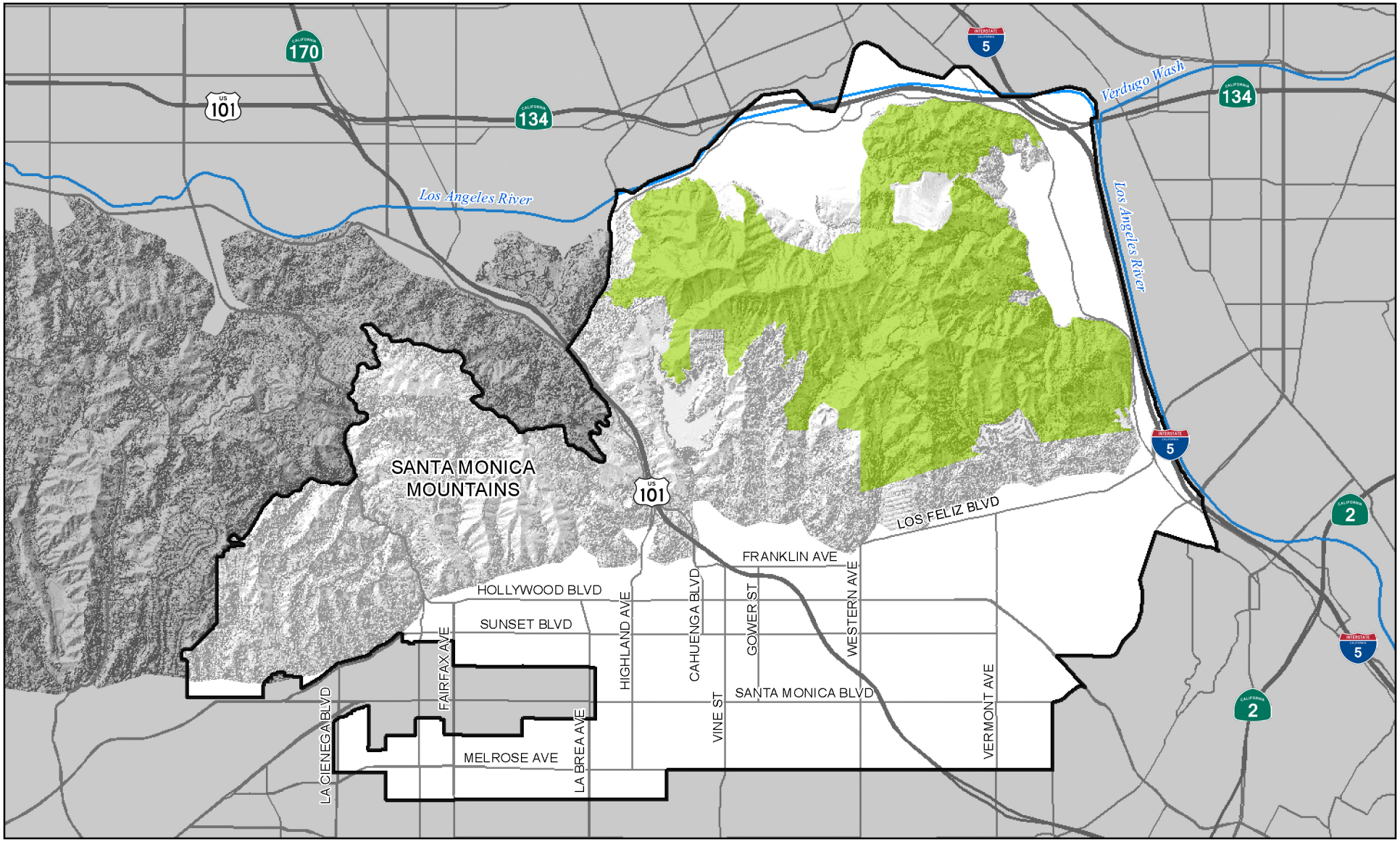
According to the Los Angeles County Department of Regional Planning's Significant Ecological Areas and Coastal Resource Areas Policy Map and the City of Los Angeles' NavigateLA, most of the Santa Monica Mountains east of US-101, including a large portion of Griffith Park, is part of an SEA known as the Griffith Park SEA (see **Figure 4.4-1**). The Griffith Park SEA is an extensive, relatively undisturbed island of natural vegetation surrounded by urban and suburban development. It is an SEA because it contains concentrated breeding, feeding, resting, or migrating grounds, which are limited in availability in the county; biotic resources that are of scientific interest because they are either an extreme in physical/geographical limitations, or represent unusual variation in a population or community; and areas that provide for the preservation of relatively undisturbed examples of original natural biotic communities in the County.[6]

WETLANDS, STREAMS, AND RIPARIAN HABITAT

A wetland is an area of land where water covers the soil or is present either at or near the surface of the soil all year or for varying periods of time during the year. Riparian areas are those plant communities adjacent to and affected by surface or ground water of perennial or ephemeral water bodies such as rivers, streams, lakes, ponds, or other drainages. Wetlands and riparian vegetation provide many valuable functions, such as water quality maintenance, flood control, bank stabilization, groundwater replenishment, and food, cover, and water for a diversity of wildlife species. Riparian vegetation and wetlands may also serve as important stopover points for migrating birds.

As previously discussed above, under "Wildlife Habitats," a portion of the Los Angeles River that flows within and adjacent to the Project Area contains a narrow band of willow riparian habitat. In addition to the Los Angeles River, the Santa Monica Mountains within and surrounding the Project Area support seasonal and perennial streams. The streams are typically found at the bottom of canyons. The various streams that can be found within the Santa Monica Mountains contain or have the potential to contain year-round or intermittent wetlands and riparian vegetation. According to the USFWS National Wetlands Inventory, portions of the Los Angeles River near the I-5/SR-134 interchange and various areas within the Santa Monica Mountain are classified as freshwater emergent wetland. Additionally, portions of the Los Angeles River near the I-5/SR-134 interchange and east of I-5, as well as various areas within the Santa Monica Mountains are classified as freshwater forested/shrub wetland.[7]

[6]County of Los Angeles, *General Plan*, Appendix E: Conservation and Natural Resources Element Resources, 2015.
[7]U.S. Fish and Wildlife Services, *National Wetlands Inventory – V2*, https://www.fws.gov/wetlands/data/mapper.HTML, accessed on December 12, 2016.



LEGEND:

Hollywood CPA

Significant Ecological Areas

N

W E

S

0 2,900 5,800 Feet

SOURCE: County of Los Angeles, 2015; TAHA, 2018.

taha environmental planners

taha 2010-073

Hollywood Community Plan Update
Draft Environmental Impact Report

CITY OF LOS ANGELES

FIGURE 4.4-1

SIGNIFICANT ECOLOGICAL AREAS

WILDLIFE MOVEMENT

The movement and migration of wildlife species has been substantially altered due to habitat fragmentation over the past century. This fragmentation has most commonly been caused by development, which can result in large patches of land becoming inaccessible for habitat purposes, forming barriers between habitats, or resulting in roads which, although narrow, may result in barriers to smaller or less mobile wildlife species. Habitat fragmentation results in isolated islands of habitat, resulting in affects to wildlife behavior, foraging activity, reproductive patterns, immigration and emigration or dispersal capabilities, and survivability.

Wildlife corridors play an important role in countering habitat fragmentation. A wildlife corridor is a linear landscape element that serves as a linkage between historically connected habitats or landscapes that are otherwise separated and is meant to provide avenues along which wildlife can travel, migrate, and meet mates; plants can propagate; genetic interchange can occur; populations can move in response to environmental changes and natural disasters; and individuals can re-colonize habitats from which populations have been locally extirpated.[8,9] Corridors can consist of a sequence of stepping-stones across the landscape (i.e., discontinuous areas of habitat such as isolated wetlands and roadside vegetation), can consist of continuous linear strips of vegetation and habitat (e.g., riparian strips and ridge lines), or may be parts of larger habitat areas selected for their known or likely importance to local wildlife.

Although not officially mapped, it is reasonable to assume there are wildlife corridors in the Santa Monica Mountains within and to the west of the Project Area. Most of the wildlife within the Project Area is found within the undeveloped portions of the Santa Monica Mountains, which is predominately located east of US-101 within the Griffith Park SEA. However, US-101 bisects the mountains within the Project Area. Dense urban development on all other sides of the Santa Monica Mountains prevents wildlife movement between the Santa Monica Mountains and other undeveloped open spaces areas in the vicinity of the Project Area, such as Verdugo Mountains. Within the Project Area, the hillside between US-101 and I-5 (including the Griffith Park SEA) is separated from the Santa Monica Mountain Range to the west and from the Los Angeles River along the Project Area's northerly and easterly boundaries. As a result, this area is become increasingly isolated and movement of most non-avian wildlife is restricted. As the Project Area is largely urbanized, the habitats within the Santa Monica Mountains and Los Angeles River are connected by bridge overpasses spanning US-101 and flood control channels. Wildlife movement between these areas is sporadic and unlikely to result in a significant exchange in genetic material or linkage of the Project Area to core habitat areas beyond the limits of the Project Area. Although wildlife movement is generally restricted in the hillside areas between US-101 and I-5, this portion of the Santa Monica Mountains, which includes the Griffith Park SEA, is viewed as an important connective island for the Santa Monica Mountains to the west of US-101, as well as the Verdugo Mountains and San Gabriel Mountains to the east. Wildlife uses natural areas as well as bridges and concrete channels of the Los Angeles River to connect to the Tujunga Valley and Hansen Dam SEA and the San Gabriel Mountains.[10] It is reasonable to assume that the bridge over the US-101 near the Hollywood Reservoir is used by wildlife.

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[8]McEuen, A., "The Wildlife Corridor Controversy: A Review," *Endangered Species Update*, Vol. 10, Nos. 11 & 12, September/October 1993.

[9]Beir, P. and S. Loe, "In My Experience: A Checklist for Evaluating Impacts to Wildlife Movement Corridors," *Wildlife Society Bulletin*, Vol. 20, No. 4, Winter 1992.

[10]County of Los Angeles, *General Plan*, Appendix E: Conservation and Natural Resources Element Resources, 2015.

The portions of the Project Area south of the Santa Monica Mountains are urbanized and developed mostly with residential, commercial, and studio- and media-related industrial development, including surface parking lots and a network of busy roads. This urbanized area, as well as the developed areas that surround the Project Area, does not provide viable linkages or migration corridors between habitat areas. To the extent that small and fragmented patches of remnant habitats occur within the developed portions of the Project Area, these portions of the Project Area have become virtual islands of habitat and provide limited opportunity for wildlife movement and exchange of genetic material. Wildlife movement between the developed portions of the Project Area and other regional open space lands is likely to be very restricted (except for bird species) due to existing barriers (e.g., roads) and the lack of physical linkages.

HABITAT CONSERVATION PLANS (HCPS)

HCPs, designated under the Endangered Species Act Section 10(a)(1)(B), are federal planning documents designed to conserve the ecosystems upon which listed species depend, ultimately contributing to their recovery. HCPs require a "take permit" when a project will affect a species identified as listed, non-listed or eligible under the act and detail how those impacts will be minimized or mitigated; and how the HCP is to be funded.[11] No HCPs are located within the Project Area.

HERITAGE TREES AND ORDINANCE-PROTECTED TREES

Heritage trees are individual trees of any size or species that are specially designated as "heritage" because of their historical, commemorative, or horticultural significance. The nomination and determination of heritage trees is an internal process within the City's Department of Recreation and Parks. Nominations are generally made by Department of Recreation and Parks staff members or community members. According to NavigateLA, which provides an inventory of all heritage trees within City parks and recreation center properties, as well as public rights-of-ways, approximately 1,600 heritage trees are distributed throughout the Project Area. Within the Project Area, heritage trees are primarily located within the City's parks and recreation center properties. Many are in Griffith Park. Heritage trees are also located along the median of Vermont Avenue, north of Los Feliz Boulevard, that leads north to Griffith Park.

The Project Area includes a variety of native and ornamental tree species including those that are protected by the City's Tree Preservation Ordinance. Ordinance-protected trees on private property and street rights-of-way are protected by the City of Los Angeles Tree Preservation Ordinance, which makes it illegal to remove or fatally harm the trees without the issuance of a permit.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, the Proposed Plan would have a significant impact related to biological resources if it would result in the following:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS;
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS;

[11] U.S. Fish and Wildlife Service, *Habitat Conservation Plans: Overview,* http://www.fws.gov/endangered/what-we-do/hcp-overview.html, February 2016.

- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;
- Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance; and/or
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

METHODOLOGY

This section outlines the methodology for evaluating impacts to biological resources, including sensitive natural communities and special status species.

In accordance with Appendix G of the CEQA Guidelines, a project would result in a significant impact if it would have a substantial adverse effect to special status species or a sensitive natural community.

For the purpose of this analysis, "sensitive natural communities" are considered to be habitats or natural communities that are unique, of relatively limited distribution in the region, and/or of particularly high value for wildlife. Sensitive habitats include specific natural communities defined by CDFW, as well as wetlands and riparian communities, which are considered special status natural communities due to their limited distribution in California. SEAs support sensitive natural communities.

For purposes of this analysis, "special status species" include:

- Plants and wildlife species listed as rare, threatened, or endangered under the FESA or the CESA;
- Species that are candidates for listing under federal or state law;
- Species designated by the USFWS as proposed or candidates for listing and/or species designated as Species of Special Concern by CDFW;
- Species protected by MTBA;
- Species identified as rare, threatened, or endangered by CNPS; and
- Any other species that may be considered endangered or rare pursuant to CEQA Guidelines Section 15380(b).

This following analysis considers potential impacts to biological resources in the Project Area as well as adjacent areas that could be impacted by development within Hollywood; the Santa Monica Mountains to the west (because much of this area is undeveloped and wildlife movement exists in the Santa Monica Mountains); and portions of the Los Angeles River to the north and east. With the exception of migratory birds, urban parcels to the north, east and west are not expected to contain special status species or sensitive natural communities.

The impact analysis considers the indirect impacts from the reasonably expected development of the Proposed Plan to special status species and sensitive natural communities under the threshold questions in Appendix G. Impacts to biological resources could include the direct take of a species or the removal or disturbance of habitats from future development or more indirect delayed or secondary effects from future development, such as fragmentation, pollination interruption, plant and wildlife dispersal interruption, increased risk of fire, and increased invasion of non-native animals and plants that out-compete natives.

IMPACTS

IMPACT 4.4-1 Would implementation of the Proposed Plan have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFW? **Significant and unavoidable impact.**

As discussed above, most of the Project Area is developed with urban uses and does not contain or provide habitat that supports candidate, sensitive, or special status species (hereinafter, collectively referred to as special status species). Suitable habitat for wildlife is generally found in undeveloped natural open space areas. The largest majority of the undeveloped natural open space areas within and near the Project Area is located within the Santa Monica Mountains, primarily east of US-101. Undeveloped natural open space areas within the Santa Monica Mountains include the Griffith Park SEA, which encompasses most of Griffith Park. The geographical location of the Griffith Park SEA is important in that it has become an island of natural vegetation surrounded by development, and birds use these island areas to rest and feed along their migration routes. Isolated areas are significant for preserving the geographical variability of vegetation and wildlife that formerly occurred through the region. Species movement that can occur between the Santa Monica and San Gabriel Mountains via the Verdugo Mountains would pass through the Griffith Park SEA. The developed portions of the Santa Monica Mountains can also provide food and shelter for wildlife found in the area. Wildlife species that are typically found in developed areas have adapted to the presence of humans and include, but are not limited to, raccoons, rabbits, skunk, squirrels, coyotes, crows, ravens, and owls. For those species that are sensitive to human activity and habitat disturbance, urban development in the surrounding areas is inhospitable.[12] In addition to the Santa Monica Mountains, a narrow band of willow riparian habitat along the bed of the Los Angeles River near the I-5/SR-134 interchange (within the Project Area) and downstream of Colorado Boulevard (near the Project Area) may support wildlife. These two areas of the Los Angeles River provide a variety of habitats, including for amphibians and nesting habitat for many bird species (see discussion of wildlife habitats under "Existing Setting").

As shown in **Table 4.4-2**, there are ten special status animals, ten special status plants, and four sensitive plant communities that have occurred in the Project Area and/or its vicinity. Four animal and plant species are identified as endangered by the CDFW and/or USFWS. Five animal species are identified as species of special concern, and one animal species is on the CDFW watch list. Ten sensitive plant species are considered threatened or endangered by CNPS. The Proposed Plan's impact on these sensitive species is discussed below. The locations, habitats, and presence of the sensitive species were provided by CNDDB.[13] CNDDB identifies a species as presumed extant if an occurrence of the species is presumed to still be in existence until evidence to the contrary is received by CNDDB. A species is presumed extirpated if evidence of habitat destruction or population extirpation has been received by CNDDB, but questions remain as to whether the species still exists. A species is identified as extirpated only when the species has been searched for but not seen for many years or when the habitat is destroyed in an area.

The portions of the Los Angeles River within the Project Area that support wildlife (i.e., the willow riparian habitat near the I-5/SR-134 interchange) and a majority of the undeveloped open space areas of the Santa Monica Mountains within the Project Area have an Open Space land use designation. The majority of the Open Space land use designation within the Santa Monica Mountains is within Griffith Park. The Proposed Plan would not change the Open Space land use designation of parcels, including those Open Space-

[12]Cooper Ecological Monitoring, Inc., *Draft Griffith Park Wildlife Management Plan*, April 10, 2008.
[13]California Department of Fish and Wildlife, *California Natural Diversity Database (CNDDB)*, https://www.wildlife.ca.gov/Data/CNDDB/Maps-and-Data, November 2016.

designated parcels within the Los Angeles River and Santa Monica Mountains. All areas in this portion of the Project Area with an Open Space land use designation would be retained by the Proposed Plan. The Proposed Plan would correct the land use designation of two subareas in Griffith Park, from Minimum Residential and Low I Residential to Open Space. These subareas consist of natural open space and are owned by the City. The consistency corrections are as follows:

- Subarea 1:5 currently has a Minimum Residential land use designation with RE40-1-H zoning. The Proposed Plan would change the land use designation for this subarea to Open Space with OS-1XL zoning. This subarea is undeveloped natural open space.
- Subarea 70 currently has a Low I Residential land use designation with OS-1XL zoning. The Proposed Plan would change the land use designation for this subarea to Open Space. The existing zoning would remain the same. This subarea contains Camp Hollywoodland and undeveloped natural open space.

The primary zone associated with the Open Space land use designation is the Open Space zone. The purpose of the Open Space zone is to provide regulations for publicly-owned land in order to implement the City's General Plan, including the Open Space, Conservation and Public Recreation Elements and the open space land use designation in the City's community plans.[14] Implementation of the Proposed Plan would serve to protect and preserve natural resources and natural features of the environment; to provide outdoor recreation opportunities and advance the public health and welfare; to encourage the management of public lands in a manner which protects environmental characteristics; and to encourage the maintenance of open space uses on all publicly-owned park and recreation land and on open space public land which is essentially unimproved. Permitted uses are most restrictive in the Open Space zone and limits what can be developed. The by-right uses for Open Space zones include parks, trails, children's play areas, child care facilities, picnic facilities, habitat protection sites, and public water supply reservoirs. However, these uses are not permitted on land that includes a lake, river, or stream, unless approved as a conditional use. Conditional uses may be approved for Open Space-zoned parcels through a discretionary review process and include uses such as community centers, tennis courts, restrooms, camping facilities, golf courses, museums, zoos, aquariums, and observatories.

Although the Proposed Plan does not propose any changes that are inconsistent with the Open Space land use designation and corresponding Open Space zone, it also would not preclude the undeveloped portions of the Santa Monica Mountains and portion of Los Angeles River that support wildlife within the Project Area from being developed with uses that are permitted by the Zoning Code or approved through the discretionary review process. The Proposed Plan includes policies to improve open space around rivers and streams (including the Los Angeles River). These policies include Policy PR3.11 to maintain and expand public green space around rivers and streams and Policy PR3.12 to support recommendations of the Los Angeles River Revitalization Master Plan for establishing parks, walking paths, bicycle trails, gathering spaces, and public art along the Los Angeles River. These features of the Los Angeles River Revitalization Master Plan could potentially increase the amount of people visiting the Los Angeles River, which could adversely affect wildlife and habitat that could be found along the Los Angeles River. Part of the Los Angeles River Revitalization Master Plan, which includes portions of the Los Angeles River within the Project Area, involves developing new or enhancing existing areas with native vegetation and landscaping to provide local habitat areas for wildlife. The revitalization project also involves restoring riparian and freshwater marsh habitat to support wildlife and enhance habitat connectivity along the Los Angeles River, as well as to the Santa Monica Mountains, Verdugo Hills, Elysian Hills, and San Gabriel Mountains. The revitalization project is undergoing a separate environmental review process from the Proposed Plan and represents a project that would potentially occur during the lifetime of the Proposed Plan that could affect wildlife and habitat along the Los Angeles River.

[14]Los Angeles Municipal Code, Section 12.04.05.

In addition to the Los Angeles River, improvements are being proposed within the developed portions of Griffith Park. Although much of Griffith Park is natural open space, the regional park also contains the Griffith Observatory, Greek Theatre, Travel Town Museum, Camp Hollywoodland, a composting facility, tennis courts, a zoo, golf courses, and restrooms. Improvements that are being proposed in the disturbed portions of Griffith Park include the following:

- An urban environmental center for conservation and sustainability, which has been identified on the City's Department of Recreation and Parks' July 2016 Projects in Design list.[15] The center would be at the site of the former Commonwealth Nursery, and the development project would involve renovating buildings on-site and restoring a large outdoor area for demonstration tree canopies and gardens.[16]
- The construction of a permanent open stage for performances in the Old Zoo area. Currently, temporary stages are built and disassembled each summer for performances in the park. The City's Bureau of Engineering is proposing restroom and trail improvements near Crystal Springs and the Pony Train Ride.[17]
- Installation of wayfinding signage, wheelchair lifts, fencing, Americans with Disability Act (ADA) restroom, and various Heating, ventilation, and air conditioning (HVAC), electrical and lighting upgrades at the Greek Theater are being proposed by the Bureau of Engineering.[18]

These improvements are examples of the types of reasonably expected development that could occur in Griffith Park in the future. Although no development projects are presently being proposed in the undeveloped natural open space areas of the Santa Monica Mountains (including within Griffith Park and Griffith Park SEA), it is possible that new structures or other types of improvements could occur during the life of the Proposed Plan that could potentially adversely affect special status species. Improvements in the developed and undeveloped areas of the Santa Monica Mountains could potentially involve the removal of natural habitat or lead to habitat degradation, such as by involving activities that could generate fugitive dust (such as through grading or excavation activities), increase noise or vibration, introduce light, or increase the amount of people visiting the area. Although the spectrum of work and location of buildings, paving of parking lots, and other improvements that could occur are currently unknown, reasonably expected disturbances occurring over the lifetime of the Proposed Plan could potentially have an adverse effect on special status species, given the amount of undeveloped open space areas in the Santa Monica Mountains portion of Project Area (primarily in Griffith Park), as well as the ability of Santa Monica Mountains to support biological resources. Additionally, changes to in the Santa Monica Mountains, primarily in Griffith Park, could potentially have an impact on Griffith Park SEA's important function as an ecologically important land that support valuable habitat for plants and animals.

Although a majority of the developed and undeveloped open space areas have a land use designation of Open Space within the Santa Monica Mountains portion of the Project Area, the Santa Monica Mountains portion of the Project Area also contains undeveloped or underutilized areas that have land use designations of Minimum Residential, Very Low II Residential, Low I Residential, and Low II Residential (hereinafter, referred to collectively as low density single-family residential land use designations). These undeveloped and underutilized areas may contain native and non-native vegetation and are generally located on steep hillsides between low density single-family residential uses. The Proposed Project does not propose any changes to these undeveloped areas, with the exception of Subareas 1:5 and 70. However, given the land use designations of these areas, it is possible that new structures or other types of improvements could occur

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[15]Los Angeles Department of Recreation and Parks, *Projects in Design – July 2016*, http://www.laparks.org/sites/default/files/planning/2016-07%20design%20projects.pdf, April 2017.

[16]Los Angeles Parks Foundation, http://www.laparksfoundation.org/EN/laparks/ongoing.html, April 2017.

[17]Bureau of Engineering, *Uniform Project Reporting System (UPRS) Project Reports*, http://boe.lacity.org/uprs/report/ProjectInfoReport.cfm?k=4667&dmy=121319, April 2017.

[18]*Ibid.*

during the lifetime of the Proposed Plan. Although such structures and improvements would be limited and, given the land use designations of the area, may be associated with low density single-family residential or recreational uses, development in these areas could potentially involve the removal of natural habitat or lead to habitat degradation, such as by involving activities that could generate fugitive dust (such as through grading or excavation activities), increase noise or vibration, or introduce light. As a result, development or improvements during the lifetime of the Proposed Plan could potentially have an adverse effect on special status species, if present in these areas.

Endangered Plant and Animal Species. According to CNDDB, the endangered species southwestern willow flycatcher (*Empidonax traillii extimus*), Nevin's barberry (*Berberis nevinii*), Braunton's milk-vetch (*Astragalus brauntonii*), and least Bell's vireo (*Vireo bellii pusillus*) have been documented to have historically occurred within the Project Area and/or the surrounding area. The southwestern willow flycatcher was documented by CNDDB as being generally located in the developed southeastern portion of the Project Area, as well as the surrounding areas to the southeast of the Project Area. The habitat for this species is riparian woodlands. According to CNDDB, an egg set was collected in the area in 1894 and skin collected in 1852. No other occurrences have been documented in or near the Project Area. The southeastern portion of the Project Area does not contain any riparian woodlands, which indicates that impacts to the southwestern willow flycatcher are not likely to occur as a result of the Proposed Plan's reasonably expected development in and around the Project Area during the lifetime of the Proposed Plan.

Nevin's barberry can be found in Griffith Park, which consists of mostly undeveloped open space. According to CNDDB, this species is presumed to be extant in the area. As previously mentioned, the Proposed Plan does not propose any changes to parcels that have an Open Space zone or land use designation, but such parcels could be disturbed given that the Zoning Code allows improvements for parks and recreational purposes on Open Space-zoned parcels. Therefore, impacts to Nevin's barberry could potentially occur under the Proposed Plan.

Braunton's milk-vetch has been historically found in the Santa Monica Mountains and foothills in the westernmost portion of the Project Area, as well as the surrounding area west of the Project Area. The habitat of Braunton's milk-vetch include chaparral, coastal scrub, and valley and foothill grassland. According to CNDDB, this species is presumed to be extirpated within the Project Area as it was last seen in 1930 and much development has occurred in the area where it was seen. Although presumed to be extirpated, there may be a low potential for this species to occur within the Project Area since it is possible that recent occurrences of this species within the Project Area may not have been documented. If present, this species is likely to exist in small numbers due to fragmented and/or disturbed habitat conditions, which may have led to its presumed extirpation. As previously discussed, open space areas within the Project Area could potentially be disturbed during the lifetime of the Proposed Plan, which could potentially result in a significant impact on Braunton's milk-vetch, if this species is still present in the Project Area.

The least Bell's vireo has been documented by CNDDB to have historically occurred at the southern end of the Cahuenga Pass and along the Los Angeles River, just east of I-5 and north of Mt. Sinai Memorial Park. Its habitat includes riparian forest, riparian scrub, and riparian woodland. It is a summer resident of Southern California in the vicinity of water or in dry river bottoms below 2,000 feet. According to CNDDB, this species is possibly extirpated within the Project Area. Although presumed extirpated, there may be a low potential for this species to occur within the Project Area since it is possible that recent occurrences of this species within the Project Area may not have been documented. If present within the Project Area, this species is likely to exist in small numbers due to fragmented and/or disturbed habitat conditions, which may have led to its presumed extirpation. If the least Bell's vireo is still present within the Project Area, this species would likely be found along the Los Angeles River or within the undeveloped portions of the Santa Monica Mountains within and around the Project Area. As previously discussed, open space areas within the Project Area could potentially be disturbed during the lifetime of the Proposed Plan. As such, it

is possible that future development occurring over the lifetime of the Proposed Plan could potentially affect this species, if this species is still present in and around the Project Area.

Species of Special Concern. The silvery legless lizard (*Anniella pulchra*) and the San Diego desert woodrat (*Neotoma lepida intermedia*) are species of special concern that have historically been found in the northerly hillside portions of the Project Area. The silvery legless lizard has been historically observed in Forest Lawn – Hollywood Hills. Its habitat consists of sandy or loose loamy soils under sparse vegetation and includes chaparral, coastal dunes, and coastal scrub. The species prefer soils with high moisture content. The San Diego desert woodrat has been documented to have been historically found in the area south of SR-134 and north and northeast of the Cahuenga Peak. Its habitat consists of coastal scrub of Southern California from San Diego County to San Luis Obispo. This species prefers moderate to dense canopies and are particularly abundant in rock outcrops, rocky cliffs, and slopes. According to CNDDB, the silvery legless lizard and San Diego desert woodrat are presumed extant in the area. Given the habitat of these species, the silvery legless lizard and San Diego desert woodrat would most likely be found in the disturbed and undisturbed open space areas of the Santa Monica Mountains within and around the Project Area. As previously mentioned, development in the disturbed and undisturbed open space areas of the Santa Monica Mountains could potentially occur during the lifetime of the Proposed Plan, which could potentially affect the habitats of these species. Therefore, impacts to the silvery legless lizard and San Diego woodrat could potentially occur as a result of future development occurring over the lifetime of the Proposed Plan.

The species of special concern that have been historically found in the developed portions of the Project Area or the Project Area's vicinity include the burrowing owl (*Athene cunicularia*), American badger (*Taxidea taxus*), and western mastiff bat (*Eumops perotis californicus*). According to CNDDB, the burrowing owl and American badger are presumed to be located in the developed southeastern portion of the Project Area and its surrounding vicinity. The western mastiff bat has been historically mapped in the central portion of the Project Area, although the exact location is unknown. CNDDB also reports that one female specimen was collected on April 3, 1991. Habitat for the burrowing owl include open, dry annual or perennial grasslands, deserts and scrublands characterized by low-growing vegetation. American badgers are most abundant in drier open stages of most shrub, forest, and herbaceous habitats with friable soils. The habitats for the western mastiff bat are open and semi-arid to arid, including conifer and deciduous woodlands, coastal scrub, grasslands, and chaparral. The areas in which these species were historically found are today primarily developed with urban uses, such as commercial uses, residential uses, studio- and media-related uses, and surface parking lots. These areas do not provide adequate habitat for these species. If present in or around the Project Area, these species would likely occur within open space areas.

Open space areas within the Project Area are generally located on parcels with an Open Space land use designation, although some undeveloped areas within the Santa Monica Mountains have low density single-family land use designations. The Open Space land use designation within the Project Area, as well as the low density single-family residential land use designations in the Santa Monica Mountains would be retained under the Proposed Plan. Development on parcels that have an Open Space land use designation are generally limited to structures and improvements that are used for park and recreation purposes. Development on parcels that have low density single-family residential land use designations are generally limited to structures and improvements that are associated with recreational and low density single-family residential uses (such as garages, accessory living quarters, recreation rooms, and private stables). Although the Proposed Plan does not propose any changes to open space areas with an Open Space land use designation throughout the Project Area and does not propose changes to open space areas with low density single-family residential land use designations in the Santa Monica Mountains portion of the Project Area (with the exception of Subareas 1:5 and 70), such parcels could be disturbed with uses that are allowed by the Zoning Code or approved through a discretionary review process. Over the life of the Proposed

Plan, it is reasonably foreseeable that improvements and new recreational structures could be developed in these areas. Therefore, impacts to species of special concerns could potentially occur in and around the Project Area under the Proposed Plan.

Other Sensitive Animal Species. According to CNDDB, the hoary bat (*Lasiurus cinereus*) is a sensitive species that has been historically found within the central portion of the Project Area, as well as in and around the eastern portions of the Project Area (in the developed foothills and south of the Santa Monica Mountains). It is presumed to be extant within the Project Area and its vicinity. This species prefers open habitats or habitat mosaics with access to trees for cover and open areas or habitat edges for feeding. If present in the Project Area or its vicinity, this species would primarily occur within developed and undeveloped open space areas. As previously discussed, open space areas (i.e., parcels with an Open Space land use designation within the Project Area, as well as the parcels with low density residential land use designations in the Santa Monica Mountains) will be retained under the Proposed Plan. The land use designation of the open space area in Subareas 1:5 and 70 would be changed from Minimum Residential and Low I Residential, respectively, to Open Space. The Proposed Plan does not propose development changes to parcels with an Open Space land use designation, but such parcels could be developed with uses that are permitted by the Zoning Code or that are approved through the discretionary review process. Similarly, the low density single-family residential land use designations in the in the Santa Monica Mountains could potentially be developed with uses that are permitted by the Zoning Code or that are approved through the discretionary review process. Over the life of the Proposed Plan, it is reasonably foreseeable that improvements and new structures could be developed in open space areas. Therefore, impacts to the hoary bat could potentially occur in the Project Area under the Proposed Plan.

The southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*) has been documented by CNDDB to be found in the undeveloped Santa Monica Mountains east of US-101, northeast of the Pilgrimage Bridge, and southwest of the Mulholland Dam. This species resides in coastal sage scrub and sparse mixed chaparral. As previously mentioned, the Proposed Plan does not propose any development changes to parcels that are designated as Open Space. Additionally, undeveloped areas with low density single-family residential land use designations in the Santa Monica Mountains would remain unchanged or would be changed to an Open Space land use designation (i.e., Subareas 1:5 and 70). However, open space areas could be disturbed given that limited development is permitted if the improvements are associated with parks and recreational purposes or low density single-family residential uses. During the lifetime of the Proposed Plan, it is possible that undeveloped open space areas in the Santa Monica Mountains may be disturbed to provide uses or other improvements that are associated with recreational and/or low density single-family residential uses. Although the types of improvements are currently unknown, disturbances to undeveloped open space areas during the lifetime of the Proposed Plan could potentially impact the southern California rufous-crowed sparrow.

The Busck's gall moth (*Carolella busckana*) is a sensitive species that has been documented by CNDDB to occur in the past in the developed area at the western portion of the Project Area and its vicinity. However, it is currently extirpated in the area. Based on this, future development occurring over the lifetime of the Proposed Plan is not likely to adversely affect this species in and around the Project Area.

Threatened Plant Species. The threatened plant species that have historically been found in the open space areas of the Santa Monica Mountains or in the vicinity of the Project Area include Parish's brittlescale (*Atriplex parishii*), mesa horkelia (*Horkelia cuneta var. puberula*), slender mariposa-lily (*Clochortus clavatus var. gracilis*), and Plummer's mariposa-lily (*Calochortus plumerae*). According to CNDDB, these species are generally found in the northernmost portion of the Project Area, east of US-101, and are presumed to have occurred in the areas surrounding the northern portion of the Project Area. Uses surrounding the northerly Project Area boundaries include residential uses, commercial uses, studio- and media-related industrial uses, and parks. As the surrounding areas to the north of the Project Area are predominately developed with urban uses, these surrounding areas are not likely to have adequate habitat

for these species. The Santa Monica Mountains within the Project Area provide suitable habitat for these plant species. These species are presumed extant within this portion of the Project Area. As previously mentioned, developed and undeveloped open space areas within the Santa Monica Mountains portion of the Project Area could potentially be disturbed with uses that are associated with low-density single-family residential and/or recreational uses, depending on the zoning and land use designation of the parcels, during the lifetime of the Proposed Plan. Therefore, impacts to these threatened plant species could potentially occur as a result of future development occurring over the lifetime of the Proposed Plan.

The many-stemmed dudleya (*Dudleya multicaulis*) has been documented by CNDDB in the foothills between Vermont and Western Avenues, in the Hollywood Hills, and the hills north of Colegrove. Habitat for this species includes chaparral, coastal scrub, and valley and foothill grassland. According to CNDDB, this species is possibly extirpated by development. Although presumed to be extirpated, there may be a low potential for this plant species to be found within the Project Area since it is possible that the location of this species within the Project Area may not have been recently documented. If present, this plant species is likely to exist in small numbers due to fragmented and/or disturbed habitat conditions, which may have led to its presumed extirpation. If this species still exist within the Project Area, the species would likely be found in the undeveloped open space areas of the Santa Monica Mountains. As previously discussed, developed and undeveloped open space areas within the Project Area could potentially be disturbed during the lifetime of the Proposed Plan, which could adversely affect this species in and around the Project Area, if this plant species is still present in the Project Area.

The threatened plant species that have been historically documented to be found within the developed portions of the Project Area and/or its surrounding area include the white rabbit-tobbacco (*Pseudognaphalium leucocephalum*), San Bernardino aster (*Symphyotrichum defoliatum*), and lucky morning-glory (*Calystegia felix*). The white rabbit-tobbaco and lucky morning-glory are presumed extant within and/or around the Project Area. According to the CNDDB, the white rabbit-tobbaco is presumed to be historically located within the central portion of the Project Area, while the lucky morning-glory is presumed to be historically located within and in the vicinity of the southeastern portion of the Project Area. The habitats for the white rabbit-tobacco are riparian woodland, cismontane woodland, coastal scrub, and chaparral. The habitats for lucky morning-glory are meadows, seeps and riparian scrub. The developed areas within and/or surrounding the Project Area in which these plant species are presumed to be found do not provide adequate habitat for the species. If present within or in the vicinity of the Project Area, the white rabbit-tobbacco would likely be found within undisturbed open space areas and the lucky morning-glory would likely be found near bodies of water within and near the Project Area. As previously mentioned, the Proposed Plan does not propose any changes to parcels that are designated as Open Space, the Los Angeles River, or other bodies of water within the Project Area. Additionally, undeveloped areas with low density single-family residential land use designations within the Santa Monica Mountains would remain unchanged or would be changed to an Open Space land use designation (i.e., Subareas 1:5 and 70). During the lifetime of the Proposed Plan, these areas potentially could be improved or developed based on the types of uses that are permitted for those parcels by the Zoning Code. Therefore, it is reasonably foreseeable that areas that may provide suitable habitat for these plant species may be disturbed during the lifetime of the Proposed Plan. Based on the above, impacts to the white rabbit-tobacco or the lucky morning-glory could occur as a result of future development occurring over the lifetime of the Proposed Plan.

The San Bernardino aster has been documented to have historically occurred within the central portion of the Project Area in the urbanized flatlands or foothills of the Project Area. Although the exact location is unknown, CNDDB's best guess is that this species has occurred near the center of the Project Area. The most recent date that this species was last observed in the Project Area, as documented by CNDDB, was in 1893. CNDDB also states that this species is currently presumed extirpated in the area as the area has been heavily developed since 1893. Habitats for this species include meadows and seeps, cismontane woodland, coastal scrub, lower montane coniferous forest, marshes and swamps, and valley and foothill grassland. If

present within the Project Area, the San Bernardino aster would likely be found on undeveloped parcels in the foothills of the Santa Monica Mountains. It is reasonably forseeable that these areas could potentially be disturbed during the lifetime of the Proposed Plan, which could potentially result in a significant impact on the San Bernardino aster, if this species is still present.

Significant Ecological Areas (SEAs). SEAs within Los Angeles County contain critical habitats for sensitive species. There is one SEA in the biological impact study area for the Proposed Plan, the Griffith Park SEA. According to the Los Angeles County Department of Regional Planning's Significant Ecological Areas and Coastal Resource Areas Policy Map and City of Los Angeles' NavigateLA, most of the Santa Mountain east of US-101, including Griffith Park, is part of the Griffith Park SEA (see **Figure 4.4-1**). As previously discussed, the Proposed Plan involves consistency corrections in Subareas 1:5 and 70. These subareas are located within the Griffith Park SEA. The consistency corrections involve changes that would change the zoning or land use designation in the subareas to reflect the existing Open Space Use. Although the Proposed Plan does not propose any development within the Open Space designated areas of the Santa Monica Mountains, these parcels potentially could be disturbed with uses associated with parks and recreational facilities uses as permitted by the Zoning Code or through a discretionary review process. Thus, it is reasonably foreseeable that undeveloped Open Space designated areas within the SEA may be disturbed during the lifetime of the Proposed Plan for recreational uses due to the large amount of Open Space designated areas in the Project Area, and the function of Griffith Park as a regional-serving park.

According to the City of Los Angeles Conservation Element, a majority of publicly-owned portions of the SEA generally have been classified in the Open Space Zone and are often part of public park sites. A small portion of the Griffith Park SEA, primarily on the west side of the SEA, has a Minimum Residential land use designation. SEAs are not wilderness preserves. Land within SEAs are either privately held, used for public recreation, or abuts developed areas. SEA designations provide an informational basis for analysis of private projects relative to CEQA Guidelines review and guide public and private efforts to develop strategies for protecting and acquiring existing habitats. Although an SEA designation assists efforts to protect the land from sale and possible development, an SEA designation does not guarantee preservation and does not protect all habitats potentially supporting special-status species. Rather, the SEA is a planning tool to provide a higher level of scrutiny for those areas and resources of greatest biological concern. Designation of a site as the SEA assists efforts to avoid activities and development that are incompatible with the long-term survival of the SEAs. The City's Conservation Element contains objectives, policies, and programs that aim to preserve, protect, restore and enhance natural plant and wildlife diversity, habitats, corridors and linkages, which include the Griffith Park SEA. Compliance with these objectives, policies, and programs would have direct and indirect beneficial effects for special status species, such as through preserving, protecting, restoring, and enhancing natural plant and wildlife diversity, habitats, corridors, and linkages to enable the healthy propagation and survival of native species. The Proposed Plan does not include components that would change the objectives, policies, and programs contained within the City's Conservation Element, and future development projects would be required to be consistent with these objectives, policies, and programs. However, because the SEA designation does not guarantee preservation and does not protect all sensitive habitat and plant communities, reasonably foreseeable development under the Proposed Plan has the potential to adversely affect various habitats, which could potentially result in the loss of special status species through direct mortality or via indirect effects (e.g., through wildlife habitat loss and edge effects at the urban-wildland interface). Therefore, impacts to habitats for sensitive species within the SEA could occur as a result of future development occurring over the lifetime of the Proposed Plan.

Heritage Trees and Other Protected Trees. According to NavigateLA, approximately 1,600 heritage trees are distributed throughout the City's parks, recreation center properties, and roadway medians.[19] Future development occurring during the lifetime of the Proposed Plan is not expected to affect heritage trees since these trees are located within public property and Department of Recreation and Parks is responsible for the maintenance and protection of heritage trees from injury.

Within the Project Area, ordinance protected trees may be located on private property and street rights-of-way. These protected trees are protected by the City of Los Angeles Tree Preservation Ordinance, which makes it illegal to relocate, remove, or fatally harm the trees without the issuance of a permit by the LADPW. According to the ordinance, removal include any act that will cause a protected tree to die, including but not limited to acts that inflict damage upon the root system or other parts of the tree by fire, application or toxic substances, operation of equipment or machinery, or by changing the natural grade of land by excavation or filling the drip line area around the trunk. In the event that the LADPW approves a tree removal, replacement of the tree is required with at least two trees of a protected variety. Thus, the Project Area would not be expected to experience a net loss of protected trees.

Conclusion

Based on all of the above, impacts related to species identified as a candidate, sensitive, or special status species are ***potentially significant***.

Mitigation Measures

BR-1 For discretionary projects that are in or within 200 feet of Griffith Park or are required to comply with the City's Baseline Hillside Ordinance, project applicants shall be required to conduct a biological resources assessment report to characterize the biological resources on-site and to determine the presence or absence of sensitive species. The report shall identify 1) approximate population size and distribution of any sensitive plant or animal species, 2) any sensitive habitats (such as wetlands or riparian areas), and 3) any potential impacts of proposed project on wildlife corridors. Off-site areas that may be directly or indirectly affected by the individual project shall also be surveyed. The report shall include site location, literature sources, methodology, timing of surveys, vegetation map, site photographs, and descriptions of on-site biological resources (e.g., observed and detected species, as well as an analysis of those species with the potential to occur on-site). The biological resources assessment report and surveys shall be conducted by a qualified biologist, and any special status species surveys shall be conducted according to standard methods of surveying for the species as appropriate. If sensitive species and/or habitat are absent from the individual project site and adjacent lands potentially affected by the individual project, a written report substantiating such shall be submitted to Department of City Planning (DCP) prior to issuance of a grading permit, and the project may proceed without any further biological investigation.

If sensitive species and/or habitat are identified, the biological resources assessment report shall require pre-construction surveys for sensitive species and/or construction monitoring to ensure avoidance, relocation, or safe escape of the sensitive species from the construction activities, as appropriate. If sensitive species are found to be nesting, brooding, denning, etc. on-site during the pre-construction survey or during construction monitoring, construction activities shall be halted until offspring are weaned, fledged, etc. and are able to escape the site or be safely relocated to appropriate off-site habitat areas. A qualified biologist shall be on-site to conduct surveys, for construction monitoring, to perform or oversee implementation of protective measures, and to determine when construction activity may resume. Additionally, the biological resources

[19]City of Los Angeles, *NavigateLA*, http://navigatela.lacity.org/index01.cfm, accessed on December 12, 2016.

assessment report shall be submitted to DCP and California Department of Fish and Wildlife (CDFW) prior to ground-disturbing activities. A follow-up report documenting construction monitoring, relocation methods, and the results of the monitoring and species relocation shall also be submitted to DCP and CDFW following construction.

BR-2 If indicated as appropriate by the biological resources assessment report required in **Mitigation Measure BR-1**, focused surveys for special status plants shall be conducted. Prior to vegetation clearing for construction in open space areas, special status plants identified in the focused surveys shall be counted and mapped and a special-status plant relocation plan shall be developed and implemented to provide for translocation of the plants. The plan shall be prepared by a qualified biologist and shall include the following components: (1) identify an area of appropriate habitat, on-site preferred; (2) depending on the species detected, determine if translocation will take the form of seed collection and deposition, or transplanting the plants and surrounding soil as appropriate; (3) develop protocols for irrigation and maintenance of the translocated plants where appropriate; (4) set forth performance criteria (e.g., establishment of quantitative goals, expressed in percent cover or number of individuals, comparing the restored and impacted population) and remedial measures for the translocation effort; and (5) establish a five-year monitoring procedures/protocols for the translocated plants. Five years after initiation of the restoration activities, a report shall be submitted to DCP and CDFW, which shall at a minimum discuss the implementation, monitoring, and management of the restoration activities over the five-year period and indicate whether the restoration activities have, in part or in whole, been successful based on the established performance criteria. The restoration activities shall be extended if the performance criteria have not been met at the end of the five-year period to the satisfaction of DCP, CDFW, and U.S. Fish and Wildlife Service (USFWS), when applicable.

Significance of Impacts after Mitigation

Mitigation Measure **BR-1** requires the completion of a biological resources assessment report for individual discretionary projects located in or within 200 feet of Griffith Park or are required to comply with the City's Baseline Hillside Ordinance. If sensitive species and/or habitat are identified, pre-construction surveys will be conducted and other protective measures will be implemented as needed during the pre-construction and construction monitoring phases. In addition, Mitigation Measure **BR-2** requires focused surveys for special status plants if the biological resources assessment report deems it appropriate to conduct such a survey. Implementing these conditions for projects would reduce the potential for substantial adverse effect on species identified as a candidate, sensitive, or special species in local or regional plans, policies, or regulations, or by the CDFW or USFW, on most development sites. However, as Mitigation Measures **BR-1** and **BR-2** would not apply to ministerial projects, the mitigation measures would not eliminate all potential impacts to special status species from implementation of the Proposed Plan.

Requiring Mitigation Measures **BR-1** and **BR-2**, if applicable, for all projects would be infeasible because the City has determined that the use of staff resources to apply these mitigation measures to all ministerial projects is not justified. It would require City staff to evaluate each and every ministerial project to determine if that project, because of its unique characteristics, should be subject to this mitigation. Alternatively, it would require rezoning every property. As discussed above in the impact analysis, the majority of the properties in and around Griffith Park and the hillsides are not expected to be altered during the Proposed Plan's 20-year horizon. From an implementation and administrative point of view requiring these procedures or actions would be extremely difficult and require an inordinate amount of staff time and resources to capture the small number of projects that could have significant impacts. Therefore, the Proposed Plan would result in a ***significant and unavoidable*** impact after mitigation.

IMPACT 4.4-2 Would implementation of the Proposed Plan have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? **Significant and unavoidable impact.**

Most of the Santa Monica Mountains east of US-101, including Griffith Park, is part of the Griffith Park SEA, which has the potential to support sensitive natural communities and riparian vegetation. Additionally, a narrow band of willow riparian habitat is located along the bed of the Los Angeles River in two areas: 1) near the I-5/SR-134 interchange, which is within the Project Area, and 2) downstream of Colorado Boulevard, which is adjacent to the Project Area. This permanently wet, partially-submerged habitat has a canopy of mid-sized willows and a dense understory of reeds and non-native weeds. Natural communities along the river include the Southern Willow Scrub, Southern Mixed Riparian Forest, and Southern Cottonwood-Willow Riparian Forest.

Plant communities that have been found within the Santa Monica Mountain portion of the Project Area include the Southern Cottonwood Willow Riparian Forest, Southern Sycamore Alder Riparian Woodland, Southern Coast Live Oak Riparian Forest, and California Walnut Woodland. These plant communities have been found within the open space areas of the Santa Monica Mountains east of US-101. The Southern Sycamore Alder Riparian Woodland can be found within the open space areas of the Santa Monica Mountains east of US-101, as well as between Forest Lawn – Hollywood Hills and Mt. Sinai Memorial Park.

The Project Area includes the Griffith Park SEA, other undeveloped and minimally developed open space areas within the Santa Monica Mountains, and portions of the Los Angeles River. As previously mentioned in Impact 4.4.1, the Proposed Plan does not propose any development in the open space areas, including the Los Angeles River, but such parcels could be developed with structures and improvements that are associated with low density single-family residential and/or recreational uses, depending on the zoning of the affected parcels. It is reasonably foreseeable that undeveloped open space areas may be disturbed during the lifetime of the Proposed Plan due to the large amount of open space in the Project Area, and the function of Griffith Park as a regional-serving park. As a result, development during the lifetime of the Proposed Plan could affect the Griffith Park SEA's important role as an island for wildlife movement or the willow riparian habitat along the bed of the Los Angeles River near the I-5/SR-134 interchange and downstream of Colorado Boulevard. The SEA designation does not guarantee preservation and does not protect all riparian habitat and sensitive plant communities that could potentially be found within the Project Area. Through zoning restrictions, development projects within the Project Area would be consistent with the objectives, policies, and programs contained within the City's General Plan Conservation Element to protect sensitive species, which would have direct and indirect beneficial effects for special status species, such as through preserving, protecting, restoring, and enhancing natural plant and wildlife diversity, habitats, corridors, and linkages to enable the healthy propagation and survival of native species. The Proposed Plan would not change the objectives, policies, and programs contained within the City's Conservation Element. However, it is reasonably foreseeable that implementation of the Proposed Plan could impact various habitat types, including riparian habitat and other sensitive plant communities. Therefore, impacts related to riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations, or by the CDFW or USFWS are ***potentially significant***.

Mitigation Measures

See Mitigation Measures **BR-1** and **BR-2**.

BR-3 During environmental review for projects that are discretionary or in a Community Plan Implementation Overlay (CPIO) District subarea, in areas potentially containing jurisdictional waters and riparian habitat, including streams, wetlands, riparian habitat, and other water bodies, affected sites as well as off-site areas that may be directly or indirectly affected by the individual development project shall be surveyed by a qualified biologist for Waters of the U.S. and Waters of the State (e.g., streams, wetlands, or riparian habitat). Whenever possible, individual projects shall be designed and/or sited to avoid disturbance to or loss of jurisdictional resources. If Waters of the U.S. or Waters of the State cannot be avoided and would be affected by the individual project, the regulatory agencies shall be consulted regarding the required permits. Individual project applicants shall demonstrate to DCP, if the lead agency, the regulating agency that the requirements of agencies with jurisdiction over the subject resource can be met prior to obtaining grading permits. This will include, but not be limited to, consultation with those agencies, securing the appropriate permits, waivers, or agreements, and arrangements with a local or regional mitigation bank including in lieu fees, as needed.

BR-4 At the discretion of the regulatory agencies, including DCP, if applicable, discretionary development projects resulting in the modification, change, and/or loss of Waters of the U.S. and Waters of the State (e.g., streams, wetland, or riparian habitat) under jurisdiction of the regulatory agencies shall be required to contribute to a mitigation bank, contribute to an in-lieu fee program, establish on-site or off-site restoration of in-kind habitat, or establish on-site or off-site restoration of out-of-kind habitat that is of high value to the watershed and provides important watershed functions. Individual project applicants shall submit a compensatory plan for review and approval by relevant regulatory agencies, including DCP, if applicable. The compensatory plan shall be developed by a qualified biologist or restoration ecologist and approved by the relevant regulatory agencies prior to issuance of a grading permit. The plan shall be based on the U.S. Army Corps of Engineers (USACE) *Final Mitigation Guidelines and Monitoring Requirements* (April 19, 2004) and the Los Angeles District's Recommended Outline for Draft and Final Compensatory Mitigation and Monitoring Plans.[20] In broad terms, this plan shall at a minimum include:

- Description of the project/impact and mitigation sites
- Specific objectives
- Implementation plan
- Success criteria
- Required maintenance activities
- Monitoring plan
- Contingency measures

At the discretion of DCP and relevant regulatory agencies, Waters of the U.S. and Waters of the State shall be replaced at a minimum 3:1 ratio. The specific success criteria and methods for evaluating whether an individual development project has been successful at meeting those criteria shall be determined by the qualified biologist or restoration ecologist and included in the compensatory plan.

[20]The USACE's Final Mitigation Guidelines and Monitoring Requirements (April 19, 2004) is available at the Army Corps of Engineers Los Angeles District Regulatory Division webpage at www.spl.usace.army.mil/regulatory/. This document contains the Los Angeles District's Recommended Outline for Draft and Final Compensatory Mitigation and Monitoring Plans. This publication is intended to serve as a technical guide for permit applicants preparing compensatory mitigation plans and identifies the types and extent of information that agency personnel need to assess the likelihood of the success of mitigation proposals. The Los Angeles District's outline is adapted to specific issues encountered in the region.

Implementation of the compensatory plan shall commence prior to issuance of a grading permit for individual projects. If the compensatory plan involves establishment or restoration activities, these activities shall be implemented over a five-year period. The establishment or restoration activities shall incorporate an iterative process of annual monitoring and evaluation of progress, and allow for adjustments to the activities, as necessary, to achieve desired outcomes and meet the success criteria. Five years after initiation of establishment or restoration activities, a final report shall be submitted to the relevant regulatory agencies and DCP, which shall at a minimum discuss the implementation, monitoring, and management of the activities over the five-year period, and indicate whether the activities have, in part, or in whole, been successful based on established success criteria. The establishment or restoration activities shall be extended if the success criteria have not been met to the satisfaction of DCP and relevant regulatory agencies.

BR-5 For projects that are discretionary or in a CPIO District subarea, prior to construction activities on properties that contain seasonal or perennial streams, year-round or intermittent wetlands, riparian habitat, or the Los Angeles River, project applicants shall be required to prepare and submit to the U.S. Army Corps of Engineers a "Preliminary Delineation Report for Waters of the U.S." (which shall delineate any on-site wetlands) and, as appropriate, a Streambed Alteration Notification package to CDFW. If these agencies determine that project features are not regulated under their jurisdiction, then no further protection measure is necessary. However, if the U.S. Army Corps of Engineers determines that a federally-protected wetland is located on-site or considers the feature to be jurisdictional through a "significant nexus" test per recent U.S. Army Corps of Engineers and USEPA guidance,[21] then a Clean Water Act Section 404 permit shall be obtained from the U.S. Army Corps of Engineers, and any permit conditions shall be agreed to, prior to the start of construction activities in the affected area. If CDFW determines that the drainage is a regulated "streambed", then a Streambed Alteration Agreement shall be entered into with CDFW and any associated conditions shall be agreed to prior to the start of construction in the affected area.

Significance of Impacts after Mitigation

Significant and unavoidable impact after mitigation. No other feasible mitigation measures have been identified.

IMPACT 4.4-3 Would implementation of the Proposed Plan have a substantial adverse effect on federally-protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? **Significant and unavoidable impact.**

According to the USFWS National Wetlands Inventory, portions of the Los Angeles River near the I-5/SR-134 interchange and various areas within the Santa Monica Mountain are classified as freshwater emergent wetland. Additionally, portions of the Los Angeles River near the I-5/SR-134 interchange and east of I-5, as well as various areas within the Santa Monica Mountains, are classified as freshwater forested/shrub wetland. The portion of Los Angeles River near the I-5/SR-134 interchange and downstream of Colorado Boulevard contains riparian vegetation. The seasonal and perennial streams that can be found within the Santa Monica Mountains in and surrounding the Project Area contain or have the potential to contain year-round or intermittent wetlands and riparian vegetation.

[21]U.S. Environmental Protection Agency and U.S. Department of the Army, Clean Water Act Jurisdiction Following the US. Supreme Court's Decision in *Rapanos v United States & Carabell v. United States.* June 5, 2007.

During the lifetime of the Proposed Plan, it is reasonably foreseeable that properties adjacent to riparian communities or other wetland habitats could potentially be developed. However, as a result of the drought and fluctuating conditions, it is not currently known where federally protected wetlands are located within the Project Area. If federally-protected wetlands are found within the Project Area, the project applicant would be required to comply with the Clean Water Act, which prohibits the discharge of dredge or fill material into wetlands, streams, and other waters of the United States unless a permit is issued by the USACE or approved state authority under Clean Water Act Section 404 authorizes such a discharge. Therefore, impacts related to federally-protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means are ***potentially significant***.

Mitigation Measures

See Mitigation Measure **BR-5**.

Significance of Impacts after Mitigation

Significant and unavoidable impact after mitigation. No other feasible mitigation have been identified.

IMPACT 4.4-4 Would implementation of the Proposed Plan interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? **Significant and unavoidable impact.**

Undisturbed natural open space within and surrounding the Project Area is predominately found within the Santa Monica Mountains. The Santa Monica Mountains within and in the vicinity of the Project Area are part of a larger wildlife corridor encompassing the Santa Monica Mountain Range. They are also an important stopover for migrating and nesting birds and provides habitat for wintering and nesting birds. The Los Angeles River near the I-5/SR-134 interchange (which is within the Project Area) and downstream of Colorado Boulevard (which is in the vicinity of the Project Area) contains riparian species and is also a stopping point for migrating birds. Within the Project Area, the Santa Monica Mountain between US-101 and I-5 is separated from the rest of the Santa Monica Mountain Range to the west and from the Los Angeles River along its northern and eastern boundaries. As a result, movement of most of the animals and plants found within this area is restricted. As the Project Area is largely urbanized, the habitats within the Santa Monica Mountains and Los Angeles River are connected by bridge overpasses spanning US-101 and flood control channels. While wildlife may cross at the bridge over the US-101 near the Hollywood Reservoir, wildlife movement is generally restricted in the Santa Monica Mountains between US-101 and I-5 (except for bird species), which includes the Griffith Park SEA. However, this area is viewed as an important connective island for the Santa Monica Mountains to the west of US-101, as well as the Verdugo Mountains and San Gabriel Mountains to the east. Wildlife may also use the natural areas, as well as bridges and concrete channels of the Los Angeles River, to connect to the Tujunga Valley and Hansen Dam SEA and the San Gabriel Mountains.

As previously discussed under Impact 4.4-1, limited development could potentially occur within the Santa Monica Mountains and Los Angeles River during the lifetime of the Proposed Plan. Within these areas, potential development generally would be limited to improvements associated with low density residential uses and/or park and recreational uses, depending on the zoning and land use designation of the parcels. Disturbances to undeveloped open space areas within these areas during the lifetime of the Proposed Plan could potentially interfere with the movement of native resident or migratory fish or wildlife species or

with established native resident or migratory wildlife corridors within the Santa Monica Mountains and Los Angeles River.

While the Santa Monica Mountains and Los Angeles River near the I-5/SR-134 interchange are stopover points for migrating and/or nesting birds, nesting birds could occur throughout the Project Area at any location that provides suitable nesting habitat for the particular species, including within native or ornamental vegetation within both open space and densely urbanized areas. Some species of birds may nest within or on man-made structures and could be harmed during renovation, demolition, or other construction activities affecting these structures. Thus, future development could potentially occur on properties with possible migratory or non-status nesting birds, which are protected by MBTA and CDFW. MBTA makes it unlawful at any time, by any means, or in any manner to pursue, hunt, take, capture, or kill migratory birds, and prohibits the removal of nests occupied by migratory birds.

The CDFW has jurisdiction over actions which may result in the disturbance or destruction of active nest sites or the unauthorized take of birds. The CFGC sections that protect birds, their eggs and nests include Sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird, except English sparrows), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take or possession of any migratory nongame bird). Development projects are required to comply with these CFGC sections and, thus, it is unlikely that development occurring during the lifetime of the Proposed Plan would result in the disturbance or destruction of active nest sites or the unauthorized take of birds. However, if development activities directly (e.g., cutting of trees or other vegetation, or removal of man-made structures containing an active bird nest) or indirectly (e.g., if activities sufficiently harassed birds to cause nest abandonment) affect nesting birds, a violation of the Fish and Game Code would result.

Based on the above, the Proposed Plan could potentially interfere with the movement of any native resident or migratory fish or wildlife species or within established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Additionally, the Proposed Plan could result in development on parcels that may contain suitable nesting habitat for birds. Therefore, impacts to native resident, migratory fish and wildlife; established native resident or migratory wildlife corridors; or native wildlife nursery sites would be ***potentially significant***.

Mitigation Measures

See Mitigation Measure **BR-1**.

BR-6 For discretionary projects that are in or within 200 feet of Griffith Park or are required to comply with the City's Baseline Hillside Ordinance, the biological resources assessment report, as mentioned in Mitigation Measure **BR-1**, shall analyze how the individual development project could affect wildlife corridors. The report shall identify measures (such as providing native landscaping to provide cover on the wildlife corridor) that the individual project would be required to implement such that the existing wildlife corridor would remain. Wildlife corridors identified in the biological resources assessment report shall not be entirely closed by any development or improvements occurring within the Project Area.

Significance of Impacts after Mitigation

Significant and unavoidable impact. No other feasible mitigation measures have been identified.

IMPACT 4.4-5 Would implementation of the Proposed Plan conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance? **This impact is less than significant.**

The Proposed Plan includes policies related to the protection of open space. These policies are as follows:

- **Policy PR3.1**: Preserve open space. Maintain, preserve, and enhance open space, and recreational facilities, and park space within the Hollywood Community Plan Area. Encourage the retention of passive open space which provides a balance to the urban development of the Community Plan Area.
- **Policy PR3.2**: Green space and plazas. Develop new public green spaces and public plazas where possible.
- **Policy PR3.3**: Site remediation. Pursue resources to clean up land, especially brownfields that can be safely used for public recreation or Open Space.
- **Policy PR3.7**: Acquire vacant land. Encourage and support continuing efforts by county, state, and federal agencies to acquire vacant land for publicly-owned open space.
- **Policy PR3.11**: Rivers and streams. Maintain and expand public green space around rivers and streams.
- **Policy PR3.12**: Los Angeles River. Support recommendations of the Los Angeles River Revitalization Master Plan for establishing parks, walking paths, bicycle trails, gathering spaces, and public art along the Los Angeles River.
- **Policy PR4.5**: Open Space designations. Maintain all open space designations within the Hollywood Community Plan Area. Designate parkland as Open Space as it is acquired by the Department of Recreation and Parks.

These policies are consistent with the policies set forth in the Open Space and Conservation sections of the City's Framework Element (**Table 4.4-1**, above), which are intended to promote and enhance the conservation and protection of natural resources and open space (Framework Element, pages 6-2 to 6-3). Future development within the Project Area would be required to comply with the policies of the Proposed Plan, as well as the policies contained within the City's Framework Element.

No HCPs are located within or near the Project Area, and the Proposed Plan would not conflict with any HCPs.

The Project Area is known to have protected tree species, on private property, street rights-of-way, and open space areas. Future development within the Project Area could occur on sites that contain protected tree species. Future development occurring within the Project Area would be required to comply with the City's Tree Preservation Ordinance, which makes it illegal to relocate, remove, or fatally harm the trees without the issuance of a permit. The Proposed Plan does not include any components that would preclude implementation of or alter the requirements and procedures contained under this ordinance in any way. Consistent with current City requirements, future development occurring within the Project Area would be required to comply with the City's Tree Preservation Ordinance. Therefore, impacts related to local policies or ordinances protecting biological resources would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

IMPACT 4.4-6 Would implementation of the Proposed Plan conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? **No impact.**

As discussed previously, no HCPs are located within or near the Project Area. There are no Natural Community Conservation Plans (NCCPs) or other local, regional, or state-adopted HCPs within or near the Project Area. Accordingly, future development occurring over the lifetime of the Proposed Plan does not have the potential to conflict with adopted HCPs, NCCPs, or other approved local, regional, or state HCPs as the Project Area is not subject to any such plans. ***No impact*** would occur.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

No impact.

CUMULATIVE IMPACTS

The following cumulative impacts discussion only addresses those thresholds that were found in the impacts analysis to have a less-than-significant or potentially significant impact. If a "no impact" was found to occur above, no cumulative analysis is provided for that threshold because the Proposed Plan would not make any contribution to potential cumulative impacts. A "no impact" conclusion means that the Proposed Plan would have no contribution to that particular environmental effect. This makes further consideration unnecessary because the intent of the cumulative analysis is to identify whether the Proposed Plan would contribute to a larger effect.

Sensitive Species, Riparian Habitat, Wetlands, Wildlife Movement, and Wildlife Corridors. Sensitive plant and animal species, sensitive plant communities, riparian habitat, wetlands, and wildlife corridors are predominately found in the open space areas in the Santa Monica Mountains within and surrounding the Project Area, as well as along certain portions of the Los Angeles River. Future development during the lifetime of the Proposed Plan has the potential to occur in these areas. Thus, reasonably expected disturbances occurring over the lifetime of the Proposed Plan in these areas could potentially have an adverse effect on sensitive species, the movement of wildlife species, or wildlife corridors. Some of the features associated with Los Angeles River Revitalization Master Plan, which is expected to be implemented within the lifetime of the Proposed Plan and is undergoing a separate environmental review process, aim to increase and improve natural vegetation along the river to provide habitat for fish and wildlife. Given that the Project Area contains areas of undisturbed natural area, including an SEA, growth in the region during the life of the Proposed Plan is anticipated to involve development of suitable areas in the San Gabriel Mountains and Los Angeles River, as well as infill and redevelopment within urban areas. Development within the Santa Monica Mountains, Los Angeles River, and the urbanized portions of the Project Area has the potential to adversely affect suitable nesting habitat for birds that are protected by MBTA and CDFW. Thus, cumulative growth in the region could result in incremental, yet significant cumulative impacts to sensitive species, riparian habitat, wetlands, wildlife movement, or wildlife corridors, if present. The Proposed Plan's contribution to cumulative impacts is significant and cumulatively considerable.

Heritage Trees and Other Protected Trees. Protected trees and heritage trees are located within public open space areas and public rights-of way. Protected trees may also be located on properties outside of the parks and recreational areas within the Project Area. Heritage trees are not expected to be adversely affected

by future development occurring during the lifetime of the Proposed Plan as these trees are located on City properties. The City's Tree Preservation Ordinance provides protection for four tree species Citywide, as previously discussed. Compliance with the Tree Preservation Ordinance would ensure that there would be no net loss of protected trees in the Project Area, although canopy coverage could be affected in the short-term as replacement trees grow. Any future projects in the City, including within the Project Area, would also be subject to these existing ordinances and regulations. Therefore, impacts to protected trees and heritage trees would not be cumulatively considerable.

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4.5 CULTURAL RESOURCES

This section provides an overview of cultural resources in the Project Area and evaluates the potential impacts on these resources associated with the Proposed Plan. Topics addressed include historical resources, archaeological resources, paleontological resources, human remains and tribal cultural resources. This section was prepared utilizing information from a variety of sources, including the SurveyLA Historic Resources Survey Report prepared for the Hollywood Community Plan Area (CPA) by the Historic Resources Group in August 2011 and revised in November 2015, and the Historic Resources Survey for the Hollywood Redevelopment Project Area prepared by Chattel Architecture, Planning & Preservation, Inc. in February 2010. Information from the Archaeology Information Center at the UCLA Institute of Archaeology, the Natural Museum of Los Angeles County Paleontological Resource Assessment and Mitigation Office and the Thomas W. Dibblee Foundation Santa Barbara Museum of Natural History was used to generally identify the location of archaeological and paleontological resources. Tribal consultation was undertaken in accordance with Assembly Bill (AB) 52 to determine the potential presence of Tribal Cultural Resources in the Project Area.

REGULATORY FRAMEWORK

Several levels of government maintain jurisdiction over historical resources. The framework for the identification and, in certain instances, protection of historical resources is established at the federal level, while the identification, documentation, and protection of such resources are often undertaken by state and local governments. The principal federal, state, and local laws governing and influencing the preservation of historical resources, as well as the other types of cultural resources are discussed below.

FEDERAL

National Historic Preservation Act (NHPA) of 1966. The NHPA was passed to preserve historical and archaeological sites from federal development. Cultural resources are considered during federal undertakings, primarily under NHPA Section 106. Section 106 requires federal agencies to take into account the effects of their undertakings on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register of Historic Places (National Register) and to afford the Advisory Council on Historic Preservation a reasonable opportunity to comment on such undertakings (36 Code of Federal Regulations [CFR] 800.1). Under Section 106, cultural resources must be identified and evaluated, and effects to historic properties must be reduced to acceptable levels through mitigation measures or agreements among consulting and interested parties.

National Register of Historic Places (National Register). The National Register was established by the NHPA as part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect the nation's historic and archaeological resources. The National Register recognizes properties that are significant at the federal, state, and/or local levels. Although administered by the National Park Service, the federal regulations explicitly provide that National Register listing of private property "does not prohibit under federal law or regulation any actions which may otherwise be taken by the property owner with respect to the property."[1] Listing in the National Register assists in preservation of historic properties through recognition that a property is of significance to the nation, the state, or the community; consideration in the planning for federal or federally-assisted projects; eligibility for federal tax benefits; consideration in the decision to issue a surface coal mining permit; and qualification for federal

[1]National Register Federal Program Regulations, Title 36, Chapter I, Part 60, Section 60.2.

assistance for historic preservation, when funds are available. In addition, for projects that receive federal funding, a clearance process must be completed in accordance with Section 106 of the NHPA. Furthermore, state and local regulations may apply to properties listed in the National Register.

To be considered eligible for listing in the National Register, buildings, objects, sites, districts, or structures must meet any or all of the following criteria:

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

In addition to meeting any or all of the above criteria, properties must also possess integrity of location, design, setting, feeling, workmanship, association, and materials.

Historic integrity is the ability of a property to convey its significance and is defined as the authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's historic period. The National Register recognizes seven aspects or qualities that comprise integrity: location, design, setting, materials, workmanship, feeling, and association. These qualities are defined as follows:

- Location is the place where the historic property was constructed or the place where the historic event occurred;
- Design is the combination of elements that create the form, plan, space, structure, and style of a property;
- Setting is the physical environment of a historic property;
- Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property;
- Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory;
- Feeling is a property's expression of the aesthetic or historic sense of a particular period of time; and
- Association is the direct link between an important historic event or person and a historic property.

In assessing a property's integrity, the National Register criteria recognize that properties change over time. In this regard, National Register Bulletin 15 indicates:

> *"To retain historic integrity a property will always possess several, and usually most, of the aspects. The retention of Specific aspects of integrity is paramount for a property to convey its significance.*
>
> *It is not necessary for a property to retain all its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity.*
>
> *A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style."*

For properties that are considered significant under National Register Criteria A and B, National Register Bulletin 15 indicates:

> *"A property that is significant for its historic association is eligible if it retains the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person(s).*
>
> *A property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique."*

STATE

Office of Historic Preservation (OHP). As an office of the California Department of Parks and Recreation, the OHP implements the policies of the NHPA on a statewide level. The OHP also carries out the duties set forth in the Public Resources Code (PRC) and maintains the California Historic Resources Inventory. The State Historic Preservation Officer (SHPO) is an appointed official who implements historic preservation programs within the state's jurisdiction.

California Register of Historical Resources (California Register). The California Register is "an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change."[2] The criteria for eligibility for the California Register are based upon National Register criteria. These criteria are:

- **Criterion 1**: Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California of the United States;
- **Criterion 2**: Associated with the lives of persons important to local, California or national history;
- **Criterion 3**: Embodies distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values; and
- **Criterion 4**: Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

The California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register resources listed automatically includes the following:

- California properties listed in the National Register (Category 1 in the State Inventory of Historical Resources) and those formally Determined Eligible for listing in the National Register (Category 2 in the State Inventory of Historical Resources);
- California Registered Historical Landmarks from No.0770 onward; and
- Those California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Resources Commission for inclusion in the California Register.

Other resources that may be nominated for listing in the California Register include:

- Historical resources with a significance rating of Categories 3 through 5 in the State Inventory of Historical Resources (Categories 3 and 4 refer to potential eligibility for the National Register, while Category 5 indicates a property with local significance);
- Individual historical resources;
- Historical resources contributing to historic districts; and
- Historical resources designated or listed as a local landmark.

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[2]PRC Section 50241.1(a).

Additionally, a historical resource eligible for listing in the California Register must meet one or more of the criteria of significance described above and retain enough of its historic character or appearance to be recognizable as a historical resource and to convey the reasons for its significance. Historical resources that have been rehabilitated or restored may be evaluated for listing.

California Penal Code Section 622.5. California Penal Code Section 622.5 provides the following: "Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor."

California Penal Code Section 623. California Penal Code Section 623 provides the following: "Except as otherwise provided in Section 599c, any person who, without the prior written permission of the owner of a cave, intentionally and knowingly does any of the following acts is guilty of a misdemeanor punishable by imprisonment in the county jail not exceeding one year, or by a fine not exceeding one thousand dollars ($1,000), or by both such fine and imprisonment: (1) breaks, breaks off, cracks, carves upon, paints, writes or otherwise marks upon or in any manner destroys, mutilates, injures, defaces, mars, or harms any natural material found in any cave. (2) disturbs or alters any archaeological evidence of prior occupation in any cave. (3) kills, harms, or removes any animal or plant life found in any cave. (4) burns any material which produces any smoke or gas which is harmful to any plant or animal found in any cave. (5) removes any material found in any cave. (6) breaks, forces, tampers with, removes or otherwise disturbs any lock, gate, door, or any other structure or obstruction designed to prevent entrance to any cave, whether or not entrance is gained.

California Public Resources Code (PRC) Section 21083.2. PRC Section 21083.2 requires agencies to determine whether proposed projects would have effects on unique archaeological resources. Section 21083.2(g) states that "unique archaeological resource means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: (1) contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; or (2) has a special and particular quality such as being the oldest of its type or the best available example of its type; or (3) is directly associated with a scientifically recognized important prehistoric or historic event of person." Treatment options under Section 21083.2 include activities that preserve such resources in place and in an undisturbed state. Other acceptable methods include excavation and curation, or study in place without excavation and curation. Section 21083.2 also provides required mitigation measures to the extent that unique archaeological resources are not preserved in place or not left in an undisturbed state.

California Public Resources Code (PRC) Sections 5020.1, 5024 and 5024.5. PRC Section 5020.1 provides definitions associated with historical resources. PRC Section 5020.1(h) defines a historic district as "a definable unified geographic entity that possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development." PRC Section 5020.1(j) defines a historical resource as "any object, building, structure, site, area, place, record, manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California." PRC Section 5020.1(p) defines State Historic Resources Inventory as "the compilation of all identified, evaluated, and determined historical resources maintained by the office and specifically those resources evaluated in historical resource surveys conducted in accordance with criteria established by the office, formally determined eligible for, or listed in, the National Register of Historic Places, or designated as historical landmarks or points of historical interest." PRC Section 5020.1(q) defines substantial adverse change to a historical resource as "demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired."

The California State Legislature enacted PRC Sections 5024 and 5024.5 as part of a larger effort to establish a state program to preserve historical resources. These sections require state agencies to take a number of actions to ensure preservation of state-owned historical resources under their jurisdictions. These actions include evaluating resources for National Register eligibility and California Historical Landmark (California Landmark) eligibility; maintaining an inventory of eligible and listed resources; and managing these historical resources so that that they will retain their historic characteristics.

PRC Sections 5097.5, 5097.9, and 5097.98-99. PRC Section 5097.5 provides protection for cultural and paleontological resources, where Section 5097.5(a) states, in part, that:

> *No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.*

PRC Section 5097.9 establishes the California Native American Heritage Commission (NAHC) to make recommendations to encourage private property owners to protect and preserve sacred places in a natural state and to allow appropriate access to Native Americans for ceremonial or spiritual activities. NAHC is authorized to assist Native Americans in obtaining appropriate access to sacred places on public lands, and to aid state agencies in any negotiations with federal agencies for the protection of Native American sacred places on federally administered lands in California.

PRC Sections 5097.98-99 require that the NAHC be consulted whenever Native American graves or human remains are found. According to these sections, it is illegal to take or possess remains or artifacts taken from Native American graves; however, it does not apply to materials taken before 1984.

California Environmental Quality Act (CEQA). Under CEQA, a "project that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment." This statutory standard involves a two-part inquiry. The first involves a determination of whether the project involves a historical resource, as specifically defined by CEQA. If so, then the second part involves determining whether the project may involve a "substantial adverse change in the significance" of the resource. Section 21084.1 of the PRC defines a historical resource as:

- A resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources;
- A resource included in a local register of historical resources, as defined in PRC Section 5020.1(k), or deemed significant pursuant to criteria set forth in PRC Section 5024.1(g), unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant.
- The fact that a resource is not listed in, or determined to be eligible for listing in, the California Register of Historical Resources, not included in a local register of historical resources, or not deemed significant pursuant to criteria set forth in PRC Section 5024.1(g) shall not preclude a lead agency from determining whether the resource may be a historical resource.

Section 15064.5 of the CEQA Guidelines, provide that for the purposes of CEQA compliance, the term "historical resources" shall include the following:

- A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register;
- A resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements in PRC Section 5024.1(g), shall be presumed to be historically or culturally significant. Public agencies must treat such

resources as significant for purposes of CEQA unless the preponderance of evidence demonstrates that it is not historically or culturally significant;

- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be 'historically significant' if the resource meets one of the criteria for listing on the California Register; and
- The fact that a resource is not listed in, or determined to be eligible for listing in the California Register, not included in a local register of historical resources (pursuant to PRC Section 5020.1(k)), or identified in a historical resources survey (meeting the criteria in PRC Section 5024.1(g)) does not preclude a lead agency from determining that the resource may be a historical resource as defined in PRC Section 5020.1(j) or 5024.1.

Section 15064.5 of the CEQA Guidelines also provides that "substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired." Material impairment occurs when a project alters or demolishes in an adverse manner "those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion" in a state or local historic registry.

California Health and Safety Code Sections 7050.5. California Health and Safety Code Section 7050.5(b) specifies protocol when human remains are discovered. The code states:

> *In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of section 27492 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of death, and the recommendations concerning treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in PRC Section 5097.98.*

Senate Bill (SB) 18. As of March 1, 2005, SB 18 (Government Code Sections 65352.3 and 65352.4) requires that, prior to the adoption or amendment of a general plan proposed on or after March 1, 2005, a city or county must consult with Native American tribes with respect to the possible preservation of, or the mitigation of impacts to, specified Native American places, features, and objects located within that jurisdiction.

Assembly Bill (AB) 52. AB 52 specifies that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.[3] AB 52 requires that a lead agency consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a project prior to the determination of whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. Furthermore, it provides examples of mitigation measures that may

[3]Assembly Bill 52 amended PRC Section 5097.94, and added PRC Sections 1073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3.

be considered to mitigate any impact. These provisions are applicable to projects that have a notice of preparation (NOP) for an environmental impact or a notice of negative declaration or mitigated negative declaration filed on or after July 1, 2015.

LOCAL

City of Los Angeles General Plan Conservation Element (1991). The City of Los Angeles General Plan contains growth and development policies that reflect a comprehensive long-range view of the City as a whole. The General Plan provides a comprehensive strategy for accommodating long-term growth should it occur as projected. The Conservation Element of the General Plan consists of an identification and analysis of the existing natural and historical resources in the City of Los Angeles. Policies in the Conservation Element include the preservation of resources of historical, archaeological, and paleontological significance. Any proposed development plan must consider the potential for encountering and preserving these cultural resources. Objectives, goals, and policies are listed in **Table 4.5-1**.

TABLE 4.5-1: RELEVANT GENERAL PLAN CULTURAL RESOURCES GOALS, OBJECTIVES, AND POLICIES

CONSERVATION ELEMENT – ARCHAEOLOGICAL AND PALEONTOLOGICAL	
Objective	Protect the city's archaeological and paleontological resources for historical, cultural, research and/or educational purposes.
Policy	Continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition or property modification activities.
CONSERVATION ELEMENT – CULTURAL AND HISTORICAL	
Objective	Protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.
Policy	Continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition or property modification activities.

SOURCE: City of Los Angeles, *Conservation Element of the City of Los Angeles General Plan*, adopted September 26, 2001.

City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code [LAAC] 22.171). The City's Cultural Heritage Ordinance was first adopted by the Los Angeles City Council in 1962 and has since been amended several times. The provisions of the Cultural Heritage Ordinance are codified in Division 22, Chapter 9, Article 1 of the LAAC, commencing with Section 22.171. The Ordinance created a Cultural Heritage Commission and criteria for designating Historic-Cultural Monuments (HCMs). The Commission comprises five citizens, appointed by the Mayor, who have exhibited a knowledge of Los Angeles' history, culture and architecture. Any interested party may apply for a proposed HCM designation. Section 22.171.7 of the LAAC states that a historical or cultural monument is:

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

Each nomination is reviewed by the Cultural Heritage Commission, then by the Planning and Land Use Management Committee of the City Council, and the City Council as a whole. Once a property has been designated a Monument, the Commission and its staff review permits for alteration, relocation, or demolition. The Commission can delay demolition of a Monument for 180 days and has the authority to recommend to the City Council to delay demolition for another 180 days. Locally designated cultural resources are presumed to be historically significant under CEQA. Therefore, demolition and/or alterations of HCMs are subject to review under CEQA.

City of Los Angeles Historic Preservation Overlay Zone Ordinance (LAMC 12.20.3). The City of Los Angeles Ordinance Number 175891, found in Section 12.20.3 of the LAMC, describes the procedures for creation of new Historic Preservation Overlay Zones (HPOZs), the powers and duties of HPOZ Boards, and the review processes for projects within HPOZs. This Ordinance was adopted by the Los Angeles City Council on March 19, 2004 and became effective on May 12, 2004. This Ordinance is intended to recognize, preserve, and enhance buildings, structures, landscaping, natural features, and areas within the City having historic, architectural, cultural or aesthetic significance in the interest of the health, economic prosperity, cultural enrichment and general welfare of the people. This Ordinance describes the procedures for the creation of new HPOZs, the powers and duties of HPOZ Boards, and the review processes for projects within HPOZs.

As required by this ordinance, the construction, addition, demolition, reconstruction, alteration, removal, or relocation of any publicly or privately-owned building, structure, landscaping, natural feature, lot, street features, furniture or fixtures within a HPOZ identified as a contributing element in the historical resources survey for the zone must obtain a Certificate of Appropriateness by the Director of the City's Department of City Planning (DCP) or Area Planning Commission. The determination to approve, conditionally approve or disapprove of a Certificate of Appropriateness for construction, addition, alteration or reconstruction is based on the project's conformance to the HPOZ's Preservation Plan, compliance with the United States Secretary of Interior's Standards of Rehabilitation, if no Preservation Plan exists, and whether the project protects and preserves the historic and architectural qualities and the physical characteristics which make the building, structure, landscape, or natural feature a contributing element of the preservation zone. Any person proposing to demolish, remove or relocate any contributing building, structure, landscaping, or natural feature within a preservation zone not qualifying as conforming work on contributing elements shall apply for a Certificate of Appropriateness and must conduct appropriate environmental review. No Certificate of Appropriateness shall be issued to demolish, remove or relocate any building, structure, landscaping, natural feature or lot within a HPOZ that is designated as a contributing element unless it can be demonstrated that the owner would be deprived of all economically viable use of the property.

Los Angeles Municipal Code (LAMC) Article 1 Chapter IX Section 91.106.4.5. All building permits on sites designated as historic at the local, state, or federal level must be reviewed by the Department of Building and Safety to determine whether the project will result in the loss of, or serious damage to, a significant historical or cultural asset. Section 91.106.4.5 states that the City of Los Angeles Department of Building and Safety "shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated, or has been determined by state or federal action to be eligible for designation, on the National Register, or has been included on the City of Los Angeles list of HCMs, without the department having first determined whether the demolition, alteration or removal may result in the loss of or serious damage to a significant historical or cultural asset."

If it is determined that loss or damage to a historical resource could occur, the project applicant is required to conduct a CEQA analysis to determine if the impact is significant, and the Department of Building and Safety may not issue a permit without first finding that specific economic, social or other considerations make infeasible the preservation of the building or structure."

LAMC Article 1 Chapter IX Section 91.106.4.5.1. Under this section of the LAMC, permits for the demolition of a building over 45 years old will not be issued unless abutting properties owners and the City Council Office are notified in writing and a public notice of application for demolition has been posted at the site at least 30 days prior to the date of issuance.

City of Los Angeles Cultural Heritage Master Plan (2000). The City of Los Angeles Cultural Affairs Department developed a Cultural Heritage Master Plan, adopted by the City Council in 2000. The Master Plan contains numerous important policy recommendations on historic preservation in the City of Los Angeles, many of which have shaped the creation and early work of the Office of Historic Resources.

EXISTING SETTING

HISTORICAL BACKGROUND

The area that would become Hollywood was originally part of two former Spanish land grants: Rancho La Brea and Rancho Los Feliz. The Western half of what is now Hollywood was part of Rancho La Brea, a Spanish land grant to Antonio Jose Rocha and Nemisio Domiguez; the eastern half occupies what was formerly Rancho Los Feliz, 7,000 acres that extended from present-day Gower Street on the west to the Los Angeles River on the east, and from the top of the hills on the north to the Los Angeles pueblo limits on the south. Rancho Los Feliz was granted to Jose Vincente Feliz in the 1780s and stayed in the Feliz family until 1861.

Hollywood began as a small agricultural community in the nineteenth century. Farmers, many of whom were European immigrants, experimented in cultivating a wide variety of exotic fruits, vegetables, and flowers. The area was developed as individual tracts of land by a handful of Anglo settlers beginning in the 1860s. The agricultural character of the community changed in the early twentieth century as large real estate tracts were developed, transforming the community into a bustling suburb of Los Angeles.

In 1900, the first electric streetcar track was completed along Hollywood Boulevard (then Prospect Avenue). Other streetcar lines soon followed, including along Melrose Avenue, La Brea Avenue, Santa Monica Boulevard, Highland Avenue, Vine Street, Western Avenue, Vermont Avenue, Virgil/Hillhurst Avenues, Kenmore Avenue, Fountain Avenue, Talmadge Street, Hyperion Avenue, Los Feliz Boulevard, and Beachwood Drive.

In 1903, the City of Hollywood was officially incorporated with a population of 700. During this era, the Hollywood boundary was generally defined by the southernmost portion of the Hollywood Hills to the north, Fountain Avenue to the south, Crescent Heights Boulevard to the west, and Mariposa Street to the east. In 1904, gas lines were laid, the streets were numbered, and a single track of the Los Angeles Pacific Railroad was placed perpendicular to the electric track already on Prospect Avenue. Residential developments ranged from sprawling estates encompassing tens of acres, to large residences with substantial gardens, to more modest suburban residences. Large estates lined Prospect Avenue, and as the area became increasingly developed, churches, clubs and schools built in close proximity to single-family residences were executed in styles such as Mission Revival, American Foursquare, and Craftsman Bungalow. The Project Area has extant examples of residential development from this era, although these examples are relatively rare.

The population of Hollywood during this early period was quite diverse, from cultural immigrants, such as the French painter of floral arrangements Paul de Longpré, to American transplants, such as Midwestern banker Gordon Wattles. Due to the large number of estates in the area, there was also a substantial local working class that was employed as caretakers and service workers. In Hollywood, many of the working class were of Japanese and Scottish origin.

By 1909, like many of its neighboring communities, Hollywood had experienced growth on an exponential scale. While its population in 1903 was 700, by 1909 it reached 4,000. Though dwarfed by the neighboring City of Los Angeles with 100,000 inhabitants, the small City of Hollywood was experiencing growing pains with water shortages, drainage issues and sewage problems. It was around this time that the City of Hollywood's attitudes towards annexation began to change, as the infrastructure that a city like Los Angeles had was seen as possibly solving some of these issues. The adjacent community was the first to fold its status as an independent city in 1909, but by November of that same year, the Hollywood Board of Trade announced to residents that it would not be able to resolve sewer problems on its own. Just two months later, in February of 1910, Hollywood was annexed to the City of Los Angeles.

The relationship between Hollywood and Los Angeles had been increasingly strengthened in the decade preceding annexation. As early as 1904, the Red Car Balloon Route – a balloon-shaped route through Los Angeles and its environs operated by the Los Angeles Pacific Railroad – facilitated transportation between Hollywood and downtown Los Angeles. It brought tourists on excursions to popular Hollywood stops, such as the studios and gardens of Paul de Longpré. The relationship of Hollywood to Los Angeles was further strengthened shortly following incorporation as the east end of Hollywood Boulevard was routed to curve into Sunset Boulevard, the main road to Los Angeles.

Five years after the 1910 annexation of Hollywood by the City of Los Angeles, the area was in the midst of a real estate boom. No longer a small independent city struggling to deal with infrastructural problems, Hollywood was a thriving suburb of Los Angeles increasingly attracting residential and commercial interests. The most significant factor in the development of Hollywood in the twentieth century was the entertainment industry. Film production began in Hollywood in 1911, and quickly grew into a significant economic force. As the popularity of motion pictures grew, more physical facilities related to motion picture production were constructed in Hollywood. In 1919, the City established a series of industrial zones specifically designated for motion picture use. The largest and most significant of these zones is located in the heart of the Project Area, generally within and surrounding the area bounded by Melrose Avenue, Sunset Boulevard, Van Ness Avenue, and Gower Street. Industrial resources include intact motion picture studio plants and a wide variety of support services dating to the 1920s. Due to its key role in the motion picture industry, Hollywood later became a center for radio, television, and record production. The burgeoning entertainment industry brought about the development of thriving business districts along Hollywood Boulevard, Vine Street, and Sunset Boulevard.

From the 1910s through the boom of the 1920s and into the 1930s, Hollywood experienced tremendous population growth. Whereas the population of Hollywood had been a little over 4,000 people upon incorporation, the area would boast a population of 153,000 by the 1930s. The rapidly expanding film business attracted migrants from around the United States and around the globe, resulting in a true "melting pot." For a period of time preceding World War II, the entertainment industry also became a refuge for émigrés from Eastern Europe. To accommodate the growing population of newcomers, residential development sharply increased. While residential development in Hollywood during the first decade of the twentieth century had focused on Prospect Avenue (present-day Hollywood Boulevard) due to its proximity to streetcar lines, by the 1920s, development was widespread throughout the area in response to the automobile. Many of the people (including some movie actors and actresses) who bought homes in Hollywood embraced the modest life-style associated with the bungalows being built at a rapid rate north and south of Hollywood Boulevard. Concentrations of residential properties from this period are located adjacent to the major motion picture studios and include modest single-family residences along with a wide variety of multi-family housing types. The integrity of many of these properties is poor, and intact neighborhoods of early 20th century studio-adjacent residences are now rare.

The bungalow court has particular significance in Hollywood as large colonies of courts were built just blocks away from the studios. These were developed primarily in the 1920s and reflect the prevalent architectural styles of the period. While many of these properties have been lost, Hollywood still contains

a substantial population of bungalow courts. During the 1920s, there was also significant residential development in the Hollywood Hills, in particular in Los Feliz, Laurel Canyon, and Beachwood Canyon. Several residential developments from this period were specifically marketed to people working in the entertainment industry, with advertisements touting their proximity to the Hollywood studios.

Density in Hollywood increased substantially following World War II. In the hillsides, residences were built on previously undeveloped lots. In the flatlands, inexpensive stucco-clad apartment buildings were erected as infill in previously established residential neighborhoods. Along the major commercial corridors, earlier buildings were updated or replaced with new construction. By the 1950s, entertainment industry-related properties began to spread out throughout the greater Los Angeles area, and the major industry in Hollywood shifted to tourism. During the late 1950s, the iconic Capitol Records Building was constructed on Vine Street and the Hollywood Walk of Fame was created on Hollywood Boulevard as a tribute to actors, directors, and other contributors to the entertainment industry. The Hollywood Walk of Fame has become an internationally-recognized Hollywood icon and the City designated Historical Cultural Monument in 1978. The Hollywood Walk of Fame comprises more than 2,600 five-pointed terrazzo and brass stars embedded in the sidewalks along 15 blocks of Hollywood Boulevard and three blocks of Vine Street.

Also, during this period, some of the nation's most important Modernist architects were working in Los Angeles, building sleek commercial buildings in the flatlands and highly innovative residential projects in the hillsides. The Project Area contains residential and commercial properties designed by a number of important Modernists, including Richard Neutra, Rudolph Schindler, Lloyd Wright, John Lautner, Craig Ellwood, Raphael Soriano, Gregory Ain, and Pierre Koenig.

In the 1960s and 1970s, Hollywood's population became more ethnically diverse as new immigrant groups began settling in the area. In addition to a significant Latino population, Armenian and Thai immigrants began living and working in the East Hollywood area and opened shops and other businesses.[4] Community and residential densities continued to increase, as original single-family houses, bungalow courts, and smaller apartment buildings were replaced with larger multi-family residential complexes.

By the 1980s, the Hollywood community was in a state of economic decline. The Community Redevelopment Agency of Los Angeles (CRA established the Hollywood Redevelopment Project Area in 1986 to encourage development in the area. Among the goals of the agency were to revitalize the historic core and preserve historically significant buildings.

By the start of the new millennium, Hollywood began to experience a resurgence that continues today post the Great Recession. The establishment of the City's Adaptive Reuse Ordinance greatly facilitated the reuse of under-utilized historic buildings into new housing. New, infill development consisting of large-scale mixed-use projects (such as the W Hotel at Hollywood Boulevard and Vine Street, Eastown Apartments at Hollywood Boulevard and Argyle Avenue, Columbia Square at Sunset Boulevard and Gower Street, as well as the Hollywood & Highland Center, which includes the Dolby Theatre, the Loews Hollywood Hotel, and the TCL Chinese Theater) along with the Los Angeles County Metropolitan Transportation Authority (Metro) Red Line subway stations, have helped to revitalize Hollywood's streets and its economy, bringing with it an influx of new residents and tourists, higher rents, and new development pressures.

[4]Little Armenia and Thai Town neighborhoods were designated by the Los Angeles City Council in 2000 and 1999, respectively.

HISTORICAL RESOURCES

For the purposes of this EIR, the discussion of historical resources is focused on historical resources that are designated as such either locally or by the State of California, and/or are identified in a survey that meets the requirements of PRC Section 5024.1(g), including SurveyLA. The Project Area contains a wide range of resource types that meet the definition of a historical resource as defined by CEQA including single- and multi-family residences, along with commercial, institutional, and industrial properties. Extant properties that would meet the definition of historical resource in CEQA, remain from every significant period of development in Hollywood, and together they represent an impressive range of historical themes and property types. The property types that are found within the Project Area that meet the CEQA definition for historical resource are as follows:

- **Pre-Consolidation Properties**. The Project Area contains a small number of intact properties dating from the period prior to Hollywood's consolidation with the City in 1910. Examples are single-family residences surrounded by later development. No commercial or institutional examples were identified from this period.
- **Residential Properties**. The Project Area contains a small number of late-19th century single-family houses not located within the pre-consolidation boundary. The Project Area still contains a substantial number of 1920s bungalow courts, reflecting the prevalent styles of the period, including Craftsman, American Colonial Revival, and Spanish Colonial Revival. Despite their numbers, the vast majority of these properties display some degree of alteration. Highly intact examples are rare. The Project Area also contains numerous examples of intact apartment houses, as well as some 1920s courtyard apartments. Apartment towers and garden apartments were not common. Identified districts include several single-family streetcar and automobile suburbs, as well as one Post World War II suburb. In addition, the Project Area has several intact collections of multi-family residential development. The Project Area has a number of residences that are associated with significant people, including important film actors and directors, industrialists and business people, musicians, literary figures, and politicians.
- **Commercial Properties**. The Project Area contains numerous intact examples of streetcar-related commercial buildings and two neighborhood commercial centers. Other less common commercial property types include theaters (live performance and motion picture), auto-related properties (auto showrooms and service stations), and banks. The Project Area has several significant examples of signs and a number of properties that are associated with long-time neighborhood businesses.
- **Institutional Properties**. The Project Area has several school buildings that pre-date the 1933 Long Beach Earthquake, including elementary, middle, and high schools. Multiple examples of religious properties are also present, including churches, synagogues, temples, and other affiliated properties. Two significant hospital facilities were identified, one of which continues in its original use today. The Project Area is home to several significant performing and visual arts venues. The Project Area also contains isolated examples of municipal service and public utility buildings, including a Department of Water and Power electrical substation, a water pumping plant, two postwar fire stations, and a telephone building. Several World War II-era air raid sirens are also located in the Project Area.
- **Architectural Properties**. A large number of single-family residences have been recognized for their architectural merit, most often as part of larger districts. Many of these properties date from the 1910s through the 1930s, and display the prevalent styles from the period, including Craftsman, American Colonial Revival, Spanish Colonial Revival, Mediterranean Revival, Tudor Revival, and French Norman. Less common styles included Prairie, Renaissance Revival, Dutch Colonial Revival, Chateauesque, Exotic Revivals (Moorish, Egyptian, Oriental, etc.), and Storybook. Examples of various Modern styles were also identified, including Early Modern, Art Deco, Streamline Moderne, Mid-Century Modern, New Formalism, and Brutalism. Examples often represent the work of an important architect.

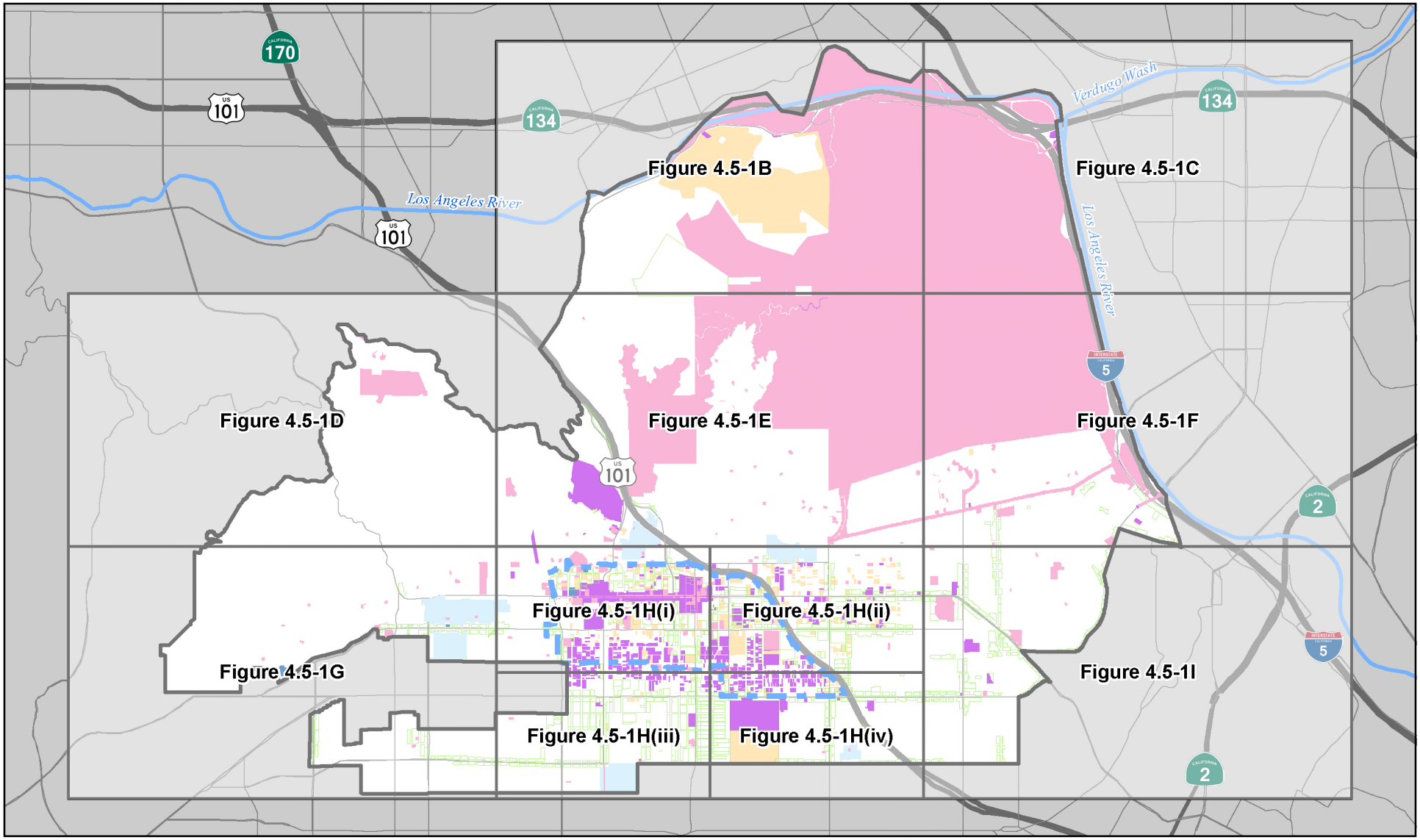
- **Entertainment-Related Properties**. The Project Area has a substantial number of properties associated with the entertainment industry. Examples included a major motion picture studio (Paramount Pictures/RKO), a small number of pre-Major Studio Era properties, and several independent/rental studios. Properties significant for their association with radio, television and music industries were also identified, as well as several entertainment-related professional and trade organization headquarters. In addition, the Project Area has a unique grouping of commercial and industrial properties that house a variety of support services for the entertainment industry including prop houses, costume houses, film laboratories and processing plants, and camera and lighting equipment vendors. Several residential neighborhoods are associated with the entertainment industry. These neighborhoods were developments that were designed and promoted for their proximity to the film studios in central Hollywood. As noted above, a number of single-family houses within the Project Area are associated with important persons in the entertainment industry.
- **Cultural Landscape Properties**. The Project Area has two cemeteries with designed landscapes: Forest Lawn Memorial Park Hollywood Hills and Mt. Sinai Memorial Park. Griffith Park, the largest interurban wilderness park in the United States, is another significant cultural landscape in the Project Area. The park, which is a City designated HCM, is home to the Los Angeles Zoo, Equestrian Center, the Griffith Merry-Go-Round, the Greek Theater, the Autry National Center, The Griffith Park Southern Railroad, pony rides, various hiking trails, and the Griffith Observatory.
- **Other Properties**. The Project Area has a number of unique or unusual property types associated with residential hillside development. Examples include public infrastructure such as public stairways, retaining walls, pedestrian tunnels, and bridges, and design features such as entry gates, planters, fountains, and signs.

The Project Area has one of the highest concentrations of designated and eligible resources in the City of Los Angeles. The designated resources include properties listed in the National Register, California Register, and locally designated City HCMs and HPOZs. **Figures 4.5-1A** through **4.5-1I** identify the locations of the designated and eligible historical resources in the Project Area as well as the boundaries for the Proposed Subareas (Plan Change Areas).

The data for **Figures 4.5-1A** and **4.5-1I** are as follows:

- Data on Historic Cultural Monuments (HCMs) and Historic Preservation Overlay Zones (HPOZs) are provided from, and maintained by, the Office of Historic Resources, Department of City Planning.
- Data for properties listed in the National Register and the California Register (Status Codes 1 and 2) are from the 2012 California State Historic Resources Inventory (HRI) maintained by the California Office of Historic Resources. This is the latest data available from the California Office of Historic Resources. The City takes no responsibility for the accuracy of data in the State HRI, including any errors in California Historic Resources Status Codes.
- Data for properties surveyed in the Hollywood Redevelopment Project Area, generally bounded by Franklin Avenue on the north, Serrano Avenue on the east, Santa Monica Boulevard and Fountain Avenue on the south and La Brea Avenue on the west, are from the 2010 survey report[5] prepared for the former Community Redevelopment Agency. The most recently available historical resource status codes for the Redevelopment Project Area result from this survey, known as the Current Survey.[6]

[5]Office of Historic Resources, http://preservation.lacity.org/files/Hollywood_CRA_Survey_Report_0.pdf.
[6]Office of Historic Resources, http://preservation.lacity.org/files/Hollywood_CRA_Survey_Index_0.pdf.



LEGEND:

- Hollywood CPA
- CPIO Boundary
- Designated Resources
- Eligible Resources
- City-Designated HCMs
- Demolished HCMs
- Historic Preservation Overlay Zones
- Hollywood Subareas

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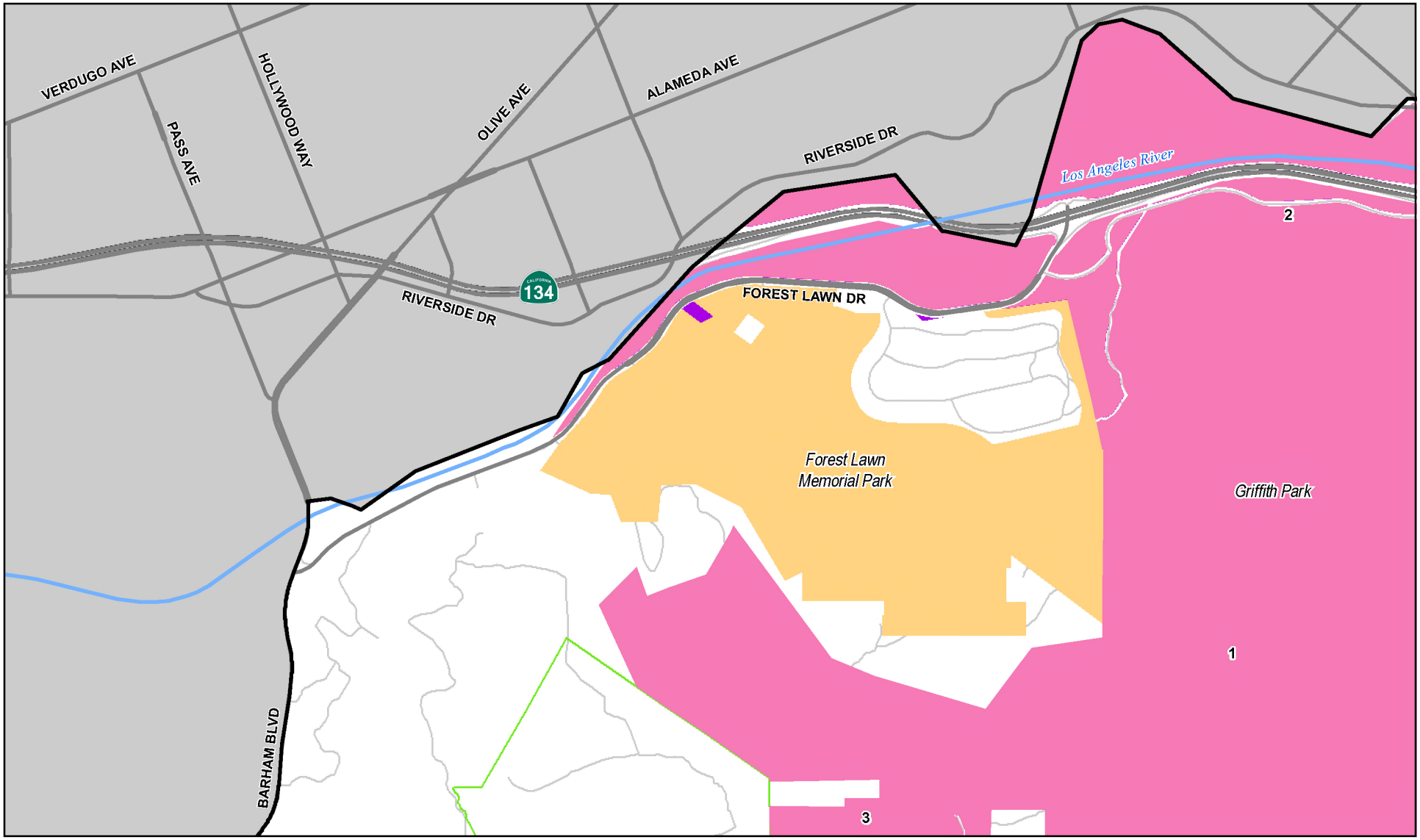
SOURCE: City of Los Angeles, 2018; TAHA, 2018.

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FIGURE 4.5-1A

INDEX MAP FOR
HISTORICAL RESOURCES



LEGEND:

- Hollywood CPA
- CPIO Boundary
- Designated Resources
- Eligible Resources
- City-Designated HCMs
- Demolished HCMs
- Historic Preservation Overlay Zones
- Hollywood Subareas

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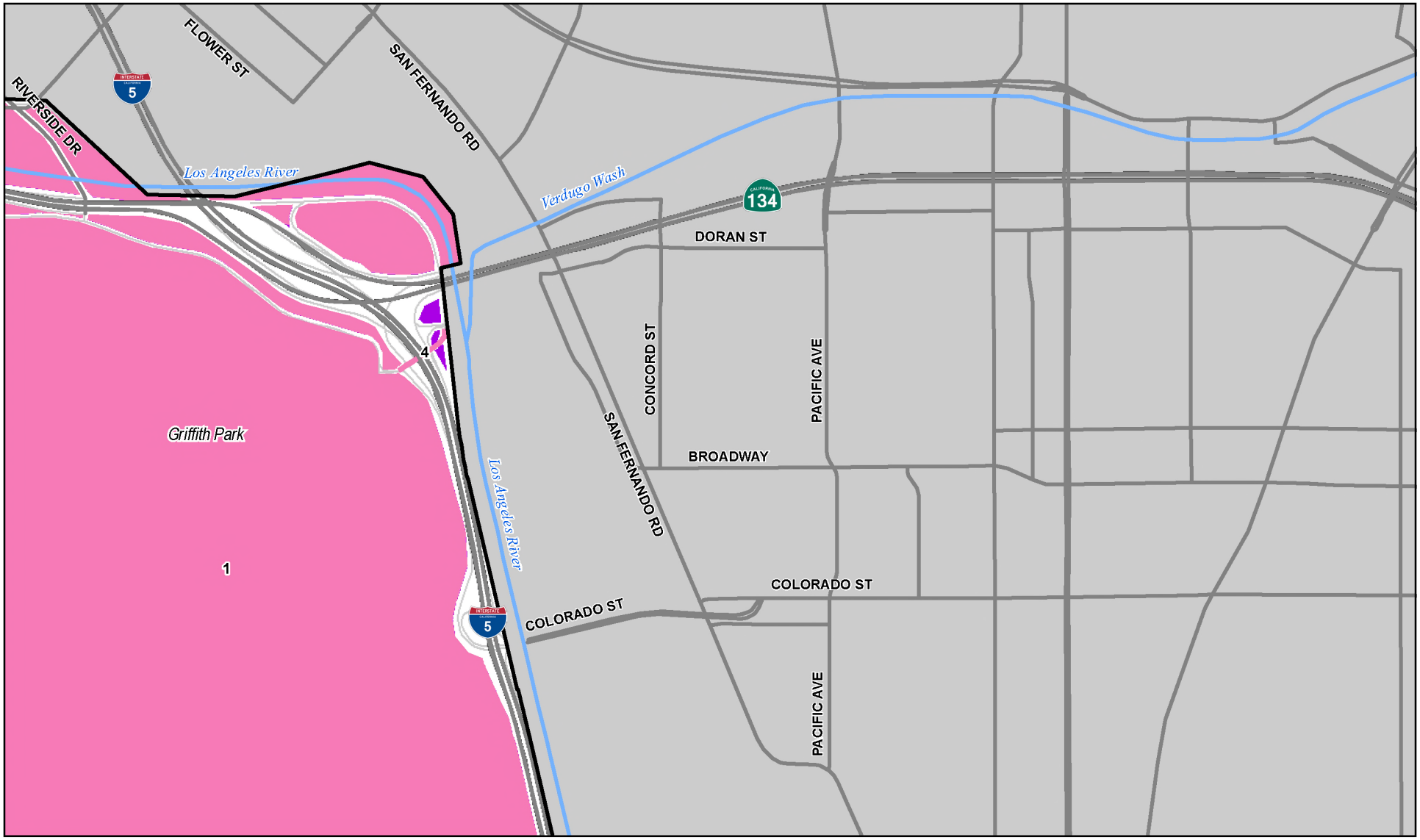
SOURCE: City of Los Angeles, 2018; TAHA, 2018.

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FIGURE 4.5-1B

HISTORICAL RESOURCES



LEGEND:

- Hollywood CPA
- CPIO Boundary
- Designated Resources
- Eligible Resources
- City-Designated HCMs
- Demolished HCMs
- Historic Preservation Overlay Zones
- Hollywood Subareas

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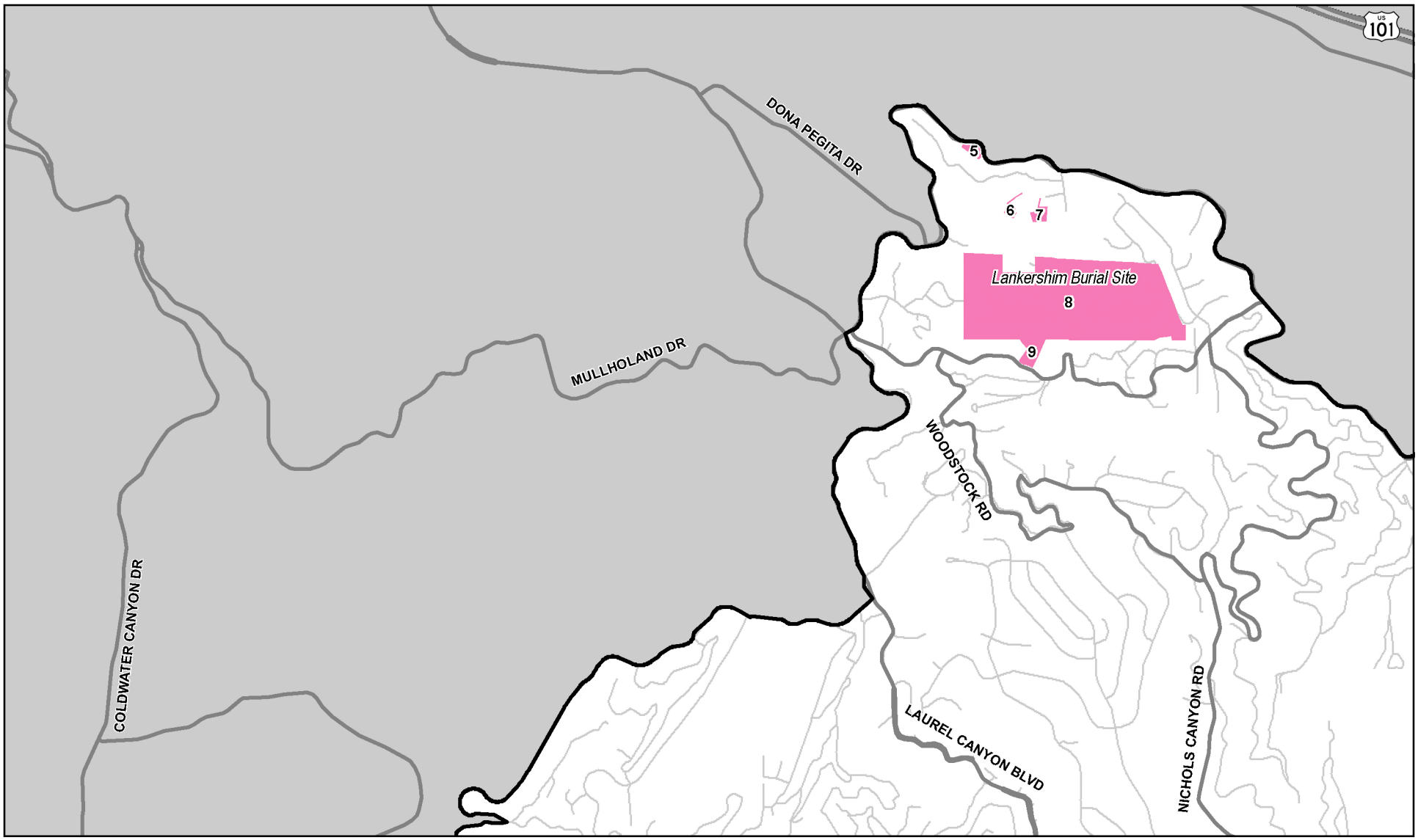
SOURCE: City of Los Angeles, 2018; TAHA, 2018.

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FIGURE 4.5-1C

HISTORICAL RESOURCES



LEGEND:

- Hollywood CPA
- CPIO Boundary
- Designated Resources
- Eligible Resources
- City-Designated HCMs
- Demolished HCMs
- Historic Preservation Overlay Zones
- Hollywood Subareas

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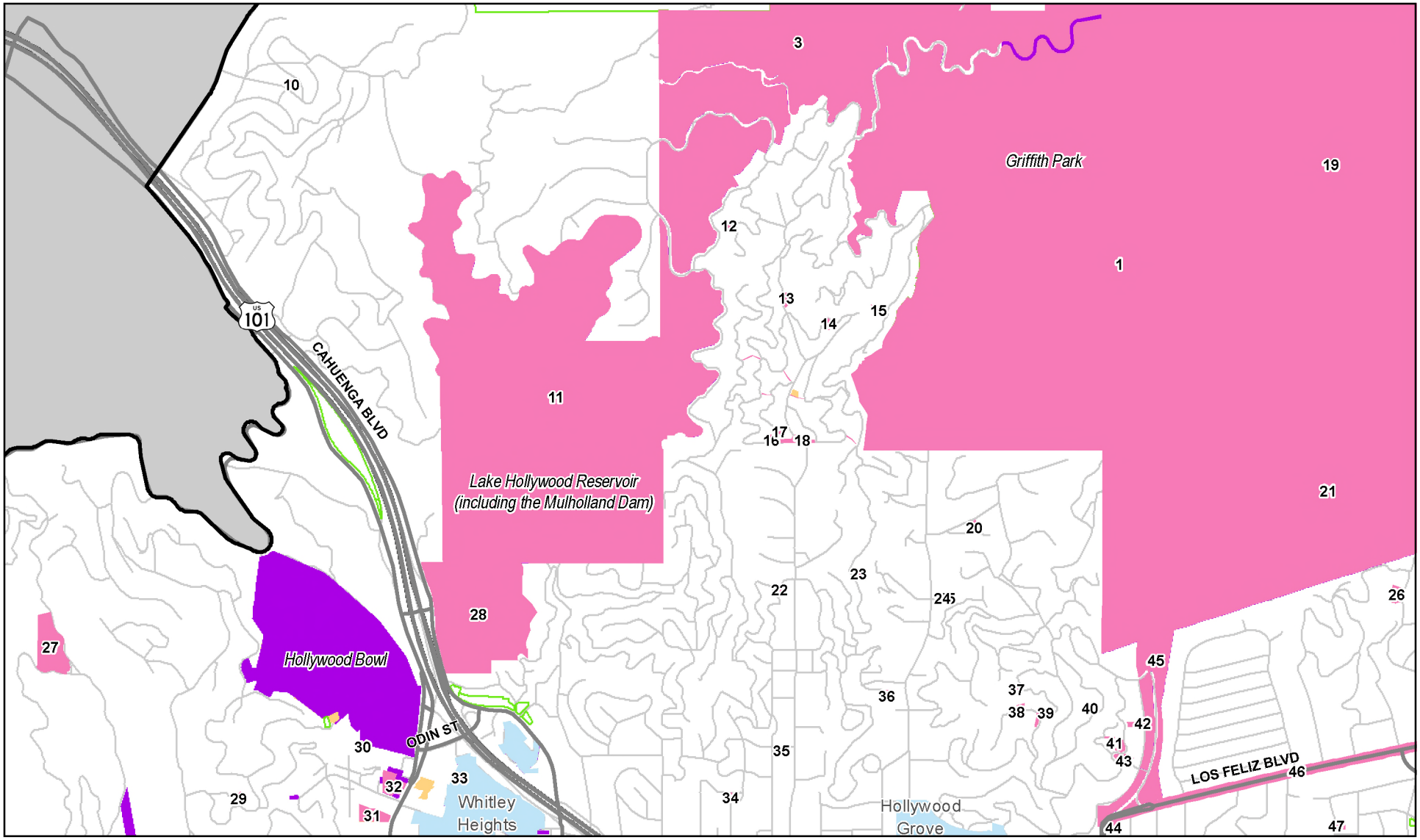
SOURCE: City of Los Angeles, 2018; TAHA, 2018.

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FIGURE 4.5-1D

HISTORICAL RESOURCES



LEGEND:

- Hollywood CPA
- CPIO Boundary
- Designated Resources
- Eligible Resources
- City-Designated HCMs
- Demolished HCMs
- Historic Preservation Overlay Zones
- Hollywood Subareas

N W E S

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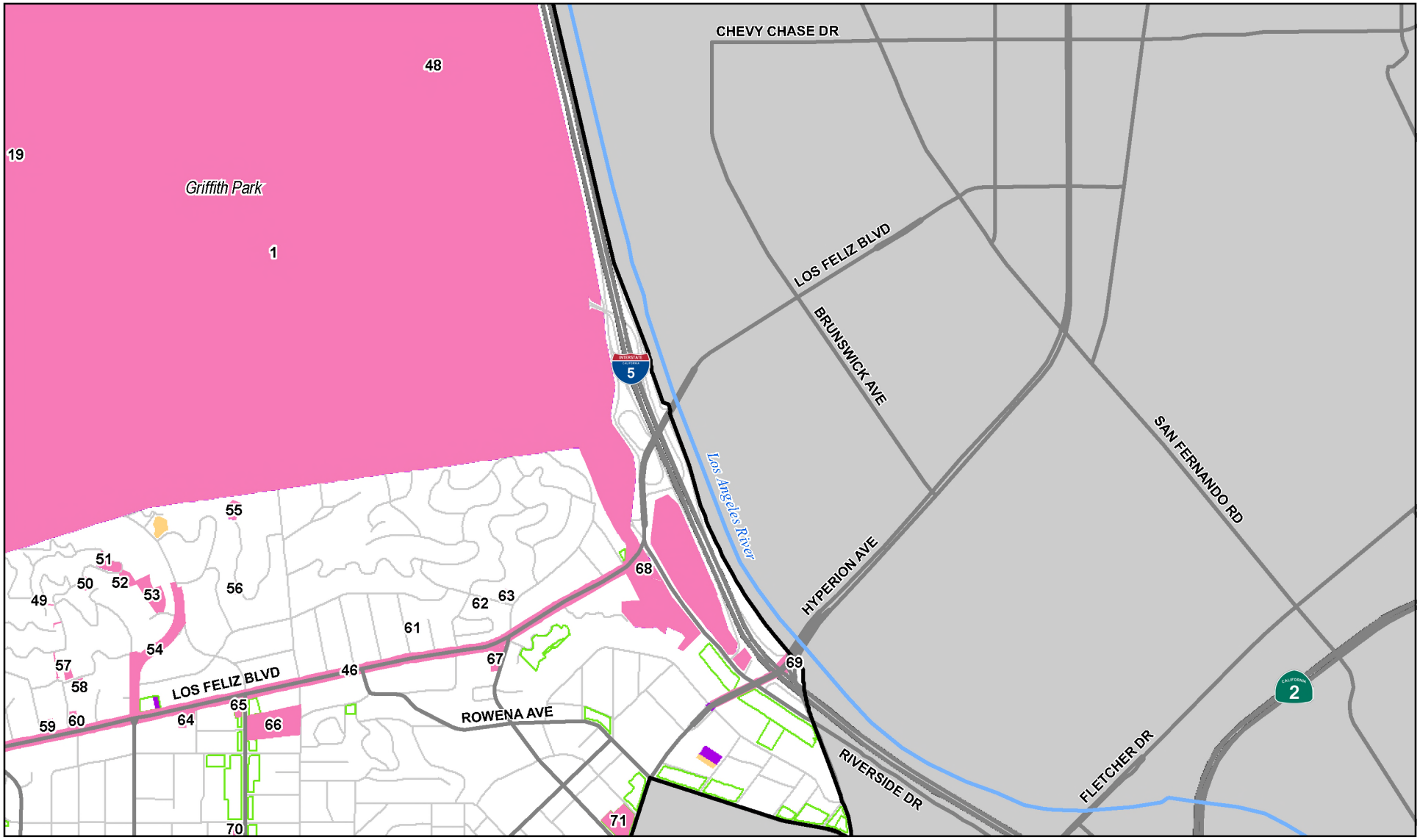
SOURCE: City of Los Angeles, 2018; TAHA, 2018.

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FIGURE 4.5-1E

HISTORICAL RESOURCES



LEGEND:

- Hollywood CPA
- CPIO Boundary
- Designated Resources
- Eligible Resources
- City-Designated HCMs
- Demolished HCMs
- Historic Preservation Overlay Zones
- Hollywood Subareas

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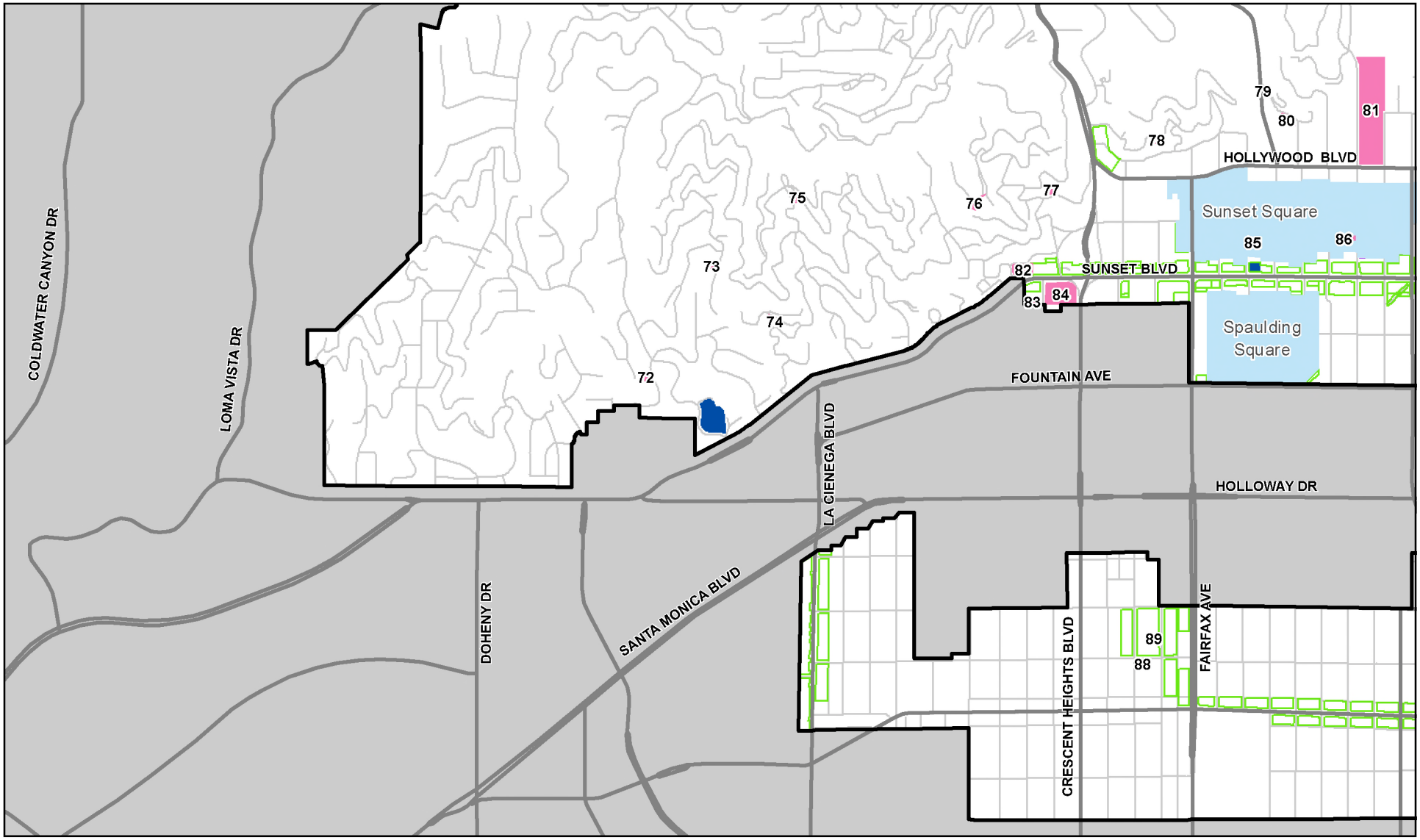
SOURCE: City of Los Angeles, 2018; TAHA, 2018.

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FIGURE 4.5-1F

HISTORICAL RESOURCES



LEGEND:

- Hollywood CPA
- CPIO Boundary
- Designated Resources
- Eligible Resources
- City-Designated HCMs
- Demolished HCMs
- Historic Preservation Overlay Zones
- Hollywood Subareas

N W E S

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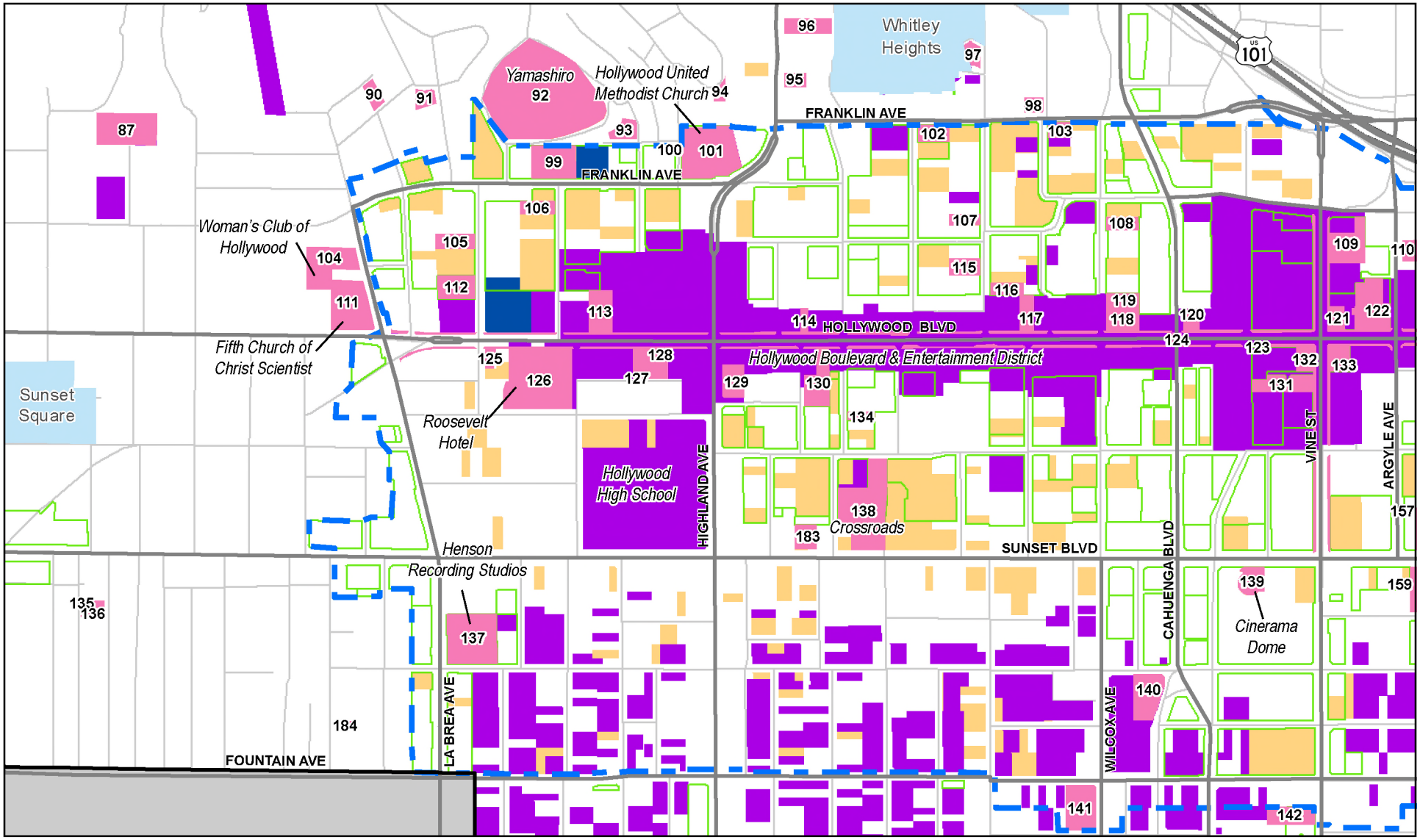
SOURCE: City of Los Angeles, 2018; TAHA, 2018.

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FIGURE 4.5-1G

HISTORICAL RESOURCES



LEGEND:

- Hollywood CPA
- CPIO Boundary
- Designated Resources
- Eligible Resources
- City-Designated HCMs
- Demolished HCMs
- Historic Preservation Overlay Zones
- Hollywood Subareas

N W E S

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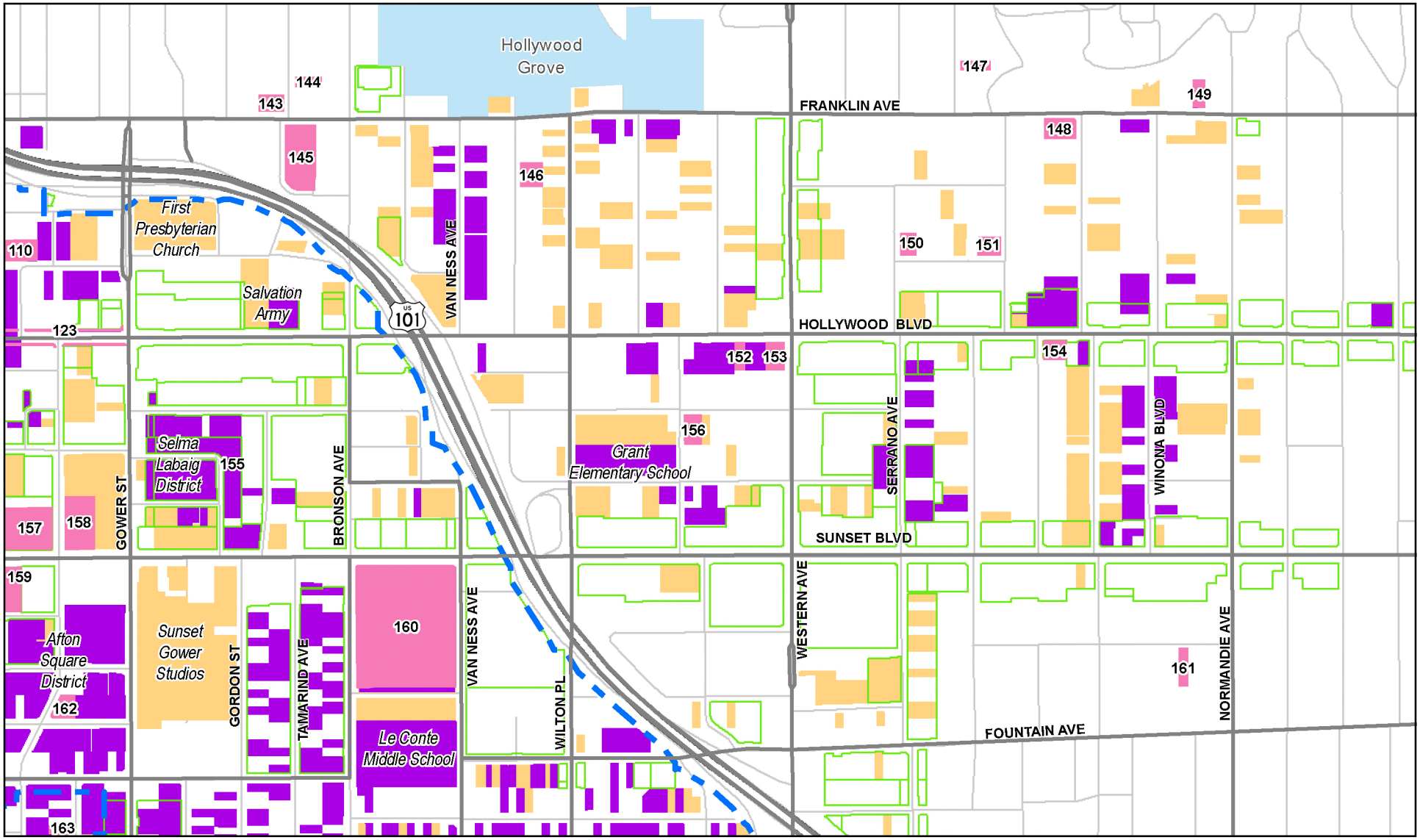
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CITY OF LOS ANGELES

FIGURE 4.5-1H(i)

HISTORICAL RESOURCES



LEGEND:

- Hollywood CPA
- CPIO Boundary
- Designated Resources
- Eligible Resources
- City-Designated HCMs
- Demolished HCMs
- Historic Preservation Overlay Zones
- Hollywood Subareas

N
W E
S

0 475 950 Feet

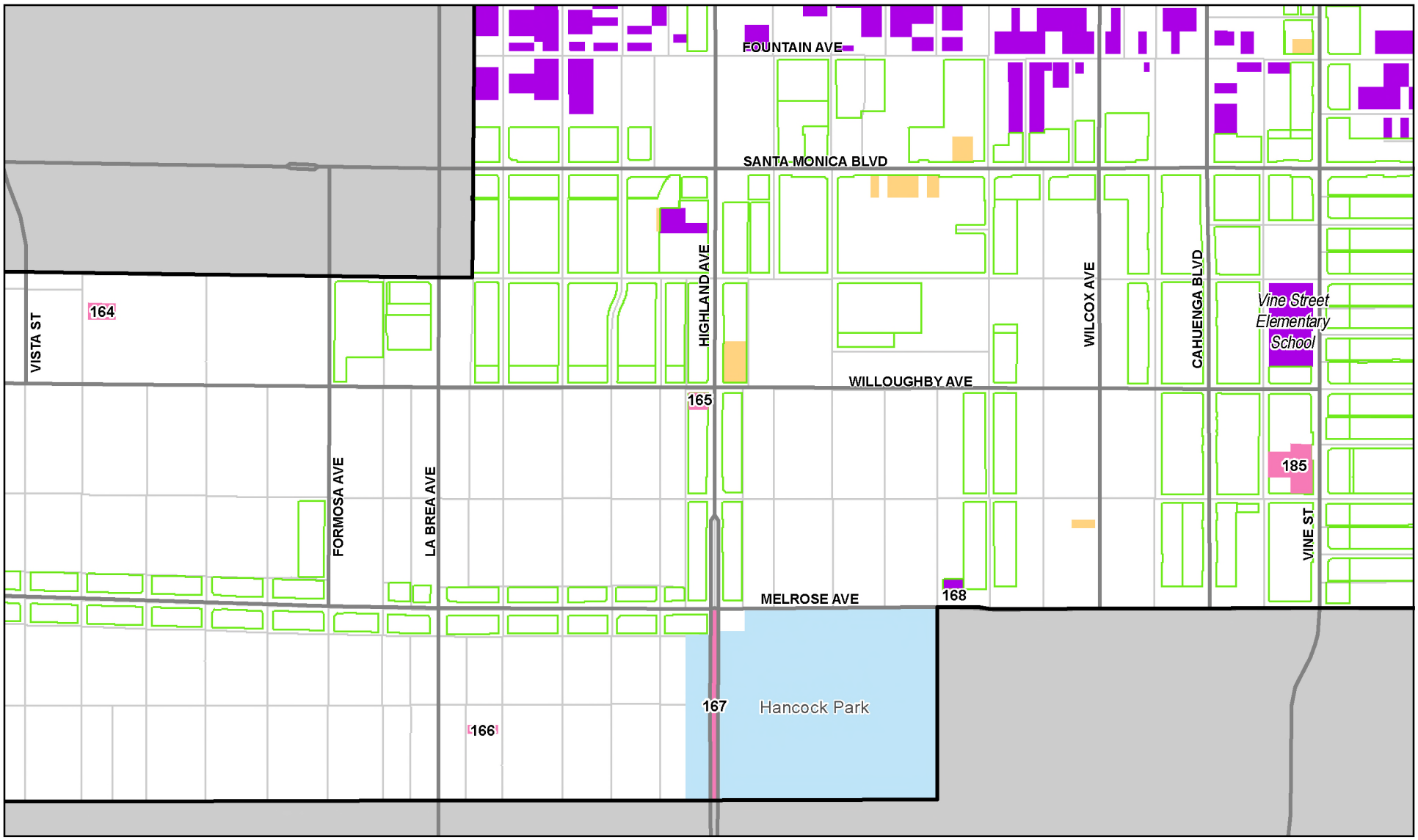
SOURCE: City of Los Angeles, 2018; TAHA, 2018.

taha environmental planners
taha 2010-073

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FIGURE 4.5-1H(ii)

HISTORICAL RESOURCES



LEGEND:

- Hollywood CPA
- CPIO Boundary
- Designated Resources
- Eligible Resources
- City-Designated HCMs
- Demolished HCMs
- Historic Preservation Overlay Zones
- Hollywood Subareas

N
W E
S

0 475 950 Feet

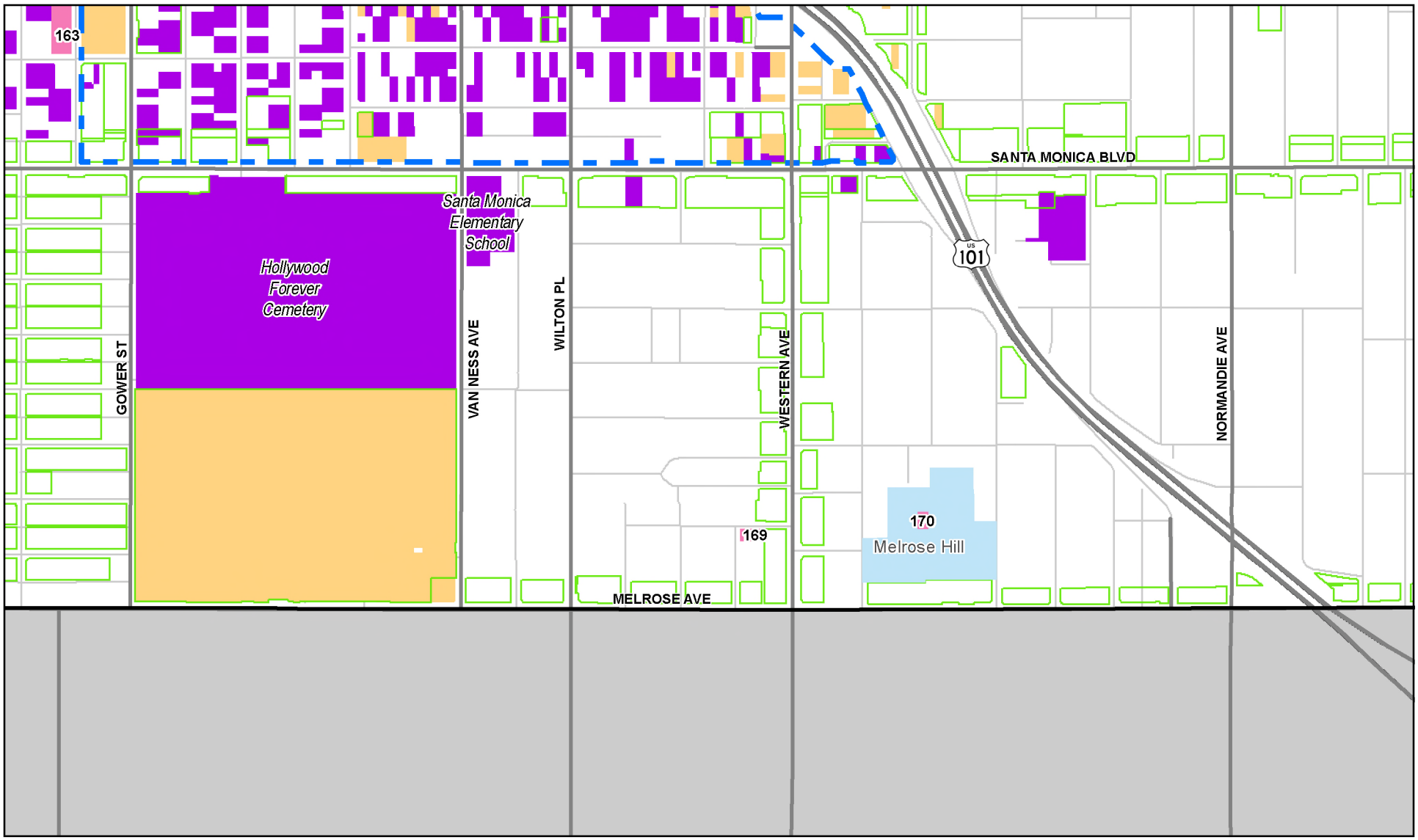
SOURCE: City of Los Angeles, 2018; TAHA, 2018.

taha environmental planners
taha 2010-073

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FIGURE 4.5-1H(iii)

HISTORICAL RESOURCES



LEGEND:

- Hollywood CPA
- CPIO Boundary
- Designated Resources
- Eligible Resources
- City-Designated HCMs
- Demolished HCMs
- Historic Preservation Overlay Zones
- Hollywood Subareas

N
W E
S

0 475 950 Feet

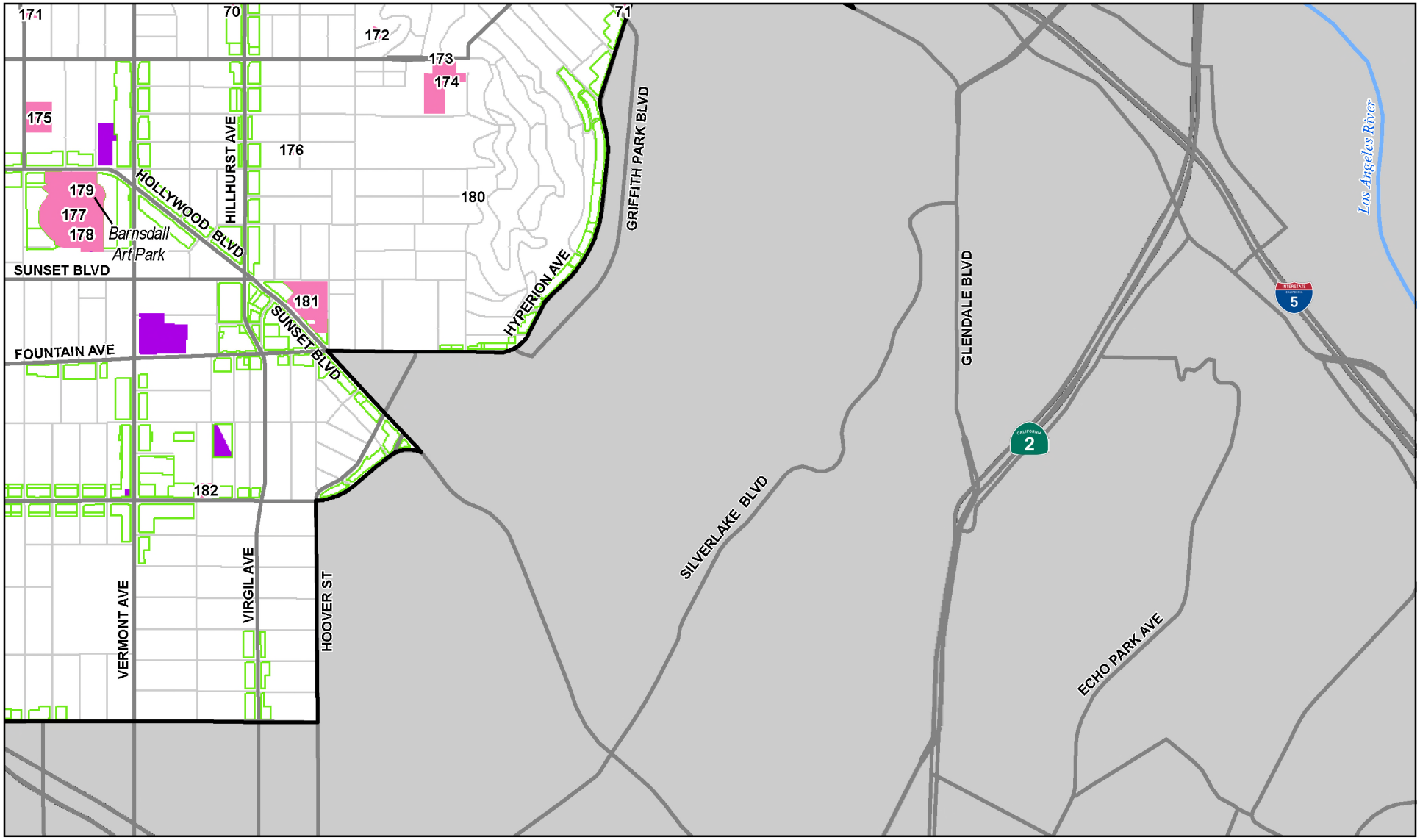
SOURCE: City of Los Angeles, 2018; TAHA, 2018.

taha environmental planners
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FIGURE 4.5-1H(iv)

HISTORICAL RESOURCES



LEGEND:

- Hollywood CPA
- CPIO Boundary
- Designated Resources
- Eligible Resources
- City-Designated HCMs
- Demolished HCMs
- Historic Preservation Overlay Zones
- Hollywood Subareas

N W E S

0 910 1,820 Feet

SOURCE: City of Los Angeles, 2018; TAHA, 2018.

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FIGURE 4.5-1I

HISTORICAL RESOURCES

Inventories of designated historical resources are continually updated by the inclusion of new resources. **Figures 4.5-1A** through **4.5-1I** are subject to change over time and should not be considered the single definitive list of historical resources in the Hollywood CPA. **Table 4.5-2** lists City-designated HCMs in Hollywood enumerated based on labels on **Figures 4.5-1A** through **4.5-1I** as of mid-June 2018. For up-to-date information on historical resources within the Plan Area, contact the Office of Historic Resources, Department of City Planning at http://preservation.lacity.org/ or (213) 978-1200.

TABLE 4.5-2: CITY DESIGNATED HISTORICAL CULTURAL MONUMENTS

Map ID No.	Monument No.	HCM Name	Address/Location
1	942	Griffith Park	4730 Crystal Springs Dr.; 3201, 3210 & 3401 Riverside Dr.; 2715 Vermont Ave.; 5333 Zoo Dr.
2	474	Little Nugget (Travel Town - Griffith Park)	5200 Zoo Dr.
3	111	Hollywood Sign and Land Underneath	Mount Lee
4	910	Riverside-Zoo Dr. Bridge	Bridge #53C1298
5	1072	Ray S. Linn House	7820 W. Mulholland Dr.
6	785	Chemosphere House	7776 W. Torreyson Dr.
7	896	Harpel House #1	7764 W. Torreyson Dr.
8	181	J. B. Lankershim Burial Place - site of (North End)	Nichols Canyon Road
9	325	Shulman House	7875-7877 Woodrow Wilson Dr.
10	1014	Ward-Berger House	3156 N. Lake Hollywood Dr.
11	421	Lake Hollywood Reservoir (including Mulholland Dam)	2460 Lake Hollywood Dr.
12	681	S.H. Woodruff Residence	3185 N. Durand Dr.
13	996	Garden of Oz	3040-3106 N. Ledgewood Dr.
14	630	Pierson Residence	3124 Belden Dr.
15	535	Hollywoodland's Historic Granite Retaining Walls and Stairs	Hollywoodland
16	648	Withers Residence	2731 Woodshire Dr.
17	715	Lehman House	2720 Belden Dr.
18	20	Two Stone Gates	Intersection of Beachwood Dr.; Belden Dr.; Westshire Dr.
19	1091	Dante's View	2801 N. Vermont Canyon
20	1080	Appel House	5730 W. Spring Oak Dr.
21	168	Griffith Observatory	2500 E. Observatory Road
22	1047	2494 Gower St. Bungalow Court	2494 N. Gower St.
23	833	Grier House	2690 N. Hollyridge Dr.
24	1031	Frederick A. Hanson Residence	5867 W. Tuxedo Terrace
25	1094	Gillespie House	5863 W. Tuxedo Terrace
26	689	Philip Chandler House	2531 N. Catalina St.
27	563	Lloyd Wright's Headley - Handley House	3003 Runyon Canyon Road
28	617	Hollywood Pilgrimage Memorial Monument	2580 Cahuenga Blvd.
29	1064	Abichandani Residence	7129 W. La Presa Dr.
30	846	B.A.G. Fuller Residence	6887 W. Alta Loma Terrace
31	462	Hollywood American Legion Post #43	2035 N. Highland Ave.
32	291	Highland-Camrose Bungalow Village	2103-2115 1/2 N. Highland Ave.; 6814-6836 Alta Loma Terrace; 6819 Camrose Ave.
33	603	Villa Vallambrosa	2074 Watsonia Terrace
34	755	Vista del Mar Steps	Between Vista del Mar and Holly Mont Dr.
35	874	Garber House	6060 Scenic Ave. (6058 original address)
36	1084	Villa Manola	5900 Manola Way
37	260	Edward's House	5642 Holly Oak Dr.

TABLE 4.5-2: CITY DESIGNATED HISTORICAL CULTURAL MONUMENTS

Map ID No.	Monument No.	HCM Name	Address/Location
38	840	Amsalem A. Ernst House	5670 Holly Oak Dr.
39	130	Samuel - Novarro House	5601-5609 Valley Oak Dr.; 2255 Verde Oak Dr.
40	301	Arzner / Morgan Residence	2249 Mountain Oak Dr.
41	915	Victor Rossetti Residence	2188 Ponet Dr.
42	1121	Franmar	2207 N. Fern Dell Pl.; 2206 N. Live Oak Dr. East
43	521	Taggart House	2150-2158 Live Oak Dr.; 5423 Black Oak Dr.
44	997	Clifford E. Clinton Residence	5470 W. Los Feliz Blvd.
45	112	Gabrielino Indian Site	Fern Dell (Griffith Park)
46	67	Cedar Trees	Los Feliz Blvd. (between Riverside Dr. and Western Ave.)
47	1027	John Anson Ford Residence	1976 N. Normandie Ave.
48	401	Feliz Adobe	4730 Crystal Springs Dr.
49	657	Los Feliz Heights Steps	Cromwell Ave.; Bonvue Ave.; Glencairn Road; Bryn Mawr Road; Glendower Ave.
50	1069	Hlaffer-Courcier Residence	2574 Glendower Ave.
51	149	Ennis - Brown House	2607 Glendower Ave.
52	812	Wirin House	2622 Glendower Ave.
53	916	Petitfils Residence	4519 W. Cockerham Dr.; 2441 N. Vermont Ave.
54	940	North Vermont Ave. Moreton Bay Fig Trees	Vermont Ave. between Los Feliz Blvd. and Aberdeen Ave.
55	123	Lovell House	4616 Dundee Dr.
56	674	Jacobson House	4520 Dundee Dr.
57	913	Blackburn Residence	4791 Cromwell Ave.
58	1117	Welfer Residence	4784 W. Cromwell Ave.
59	1061	Abraham Gore Residence	2208 N. Catalina St.
60	1113	Schlyen House	4773 W. Los Feliz Blvd.; 2210 N. Berendo St.
61	1065	McTernan Residence	2226 N. Wayne Ave.
62	1026	Sherwood House	3435 Amesbury Road
63	1025	Durex Model Home	3410 N. Amesbury Road
64	353	Monterey Apartments	4600-4604 Los Feliz Blvd.
65	843	Los Feliz Brown Derby	4500 Los Feliz Blvd.
66	343	Avocado Trees	4400 block Avocado St.
67	592	Philosophical Research Society	3341-3351 Griffith Park Blvd.; 3910-3918 Los Feliz Blvd.
68	162	William Mulholland Memorial Fountain	Riverside Dr. and Los Feliz Blvd.
69	164	Glendale / Hyperion Bridge	Los Angeles River
70	136	Saint Mary of the Angels	4510 Finley Ave.
71	163	First Walt Disney Studio - site of	2660-2664 & 2701-2739 N. Hyperion Ave.; 2646-2664 & 2710-2746 Griffith Park Blvd.; 3616-3618 Monon St. & 3027-3033 Angus St.
72	668	Hillside House by Carl Maston	8707 St. Ives Dr.
73	1040	1513 Forest Knoll Dr. Residence	1513 Forest Knoll Dr.
74	852	Wolff Residence	8530 W. Hedges Place
75	1100	Polito House	1650 N. Queens Road
76	670	Stahl House - Case Study House #22	1635 Woods Dr.
77	96	Storer House	8161 Hollywood Blvd.
78	1006	Kun Residence	7960 Fareholm Dr.
79	822	Hellman House	1845 N. Courtney Ave.
80	445	Courtney Desmond Estate	1801-1811 Courtney Ave.
81	579	Wattles Park (Mansion and Garden)	1824-1850 N. Curson Ave.; 1701-1755 Sierra Bonita Ave.; 7561 Hollywood Blvd.

TABLE 4.5-2: CITY DESIGNATED HISTORICAL CULTURAL MONUMENTS

Map ID No.	Monument No.	HCM Name	Address/Location
82	151	Chateau Marmont	8225 Marmont Lane; 8215-8221 Sunset Blvd.; 8244 Monteel Rd.
83	435	Andalusia Apartments	1471-1475 Havenhurst Dr.
84	1137	Lytton Savings	8150 W. Sunset Blvd.
85	235	Bollman House	1530-1534 N. Ogden Dr.
86	702	Hewitt Residence	1543 N. Curson Ave.
87	285	C.E. Toberman Estate	1847 Camino Palmero
88	1105	Edinburgh Bungalow Court	750-756 N. Edinburgh Dr.
89	231	El Greco Apartment	817-823 N. Hayworth Ave.
90	994	Arensberg-Stendahl Home Gallery	7065 W. Hillside Ave.
91	673	The Outpost 11	1851 Outpost Dr.
92	921	Yamashiro	1900, 1920, 1930, 1940, 1964 & 1966 N. Fitch Dr.; 1821,1831,1901, 1921, 1941, 1961 & 1999 N. Sycamore Ave.
93	821	Las Orchidias	1903 N. Orchid Ave.
94	247	Samuel Freeman House	1962 Glencoe Way
95	475	Highland Towers Apartments	1920-1928 N. Highland Ave.
96	397	Roman Gardens	2000 N. Highland Ave.
97	842	Ojai Apartments	1929-1933 N. Whitley Ave.
98	1095	N.F. Stokes Residence	1905 Grace Ave.
99	406	Magic Castle	7001 Franklin Ave.
100	956	Villa Bonita	1817 Hillcrest Rd.
101	248	First United Methodist Church of Hollywood	6817 Franklin Ave.
102	799	Chateau des Fleur	6626 Franklin Ave.
103	773	El Cabrillo Apartments	1832-1850 N. Grace Ave.
104	604	Hollywood School for Girls (Woman's Club of Hollywood)	1741-1751 N. La Brea Ave.
105	226	Masquers Club Building (site of)	1765 N. Sycamore Ave.
106	816	Nirvana Apartments	1775-1781 N. Orange Dr.
107	882	The Fontenoy	1811 N. Whitley Ave.
108	867	Mayfair Apartments and Rooftop Neon Sign	1760 N. Wilcox Ave.
109	857	Capitol Tower and Rooftop Sign	1740-1750 N. Vine St.; 6236 W. Yucca St.
110	567	Little Country Church of Hollywood	1750 N. Argyle Ave.; 6151-6161 Carlos Ave.
111	1097	Fifth Church of Christ Scientist	7107-7129 Hollywood Blvd.
112	775	El Cadiz Apartments	1721 N. Sycamore Ave.
113	55	Grauman's (Now Mann's) Chinese Theater	6915-6927 Hollywood Blvd.
114	453	Artisan's Patio Complex	6727-6733 Hollywood Blvd.
115	817	La Leyenda Apartments	1735-1737 N. Whitley Ave.
116	448	Whitley Court	1720-1728 Whitley Ave.
117	227	Janes House	6541 Hollywood Blvd.
118	316	William Stromberg Clock	6439 Hollywood Blvd.
119	572	Warner Brothers Hollywood Theater Building	6423-6445 Hollywood Blvd.; 1700-1718 Wilcox Ave.
120	334	Security Trust and Savings	6367-6385 Hollywood Blvd.; 1708 Cahuenga Blvd.
121	1088	Bank of Hollywood/Equitable Building	6253 W. Hollywood Blvd.
122	193	Pantages Theatre	6225-6249 Hollywood Blvd.; 1709-1715 Argyle Ave.
123	194	Hollywood Walk of Fame	Hollywood Blvd. (between Gower and La Brea) & Vine St. (between Sunset and Yucca)

TABLE 4.5-2: CITY DESIGNATED HISTORICAL CULTURAL MONUMENTS

Map ID No.	Monument No.	HCM Name	Address/Location
124	597	Raymond Chandler Square	Intersection of Hollywood Blvd. and Cahuenga Ave.
125	876	Hollywood Professional Building	7046 Hollywood Blvd.
126	545	Hollywood Roosevelt Hotel and Pool	7000-7034 Hollywood Blvd.; 7001-7039 Hawthorn Ave.
127	277	Hollywood Masonic Temple	6840 Hollywood Blvd.
128	495	El Capitan Theater Building	6834-6838 Hollywood Blvd.
129	593	Max Factor Make-Up Salon	1666 N. Highland Ave.
130	584	Egyptian Theater and Forecourt Storefronts	6706-6712 Hollywood Blvd.; 1650-1654 McCadden Place
131	665	Hollywood Plaza Hotel and Neon Sign	1633 Vine St.
132	664	Broadway Department Store and Neon Sign	6300 W. Hollywood Blvd.
133	666	Taft Building and Neon Sign	6280 W. Hollywood Blvd.
134	1114	Redwine Building	1618 N. Las Palmas Ave.
135	246	Residence	1443 N. Martel Ave.
136	527	Residence	1437 N. Martel Ave.
137	58	A & M Records Studio (Formerly Charlie Chaplin Studio)	1416 N. La Brea Ave.; 7053-7067 De Longpre Ave.
138	134	Crossroads of the World	1509-1597 Crossroads of the World; 6671-6679 Sunset Blvd.; 6678-6684 Selma Ave.; 1510-1536 N. Las Palmas Ave.
139	659	Pacific's Cinerama Dome Theater and Marquee	6360 Sunset Blvd.
140	165	Fire Station No. 27	1355 N. Cahuenga Blvd.; 1333 Cole Place
141	859	Orchard Gabels Cottage	1277 N. Wilcox Ave.; 6516 W. Fountain Ave.
142	675	Villa Elaine	1241-1249 N. Vine St.
143	315	Villa Carlotta	5959 Franklin Ave.
144	687	Tornborg House	1918 N. Tamarind Ave.
145	329	Chateau Elysee	5925-5939 Yucca St.; 5930-5936 Franklin Ave.; 1806-1830 Tamarind Ave.
146	1070	The Polynesian	1830 N. Taft Ave.
147	1003	Ralph J. Chandler Residence	1926 N. Hobart Blvd.
148	832	Casa Laguna	1855-1883 N. Kingsley Dr.
149	762	John Sowden House	5121 Franklin Ave.
150	616	The Trianon and Neon Roof Sign	1750-1754 N. Serrano Ave.
151	769	Toberman House	1749 N. Harvard Blvd.
152	382	Falcon Studios	5524 Hollywood Blvd.
153	336	Hollywood Western Building	5500-5510 Hollywood Blvd.; 1669-1685 N. Western Ave.
154	714	Don Carlos Apartments	5226 Hollywood Blvd.
155	801	The Courtyard Apartments	1570 Labaig Ave.
156	441	Dunning House	5552 Carlton Way; 1606-1616 Saint Andrews Place
157	1130	Hollywood Palladium	6201-6225 Sunset Blvd.
158	947	CBS Columbia Square Studios	1526-1528 El Centro Ave.; 6121-6125 W. Sunset Blvd.
159	1136	Earl Carroll Theater	6220-6230 Sunset Blvd.
160	180	Filming of First Talking Film - site of	5800-5858 Sunset Blvd.; 1424-1456 Bronson Ave.
161	912	Bukowski Court	5124-5126 1/2 W. De Longpre Ave.
162	463	Afton Arms Apartment	6141 Afton Place
163	175	YWCA Hollywood Studio Club	1215-1233 Lodi Place
164	783	Covert Cottages Bungalow Court	938-944 1/2 N. Martel Ave.
165	508	Gilmore Gasoline Service Station	853-859 N. Highland Ave.; 6800 Willoughby Ave.
166	733	The Garrick	539 N. Sycamore Ave.

TABLE 4.5-2: CITY DESIGNATED HISTORICAL CULTURAL MONUMENTS

Map ID No.	Monument No.	HCM Name	Address/Location
167	94	Palm Trees (Queen & Washingtonia Robusta) and the Median Strip	Highland Ave. (between Wilshire Blvd. and Melrose Ave.)
168	303	John C. Fremont Branch Library	6121 Melrose Ave.
169	390	Jardinette Apartments	5128 Marathon St.
170	777	Weaver Residence	4940 Melrose Ave.
171	1068	J.W. Blank Residence	1950 N. Edgemont St.
172	690	Eliot House	4237 Newdale Dr.
173	126	Franklin Ave. Bridge (Shakespeare Bridge)	Franklin Ave.
174	553	Midtown School (site plus four John Lautner Buildings)	4155 Russell Ave.
175	559	Thirteenth Church of Christ Scientist	1748-1780 N. Edgemont St.
176	1132	Charlotte and Robert Disney House	4406 Kingswell Ave.
177	34	Barnsdall Art Park	4800 Hollywood Blvd.
178	12	Hollyhock House	4800 Hollywood Blvd.
179	33	Barnsdall Park Arts Center (Residence A)	4800 Hollywood Blvd.
180	784	Paul Lauritz House	3955 Clayton Ave.
181	198	KCET Studios	4391-4421 Sunset Blvd.; 1327-1435 N. Hoover St.
182	314	Cahuenga Branch Library	4591 W. Santa Monica Blvd.
183	1151	Hollywood Reporter Building	6709-6713 1/2 W Sunset Blvd.
184	1153	Village Court	1328-1330 1/2 North Formosa Ave.
185	1158	Musicians Union of Hollywood	590 W. Waring; 807-831 N. Vine St.; 808-820 Lillian Way

SOURCE: City of Los Angeles, 2018.

National and California Registers of Historic Places

A number of National Register-listed districts and California Register-listed districts are located in the Project Area. The National Register-listed districts in the Project Area include the following:

- Hollywood Boulevard Commercial and Entertainment District
- Highland-Camrose Bungalow Village
- Hollywood Forever Cemetery
- Whitley Heights Historic District

The California Register-listed districts in the Project Area include the following:

- Afton Square District Contributor
- East Hollywood Boulevard District
- Hollywood Reservoir Complex Districts
- Selma-LaBaig District Contributor
- Serrano District
- Toberman Storage Company (Bekins Van and Storage)
- Vista Del Mar/Carlos District

Historic-Cultural Monuments (HCMs)

The City of Los Angeles HCM designation recognizes buildings, structures, sites, or plant life as important to the history of the city, state, or nation. The City's Office of Historic Resources has recorded over 1,000 HCMs citywide, providing official recognition and protection for Los Angeles' most significant historical resources.[7] The locations of HCMs in the Project Area are shown in **Figures 4.5-1A** through **4.5-1I**.

Historic Preservation Overlay Zones (HPOZs)

The Project Area contains six existing HPOZs. The locations of these HPOZs are shown in **Figures 4.5-1A** through **4.5-1I** and are described below.

- **Hancock Park**. The residential subdivision of Hancock Park was developed in the 1920s. Outstanding architects of the era designed the palatial two-story, single-family residences in various Period Revival styles (including Tudor Revival, English Revival, Spanish Colonial Revival, Mediterranean Revival, Monterey Revival, and American Colonial Revival) for influential members of Los Angeles society. A small portion of this HPOZ is located within the Hollywood CPA but the majority of it is in the adjacent Wilshire CPA.
- **Melrose Hill**. Melrose Hill is a small neighborhood that illustrates why Los Angeles is known as "the bungalow capital of the world." The modest single-family homes of this tree-shaded community were built between 1911 and 1926, at the height of the popularity of the California bungalow.
- **Spaulding Square**. A neighborhood of modest one-story Period Revival styles houses built between 1916 and 1926, Spaulding Square was named after real estate speculator Albert Starr Spaulding who purchased and subdivided the land in 1914. Spaulding attracted buyers to the area using a "lecture and lunch" strategy whereby interested buyers received a free streetcar ride, a meal, and a talk on the endless possibilities of the area. The neighborhood location off Sunset Boulevard made it an appealing place for film technicians and up-and-coming actors to settle.
- **Whitley Heights**. Whitley Heights is located east of the Hollywood Bowl and occupies an area of lush hilly terrain to the north of Franklin Avenue. H.W. Whitley, who also helped develop Reseda, Van Nuys, and Hollywood, considered Whitley Heights his "crowning achievement." Architect A.S. Barnes designed the majority of the residences in Whitley Heights from 1918 to 1928. Unfortunately, the construction of the Hollywood Freeway divided the original layout of the neighborhood and destroyed many houses. However, the use of the Spanish Colonial Revival style in Whitley Heights led the way for the popularity of this architectural style throughout Los Angeles.
- **Hollywood Grove**. Hollywood Grove is a small neighborhood composed of Turn-of-the-20th-Century houses in the foothills of the Hollywood Hills. The neighborhood, a collection of Craftsman and American Colonial Revival bungalows (with a noticeable number of Period Revival houses as well), stands out as a strong indication of what a typical residential subdivision once looked like in the Hollywood community.
- **Sunset Square**. Sunset Square is composed of single- and multi-family residences constructed primarily in the first half of the 20th century, with most of the construction occurring between 1910 and the 1920s. The dominant architectural styles are Craftsman, Spanish Colonial Revival, and American Colonial Revival; other styles include Tudor Revival, Mediterranean Revival, French Revival, and Minimal Traditional.

[7] A list of the HCMs with the Project Area can be found on the City of Los Angeles Office of Historic Resources website at http://cityplanning.lacity.org/complan/HCM/dsp_hcm_result.cfm?community=Hollywood.

SurveyLA

SurveyLA is a citywide survey that identifies and evaluates individual resources (such as buildings, structures, objects), non-parcel resources (such as natural features, landscapes, and public art), and historic districts for eligibility for listing in the National Register, California Register, and local designation as an HCM or HPOZ. The survey covers the period from approximately 1850 to 1980. Significant resources reflect important themes in the city's growth and development in various areas, including architecture, city planning, social history, ethnic heritage, politics, industry, transportation, commerce, entertainment, and others.

The survey generally does not include properties constructed after 1980, resources that have been designated under federal, state, or local programs, and proposed HPOZs that have been surveyed within the last five years of the SurveyLA Historic Resources Survey Report for the Hollywood CPA. Additionally, the survey does not include the properties located within the Hollywood Redevelopment Project Area, which was surveyed by the CRA prior to 2010.[8]

SurveyLA findings are subject to change over time as properties age, additional information is uncovered, and more detailed analyses are completed. SurveyLA evaluates properties within the survey area for significance and eligibility for historical designation. Designation at the federal, state, or local levels would require additional review through each respective designation process. SurveyLA identifies the following resource types:

- **Individual Resources** are generally resources located within a single assessor parcel such as a residence or duplex. However, a parcel may include more than one individual resource, if each appears to be significant.
- **Non-Parcel Resources** are not associated with Assessor Parcel Numbers and generally do not have addresses. Examples may include street trees, street lamps, landscaped medians, bridges, and signs.
- **Historic Districts** and Multi-Property Resources are areas that are related geographically and by theme. Districts may include single or multiple parcels depending on the resource. Examples of resources that may be recorded as historic districts include residential neighborhoods, garden apartments, commercial areas, large estates, school and hospital campuses, and industrial complexes. These areas require additional analysis and field work for HPOZ determination. District contributors and non-contributors are located within resources recorded as historic districts. Non-contributing resources may be those that are extensively altered, built recently, or that do not relate to historic contexts and themes defined for the district.
- **Planning Districts** are areas that are related geographically and by theme, but do not meet eligibility standards for designation, and as such are not considered "historical resources" as defined by CEQA (and will not be analyzed as such for purposes of this EIR). This is generally because the majority of the contributing features have been altered, resulting in a cumulative impact on the overall integrity of the area and making it ineligible as a Historic District. The Planning District determination, therefore, is used as a tool to inform new Community Plans being developed by the Department of City Planning. These areas have consistent planning concepts, such as height, massing, setbacks, and street trees, which may be considered in the local planning process.

[8]The methodology used for SurveyLA can be found at the SurveyLA, http://preservation.lacity.org/news/field-survey-methodology and http://preservation.lacity.org/surveyla-findings-and-reports#Hollywood.

The California State Office of Historic Preservation developed California Historical Resource (CHR) Status Codes as a standardized system for classifying historical resources in the State's Historic Resources Inventory. Field surveyors applied the following CHR Status Codes when evaluating properties for SurveyLA.

- 3S – Appears eligible for National Register as an individual property through survey evaluation.
- 3CS – Appears eligible for California Register as an individual property through survey evaluation.
- 5S3 – Appears to be individually eligible for local listing or designation through survey evaluation.
- 6L – Property identified through the SurveyLA process as ineligible for National Register, California Register or local designation; may warrant special consideration for local planning.
- 6LQ – Determined ineligible for local listing or designation as a historic district through a survey process; neighborhood or area may warrant special consideration for local planning. This Status Code is used for Planning Districts.
- 6Z – Found ineligible for National Register, California Register or local designation through survey evaluation.
- 7RQ – Individual property identified in a SurveyLA Survey – Not evaluated

This status code is used to identify properties that were considered during the field survey process but were not recorded as significant based on the following: 1) field observations regarding the overall quality of the resource and alterations and/or 2) no preloaded information relating to the social, cultural or historical significance of the resource was obtained through SurveyLA research or the Public Participation and Outreach Program. A 7RQ status code does not preclude that a resource may be found to be significant with additional research, new information, and analysis.

- 7SQ – Individual property assessed for significance in accordance with the SurveyLA Multiple Property Documentation approach and citywide Historic Context Statement but does not meet eligibility standards.
- QQQ – Properties requiring additional research to evaluate or that cannot be evaluated due to limited or no visibility.

SurveyLA identifies numerous potentially eligible properties in the Project Area that fall under one or more of the above resource types. Properties in the Project Area identified by SurveyLA as eligible for historic designation include single-family homes, multi-family buildings, commercial buildings, institutional properties, and industrial buildings. A large number of single-family and multi-family buildings have been identified appearing individually eligible for historic designation because they contribute to the history of Hollywood; are representative of a particular architectural style; embody distinctive characteristics of a period in history; represent the work of a master architect; and/or are associated with an important person in history, many of which are associated with the entertainment industry.

Commercial resources that were identified as potentially eligible for historic designation include retail development, auto-related commercial development, theaters, financial institution, restaurants, night clubs, and signs. Commercial buildings were identified as appearing individually eligible for historic designation because they contribute to the history of Hollywood, are representative of a particular architectural style, and/or represent a period of development. Many of the commercial resources are examples of streetcar-related commercial development in Hollywood.

Eligible industrial buildings are mostly associated with the entertainment industry. Industrial buildings were identified as appearing individually eligible for historic designation because they contribute to the history of the entertainment industry, are representative of a particular architectural style, and/or are representative of a period of development in the entertainment industry.

Eligible institutional properties include religious facilities, social halls, schools, government buildings (such as fire stations and pumping plants), and medical facilities. Institutional buildings were identified as appearing individually eligible for historic designation because they are representative of a particular architectural style, a period of development, or a group of persons in history. Many of the religious facilities that were identified are associated with the Krotona Colony, a Theosophical society established in lower Beachwood Canyon in 1912.

A number of non-parcel resources were identified in the Project Area. These non-parcel resources include air raid sirens, stairways, entrance markers and gates, bridges, landscaping, elevator tower, pedestrian tunnels, retaining walls, fountains. These resources are representative of a period of development or features that are unique to the area. The Project Area contains several public stairways and an elevator tower, which are examples of non-parcel resources that are unique features of hillside residential development in Los Angeles.

SurveyLA identified numerous eligible historic districts in the Project Area, many of which are bungalow courts. As explained above, bungalow courts have particular significance in Hollywood as many bungalow courts were built in the 1920s-30s to accommodate people working in the entertainment industry.[9]

Figures 4.5-2A through **4.5-2C** show the locations of the districts, multi-property sites, non-parcel, and individual properties in the Project Area identified by SurveyLA as potentially eligible for historic designation.

Historic Resources Survey: Hollywood Redevelopment Project Area

The Historic Resources Survey for the Hollywood Redevelopment Project Area, published February 2010, evaluated properties for eligibility for local, state, or national designation to focus effort on preserving those buildings that best illustrate the unique narratives of the Hollywood Redevelopment Project Area, while allowing for appropriate economic development.[10] The Hollywood Redevelopment Project Area is approximately 1,107 acres in size and is completely within the Hollywood CPA. While the themes and contexts for this historical resources survey are consistent with those developed for SurveyLA, those significant to Hollywood are given greater emphasis, specifically property types associated with the entertainment industry context and connected themes as Hollywood is nearly synonymous with this theme.

The survey identified 41 properties as appearing individually eligible for listing in the National Register. These resources would also be eligible for listing in the California Register and for local HCM designation. The survey also found 137 properties and eight historic districts that appear to be eligible for listing in the California Register. The 137 properties that appear to be eligible for individual listing in the California Register would also be eligible for local HCM designation. The survey identified 13 properties that appear individually eligible for local HCM designation, and three potentially eligible HPOZs.[11]

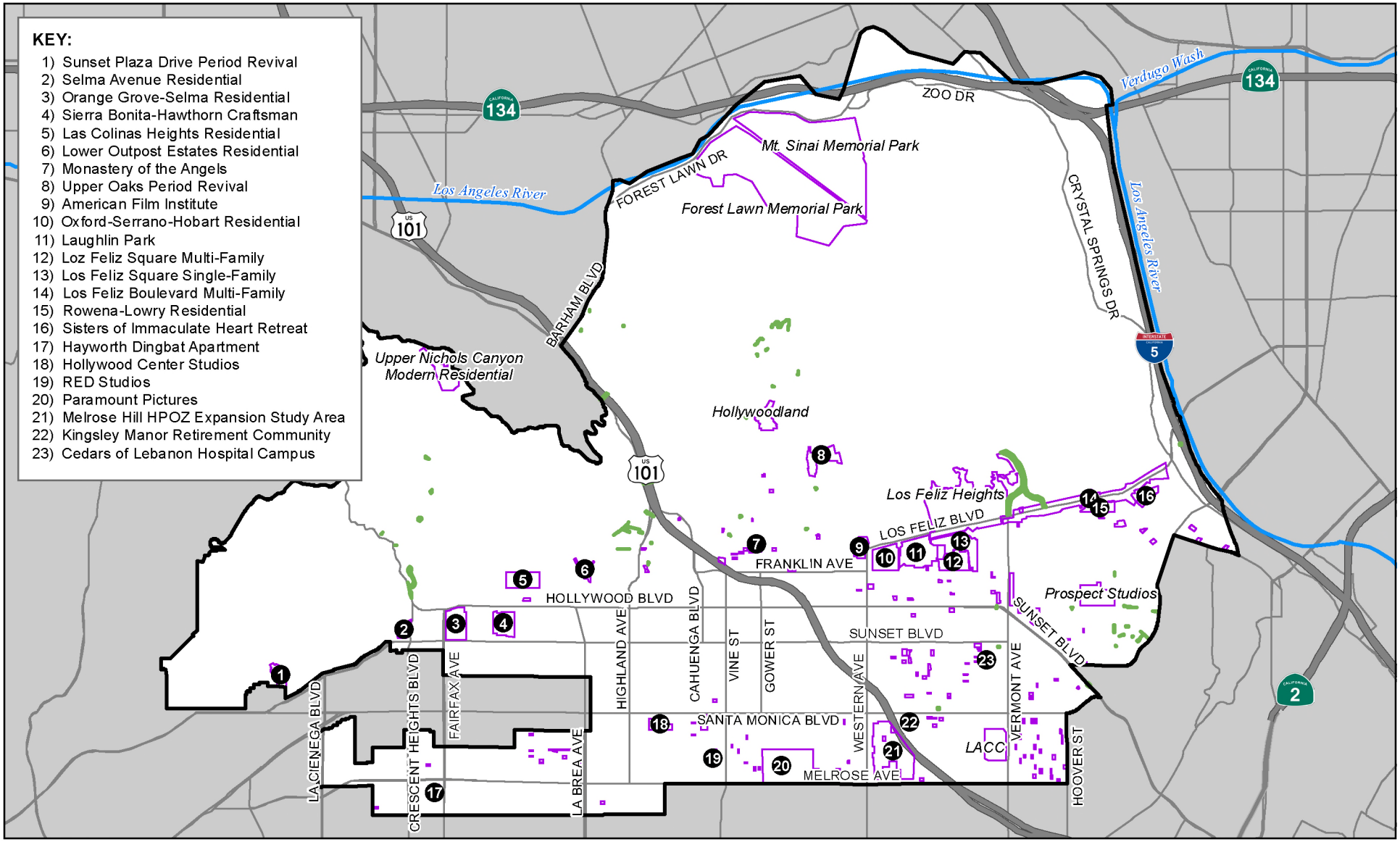
The locations of the properties within the Hollywood Redevelopment Project Area that were identified as potentially eligible for historic designation in the 2010 survey are shown in **Figures 4.5-1A** through **4.5-1I**. In the interests of being conservative, this EIR treats properties identified in this survey as having designated or eligible resources as historical resources.

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[9]The findings for the Project Area are located at the SurveyLA, http://preservation.lacity.org/surveyla-findings-and-reports#Hollywood).

[10]The methodology used in the Historic Resources Survey for the Hollywood Redevelopment Project Area can be found in the following website: http://preservation.lacity.org/surveyla-findings-and-reports#Hollywood.

[11]The findings for the Project Area are located at the SurveyLA, http://preservation.lacity.org/surveyla-findings-and-reports#Hollywood.



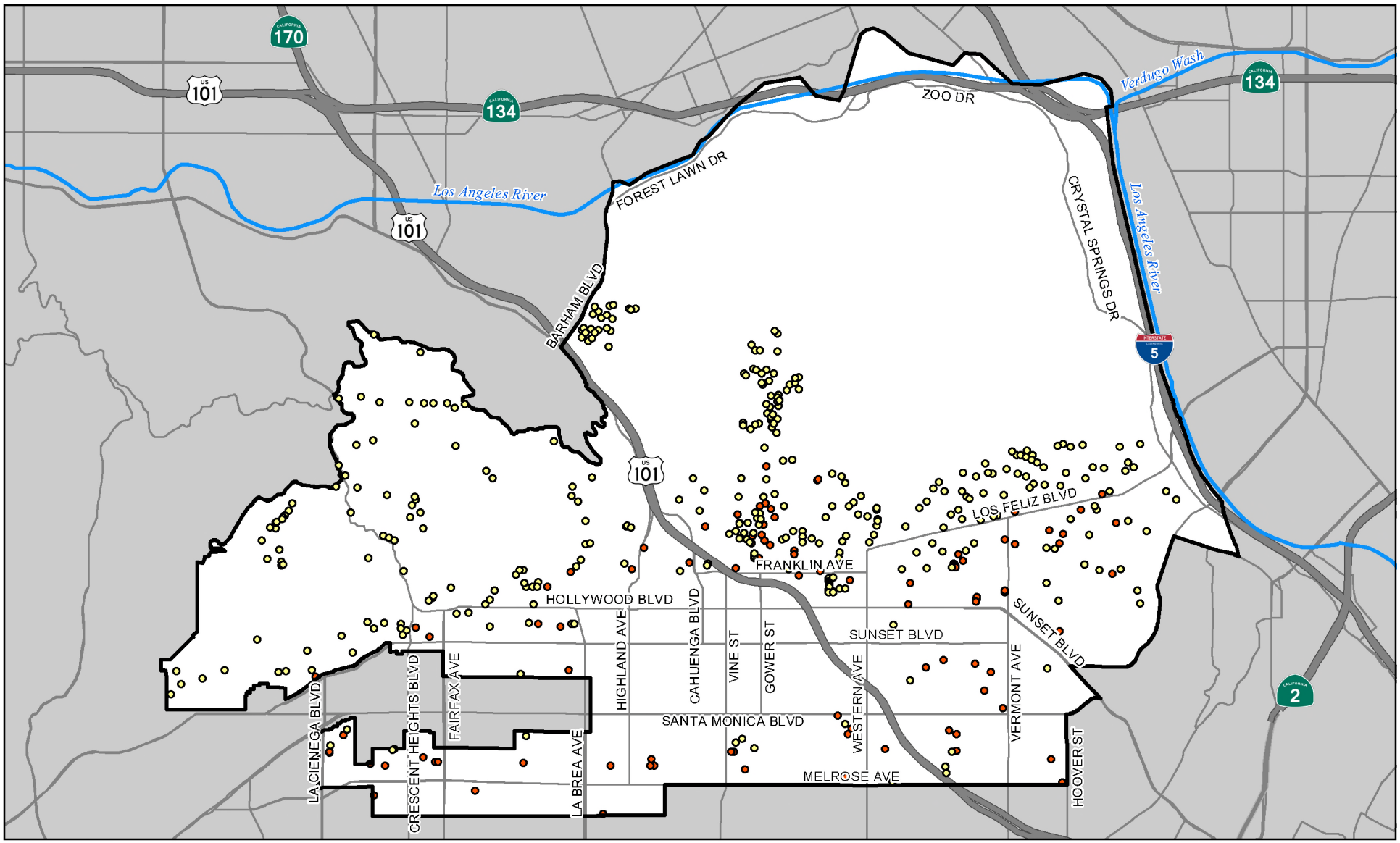
SOURCE: City of Los Angeles, 2017; TAHA, 2018.

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FIGURE 4.5-2A

DISTRICTS, MULTI-PROPERTY RESOURCES, AND NON-PARCEL RESOURCES POTENTIALLY ELIGIBLE FOR HISTORIC PRESERVATION SURVEYLA



LEGEND:

Hollywood CPA ○ Single-Family Resources ● Multi-Family Resources

N W E S

0 2,800 5,600 Feet

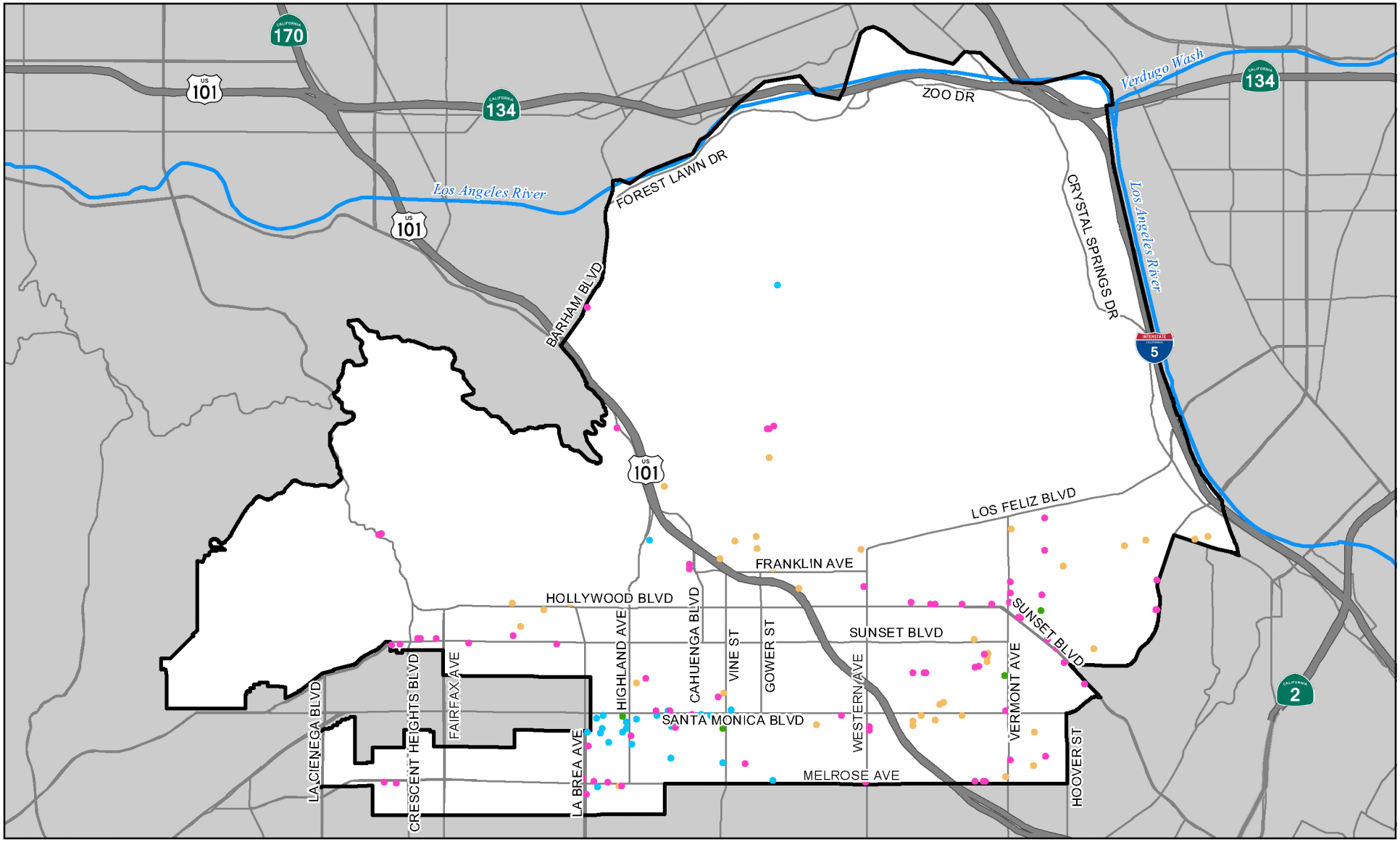
SOURCE: City of Los Angeles, 2017; TAHA, 2018.

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FIGURE 4.5-2B

INDIVIDUAL RESOURCES (RESIDENTIAL)
POTENTIALLY ELIGIBLE FOR HISTORIC PRESERVATION SURVEYLA



LEGEND:

Hollywood CPA | Commercial Resources | Infrastructure Resources | Institutional Resources | Industrial Resources

N W E S

0 2,800 5,600 Feet

SOURCE: City of Los Angeles, 2017; TAHA, 2018.

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FIGURE 4.5-2C

INDIVIDUAL RESOURCES (NON-RESIDENTIAL)
POTENTIALLY ELIGIBLE FOR HISTORIC PRESERVATION SURVEYLA

ARCHAEOLOGICAL AND TRIBAL CULTURAL RESOURCES

Pre-historic and historic archaeological sites exist throughout the City. Hunter-gatherer tribes inhabited the Los Angeles region long before Europeans arrived. Remnants of their various cultures continue to be unearthed and documented. Before the Spaniards arrived, portions of the City, including the Project Area was inhabited by the Gabrielino or Tongva-speaking Indians, who may have left behind archaeological resources that may still exist within the Project Area. Gabrielino territory included the watersheds of the San Gabriel, Santa Ana, and Los Angeles rivers; portions of the Santa Monica and Santa Ana mountains; the Los Angeles basin; the coast from Aliso Creek to Topanga Creek; and San Clemente, San Nicolas, and Santa Catalina Islands.

The Gabrielino had an elaborately developed material culture. Technological and artistic items included shell set in asphalt; carvings; paintings; extensive steatite industry; baskets; and a wide range of stone, shell, and bone objects that were both utilitarian and decorative. Gabrielino subsistence was based on a varied hunting and gathering strategy that included large and small land and sea mammals, river and ocean fish, and a variety of plant resources. Deep-sea fishing was accomplished from boats of wooden planks tied together and sealed with asphalt and other materials. Sea mammals were taken with harpoons, spears, and clubs. River fishing was undertaken with the use of line and hook, nets, basket traps, spears, and poisons. Land mammals were hunted with bow and arrow, trapped, clubbed, or taken with the use of deadfalls.

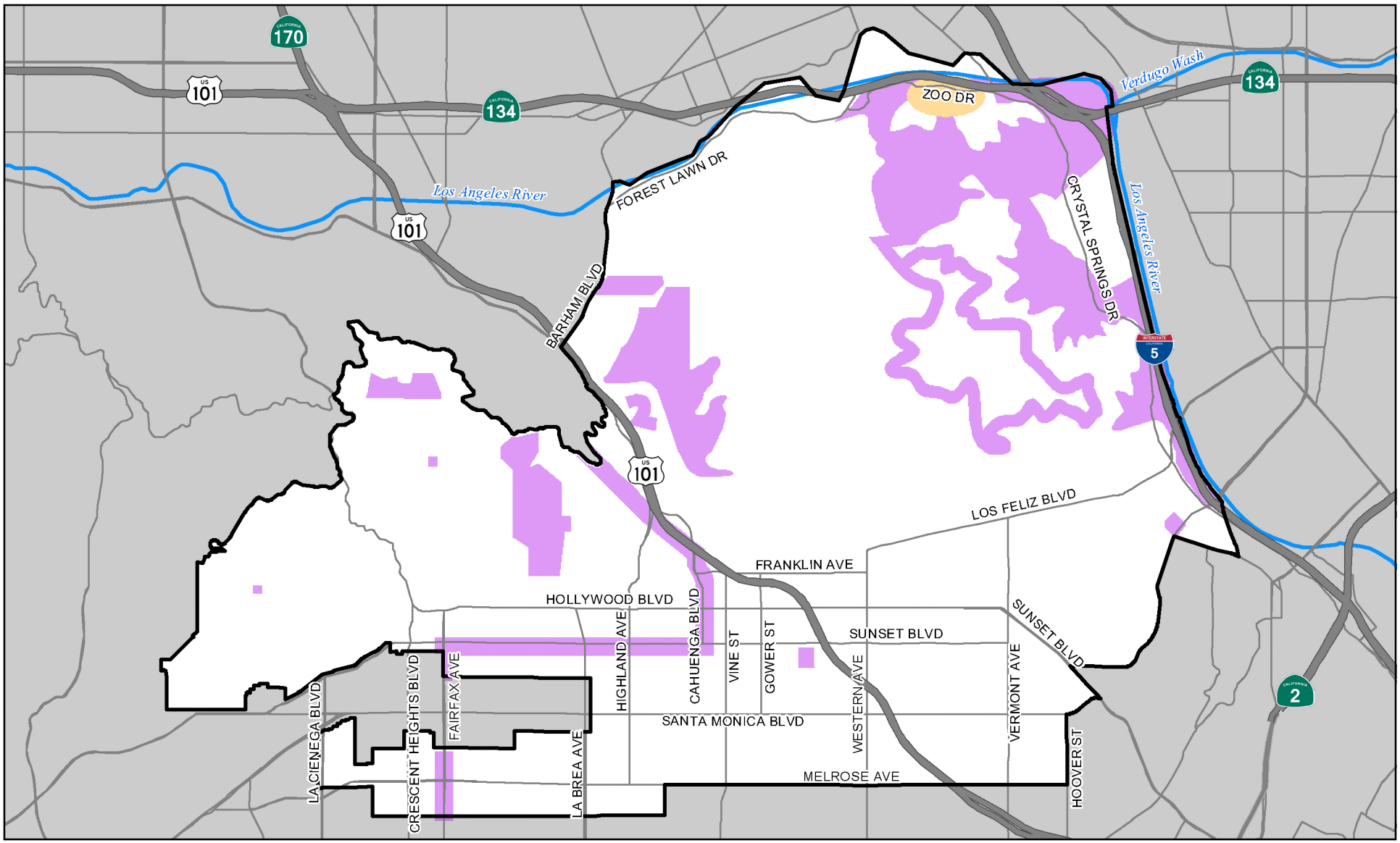
The Gabrielino were apparently first contacted by Europeans in 1542 when the Spanish conquistador Juan Rodriguez Cabrillo entered the area. Following other Spanish visits to the region, colonization began in 1769 and resulted in the establishment of Missions San Fernando and San Gabriel. Because of Euro-American introduced diseases and the harsh effects of mission life, the Gabrielino population and culture were greatly diminished. Following the secularization of the missions, most surviving Gabrielinos became wage laborers on the ranchos of Mexican California. In the early 1860s, a smallpox epidemic nearly wiped out the remaining Gabrielino population.

Significant archaeological resources and tribal cultural resources found in the Project Area include a Gabrielino Indian site in Griffith Park. Prehistoric and historic archaeological sites and survey areas in the Project Area are generally shown in **Figure 4.5-3**. The sites and survey areas depicted on these maps represent generalized locations. Various federal, state and local regulations have been promulgated to protect archaeological sites and resources. Although the state general plan law calls for mapping of the sites, the location of sites are confidential, pursuant to California Government Code Section 6254.10, to protect sites from disturbance, scavenging and vandalism.

As discussed in more detail below, the City sent notification letters to the California Native American Tribes that requested inclusion on the City's AB 52 notification list on May 9, 2016. No potential tribal resources were disclosed during the consultation process as either listed or eligible for listing in the California Register or in a local register of historical resources.

PALEONTOLOGICAL RESOURCES

Paleontological resources, or fossils, are the remains, imprints, or traces of once-living organisms preserved in rocks and sediments. These include mineralized, partially mineralized, or unmineralized bones and teeth, soft tissues, shells, wood, leaf impressions, footprints, burrows, and microscopic remains. The fossil record is the only evidence that life on earth has existed for more than 3.6 billion years. Fossils are considered non-renewable resources because the organisms they represent no longer exist. Thus, once destroyed, a fossil can never be replaced.



LEGEND:

Hollywood CPA | Archaeological Sites | Archaeological Survey Areas

N
W E
S

0 2,800 5,600 Feet

SOURCE: UCLA Institute of Archaeology; TAHA, 2018.

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FIGURE 4.5-3

PREHISTORIC AND HISTORIC ARCHAEOLOGICAL SITES

Paleontological sensitivity is defined as the potential for a geologic unit to produce scientifically significant fossils. There is a direct correlation between fossils and the geologic formation in which they are preserved; therefore, paleontological sensitivity is determined by rock type, past history of the geologic unit in producing significant fossils, and fossil localities that are recorded from that unit. Paleontological sensitivity is derived from the known fossil data collected from the entire geologic unit, not just from a specific location.

Three major groups of rocks are represented within the Los Angeles Basin: older igneous and metamorphic bedrock (100 to 75 million years old), older sedimentary rocks (about 65 to 15 million years old), and younger sedimentary rocks (15 to 1 million years old). The sedimentary rock layers contain shale, siltstone, sandstone, and conglomerates, as well as some interbedded volcanic rocks. Over 22 million years ago, the Los Angeles Basin was a deep marine basin formed by tectonic forces between the North American and Pacific plates. Since that time, over five miles of marine and non-marine sedimentary rock, as well as intrusive and extrusive igneous rocks, have filled the basin.

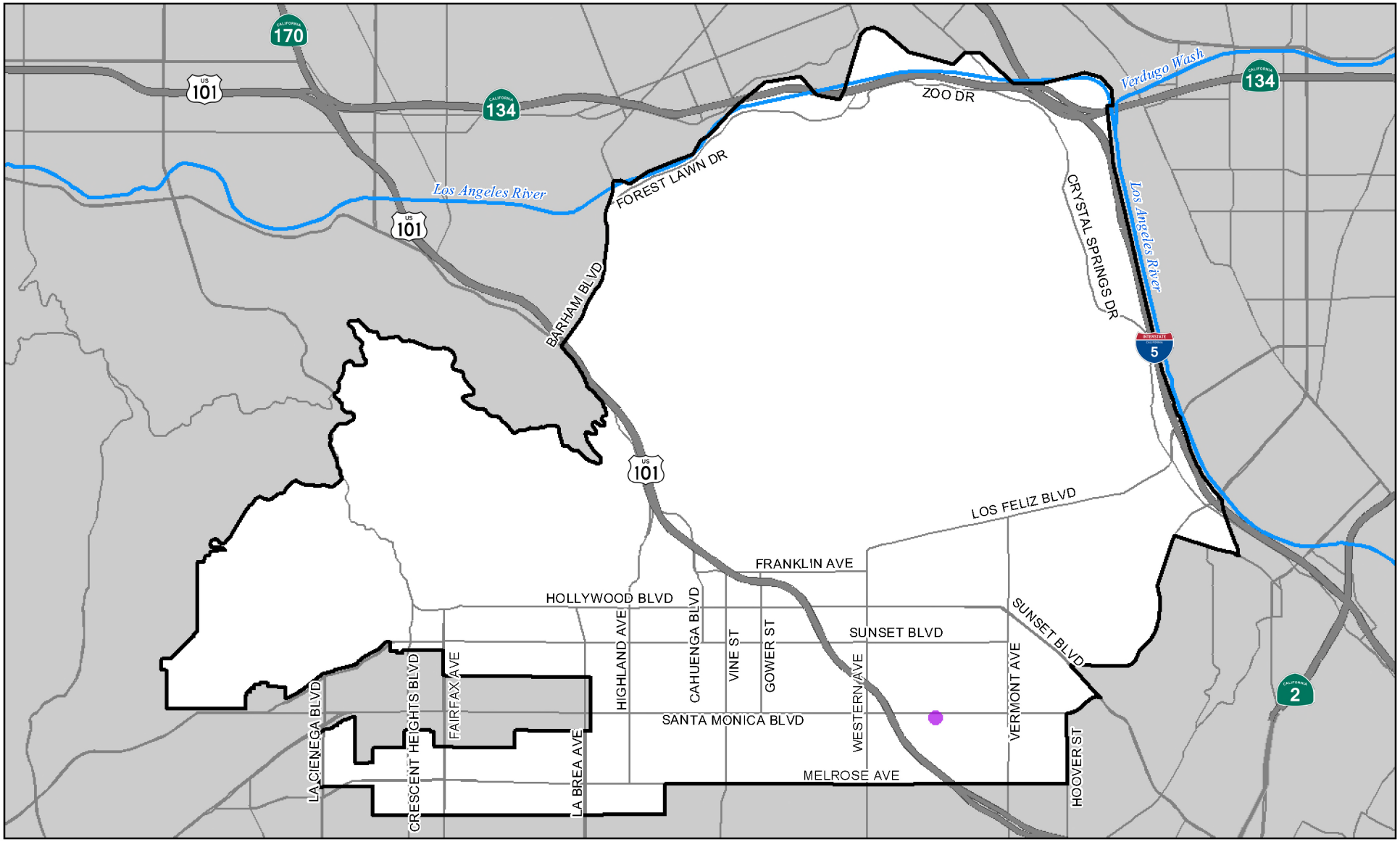
During the last two million years, defined by the Pleistocene and Holocene epochs, the Los Angeles Basin and surrounding mountain ranges have been uplifted to form the present-day landscape. Erosion of the surrounding mountains has resulted in deposition of unconsolidated sediments in low-lying areas by rivers, such as the Los Angeles River.

The Los Angeles Basin is known for its significant paleontological resources, particularly those associated with Ice Age mammals. Fossils have been found mostly in sedimentary rock that has been uplifted, eroded or otherwise exposed. Undiscovered vertebrate fossils are likely to be found in rock formations. Pleistocene older alluvium of similar lithologies elsewhere in Los Angeles County and southern California has been reported to contain locally abundant and scientifically significant vertebrate, invertebrate and plant fossils. These localities have yielded fossils of extinct Ice-Age mammals, including mammoths, mastodons, ground sloth, dire wolves, short-faced bears, saber-toothed cats, large and small horses, large and small camels, bison, and other fauna similar to fossil specimens recovered from the Rancho La Brea asphalt deposits, which is located approximately one mile south of the Project Area. Vertebrate paleontological resources in the Project Area are generally represented in **Figure 4.5-4**, and the invertebrate paleontological resources in the Project Area are generally represented in **Figure 4.5-5**. Disclosure of specific site locations is prohibited by law in order to protect the integrity of the paleontological resources.

HUMAN REMAINS

Three cemeteries are located within the Project Area, Forest Lawn-Hollywood Hills Memorial Park, Mount Sinai Hollywood Hills, and Hollywood Forever Cemetery. Forest Lawn-Hollywood Hills Memorial Park and Mount Sinai Memorial Parks and Mortuaries are located at the northern portion of the Project Area, just west of Griffith Park. Forest Lawn-Hollywood Hills is located at 6300 Forest Lawn Drive, and Mount Sinai Hollywood Hills is located at 5950 Forest Lawn Drive. Mount Sinai dedicates its cemetery and mortuary services to the Jewish community of Los Angeles. Hollywood Forever Cemetery, which was founded in 1899, is listed in the National and California Registers. Located at 5970-6000 West Santa Monica Boulevard, this cemetery is the final resting place for many Hollywood's founders and celebrities from the entertainment industry.

The Project Area falls within the Los Angeles Basin, which includes the Mission-associated Native American history of Los Angeles. It was often Native American practice to bury people outside Mission grounds in informal cemeteries. However, the nearest mission is the San Gabriel Mission located approximately nine miles east of the Project Area. No known informal cemetery sites are located within the Project Area.



LEGEND:

Hollywood CPA

Vertebrate Paleontological Sites

N
W E
S

0 2,800 5,600 Feet

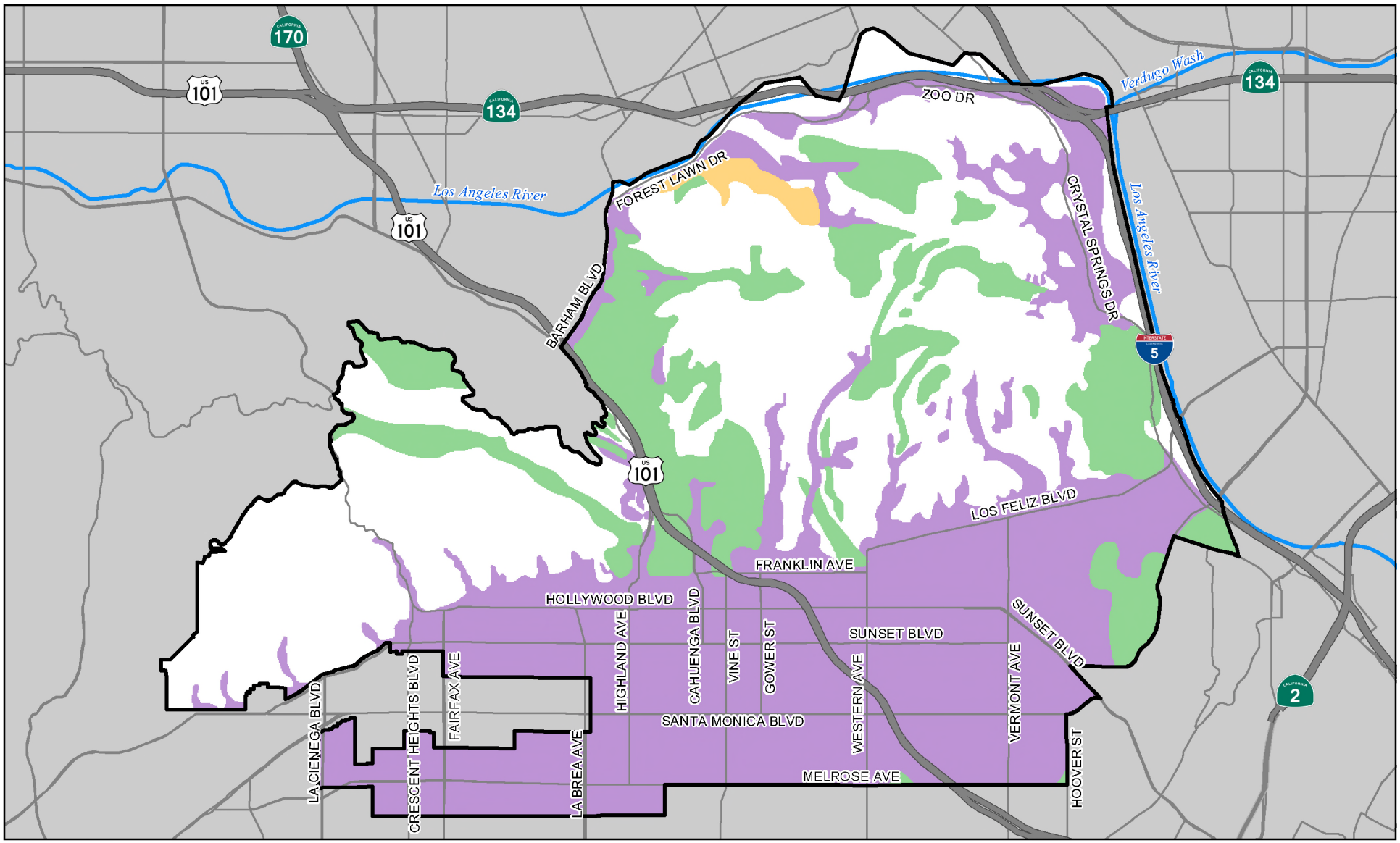
SOURCE: Natural Museum of Los Angeles County; TAHA, 2017.

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FIGURE 4.5-4

VERTEBRATE PALEONTOLOGICAL SITES



LEGEND:

- Hollywood CPA
- Bedrock where fossils are likely to be found
- Older surface sediments where fossils are likely to be found
- Surface sediments with unknown fossil potential

N W E S

0 2,800 5,600 Feet

SOURCE: Santa Barbara Museum of Natural History; TAHA, 2018.

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FIGURE 4.5-5

INVERTEBRATE PALEONTOLOGICAL RESOURCES

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the CEQA Guidelines, the Proposed Project would have a significant impact related to cultural resources and tribal cultural resources if it would:

- Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5;
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5;
- Directly or indirectly destroy a unique paleontological resources or site or unique geologic feature;
- Disturb any human remains, including those interred outside of formal cemeteries; and or
- Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
    - Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
    - A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

METHODOLOGY

The cultural resources and tribal cultural resources analysis considers the presence and absence of known cultural resources and tribal cultural resources, as well as the potential for significant cultural resources and tribal cultural resources to occur, within the Project Area, and considers the potential impacts on such resources from adoption and implementation of the Proposed Plan.

The analysis of historical resources examines the likelihood that the Proposed Plan could cause a substantial adverse change in the significance of a historical resource. For purposes of the analysis of impacts to historical resources, historical resources include all resources on the California Register (which include those on the National Register); all HCMs, all HPOZs; all resources identified in a survey that meets the standards of PRC Section 5024.1(g), including SurveyLA; and resources identified in the CRA survey as eligible for listing or designated on a register.

A significant impact to historical resources will occur if there is a "substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired, which is considered to be a significant effect on the environment." Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995) is considered to be mitigated to a level of less-than-significant impact on the historical resource.[12]

[12]California Code of Regulations, Title 14, Chapter 3 15064.5. (b)(3).

The analysis of archaeological resources identifies the likelihood of ground disturbing activities to potentially result in a significant impact to unique archaeological resources (non-unique resources do not have to be addressed in an Environmental Impact Report). PRC Section 21083.2 defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

The analysis of paleontological resources identifies the likelihood of ground disturbing activities to encounter rock units with potential for containing significant paleontological resources, which is considered high in quaternary alluvial fan deposits exhibiting a composition conducive to the preservation of fossil resources. Paleontological resources in the Project Area were evaluated qualitatively based on general information about Project Area conditions. In the absence of an inventory of unique geological resources, the potential for such resources to be present and impacted is generally assessed.

Similar to archaeological resources, the analysis of human remains considers the likelihood of ground disturbing activities to potentially encounter human remains.

A Tribal Cultural Resource (TCR) is a feature, place, landscape, or object that has cultural value to a tribe and is either eligible for the California Register or a local register or the lead agency at its discretion chooses to treat the resource as a TCR (PRC Section 21074 (a)(1) (A)-((B)).

IMPACTS

IMPACT 4.5-1 Would implementation of the Proposed Plan cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5? **Significant and unavoidable impact**.

One of the primary objectives of the Proposed Plan is to protect historical resources. Towards this end, the Proposed Plan includes a series of policies and programs intended to provide protections for historical resources in the Project Area **(Table 4.5-3)**.

TABLE 4.5-3: PROPOSED PLAN POLICIES AND PROGRAMS RELATED TO CULTURAL RESOURCES

Policies/Programs	Description
Policy LU.5.10	Preserve and promote Theatre Row. Maintain existing land use controls to protect the cluster of small equity-waiver theaters on Santa Monica Boulevard between El Centro and McCadden.
Policy P1.1	Significant neighborhoods and districts. Support the preservation of culturally and historically significant neighborhoods and districts. (P28, P29, P30, P31)
Program P28	Existing and new HPOZs in Hollywood ensure that the character of historic neighborhoods are maintained by providing guidance for the rehabilitation of historic structures and the review of new development within historic neighborhoods.
Program P29	Develop a historic preservation district or districts in Los Feliz with community involvement and support.

TABLE 4.5-3: PROPOSED PLAN POLICIES AND PROGRAMS RELATED TO CULTURAL RESOURCES

Policies/Programs	Description
Program P30	Develop a historic preservation district in Sunset Square with community involvement and support.
Program P31	Study the historical resources in neighborhoods surrounding the Melrose Hill HPOZ.
Policy P1.2	Adaptive reuse. Promote the preservation and adaptive reuse of existing building stock, especially for designated or eligible historical resources. (P65)
Program P65	Improve and streamline the building permit process and ensure compatible rehabilitation of historical resources by providing early technical advice and assistance from the staff of City Planning and Building and Safety.
Policy P1.3	Designated and potentially significant resources. Preserve designated Historic Cultural Resources and further study eligible resources as potentially significant resources.
Policy P1.4	Buildings in FAR Incentive Areas. Protect designated historical buildings, including those which are located within Floor Area Ratio (FAR) Incentive Areas and multi-family residential areas where the Plan restores citywide standard R4 density. (P32, P33)
Program P32	Establish zoning which conditions a project's use of Floor Area Ratio Incentives upon conformance with the Secretary of the Interior Standards for Rehabilitation.
Program P33	Study the feasibility of implementing a Transfer of Development Rights program in Hollywood to encourage preservation of historical resources.
Policy P1.5	Distinctive street features. Protect distinctive features of prominent streets in Hollywood, such as the Walk of Fame, a recognized Historic Cultural Monument of the City of Los Angeles. (P34, P66)
Program P34	Maintain existing street dimensions and street designation along the Walk of Fame.
Program P66	Work with the Bureau of Engineering to establish a Treatment Plan to guide future rehabilitation work affecting the Hollywood Walk of Fame.
Policy P1.6	Study preservation tools. Support the study of Residential Floor Area (RFA) Special Districts, Community Design Overlays (CDOs), or a Community Plan Implementation Overlay (CPIO) for neighborhoods that retain a cohesive character but are not eligible to become Historic Preservation Overlay Zones.
Policy P1.7	Preserve designated resources. Any development project which involves designated historical resources, including City of Los Angeles Historic-Cultural Monuments, shall conform with the Secretary of Interior's Standards for Rehabilitation. (P35)
Program P35	Establish regulations (D limitations) to ensure appropriate review of design for resources.
Policy P1.8	Complementary design. Encourage the design of new buildings that respect and complement the character of adjacent historical resources. (P36, P37, P38)
Program P36	Utilize adopted Citywide Design Guidelines for new and infill development.
Program P37	Study the garden apartments in the block bounded by Prospect Avenue on the north, Rodney Drive on the west, Lyman Place on the east, and the alley north of Hollywood Boulevard on the south for potential historic significance.
Program P38	Study the implementation of a Specific Plan, Community Plan Implementation Overlay (CPIO), or other zoning tools in central Hollywood, including Sunset Boulevard and Hollywood Boulevard, which may include guidelines for site planning and building design, controls on lot consolidation, and possible requirements for approved plans prior to demolition, in order to ensure that infill development in the Regional Center complements existing neighborhood character.
Policy P1.9	Land use and zoning. Maintain appropriate General Plan Land Use designations and zoning in existing historic districts which are either listed in, or are eligible to be listed in the National Register of Historical Resources. Promote infill development that matches the scale of historical resources within each district, including the following: height, massing, setbacks, stepbacks, and development pattern. (P39)
Program P39	Study design regulations for: • Afton Square Historic District: Eastern half of block between Leland Way on the north, El Centro to the east, De Longpre to the south and Vine to the West. • Selma-Labaig Historic District: Both sides of Labaig roughly between Gower and Gordon, including the north side of Harold Way.

TABLE 4.5-3: PROPOSED PLAN POLICIES AND PROGRAMS RELATED TO CULTURAL RESOURCES

Policies/Programs	Description
	• Serrano Historic District: East side of Serrano roughly between Hollywood Boulevard and Sunset/west side of Serrano generally between Carlton Way and Sunset.
Policy P1.10	Height limits. Maintain height limitations on commercial zones that border designated or eligible historic neighborhoods. Encourage the design of new buildings that respect and complement the character of adjacent historic neighborhoods. (P40)
Program P40	Study the creation of new height limits on portions of Sunset Boulevard and Western Avenue that abut designated or eligible historic neighborhoods.
Policy P1.11	Financial resources. Support efforts to identify financial resources for rehabilitation of historical resources. Promote the use of the City's Mills Act Historical Property Contract Program, the Federal Historic Rehabilitation Tax Credit, and the California Historical Building Code. (P67)
Program P67	Partner with the Los Angeles Housing and Community Investment Department, and other agencies to identify new financial resources for rehabilitation grants and loans to low- and moderate-income owners of historic homes.
Policy P1.12	Documentation. Support opportunities to document Hollywood's history and architectural legacy and share that history with the community. (P41, P68)
Program P41	Support and complete Historic Places LA within the Hollywood Community Plan area.
Program P68	Seek opportunities to partner with preservation organizations and certified neighborhood councils to create new interpretive programs, tours and signage highlighting the community's history and architectural legacy.

SOURCE: City of Los Angeles, *Draft Hollywood Community Plan*, 2018.

The Proposed Plan does not introduce any features that would preclude implementation of, or alter the regulatory control ordinances that designated historical resources are subject to in the HPOZ Ordinance and the Cultural Heritage Ordinance regulations discussed above. There are no historical resources that are called for removal or alteration under the Proposed Plan. However, development that would occur over the life of the Proposed Plan has the potential to occur on, or adjacent to, historical resources. This is particularly true for the Change Areas where land use and/or zone changes are proposed, which could result in pressure to remove historical resources. Development can impact historical resources either through direct effects (demolition or alteration of a historical resource's physical characteristics that convey its historical significance, such as incompatible façade changes) or through indirect effects to the area surrounding a resource (such as creating a visually incompatible structure adjacent to a historical structure). For example, projects abutting the Hollywood Walk of Fame and the resultant ground surface disturbance could potentially impact this City designated HCM. However, the Proposed Plan includes policies to protect distinctive prominent streets such as the Walk of Fame (Policy P1.5).

The Proposed Plan also includes other components intended to assist in protecting historical resources. The proposed Community Plan Implementation Overlay (CPIO) District that generally follow Franklin Avenue to the north, the 101 Freeway to the east, Fountain Avenue to the south and La Brea Avenue to the west includes regulatory protections for commercially zoned properties with designated or eligible historical resources, including demolition delay for all buildings or structures that are 45 years or older. The CPIO would also restrict applicants from obtaining a demolition permit without an approved replacement project and require that renovation of designated resources comply with the Secretary of the Interior's Standards. Demolition delay allows time for further consideration of a resource as well as efforts to nominate a resource as an HCM and potentially seek alternatives to demolition. But ultimately demolition delay does not prohibit a resource from being demolished.

The provisions in the Cultural Heritage Ordinance reduce impacts to historic properties in the City as a whole including throughout the Project Area where a specific development site is located on designated historic properties. Specifically, the Cultural Heritage Ordinance requires that the Office of Historic

Resources review projects that are: 1) located adjacent to properties designated as HCMs; 2) discretionary and located on properties that have been identified in survey meeting requirements of PRC Section 5024.1(g), including SurveyLA as having potentially historical resources; 3) discretionary and included in the CRA Survey as eligible for listing. These projects are required to include any modifications identified by the Office of Historic Resources, or a historic resource assessment prepared by a qualified architectural historian as deemed necessary, that will retain eligibility of the historical resource. The Office of Historic Resources typically recommends modifications that are consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. Such modifications may include setbacks, step backs, height and other project features related to context-sensitive project design.[13]

Projects located within HPOZs require review and approval. The type of HPOZ review is determined by the scale, location, and scope of the project. Structures located within an HPOZ are defined in one of three ways:

- Contributing structures are those structures, landscape features, natural features, or sites identified as Contributing in the Historic Resources survey for the HPOZ. Generally, "Contributing" structures will have been built within the historic Period of Significance of the HPOZ, and will retain elements that identify it as belonging to that period. The historic Period of Significance of the HPOZ is usually the time period in which the majority of construction in the area occurred. In some instances, structures that are compatible with the architecture of that period or that are historic in their own right, but were built outside of the Period of Significance of the district, will also be "Contributing".
- Contributing Altered structures are structures that date from the Period of Significance, built in the same time period as Contributing structures that have retained their historic character in spite of subsequent alterations or additions and are deemed reversible.
- Non-Contributing structures are those structures, landscapes, natural features, or sites identified as not retaining their historic character as a result of un-reversible alterations, or as having been built outside of the HPOZ Period of Significance or because they are vacant lots.

The following procedures are required within an HPOZ for the different types of structures and level of work proposed:

- Certain less significant exterior work, like routine maintenance or changes to the exterior paint color or landscaping, are approved by the Planning Department as "Conforming Work."
- A Certificate of Appropriateness (COA) is required when significant work is proposed for a Contributing element in the HPOZ. A COA requires that a formal application be filed with the Department of City Planning. The HPOZ Board will conduct a public hearing and submit a recommendation to the Director of Planning, who will also consider input from the Cultural Heritage Commission regarding the project. The process requires the submission of a formal application form, detailed plans, and a fee.
- Conforming Work on a Non-Contributing Element (CWNC) is a review process for work on Non-Contributing properties that does not involve demolition of a primary structure or construction of a new primary building on a vacant lot. The HPOZ Board reviews exterior work or changes to a non-contributing structure, unless authority is delegated to the Director of Planning in an adopted Preservation Plan.

[13]If the historic or cultural significance of a potential resource is contested, applicants will be required to provide a historic resource assessment prepared by a qualified architectural historian to determine the proposed resource's potential significance.

- A Certificate of Compatibility (CCMP) is required for the review of new construction on vacant lots or on lots where a Non-Contributor is proposed for demolition. The HPOZ Board will conduct a public hearing and submit a recommendation to the Director of Planning. As with a "Certificate of Appropriateness," this permit requires the submission of a formal application form, detailed plans, and a fee.

While the HPOZ process requires detailed review and approval, each HPOZ Board is advisory to the Planning Department. The Director of Planning has the authority to issue determinations, building permit sign-offs, and Certificates of Appropriateness. Decisions may be appealed to the Area Planning Commission. The Area Planning Commission also serves as the first level of review for proposed demolition, removal or relocation of structures within HPOZs; appeals of these cases go to the City Council.

Within Specific Plan areas (such as the Station Neighborhood Area Plan [SNAP]) all projects are discretionary and subject to Project Permit Compliance review to ensure compliance with requirements of the Specific Plan.

Additionally, all other discretionary projects that have the potential to impact historical resources must be individually reviewed by the Office of Historic Resources.

While the Office of Historic Resources reports that it is extremely uncommon in the City to lose designated historical resources when a property owner has complied with the City's regulations, the Cultural Heritage Ordinance and the HPOZ Ordinance cannot prevent a property from being demolished or redeveloped or prevent structures from being altered. Rather these ordinances provide for processes, including environmental review, but they do not prohibit demolition. Therefore, even though the Proposed Plan incorporates changes that would assist in further protecting both designated and eligible historical resources, it is possible that demolition and/or significant alteration to some of the hundreds of historical resources within the Project Area would occur during the life of the Proposed Plan. Therefore, the Proposed Plan's impacts related to historical resources would be ***potentially significant***.

Mitigation Measures

No feasible mitigation measures have been identified. As discussed above, historical resources that are designated under HCM or HPOZ may be demolished if an applicant goes through the discretionary review process and receives an approved entitlement. Resources included in SurveyLA or any other survey meeting the requirements of PRC Section 5024.1(g) or the CRA Survey, whether subject to additional review pursuant to the CPIO and/or the SNAP, or based on discretionary entitlements, are not prohibited from demolition or alteration, provided they go through the appropriate process including environmental review. As a policy matter, the City finds that requiring additional review of projects not in the SNAP or the CPIO or otherwise undergoing discretionary review is undesirable based on the requirements it would place on City resources and the delay it would result in for projects. Additionally, as a policy matter, the City finds that it is undesirable to put additional regulations or processes to projects involving historical resources that are designated under the HCM or HPOZ, or subject to review by the proposed CPIO or SNAP, or other discretionary review. Based on the above, there is no feasible mitigation to prevent the demolition or substantial alteration of historical resources.

Significance of Impact after Mitigation

Significant and unavoidable.

IMPACT 4.5-2 Would implementation of the Proposed Plan cause a substantial adverse change in the significance of an archaeological resource? **Less than significant impact with mitigation.**

As discussed above, portions of the City, including the Project Area were inhabited by the Gabrielino or Tongva-speaking Indians, who may have left behind archaeological resources that may still exist within the Project Area. In addition, non-tribal resources (such as from local missions) from the same time periods may exist in the Project Area **(Figure 4.5-3)**. Much of the Project Area is highly urbanized and any archaeological resources that may have existed at the surface have likely been disturbed by past development. Future development under the Proposed Plan would likely include ground-disturbing activities that could go beyond man-made fills/existing disturbed areas and could impact previously undetected archaeological resources. A comprehensive survey of archaeological resources in the Hollywood area is not feasible at the Plan level. For those projects that do not disturb previously undisturbed soil no impact is anticipated. For projects that disturb previously un-disturbed soils, construction could encounter resources and an impact could occur.

Although it is a misdemeanor for anyone to destroy or remove anything of archaeological interest, it could potentially occur through negligence during grading and excavation absent monitoring and enforcement. Therefore, without mitigation, impacts related to archaeological resources would be ***potentially significant***.

Mitigation Measures

CR1 For all discretionary projects or projects in a CPIO District Subarea, a qualified archaeologist shall be required to monitor excavation and grading activities in soils that have not been previously disturbed, to identify, record, and evaluate the significance of any archaeological finds during construction. If archaeological resources are uncovered (in either a previously disturbed or undisturbed area), the City Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, state, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the project shall not collect or move any archaeological materials or associated materials. Construction activity may continue unimpeded on other portions of the project site. The found deposits shall be treated in accordance with federal, state, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Construction activities in the area where resources were found may commence once the identified resources are properly assessed and processed by a qualified archeologist.

CR2 For all discretionary projects or projects in a CPIO District Subarea, the City shall require that all cultural resources identified on a site be assessed and treated in a manner consistent with PRC Section 21083.2, as determined appropriate by a qualified archaeologist in consultation with the City's Office of Historic Resources. A report shall be prepared according to current professional standards that describes the resource, how it was assessed, and disposition.

CR3 For all projects that are not subject to Mitigation Measures **CR1** and **CR2** that are seeking excavation or grading permits, the Department of Building and Safety shall issue the following notice and obtain an acknowledgement of receipt of the notice from applicants:

- California Penal Code Section 622.5 provides the following: "Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor."

- Best practices to ensure archaeological resources are not damaged include but are not limited to the following steps:
    - A qualified archaeologist monitors excavation and grading activities in soils that have not been previously disturbed, to identify, record, and evaluate the significance of any archaeological finds during construction.
    - If archaeological resources are uncovered (in either a previously disturbed or undisturbed area), all work ceases in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, state, and local guidelines.
    - Personnel of the project shall not collect or move any archaeological materials or associated materials.
    - If cleared by a qualified archaeologist, construction activity may continue unimpeded on other portions of the project site.
    - The found deposits shall be treated in accordance with federal, state, and local guidelines and regulations.
    - As provided in Public Resources Code Section 21083.2, archaeological resources should be preserved in place or left in an undisturbed state. When preserving in place or leaving in an undisturbed state is not possible, excavation should occur unless testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, and this determination is documented by an archaeologist.
    - Construction activities in the area where resources were found may commence once the identified resources are properly assessed and processed by a qualified archeologist and the archaeologist clears the site for construction activity.

Significance of Impact after Mitigation

As a general matter, projects that would impact previously undisturbed soils would be expected to be larger projects that require discretionary permits and would be subject to Mitigation Measure **CR1** and **CR2**. Projects subject to Mitigation Measures **CR1** and **CR2** would be expected to be reduced to less than significant. Additionally, for those projects that would not be subject to Mitigation Measures **CR1** and **CR2**, it would be expected that requiring a signed acknowledgement that applicants have been put on notice of the criminal liability for destroying archaeological resources and the best management practices to avoid those impacts, should ensure that impacts will be less than significant.

Less than significant with mitigation.

IMPACT 4.5-3 Would implementation of the Proposed Plan directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? **Less than significant impact with mitigation**.

Unique Geological Feature. There are no unique geological features in the Project Area that would be affected by the Proposed Plan. Therefore, there is no impact.

Unique Paleontological Resources and Sites. Much of Project Area is highly urbanized and any paleontological resources that may have existed at the surface have likely been disturbed by past development. As a result, the uppermost sediments are not likely to contain fossils. However, there is the potential for future development allowed under the Proposed Plan to impact previously undetected paleontological resources or sites during construction-related earth moving activities that would go beyond man-made fills/existing disturbed areas. A comprehensive survey of paleontological resources in the Hollywood area is not feasible at the Plan level; however, vertebrate and invertebrate paleontological resources in the Project Area are generally represented in **Figures 4.5-4** and **4.5-5**. For those projects that do not disturb

previously undisturbed soil, no impact is anticipated. For projects that disturb previously un-disturbed soils, construction could encounter resources and an impact could occur.

Therefore, although it is a misdemeanor for anyone to destroy or remove anything of paleontological interest, it could potentially occur through negligence during grading and excavation absent monitoring and enforcement. Therefore, without mitigation, impacts related to paleontological resources would be ***potentially significant***.

Mitigation Measures

CR4 At the time of application for discretionary projects or project in a CPIO District Subarea that involve grading, trenching, or other new ground disturbance in areas with high paleontological resource sensitivity, the project applicant shall conduct a paleontological assessment to further evaluate the potential impacts to paleontological resources and, as necessary, take actions to preserve significant paleontological resources. Specific requirements include:

a) **Retain a Qualified Paleontologist**. Prior to initial ground disturbance, the applicant shall retain a project paleontologist, defined as a paleontologist who meets the SVP standards for Qualified Professional Paleontologist, to direct all mitigation measures related to paleontological resources. A qualified paleontologist (Principal Paleontologist) is defined by the SVP standards as an individual preferably with an M.S. or Ph.D. in paleontology or geology who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology of California, preferably southern California, and who has worked as a paleontological mitigation project supervisor for a least one year.

b) **Paleontological Resources Assessment**. Prior to any construction activity in areas determined to have a low to high paleontological sensitivity that increases with depth, a Qualified Professional Paleontologist shall prepare a Paleontological Resources Assessment to the satisfaction of the City to evaluate potential for impacts to paleontological resources from development of the proposed project. The Paleontological Resources Assessment may require a museum records search from the Natural History Museum of Los Angeles County to identify whether previous paleontological localities exist within the development area and if so, at what depth(s). If the project paleontologist determines that sediments on a development site are sensitive for scientifically important paleontological resources, steps CR-4c to g shall be taken prior to, during, and after construction activities. A Paleontological Resources Assessment shall not be required for development areas already identified as having a high paleontological sensitivity at the surface.

c) **Paleontological Mitigation and Monitoring Program**. Prior to construction activity a qualified paleontologist shall prepare a Paleontological Mitigation and Monitoring Program, subject to City approval, to be implemented during ground disturbance activity for the proposed project. This program should outline the procedures for construction staff Worker Environmental Awareness Program (WEAP) training, paleontological monitoring extent and duration, salvage and preparation of fossils, the final mitigation and monitoring report, and paleontological staff qualifications.

d) **Paleontological Worker Environmental Awareness Program (WEAP)**. Prior to the start of construction, the project paleontologist or his or her designee shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff. The WEAP shall be fulfilled at the time of a preconstruction meeting at which a qualified paleontologist shall attend. In the event of a fossil discovery by construction personnel, all work in the immediate vicinity of the find shall cease and a qualified paleontologist shall be contacted to evaluate the

find before restarting work in the area. If it is determined that the fossil(s) is(are) scientifically significant, the qualified paleontologist shall complete the following conditions to mitigate impacts to significant fossil resources.

e) Paleontological Resource Construction Monitoring. Ground disturbing construction activities (including grading, trenching, foundation work and other excavations) in undisturbed sediments, below five feet, with high paleontological sensitivity should be monitored on a full-time basis by a qualified paleontological monitor during initial ground disturbance. The Paleontological Mitigation and Monitoring Program shall be supervised by the project paleontologist. Monitoring should be conducted by a qualified paleontological monitor, who is defined as an individual who has experience with collection and salvage of paleontological resources. The duration and timing of the monitoring will be determined by the project paleontologist. If the project paleontologist determines that full-time monitoring is no longer warranted, he or she may recommend that monitoring be reduced to periodic spot-checking or cease entirely. Monitoring would be reinstated if any new or unforeseen deeper ground disturbances are required and reduction or suspension would need to be reconsidered by the Supervising Paleontologist. Ground disturbing activity that does not occur in undisturbed sediments with high paleontological sensitivity would not require paleontological monitoring.

f) Fossil Salvage. If fossils are discovered, the project paleontologist or paleontological monitor shall recover them. Typically fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner.

Once salvaged, significant fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition and curated in a scientific institution with a permanent paleontological collection (such as the Natural History Museum of Los Angeles County), along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the project paleontologist.

g) Final Paleontological Mitigation Report. Upon completion of ground disturbing activity (and curation of fossils if necessary) the qualified paleontologist shall prepare a final mitigation and monitoring report outlining the results of the mitigation and monitoring program. The report shall include discussion of the location, duration and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated.

h) For any discoveries of paleontological resources not covered by the above process, the applicant shall comply with Mitigation Measure **CR4f**.

CR5 For all discretionary projects or projects in a CPIO District Subarea, the City shall require that all paleontological resources identified on a project site be assessed and treated in a manner determined by a qualified paleontologist in consultation with the City's Office of Historic Resources. A report shall be prepared according to current professional standards that describes the resource, how it was assessed, and disposition. Any reports and surveys shall be submitted to the City's Office of Historic Resources and the Natural History Museum of Los Angeles County.

CR6 For all projects that are not subject to Mitigation Measures **CR4** and **CR5** that are seeking excavation or grading permits, the Department of Building and Safety shall issue the following notice and obtain an acknowledgement of receipt of the notice from applicants:

- California Penal Code Section 622.5 provides the following: "Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor."
- Public Resources Code Section 5097.5 (a) states, in part, that:

  No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.

- Best management practices to ensure unique geological and paleontological resources are not damaged include but are not limited to the following steps:
  - Prior to excavation and grading activities a qualified paleontologist prepares a resource assessment using records from the Natural History Museum of Los Angeles County.
  - If in the assessment, the soil is identified as potentially containing paleontological resources, a qualified paleontologist monitors excavation and grading activities in soils that have not been previously disturbed, to identify, record, and evaluate the significance of any paleontological finds during construction.
  - If paleontological resources are uncovered (in either a previously disturbed or undisturbed area), all work ceases in the area of the find until a qualified paleontological has evaluated the find in accordance with federal, state, and local guidelines.
  - If fossils are discovered, a qualified paleontologist shall recover them. Typically fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the paleontologist would have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. Once salvaged, significant fossils should be identified to the lowest possible taxonomic level, prepared to a curation-ready condition and curated in a scientific institution with a permanent paleontological collection (such as the Natural History Museum of Los Angeles County), along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the project paleontologist. All other federal, state and local laws related to such resources would be complied with.
  - Personnel of the project would not collect or move any paleontological materials or associated materials.
  - If cleared by the qualified paleontologist, construction activity would continue unimpeded on other portions of the project site.
  - Construction activities in the area where resources were found would commence once the identified resources are properly assessed and processed by a qualified paleontologist and if construction activities were cleared by the qualified paleontologist.

Significance of Impact after Mitigation

As a general matter, projects that would impact previously undisturbed soils would be expected to be larger projects that require discretionary permits and would be subject to Mitigation Measures **CR4** and **CR5**. Projects subject to Mitigation Measures **CR4** and **CR5** would be expected to be reduced to less than significant. Additionally, for those projects that would not be subject to Mitigation Measures **CR4** and **CR5**, it would be expected that requiring a signed acknowledgement that applicants have been put on notice of the criminal liability for destroying paleontological resources and the best management practices to avoid those impacts, should ensure that impacts will be less than significant.

Less than significant with mitigation.

IMPACT 4.5-4 Would implementation of the Proposed Plan disturb human remains, including those interred outside of formal cemeteries? **Less than significant impact**.

The Project Area contains three formal cemeteries, Forest Lawn-Hollywood Hills Memorial Park, Mount Sinai Hollywood Hills, and Hollywood Forever Cemetery. The Proposed Plan does not include any changes to these properties. The potential to disturb human remains interred outside of formal cemeteries is considered low given the level of past human activity. During the Mission-associated Native American history of Los Angeles it was often Native American practice to bury people outside mission grounds in informal cemeteries. The nearest mission is the San Gabriel Mission located approximately nine miles east of the Project Area. There is no history of any missions and their accompanying cemeteries in the Project Area. Furthermore, the Project Area is highly urbanized, and unmarked cemeteries or graves that may have existed at the surface have likely been disturbed by past development. Nonetheless, while the potential to disturb human remains interred outside of formal cemeteries within the Project Area is considered low, it is possible that unknown human remains could be located within the Project Area and that future development could encounter these remains. In the event of the inadvertent discovery or recognition of any human remains during future, project-related ground disturbance, California Health and Safety Code Section 7050.5 states that, if human remains are unearthed during construction, then no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to PRC Section 5097.98. PRC Section 5097.98 outlines the Native American Heritage Commission notification process and the appropriate procedures if the County Coroner determines the human remains to be Native American. Compliance with applicable regulations would protect unknown and previously unidentified human remains. Therefore, impacts related to human remains would be ***less than significant***.

Mitigation Measures

No mitigation measures are required. Impacts related to human remains would be less than significant under the Proposed Plan without mitigation.

Significance of Impact after Mitigation

Less than significant.

Impact 4.5-5 Would implementation of the Proposed Plan cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is 1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or 2) A resource determined by the lead agency, in

its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. **Less than significant impact with mitigation.**

A Tribal Cultural Resource (TCR) is a site, feature, place, cultural landscape, sacred place, or object which is of cultural value to a California Native American Tribe and is either on or eligible for the California Register or a local historic register. As discussed above, portions of the City, including the Project Area were inhabited by the Gabrielino or Tongva-speaking Indians, who may have left behind archaeological resources that may still exist within the Project Area. Prehistoric and historic archaeological sites and survey areas in the Project Area are generally shown in **Figure 4.5-3**. The sites and survey areas depicted on this map represent generalized locations. The location of sites are confidential, pursuant to California Government Code Section 6254.10, to protect sites from disturbance, scavenging and vandalism.

The City sent notification letters to the California Native American Tribes that requested inclusion on the City's AB 52 notification list. The City received only one response to these notification letters, from the Fernandeno Tataviam Band of Mission Indians requesting that the City forward the estimated cubic yards of soil disturbance for the Proposed Plan. The Proposed Plan is a long-range policy document, not a specific development project, and it is not possible to estimate cubic yards of soil disturbance.

No potential TCRs were identified during the consultation process. Nonetheless, for projects that disturb previously undisturbed soils, construction activities could encounter resources and an impact could occur. Therefore, without mitigation, impacts related to tribal resources would be ***potentially significant***.

Mitigation Measure

CR7 For all discretionary projects or projects in a CPIO District Subarea where excavation could extend below previously disturbed levels, notification shall be provided to California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project site and have submitted a written request to the Department of City Planning to be notified of proposed projects in that area. If the potential for tribal resources exists, excavation in previously undisturbed soils shall be monitored by a qualified tribal monitor. If tribal resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until an appropriate Tribal Representative has evaluated the find. Construction personnel shall not collect or move any tribal resources. Construction activity may continue unimpeded on other portions of the project site. Any tribal resources shall be treated with appropriate dignity and protected and preserved as appropriate.

CR8 For all projects that are not subject to Mitigation Measure **CR7** that are seeking excavation or grading permits, the Department of Building and Safety shall issue the following notice and obtain an acknowledgement of receipt of the notice from applicants:

- Several federal and state laws regulate the treatment of tribal resources, as well as make it a criminal violation to destroy those resources. These include but are not limited to:
    - California Penal Code Section 622.5 provides the following: "Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor."
    - Public Resources Code Section 5097.5 (a) states, in part, that:

> No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.

- Best practices to ensure tribal resources are not damaged include but are not limited to the following steps:
  - A qualified tribal monitor or archaeologist qualified to identify tribal resources would monitor excavation and grading activities in soils that have not been previously disturbed, to identify, record, and evaluate the significance of any archaeological finds during construction.
  - If tribal resources are uncovered (in either a previously disturbed or undisturbed area), all work ceases in the area of the find until an appropriate tribal representative has evaluated the find or, if no tribal representative is identified, the qualified archaeologist has evaluated the find in accordance with federal, state, and local guidelines.
  - The found deposits shall be treated with appropriate dignity and protected and preserved as appropriate with the agreement of the Tribal Representative, as well as in accordance of federal, state, and local guidelines.
  - An agreement would be reached with the Tribe to mitigate or avoid any significant impacts to the Tribal Resources.
  - The location of the find of Tribal Resources and the type and nature of the find would not be published beyond providing it to public agencies with jurisdiction or responsibilities related to the resources, the qualified archaeologist, and tribal representatives.
  - Absent an agreement with the Tribe, as provided in Public Resources Code Section 21083.2, archaeological resources should be preserved in place or left in an undisturbed state. When preserving in place or leaving in an undisturbed state is not possible, excavation should occur unless testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, and this determination is documented by a qualified archaeologist.
  - Personnel of the project shall not collect or move any archaeological or tribal resources or associated materials, or publish the location of the tribal resources.
  - Construction activity may continue unimpeded on other portions of the project site if cleared by the tribal representative or the qualified archaeologist.
  - Construction activities in the area where resources were found may commence once the identified resources are properly assessed and processed by a tribal representative, or if no tribal representative is identified, a qualified archeologist.

Significance of Impact after Mitigation

As a general matter, projects that would impact previously undisturbed soils would be expected to be larger projects that require discretionary permits and would be subject to Mitigation Measure **CR7**. Projects subject to Mitigation Measure **CR7** would be expected to be reduce impacts to less than significant. Additionally, for those projects that would not be subject to Mitigation Measure **CR7**, it would be expected that requiring a signed acknowledgement--that applicants have been put on notice of the criminal liability for destroying archaeological and tribal resources and the best management practices to avoid those impacts--should ensure that impacts will be less than significant.

Less than significant with mitigation.

CUMULATIVE IMPACTS

The cumulative context for the cultural resources analysis includes reasonably foreseeable future development within the City of Los Angeles, as well as the County of Los Angeles pursuant to applicable planning documents including the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and adjacent Community Plans, as well as previously approved but unbuilt projects in the Plan Area and in the County or adjacent Community Plan Areas.

HISTORICAL RESOURCES

As discussed above, it is possible that future development within the Project Area could result in demolition and/or significant alteration to some of the hundreds of historical resources during the life of the Proposed Plan. Implementation of the Proposed Plan in combination with other projects located throughout the City of Los Angeles would similarly increase the potential for impacts to historical resources and could contribute to the loss of historical resources in the City. The Cultural Heritage Ordinance and the HPOZ Ordinance cannot prevent a property from being impacted by demolition or redevelopment or prevent structures from being altered so long as an applicant has gone through all necessary processes, including environmental review. These losses are anticipated to be significant throughout the City and region as a result of reasonably foreseeable development from the Proposed Plan and from previously approved projects but not constructed in the Plan area, as well as reasonably foreseeable development and previously approved but not built projects in the County and surrounding Community Plan areas. As discussed above, there is no identified feasible mitigation measure to protect historical resources within the Plan Area and for the same reasons there is no identified feasible mitigation measures outside the Plan Area to avoid cumulative impacts and the Proposed Plan would result in significant impacts and cumulatively considerable contributions to significant cumulative impacts.

ARCHAEOLOGICAL RESOURCES

Based upon existing studies documenting archaeological resources recovered from the prehistoric era to the present, the Los Angeles Basin and San Fernando Valley are known to have high archaeological sensitivity, and past development has resulted in substantial adverse changes in the significance of various archaeological resources prior to the implementation of regulations enacted for the purpose of avoiding disturbance, damage, or degradation of these resources. Future development may uncover or disturb known or previously unknown archaeological resources. However, implementation of Mitigation Measures **CR1**, **CR2**, and **CR3** would reduce impacts related to archaeological resources to a less than significant level. The Proposed Plan's effect on archaeological resources would be reduced to a level that would not be cumulatively considerable.

PALEONTOLOGICAL RESOURCES

Based upon the geologic history of the Los Angeles Basin, and the high paleontological sensitivity of the rock units within this region, there is the possibility that ground-disturbing activities during future construction may uncover previously unknown paleontological resources or sites. However, implementation of Mitigation Measures **CR4, CR5**, and **CR6** would reduce impacts related to archaeological resources to a less than significant level. The Proposed Plan's effect on paleontological resources would be reduced to a level that would not be cumulatively considerable.

HUMAN REMAINS

Past development has disturbed human remains, including those interred outside of formal cemeteries. This has led to the implementation of specific requirements to preserve such remains, as codified in CEQA Guidelines Section 15064.5(e) and PRC Section 5097.98. There is the possibility that ground-disturbing

activities during future construction could uncover previously unknown and buried human remains. Treatment of human remains is addressed by standard regulatory requirements, which apply to all development projects statewide. Any development project, including those in accordance with the Proposed Plan would be subject to these same regulations. The Proposed Plan's effect on human remains would not be cumulatively considerable.

TRIBAL CULTURAL RESOURCES

As discussed above, no TCR were identified during AB 52 tribal consultation. Nonetheless, for projects that disturb previously undisturbed soils, construction activities could encounter TCRs and an impact could occur. However, implementation of Mitigation Measures **CR7** and **CR8** would reduce impacts related TCRs to a less than significant level. Therefore, the Proposed Projects effect on tribal cultural resources would not be cumulatively considerable.

REFERENCES

California Code of Regulations, Title 14, Chapter 3 15064.5. (b)(3).

City of Los Angeles, *Conservation Element of the City of Los Angeles General Plan*, adopted September 26, 2001.

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City of Los Angeles, Department of City Planning, Office of Historic Resources, *Historic-Cultural Monument List,* last updated November 7, 2017, https://preservation.lacity.org/sites/default/files/HCMDatabase%23110717.pdf.

City of Los Angeles, Department of City Planning, Office of Historic Resources, *SurveyLA Historic Resources Survey Report Hollywood Community Plan Area,* August 2011 and revised in November 2015.

City of Los Angeles, *Draft Hollywood Community Plan*, 2016.

Community Redevelopment Agency of the City of Los Angeles, *Historic Resources Survey: Hollywood Redevelopment Project Area,* February 2010.

National Register Federal Program Regulations, Title 36, Chapter I, Part 60, Section 60.2.

SurveyLA, http://preservation.lacity.org/news/field-survey-methodology and http://preservation.lacity.org/surveyla-findings-and-reports#Hollywood.

US Department of the Interior National Park Service, *National Register of Historic Places Program: Research Database*, www.nps.gov/nr/research/, accessed October 6, 2016.

4.6 GEOLOGY AND SOILS

This section provides an overview of geology and soils in the Project Area and evaluates impacts associated with geology and soils for the Proposed Plan. Topics addressed include suitability of soil for development, seismicity, faults, ground shaking, liquefaction, and landslides. This section was prepared utilizing documents and maps published by the California Department of Conservation (DOC), California Geological Survey (CGS), County of Los Angeles, City of Los Angeles, and other applicable sources.

REGULATORY FRAMEWORK

Federal, state and local laws, regulations, plans, and guidelines that are potentially applicable to the Proposed Plan are summarized below.

FEDERAL

International Building Code (IBC). The IBC is published by the International Code Council and forms the basis of California's building code. It has been adopted by the California Legislature to address the specific building conditions and structural requirements for California. The IBC contains provisions that are intended to ensure that structures can adequately resist seismic forces during earthquakes. These seismic provisions represent the best available guidance on how structures should be designed and constructed to limit seismic risk.

National Pollutant Discharge Elimination System (NPDES). NPDES permits are required by Section 402 of the Clean Water Act. The goal of the NPDES diffuse-source regulations is to improve the quality of stormwater discharged to receiving waters to the "maximum extent practicable" through the use of best management practices (BMPs). The NPDES permit system regulates point source discharges (e.g., a municipal or industrial discharge at a specific location or pipe) and certain types of diffuse source dischargers (e.g., municipal stormwater and construction runoff). The NPDES permit sets erosion control standards and requires implementation of nonpoint source control of surface drainage through the application of a number of BMPs to decrease the effects of erosion and sedimentation associated with grading. See Section 4.9, Hydrology and Water Quality, of this Draft EIR for further discussion of the NPDES.

STATE

Alquist-Priolo Earthquake Fault Zoning Act (Alquist-Priolo Act). The Alquist-Priolo Act, which is codified in the Public Resources Code (PRC) Division 2, Chapter 7.5, provides policies and criteria to assist cities, counties, and state agencies in the development of structures for human occupancy across the trace of active faults.[1] The Alquist-Priolo Act was intended to provide citizens of the state with increased safety and to minimize the loss of life during and immediately following earthquakes by facilitating seismic retrofitting to strengthen buildings, including historical buildings, against ground shaking. This Act requires the State Geologist to establish regulatory zones known as "Earthquake Fault Zones" around the surface traces of active faults and to issue appropriate maps. Before a project can be permitted within an Alquist-Priolo Earthquake Fault Zone, the City of Los Angeles requires a geologic investigation to

[1]A fault trace is the intersection of a geological fault with the ground surface, leaving a visible mark; also, the line commonly plotted on geologic maps to represent a fault (U.S. Geological Survey, Earthquake Glossary, https://earthquake.usgs.gov/learn/glossary/?term=fault%20trace).

demonstrate that proposed building(s) will not be constructed across active faults. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (generally 50 feet).

Seismic Hazards Mapping Act. To address the effects of strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events, the State of California passed the Seismic Hazards Mapping Act of 1990. Under the Seismic Hazards Mapping Act, which is codified in PRC Chapter 7.8, Sections 2690-2699.6, the State Geologist is required to delineate "seismic hazard zones." Cities and counties must regulate certain development projects (i.e., development projects that involve structures for human occupancy with the exception of single-family dwellings that are less than two stories and are not part of a development of four or more dwellings, and subdivision of land which contemplates the eventual construction of structures for human occupancy) within these zones to ensure that geologic and soil conditions are investigated and appropriate mitigation measures, if any, are incorporated into development plans. The State Mining and Geology Board provides additional regulations and policies to assist municipalities in preparing the Safety Element of their General Plan and encourages land use management policies and regulations to reduce and mitigate those hazards to protect public health and safety. Under PRC Section 2697, cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard. The requirement for a report may be waived if the city finds that no undue seismic hazard exists, based on information resulting from studies conducted on sites in the immediate vicinity of the project and of similar soil composition to the project site. Each city or county shall submit one copy of each geotechnical report, including mitigation measures, to the State Geologist within 30 days of its approval.

California Building Code (CBC). The CBC, found in California Code of Regulations (CCR) Title 24, is a compilation of the state building standards, including seismic safety standards for new buildings. Each jurisdiction in California must adopt its own building code that incorporates the CBC. Local codes are permitted to be more stringent than the CBC (with limitations), but, at a minimum, are required to meet all State standards and enforce the regulations of the CBC. The CBC standards are based on (1) building standards that have been adopted by state agencies without change from the IBC, (2) building standards based on the IBC that have been changed to address particular California conditions, and (3) building standards authorized by the California Legislature but not covered by the IBC.

Given the state's susceptibility to seismic events, the seismic standards within the CBC are among the strictest in the world. The CBC applies to all occupancies in the state, except where stricter standards have been adopted by local agencies. Chapter 16 of the CBC deals with structural design requirements governing seismically resistant construction (Section 1604), including (but not limited to) factors and coefficients used to establish seismic site class and seismic occupancy category for the soil/rock at the building location and the proposed building design (Sections 1613.5 through 1613.7). Chapter 18 includes (but is not limited to) the requirements for foundation and soil investigations (Section 1803); excavation, grading, and fill (Section 1804); allowable load-bearing values of soils (Section 1806); and the design of footings, foundations, and slope clearances (Sections 1808 and 1809), retaining walls (Section 1807), and pier, pile, driven, and cat-in-place foundation support systems (Section 1810). Chapter 33 includes (but is not limited to) requirements for safeguards at worksites to ensure stable excavations and cut or fill slopes (Section 3304).

CBC Appendix J applies to grading, excavation, and earthwork construction, and prohibits grading from occurring without first having obtained a permit from the building official. Section J104.3 requires the preparation of a geotechnical report that contains at least the following:

- The nature and distribution of existing soils,
- Conclusions and recommendations for grading procedures,
- Soil design criteria for any structures or embankments required to accomplish the proposed grading, and

- Where necessary, slope stability studies, and recommendations and conclusions regarding site geology.

LOCAL

City of Los Angeles General Plan Safety Element and Conservation Element. State law requires that the City's General Plan includes a Safety Element, which addresses the issue of protecting its people from unreasonable risks associated with natural disasters (e.g., fires, floods, and earthquakes). The Safety Element of the General Plan contains policies that emphasize seismic safety issues because seismic events present the most widespread threat of devastation to life and property. The Safety Element provides a contextual framework for understanding the relationship between hazard mitigation, response to a natural disaster, and initial recovery from a natural disaster. Policy 1.1.6 of the Safety Element addresses compliance with applicable state and federal planning and development regulations (e.g., Alquist-Priolo Act, Seismic Hazards Mapping Act and Cobey-Alquist Flood Plain Management Act).

The Conservation Element is intended to provide for the conservation and preservation of natural resources. Policies of the Conservation Element address the effect of erosion on natural resources, such as beaches, watersheds and watercourses. The Conservation Element cites erosion of hillsides resulting in the loss of natural watersheds and features, as well as flooding and endangerment to structures and people, as ongoing issues. The Conservation Element also contains limited policies related to erosion and refers to the Los Angeles Municipal Code (LAMC) Sections 91.700 et seq. and the Specific Plan for Management of Flood Hazards (Ordinance 172.081) for specific guidance.

Los Angeles Building Code (LABC). Earthwork activities, including grading, are governed by the LABC, which is contained in LAMC Chapter IX, Article 1. Specifically, Section 91.7006.7 of the LABC includes requirements regarding import and export of material; Section 91.7010 includes regulations pertaining to excavations; Section 91.7011 includes requirements for fill materials; Section 91.7013 includes regulations pertaining to erosion control and drainage devices; Section 91.7014 includes general construction requirements; and Section 91.7016 includes regulations for areas that are subject to slides and unstable soils. Additionally, the LABC includes specific requirements addressing seismic design, site grading, foundation design, cut and fill slope design, soil expansion, geologic investigations and reports before and during construction, retaining walls, soil and rock testing, basement walls, shoring of adjacent properties, and potential primary and secondary seismic effects and groundwater.

City requirements to address grading, excavation, and fill are specified in LABC (i.e., LAMC Chapter IX, Article 1, Division 70). Under this part of the LABC, the Los Angeles Department of Building and Safety (LADBS) has the authority to withhold building permit issuance if a project cannot mitigate potential hazards to the project or which are associated with the project. The Grading Code periodically is revised to reflect new technology and improved standards and requirements.

The LABC incorporates by reference the CBC, with City amendments for additional requirements; LADBS is responsible for implementing the provisions of the LABC. Throughout the permitting, design, and construction phases of a building project, LADBS engineers and inspectors confirm that the requirements of the LABC pertaining specifically to geoseismic and soils conditions are being implemented by project architects, engineers, and contractors.

Standard Urban Stormwater Mitigation Plan (SUSMP) Requirements. On March 8, 2000, SUSMP requirements were approved by the Los Angeles Regional Water Quality Control Board (LARWQCB) to address stormwater pollution from new construction and redevelopment projects. The SUSMP requirements contain a list of minimum BMPs that must be employed to infiltrate or treat stormwater runoff, control peak flow discharge, and reduce the post-project discharge of pollutants from stormwater conveyance systems. SUSMP requirements include BMPs to decrease the effects of erosion. See Section 4.9, Hydrology and Water Quality for further discussion of the SUSMP.

Stormwater Pollution Prevention Plan (SWPPP). As part of the NPDES permitting system, a SWPPP is required to be prepared prior to the beginning of construction activities. The SWPPP specifies BMPs that will prevent construction pollutants from contacting stormwater with the intent of keeping all products of erosion from moving off-site into receiving waters. See Section 4.9, Hydrology and Water Quality for further discussion of the SWPPP.

Hillside Construction Regulation (HCR). The HCR Supplemental Use District, effective March 2017, was established by Ordinance No. 184827 to provide additional protections that would address the cumulative construction related impacts of multiple single-family houses in hillside areas. New single-family home developments in HCR districts are required to comply with grading limits, hauling truck operation standards, and specific operating hours for construction activity. In addition, any single-family home development exceeding 17,500 square feet in a HCR district will need to file for a Site Plan Review discretionary approval. Properties located within HCR districts are identified with the HCR suffix as part of the zoning string. There are currently two HCR districts in the western part of the Community Plan Area (CPA): the Bel Air Beverly Crest neighborhood (Ordinance 184828, effective March 2017) and the Bird Streets and Laurel Canyon neighborhood (Ordinance 185491, effective May 28, 2018).

EXISTING SETTING

SEISMICITY

The entire Southern California region is considered a seismically active region. Seismic events present the most widespread threat of devastation to life and property. With an earthquake, there is no containment of potential damage. Since 1800, there have been approximately 60 damaging seismic events, or earthquakes, in the Los Angeles region. In 1857, one earthquake exceeded Richter magnitude 8.0. Since 1933, there have been four moderate-size earthquakes which have caused numerous deaths and substantial property damage in the metropolitan Los Angeles area. These four events are identified by their location as the Long Beach (March 11, 1933; magnitude 6.3), San Fernando (February 9, 1971; magnitude 6.4), Whittier Narrows (October 1, 1987; magnitude 5.9), and Northridge (January 17, 1994; magnitude 6.7) earthquakes.

The Project Area may be exposed to strong ground shaking during a seismic event since it is within the seismically-active Southern California region. Issues of concern relating to earthquakes include fault rupture, strong ground shaking, liquefaction, and landslides.

Faults. A fault is a fracture or line of weakness in the earth's crust, along which rocks on one side of the fault are offset relative to the same rocks on the other side of the fault. Based on criteria established by the California Geological Survey, faults may be categorized as active, potentially active, or inactive. Active faults are those that show evidence of surface displacement within the last 11,000 years (Holocene age). Potentially active faults are those that show evidence of surface displacement within the last 1.6 million years (Quaternary age). Faults showing no evidence of surface displacement within the last 1.6 million years may be considered inactive in most cases.

Many active earthquake fault zones are mapped in the Los Angeles area. A number of earthquake faults are visible and aboveground, such as the San Andreas Fault. However, earthquakes along unmapped faults, such as the blind thrust fault associated with the Northridge earthquake, are increasingly becoming the focus of study and concern. These faults may dominate the geology of the Los Angeles Basin in a way not previously known.

Table 4.6-1 provides a summary of major active faults in the Los Angeles region, and **Figure 4.6-1** identifies the faults in the Southern California region.

TABLE 4.6-1: MAJOR NAMED ACTIVE FAULTS IN SOUTHERN CALIFORNIA

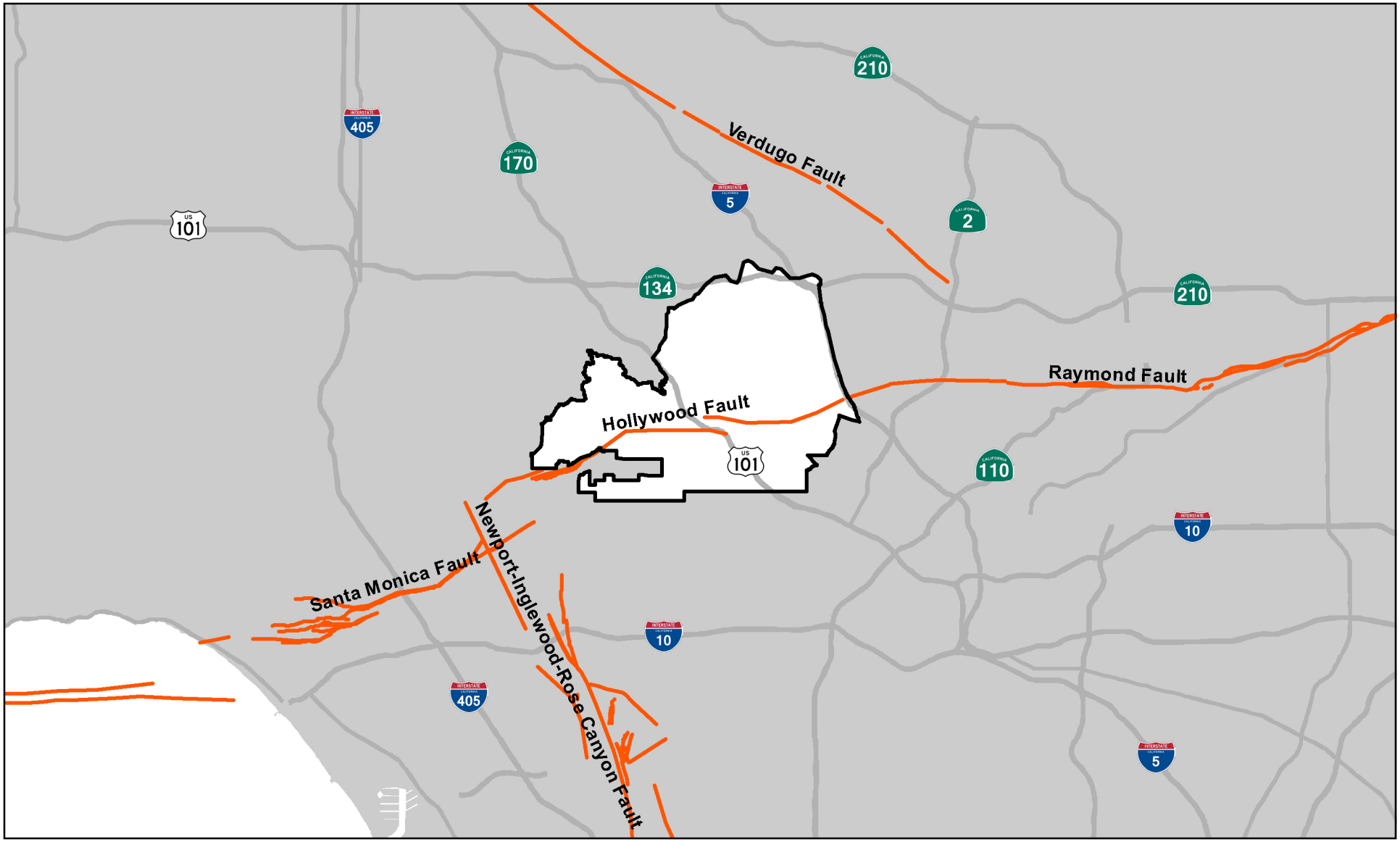
Fault	Maximum Magnitude	Slip Rate (mm/yr)	Type of Fault	Most Recent Seismic Event
Cabrillo	6.0 - 6.8	Uncertain	Right normal	Holocene
Cucamonga	6.0 - 7.0	5.0 - 14.0	Thrust	Holocene
Elsinore (Glen Ivy Segment)	6.5 - 7.5	4.0	Right lateral strike-slip	1910
Hollywood	5.8 - 6.5	0.33 - 0.75	Left reverse	Holocene
Los Alamitos Thrust	Uncertain	Uncertain	Thrust	Uncertain
Malibu Coast	Uncertain	0.3	Reverse	Holocene
Northridge Thrust (Pico Thrust)	6.5 - 7.5	3.5 - 6.0	Thrust	1994
Newport-Inglewood – Rose Canyon	6.0 - 7.2	0.8 – 2.1	Right lateral	Holocene
Oak Ridge	6.5 - 7.5	3.5 - 6.0	Thrust	Holocene
Palos Verdes	6.0 - 7.0	0.1 - 3.0	Right reverse	Holocene
Raymond	6.0 - 7.0	0.10 - 0.22	Left lateral	Holocene
San Andreas (Southern Segment)	6.8 - 8.0	20.0 - 35.0	Right lateral strike-slip	1857
San Cayetano	6.5 - 7.3	1.3 - 9.0	Thrust	Uncertain
San Fernando	6.0 - 6.8	5.0	Thrust	1971
San Gabriel	Uncertain	1.0 - 5.0	Right-lateral strike-slip	Late Quaternary
San Jacinto (San Bernardino Segment)	6.5 - 7.5	7.0 - 17.0	Right lateral strike-slip	1968
Santa Monica	6.0 - 7.0	0.27 - 0.39	Left reverse	Late Quaternary
Sierra Madre	6.0 - 7.0	0.36 - 4.0	Reverse	Holocene
Simi (also known as Santa Rosa)	Uncertain	Uncertain	Reverse	Holocene
Verdugo	6.0 - 6.8	0.5	Reverse	Holocene
Whittier	6.0 - 7.2	2.5 - 3.0	Right lateral strike-slip	1987

SOURCE: Southern California Earthquake Data Center, http://www.data.scec.org/significant/fault-index.html, accessed September 12, 2016.

The Hollywood fault traverses through the Project Area. The Hollywood fault is located along the southern side of the eastern Santa Monica Mountains. This fault starts in the City of Beverly Hills, traverses through the Project Area to Los Angeles River, and continues eastward as the Raymond fault. Within the Project Area, the Hollywood Alquist-Priolo Earthquake Fault Zone generally encompasses the area surrounding Sunset Boulevard in the western portion of the Project Area, Franklin Avenue, Yucca Street, Carlos Avenue, Hollywood Boulevard, and Los Feliz Boulevard in the eastern portion of the Project Area. Several residential streets that are located near the aforementioned streets are also located within this fault zone. The Hollywood fault and Earthquake Fault Zone are shown in **Figure 4.6-2**.

In addition to the Hollywood fault, four faults are located within two miles of the Project Area: the Raymond, Verdugo, Newport-Inglewood-Rose Canyon, and Santa Monica faults (see **Figure 4.6-1**). The Raymond fault traverses in an east-west direction from Interstate 5 (I-5), just east of the Project Area's eastern boundary, to the Sierra Madre fault at the southern side of the San Gabriel Mountains.

The Verdugo fault is located approximately 1.5 miles north of the Project Area. This fault starts in the Arleta-Pacoima Community of the City of Los Angeles and travels in a southeasterly direction towards the State Route 2/State Route 134 (SR-2/SR-134) junction, where it becomes the Eagle Rock fault.

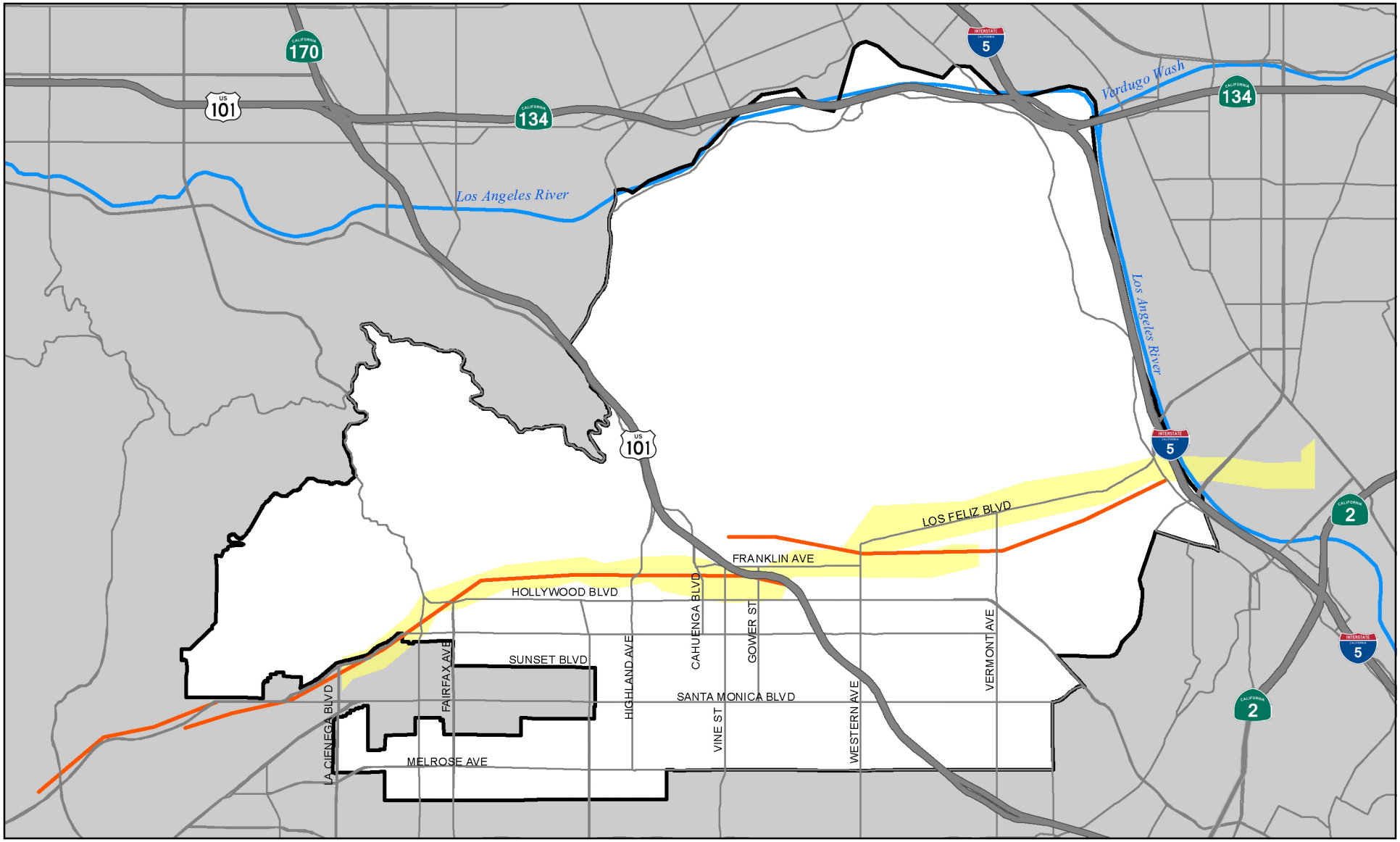


SOURCE: City of Los Angeles, 2016; California Department of Conservation, 2018; TAHA, 2018.

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FIGURE 4.6-1
ACTIVE FAULTS



LEGEND:

Hollywood CPA

Hollywood Fault

Alquist-Priolo Earthquake Fault Zone

N

W E

S

0 2,900 5,800 Feet

SOURCE: City of Los Angeles, 2016; California Department of Conservation, 2016; TAHA, 2018.

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FIGURE 4.6-2

ALQUIST-PRIOLO
EARTHQUAKE FAULT ZONE

A segment of the Newport-Inglewood fault is approximately 1.8 miles southwest of the Project Area. This fault extends from Beverly Hills to Newport Bay along the western side of the Los Angeles Basin. From Newport Bay, it heads offshore. The offshore reach of the fault zone continues southeastward until offshore of Oceanside where it continues on a more south-southeast trend, paralleling the coastline in San Diego.

The Santa Monica fault is located approximately 2.0 miles southwest of the Project Area. The fault travels in an east-west direction. It extends from Beverly Hills to Potrero Canyon and offshore towards Malibu.

Ground Failure. The principal seismic hazard occurring as a result of an earthquake produced by local faults is strong ground shaking. The intensity of ground shaking depends on several factors, including the magnitude of the earthquake, distance from the earthquake epicenter, and the underlying soil conditions. In general, the larger the magnitude of an earthquake and the closer a site to the epicenter of the event, the greater the effects will be. However, soil conditions can also amplify the earthquake shock waves. Generally, the shock waves remain unchanged in bedrock, are amplified to a moderate degree in thick alluvium, and are greatly amplified in thin alluvium.

Most of the Project Area is covered by Quaternary alluvial basin and fan deposits consisting mainly of sand, silt, and clay. Since not all alluvial material is unconsolidated (clay, for example, is highly cohesive), the risk of structure damage in the Project Area as the result of earthquake-induced ground shaking would vary from site to site. Younger alluvial deposits is located along the flatlands, with older Quaternary deposits mostly exposed over the southern portion of the Project Area, as well as in the hillside area located at the eastern portion of the Project Area. The young Quaternary alluvial deposits consist mainly of clayey sand and silt that overlie older Quaternary deposits at depths of 10 to 15 feet. Most of these sediments likely accumulated as slope wash and debris flow deposits along the base of the Santa Monica Mountains.[2]

In the northeasterly portion of the Project Area, younger alluvium consists of sand and silty sand. Additionally, modern streambed sediments are located along and next to the Los Angeles River, I-5, and SR-134. In this area, loose to moderately dense sand and silty sand are found. These finer sediments of sand and silty sand are very porous and move easily during seismic activity. These types of soil tend to amplify damage during seismic activity.[3]

Pre-quaternary bedrock is primarily located in the Santa Monica Mountains, as well as in the hillside at the eastern portion of the Project Area. Pre-quaternary bedrock is also found in several areas in the flatlands towards the eastern portion of the Project Area. Cretaceous granitic rocks are located along the western portion of the Santa Monica Mountains within the Project Area. These soil types are relatively stable and do not easily move during seismic activity.[4]

Modern, well-constructed buildings are designed to resist ground shaking through the use of shear walls and reinforcements. The entire Southern California area, which includes the Project Area, is considered a seismically active region, and every building in the region is susceptible to ground shaking and earthquakes.

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[2]California Department of Conservation (DOC), Division of Mines and Geology, *Seismic Hazard Zone Report 026, Seismic Hazard Zone Report for the Hollywood 7.5-Minute Quadrangle, Los Angeles County, California*, 1998; California DOC, Division of Mines and Geology, *Seismic Hazard Zone Report 016, Seismic Hazard Zone Report for the Burbank 7.5-Minute Quadrangle, Los Angeles County, California*, 1998; California DOC, Division of Mines and Geology, *Seismic Hazard Zone Report 023, Seismic Hazard Zone Report for the Beverly Hills 7.5-Minute Quadrangle, Los Angeles County, California*, 1998.

[3]California DOC, Division of Mines and Geology, *Seismic Hazard Zone Report 016, Seismic Hazard Zone Report for the Burbank 7.5-Minute Quadrangle, Los Angeles County, California*, 1998.

[4]California DOC, Division of Mines and Geology, *Seismic Hazard Zone Report 026, Seismic Hazard Zone Report for the Hollywood 7.5-Minute Quadrangle, Los Angeles County, California*, 1998; California DOC, Division of Mines and Geology, *Seismic Hazard Zone Report 016, Seismic Hazard Zone Report for the Burbank 7.5-Minute Quadrangle, Los Angeles County, California*, 1998; California DOC, Division of Mines and Geology, *Seismic Hazard Zone Report 023, Seismic Hazard Zone Report for the Beverly Hills 7.5-Minute Quadrangle, Los Angeles County, California*, 1998.

As discussed above in the Regulatory Framework subsection, the LABC includes regulations and requirements designed to reduce risks to life and property to the maximum extent feasible.

Liquefaction. Liquefaction involves the sudden loss of strength in saturated, cohesionless soils that are subjected to ground vibration and result in temporary transformation of the soil into a fluid mass. If the liquefying layer is near the surface, the effects are much like that of quicksand for any structures located on top of it. If the layer is deeper in the subsurface, it may provide a sliding surface for the material above it. The effects of liquefaction include the loss of the soil's ability to support footings and foundations, which can cause buildings and foundations to buckle. These failures were observed in the 1971 San Fernando and the 1994 Northridge earthquakes. Liquefaction-related phenomena include subsidence and lateral spreading. Subsidence is the gradual settling or sudden sinking of land due to movement or removal of underlying earth materials. Lateral spreading can occur on relatively shallow slopes. Liquefaction of shallow layers causes a loss of shear strength, allowing the surface to move laterally across gentle slopes. Areas with lateral spreading potential would most likely be adjacent to drainages where slopes are steepest and water may be more likely to accumulate.

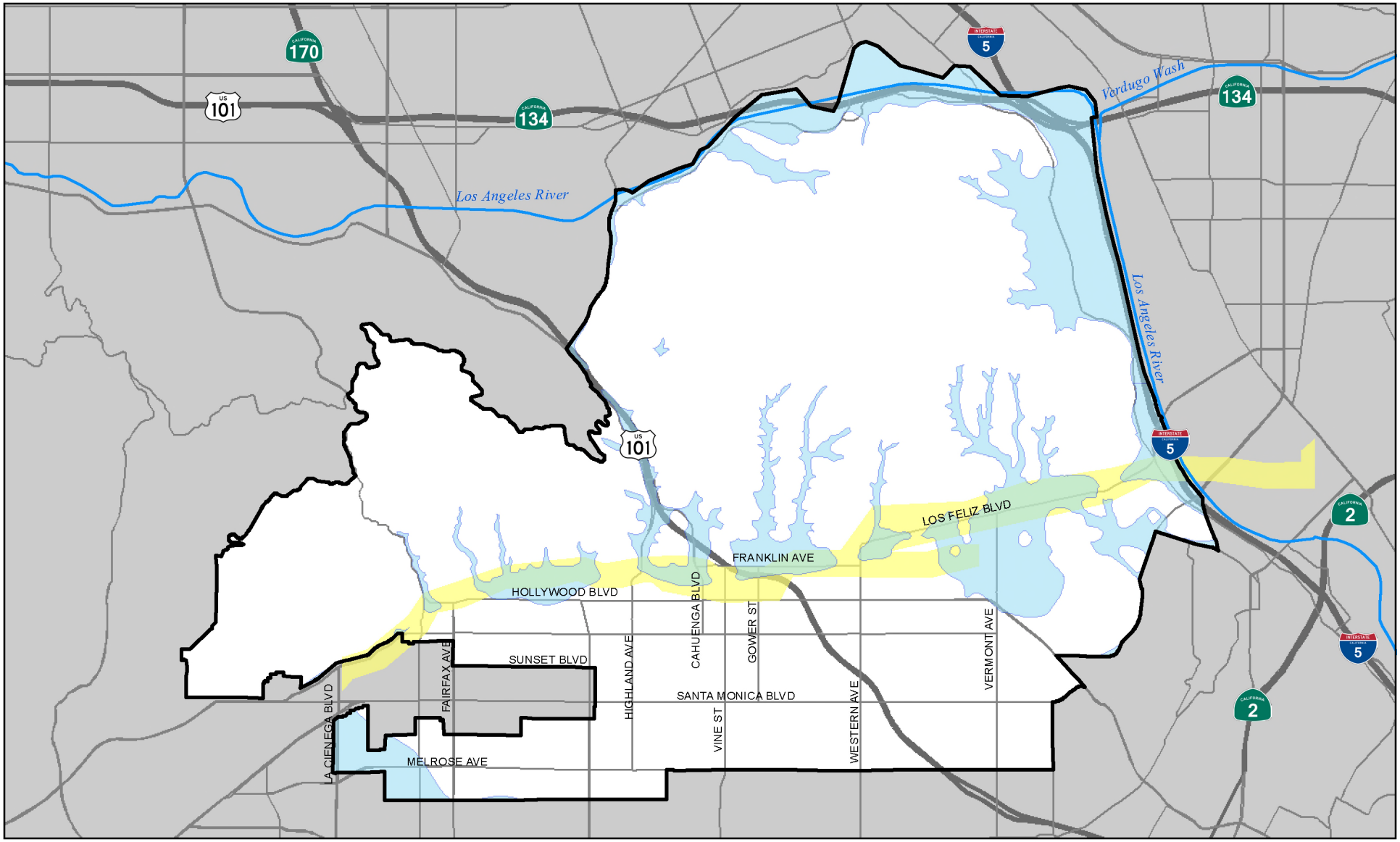
The Beverly Hills and Burbank Quadrangle Seismic Hazard Zones Maps, as well as the Hollywood Quadrangle Earthquake Zones of Required Investigation Map, prepared by the DOC, Division of Mines and Geology, identify the southwestern, northern, and eastern portions of the Project Area, as well as various areas north of Hollywood Boulevard, as located in liquefaction zones and are, thus, susceptible to liquefaction. Along the base of the hillside, liquefaction zones overlap with the Hollywood Earthquake Fault Zone. **Figure 4.6-3** identifies the portions of the Project Area that is within liquefaction zones.

Landslide. A landslide is a mass down-slope movement of earth materials under the influence of gravity, and includes a variety of forms including rockfalls, debris slides, mudflows, block slides, soil slides, slumps, and creeps. These mass movements are triggered or accelerated by earthquake-induced ground motion, increased water content, excessive surface loading, or alteration of existing slopes by man or nature. Earthquake-induced landslides, usually associated with steep canyons and hillsides, can originate on, or move down, slopes as gentle as one degree in areas underlain by saturated, sandy materials, such as alluvium, which are present in the Project Area. In addition to being triggered by earthquakes, landslides can be caused by increased water content, excessive surface loading, or alteration of existing slopes by man or nature.

The Santa Monica Mountain Range extends from the Project Area's northern boundary to Franklin Avenue. Additionally, a hill is located in the area east of Talmadge Street. According to the California DOC, Division of Mines and Geology Beverly Hills and Burbank Quadrangle Seismic Hazard Zones Maps, as well as the Hollywood Quadrangle Earthquake Zones of Required Investigation Map, a majority of the Santa Monica Mountains within the Project Area north of Franklin Avenue and Sunset Boulevard are within earthquake-induced landslide zones. Additionally, various portions of the hillside area east of Talmadge Street are within earthquake-induced landslide zones. **Figure 4.6-4** identifies the portions of the Project Area that are within earthquake-induced landslide zones.

Unstable Soils. Under certain circumstances, strong ground shaking can cause densification or compaction of soils, resulting in local or regional settlement of the ground surface. This can result in local differential settlement and damage to foundations and structures, as well as damage to water and sewer lines. The potential for seismically-induced settlement to occur is controlled by the intensity and duration of ground shaking, and the relative density of the subsurface soils.[5] Recently deposited alluvial sediments that contain loose to moderately dense sands are potentially subject to seismically induced settlement. The areas along and next to the Los Angeles River, I-5, and SR-134, as well as the northeasterly portion of the Project Area, contain such alluvial sediments – Tujunga fine sandy loam (see **Figure 4.6-5**).

[5]Relative density is the ratio between the in-place density and the maximum density.



LEGEND:

Hollywood CPA | Liquefaction Zone | Alquist-Priolo Earthquake Fault Zone

N
W E
S

0 2,900 5,800 Feet

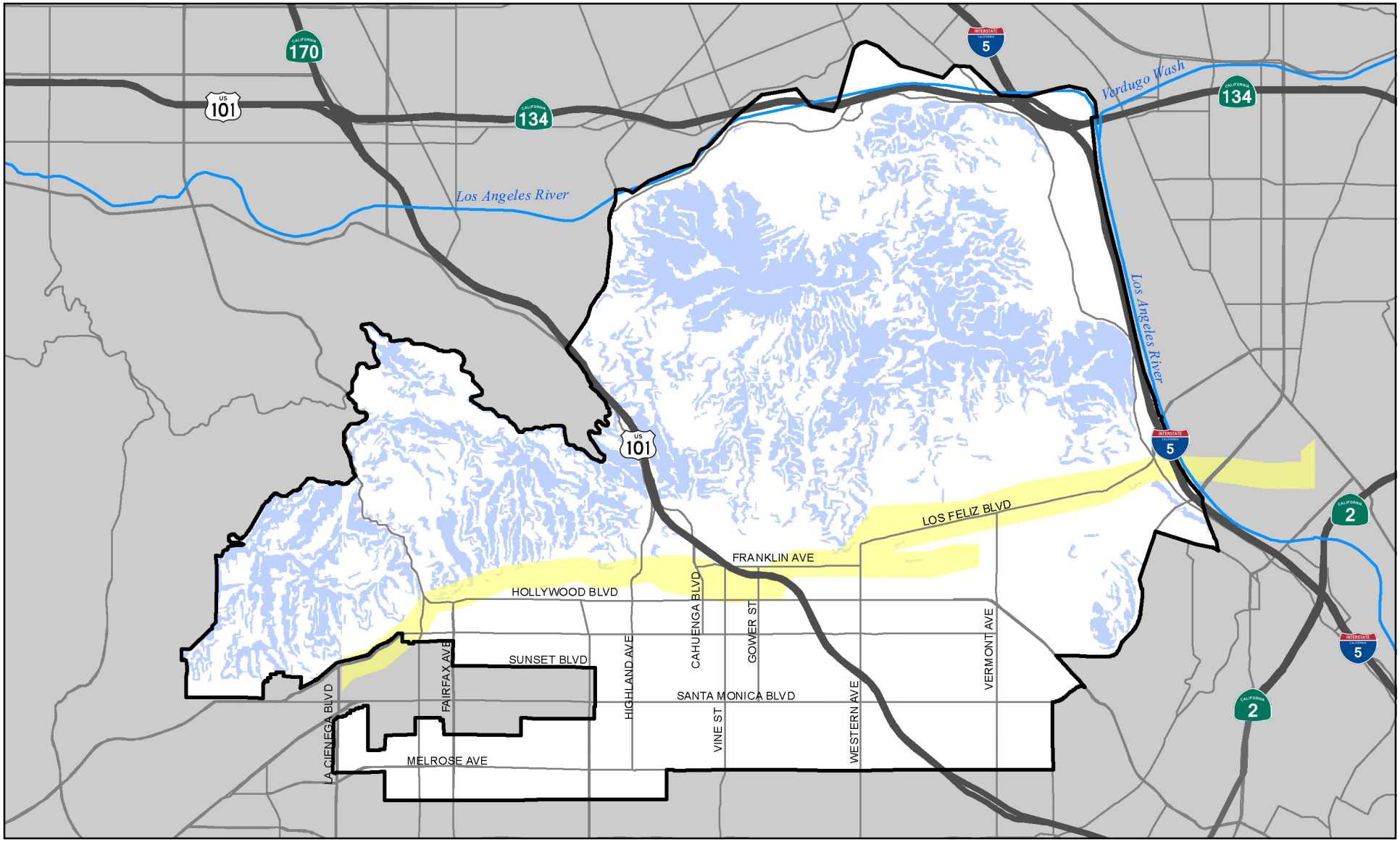
SOURCE: City of Los Angeles, 2016; TAHA, 2018.

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FIGURE 4.6-3

LIQUEFACTION ZONES



LEGEND:

Hollywood CPA

Alquist-Priolo Earthquake Fault Zone

Landslide Area

N W E S

0 2,900 5,800 Feet

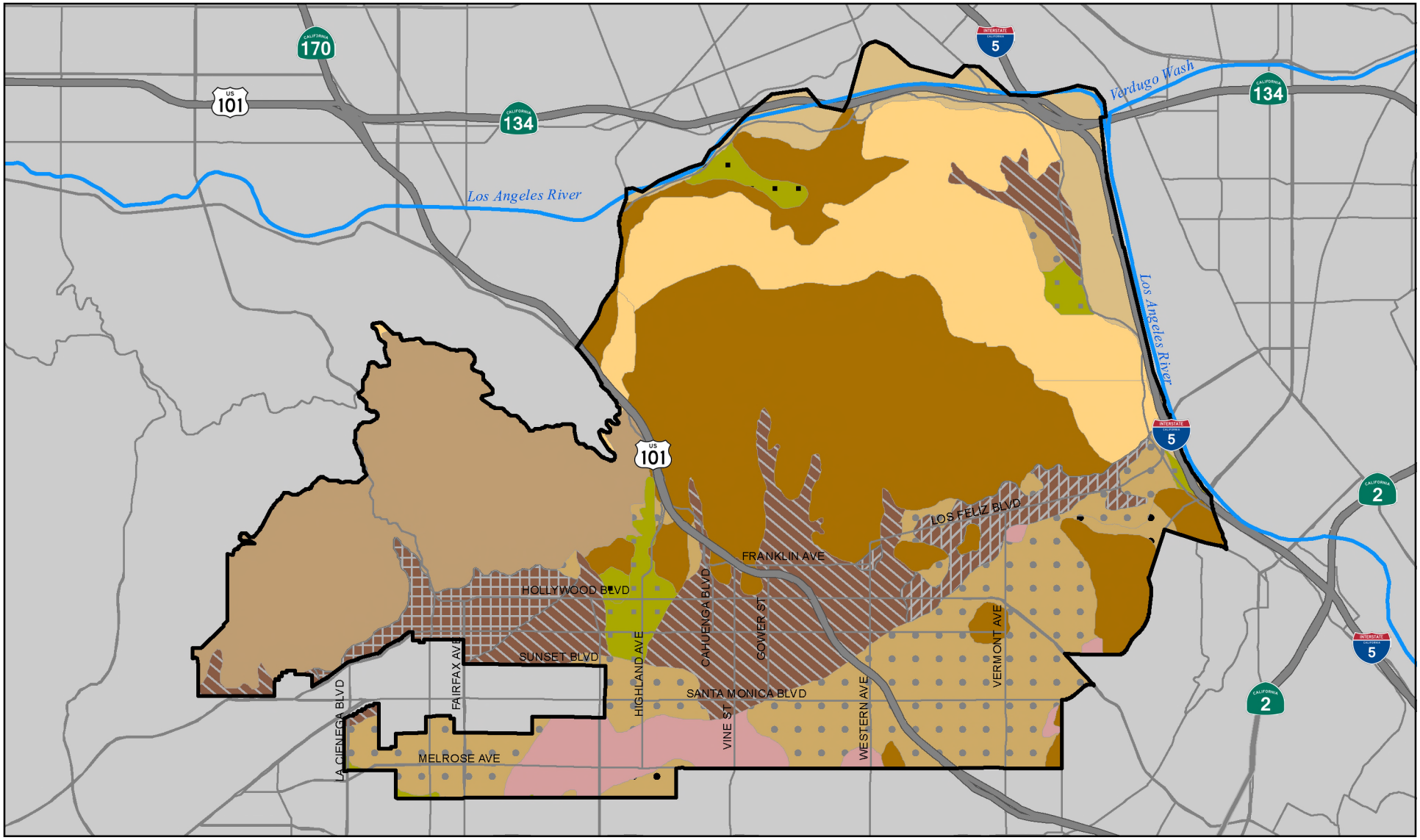
SOURCE: City of Los Angeles GeoHub; TAHA, 2016.

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FIGURE 4.6-4

EARTHQUAKE-INDUCED LANDSLIDE AREAS



LEGEND:

- Hollywood CPA
- Altamont Clay Loam
- Hanford Fine Sandy Loam
- Hanford Gravelly Sandy Loam
- Hanford Silt Loam
- Montezuma Clay Adobe
- Ramona Clay Loam
- Ramona Loam
- Santa Monica Mountains
- Tujunga Fine Sandy Loam
- Upper Los Angeles River
- Yolo Clay Loam
- Yolo Loam

N W E S

0 3,000 6,000 Feet

SOURCE: USGS, 2006; TAHA, 2018.

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FIGURE 4.6-5
SOIL TYPES

SOILS AND GEOLOGIC MATERIALS

The Project Area contains a variety of soils. Native soils found in the Santa Monica Mountains portion of the Project Area include Altamont clay loam, as well as soils associated with the Upper Los Angeles River and Santa Monica Mountains. Native soils found within the northerly base of the Santa Monica Mountains (within Forest Lawn – Hollywood Hills and Mt. Sinai Memorial Park) include Yolo Clay Loam and Altamont Clay Loam. Native soils found in the northeastern base of the Santa Monica Mountains (Los Angeles Zoo, Wilson and Harding Golf Courses, and John Ferraro Athletic Fields) include Tujunga Fine Sandy Loam, Yolo Loam, and Hanford Fine Sandy Loam.

The native soil that is predominately found in the hill at the eastern end of the Project Area is composed of Altamont Clay Loam. Native soils that are found within the southerly foothills of the Santa Monica Mountains and the flatlands include Hanford Silt Loam Montezuma, Hanford Fine Sandy Loam, Yolo Loam, Yolo Clay Loam, Clay Adobe, Ramona Clay Loam, and Ramona Loam. Pockets of Altamont Clay Loam can also be found within these areas.[6] The soils underlying the Project Area are shown in **Figure 4.6-5**.

Soil Erosion. Factors that contribute to potential soil erosion include climate, the physical characteristics of soils, topography, land use, and the amount of soil disturbance. Excessive soil erosion can eventually lead to damage of building foundations, roadways and dam embankments. Rates of erosion can vary depending on the soil material, structure, and placement by human activity. The erosion potential for soils is variable throughout the Project Area. Soil containing high amounts of silt can be easily erodible while sandy soils are less susceptible. In general, the loss of ground cover caused by construction activities is a primary factor contributing to an increase in soil erosion potential. Erosion potential is also directly related to the terrain's steepness. While the Project Area includes the Santa Monica Mountains to the north and a hill to the east, the actual potential for erosion is difficult to predict, as the conditions where erosion occurs are site-specific.

Expansive Soils. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. The ability of clayey soil to change volume can result in uplift or cracking to foundation elements or other rigid structures, such as slabs-on-grade, rigid pavements, sidewalks, or other slabs or hardscape located on these soils. Expansive soils, such as alluvium that are clay and silt based, are present within the Project Area. See **Figure 4.6-5** for areas that has clay- and silt-based soil.

Septic Tanks. The Project Area is served by City-owned wastewater treatment and disposal facilities. However, there are a few properties that use septic systems to dispose of wastewater as public sewers are not available nearby for connection or homes were built before public sewers were available. Since septic systems are on private property, property owners are completely responsible for taking care of them.[7]

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[6]County of Los Angeles, Department of Public Works, *2006 Hydrology Manual*, 2006; County of Los Angeles Department of Public Works, *Soil Types Shapefile*, http://ladpw.org/wrd/publication/, 2004.

[7]City of Los Angeles Department of Public Works, Bureau of Sanitation, *On-Site Wastewater Treatment Systems Map*, https://www.lacitysan.org/san/sandocview?docname=cnt009972, April 15, 2013.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines the Proposed Plan would have a significant impact related to geology and soils if it would:

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving;
  - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Division of Mines and Geology Special Publication 42.
  - Strong seismic ground shaking.
  - Seismic-related ground failure, including liquefaction.
  - Landslides.
- Result in substantial soil erosion or the loss of topsoil.
- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.
- Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.

METHODOLOGY

This analysis uses the thresholds in Appendix G of the State CEQA Guidelines to make a significance determination.

In 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. 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 a project. However, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze the impact of that exacerbated condition on the environment, which may include future residents and users within the Project Area. Analysis of the Appendix G questions in this impact analysis will apply to the decision from *CBIA v. BAAQMD*.

Baseline information for the analysis was compiled from a review of published geologic maps and reports, as well as information compiled and evaluated by the City of Los Angeles in conjunction with its overall planning and hazard mitigation processes to identify geologic conditions and geologic hazards in the areas that could potentially be affected by the Proposed Plan. For geology and soils, the areas that could potentially be affected by the Proposed Plan is the Project Area since potential impacts related to geology and soils are generally site-specific.

Independent of the CEQA process, there is a comprehensive regulatory framework implemented at the state and city levels to mitigate potential hazards associated with geologic and soils conditions. The design-controllable aspects of building foundation support, protection from seismic ground motion, and soil instability are governed by existing regulations. Compliance with these regulations is required, not optional. Any proponent of a development project must demonstrate compliance by incorporating the regulations in the project's design before permits for project construction are issued. The analysis presented

herein assumes compliance with all applicable laws, regulations, and standards, as part of the initial CEQA baseline and future conditions.

The impact analysis for geology and soils addresses impacts within the entire Project Area. It was based on proposed land use designations under the Proposed Plan, the existing geologic conditions and hazards in the Project Area, and the thresholds of significance for geology and soils.

IMPACTS

IMPACT 4.6-1 Would implementation of the Proposed Plan expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving the rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? **No impact.**

In light of the California Supreme Court ruling in *CBIA v. BAAQMD*, which 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 a project, the potential for substantial adverse effects on people or structures from the rupture of a known earthquake, an existing environmental condition, would not be an impact under CEQA unless the project exacerbated the existing environmental condition. The type of development expected to occur under the Proposed Plan is typical of urban environments and would 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 that would result in the rupture of a fault. While the Proposed Plan would increase development potential in some Active Change Areas, and some Administrative Change Areas and Non-Change Areas could potentially be redeveloped with higher density uses as permitted by the existing Zoning Code and General Plan land use designation, thereby potentially increasing the number of people and structures exposed to an earthquake rupture, the Proposed Plan would not cause or accelerate existing geologic hazards. Future development under the Proposed Plan would not exacerbate the rupture of the Hollywood fault or any other fault in the Project Area. Therefore, the Proposed Plan would have ***no impacts*** related to the rupture of a known earthquake fault.

The following information about the Earthquake Fault Zones, the implementation of the Proposed Project, and building and seismic codes is provided for informational purposes.

Table 4.6-1 and **Figure 4.6-1**, above, identify active and potentially active faults in the region, as well as within the Project Area. **Figure 4.6-2** shows the location of the Hollywood fault and the Alquist-Priolo Earthquake Fault Zone within the Project Area. The Hollywood fault traverses through the Project Area along the southern side of the eastern Santa Monica Mountains. This fault is within the Hollywood Earthquake Fault Zone and generally encompasses the area surrounding Sunset Boulevard in the western portion of the Project Area, Franklin Avenue, Yucca Street, Carlos Avenue, Hollywood Boulevard, and Los Feliz Boulevard in the eastern portion of the Project Area. Several residential streets that are located near the aforementioned streets are also located within this fault zone. Commercial and residential structures currently exist within the Earthquake Fault Zone.

The Alquist-Priolo Act mitigates fault rupture hazards by prohibiting the location of most structures for human occupancy across traces of active faults. Additionally, LADBS requires surface fault rupture hazard investigations for development projects located within an official or preliminary Alquist-Priolo Earthquake Fault Zone. Before a project can be permitted within an Earthquake Fault Zone, a fault investigation must be conducted to demonstrate that proposed building(s) will not be constructed across active faults. The investigation must be conducted by a licensed California Certified Engineering Geologist or Professional

Geologist who is experienced with fault investigations. If an active fault is found on a property, buildings are required to be set back from active fault traces. The building setback from an active fault is typically 50 feet, but is determined on a case-by-case basis, depending on whether the location, trend, and nature of the fault trace are accurately established.

Active Change Areas are proposed within the Hollywood Earthquake Fault Zone between La Brea Avenue and US-101, as well as along Hillhurst Avenue. The existing conditions in the Active Change Areas within the Earthquake Fault Zone include multi-family residential and commercial areas that are generally developed with existing uses. Proposed changes to the commercial areas would generally permit an increase in allowable floor area ratio (FAR). Proposed changes to the multi-family residential areas would implement reduced or new height limits in some areas and increased density to allow for more housing in other areas. As such, the Proposed Plan is expected to result in redevelopment of larger and taller structures and more people living in the Earthquake Fault Zone. Although the Proposed Plan does not propose changes that would affect development potential in the Administrative and Non-Change Areas, these areas could potentially be redeveloped with larger and taller structures that are permitted by the existing Zoning Code and General Plan land use designation and, thus, potentially increasing the number of people living in the Earthquake Fault Zone. Future development within the Earthquake Fault Zone (both in the Change and Non-Change Areas) would be subject to project-specific foundation and structural studies and imposition of structural design standards to reduce structural failure during a fault rupture. Development will be required to adhere to up-to-date seismic design requirements of the CBC and LABC, which ensure new buildings are designed to withstand seismic events through modern construction techniques (as further described in Impact Section 4.6-2, below).

Based on the above, the Proposed Plan would result in ***no impact*** related to fault rupture.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

No impact.

IMPACT 4.6-2 Would implementation of the Proposed Plan expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking? **No impact.**

In light of the California Supreme Court ruling in *CBIA v. BAAQMD*, which 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 a project, the potential for substantial adverse effects on people or structures from strong seismic ground shaking from earthquakes would generally not be an impact under CEQA unless it results from the project exacerbating the existing environmental condition. The type of development expected to occur under the Proposed Plan is typical of urban environments and would 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. While the Proposed Plan would increase development potential in some Active Change Areas, and some Administrative Change Areas and Non-Change Areas could potentially be redeveloped with higher density uses as permitted by the existing Zoning Code and General Plan land use designation, thereby potentially increasing the number of people and structures exposed to strong seismic ground shaking, the Proposed Plan would not cause or accelerate existing geologic hazards. This condition exists throughout the Los Angeles area given that it is a seismically active area. Future development under the

Proposed Plan would not exacerbate existing seismic conditions in the Project Area. Therefore, the Proposed Plan would have ***no impacts*** related to strong seismic ground shaking.

The following information about seismic risk and building and seismic codes is provided for informational purposes.

The Project Area and all communities in the City of Los Angeles are in a seismically active region and are subject to risk of damage to persons and property as a result of seismic ground shaking from earthquakes originating on one or more of the active faults in the region (**Table 4.6-2**). Any new development in the State, including future development within the Project Area, would be required to conform to the most up-to-date seismic design provisions to ensure new buildings are designed to resist ground shaking through modern construction techniques. Buildings in California are strictly regulated by the CBC, as adopted and enforced by each jurisdiction, to reduce risks from seismic events to the maximum extent possible. The currently accepted design standards for seismically induced ground shaking-resistant construction are addressed in the CBC and LABC. These requirements are considered minimum standards for the design and construction of buildings and must be incorporated into any final project designs. Because the design and construction of new habitable structures are required to be in compliance with the CBC's recommended seismic design criteria, potential hazards associated with strong seismic ground shaking on new development in the Project Area would be reduced.[8]

The City's plan check and permitting process ensures that all new construction adheres to adopted Building Code requirements and incorporates structural features and construction methods that meet seismic and geologic safety standards. Compliance with the CBC, LABC, Policy 1.1.6 of the General Plan Safety Element (as described in the Regulatory Framework, above), and related applicable regulatory requirements would reduce the level of risk to future residents or users associated with strong seismic ground shaking on any particular site within the Project Area.

Based on the above, the Proposed Plan would not result in impacts associated with seismic ground shaking, and ***no impact*** is anticipated.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

No impact.

IMPACT 4.6-3 Would implementation of the Proposed Plan expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction and/or landslides? **No impact.**

In light of the California Supreme Court ruling in *CBIA v. BAAQMD*, which 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 a project, the potential for substantial adverse effects on people or structures from seismic-related ground failure, generally a result of existing environmental conditions, would not be an impact under CEQA unless the project exacerbated the existing environmental conditions. The type of development expected

[8]Conformance to the recommended seismic design criteria does not constitute any kind of guarantee or assurance that substantial structural damage or ground failure would not occur if a maximum magnitude earthquake occurred. The primary goal of seismic design is to protect life through prevention of structural collapse and not to avoid all damage.

to occur under the Proposed Plan is typical of urban environments and would 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. While the Proposed Plan would increase development potential in some Active Change Areas, and some Administrative Change Areas and Non-Change Areas could potentially be redeveloped with higher density uses as permitted by the existing Zoning Code and General Plan land use designation, thereby potentially increasing the number of people and structures exposed to seismic-related ground failure, it would not cause or accelerate existing conditions with respect to geologic hazards which are common to areas throughout the City and region due to its seismically active nature. As such, future development under the Proposed Plan would not cause or exacerbate existing conditions with respect to seismic-related ground failure in the Project Area. Therefore, the Proposed Plan would have ***no impacts*** related to seismic-related ground failure.

The following information about liquefaction and landslides is provided for informational purposes.

Liquefaction. Liquefaction-prone areas cover the southwestern, northern, and eastern portions of the Project Area, as well as various areas north of Hollywood Boulevard along the foothills of the Santa Monica Mountains, as shown in **Figure 4.6-3**, above. The foothills and the southwestern portion of the Project Area are already developed with residential and commercial structures. The Proposed Plan would not directly increase liquefaction hazards because it would not affect seismic conditions or alter underlying soil or groundwater characteristics that govern liquefaction potential. However, some of the Active Change Areas are located in liquefaction zones, and some of the Active Change Areas would increase density compared to existing conditions. Additionally, some Non-Change areas and Administrative Change Areas have potential for build-out in liquefaction zones. As such, the number of occupied structures could increase in the Project Area, which could potentially increase the number of people or structures that could be exposed to liquefaction and geologic hazards.

Under the provisions of state law and LABC, all new construction in liquefaction-prone areas would be required to prepare a geotechnical report. Additionally, for properties with mapped maximum considered earthquake spectral response, as determined by Section 1613 of the CBC, a liquefaction potential study of the property is required. The recommendations (including structural and foundation design features) that are contained in the liquefaction potential study prepared by a geologist are required by the City to be incorporated in grading and construction plans. Required compliance with the recommendations identified in the project-specific geotechnical evaluation, the LABC, and any specific requirements established by Los Angeles Department of Public Works (LADPW) and/or the City's Engineer would ensure that future development (within both the Change and Non-Change Areas) would not be exposed to substantial risks associated with liquefaction. Therefore, the Proposed Plan would not be expected to create risks to future residents and users of the Project Area associated with liquefaction.

Landslides. As shown in **Figure 4.6-4**, above, a majority of the Santa Monica Mountains within the Project Area north of Franklin Avenue and Sunset Boulevard are within earthquake-induced landslide zones. Additionally, various portions of the hillside area east of Talmadge Street are within earthquake-induced landslide zones. It is the City's standard practice to require the preparation, review, and approval of geotechnical reports for new developments in landslide susceptible areas. Required compliance with the recommendations identified in the project-specific geotechnical evaluation, the LABC, and any specific requirements established by LADPW and/or the City's Engineer would ensure that future development within the Project Area would not be exposed to substantial risks associated with landslides. As such, future development during the lifetime of the Proposed Plan would not be expected to result in risks associated with landslides.

Conclusion

In summary, compliance with the LABC and the recommendations contained within the project-specific geotechnical reports and any specific requirements established by LADPW and/or the City's Engineer would help to minimize the potential risk of loss, injury, or death due to liquefaction and landslides for future residents and users within the Project Area. Moreover, future development under the Proposed Plan would not cause or exacerbate environmental conditions that would cause seismic-related ground failure in the Project Area. Therefore, the Proposed Plan would have ***no impacts*** related to seismic-related ground failure, including liquefaction and/or landslides.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

No impact.

IMPACT 4.6-4 Would implementation of the Proposed Plan result in substantial soil erosion or the loss of topsoil? **Less than significant impact.**

The agents of soil erosion are water and wind, each contributing a significant amount of soil loss. The effects of erosion are intensified with an increase in slope (as water moves faster, it gains momentum to carry more debris), the narrowing of runoff channels (which increases the velocity of water), and by the removal of groundcover (which leaves the soil exposed to erosive forces). The potential for soil erosion can be accelerated and increased by human activities such as grading and cut-and-fill methods, particularly on steep slopes. Erosion can result in the loss of valuable ground surface materials, depositing them into basins and the ocean, and can result in the reduction in air quality due to wind-carried dust.

Grading for most structures that would be constructed during the lifetime of the Proposed Plan involves grading for foundations, building pads, and utility trenches. Excavations for utility trenches and foundations typically involve less-than-five feet of change in ground surface elevations. Most pad grading typically would be less-than-two feet deep. Nonetheless, deeper excavations could accompany the emplacement of underground facilities and high-rise buildings.

Implementation of the Proposed Plan would increase development potential in various portions of the Project Area, which could result in increased grading and subsequent erosion and loss of topsoil within these portions of the Project Area. However, all future construction activities that involve earthwork and grading must comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills, and the recommendations of a site-specific geotechnical report. The City and PRC Section 2697 require the preparation of a site-specific geotechnical report to evaluate soils issues. Development projects would also be required to comply with the City's Low Impact Development Ordinance (See Section 4.7, Hydrology and Water Quality), which would help reduce soil erosion and the loss of topsoil.

Because one of the major effects associated with grading is sedimentation in receiving waters, erosion control standards are set by the Regional Water Quality Control Board (RWQCB) through administration of the NPDES permit process for storm drainage discharge. The NPDES permit requires implementation of nonpoint source control of stormwater runoff through the application of a number of BMPs. These BMPs are meant to reduce the amount of constituents, including eroded sediment, that enter streams and other water bodies. A SWPPP, as required by the RWQCB, is required to describe the stormwater BMPs (structural and operational measures) that would control the quality and quantity of stormwater runoff.

Erosion and sedimentation issues are addressed more fully in Section 4.9, Hydrology and Water Quality. All new development permitted under the Proposed Plan will be required to comply with the State NPDES permit process, the City's standard grading and building permit requirements, and the application of BMPs.

Compliance with the state permit process; compliance with the City's codes, regulatory requirements, standard grading and building permit requirements; and the application of BMPs would ensure that the Proposed Plan would not result in substantial soil erosion or the loss of topsoil. Thus, potential impacts from soil erosion or loss of top soils would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

IMPACT 4.6-5 Would implementation of the Proposed Plan be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, or collapse? **No impact.**

Landslides. The hillside areas within the Project Area are generally susceptible to landslides and generally include the Santa Monica Mountain Range and the hillside area east of Talmadge Street. It is the City's standard practice to require the preparation, review, and approval of geotechnical reports for new developments in landslide susceptible areas. The City requires developers to implement the recommendations contained within the geotechnical reports. Required compliance with the recommendations identified in the project-specific geotechnical evaluation, the LABC, and any specific requirements established by LADPW and/or the City's Engineer would reduce landslide hazards. As such the Proposed Plan would not cause landslides or exacerbate existing conditions associated with landslides and would have ***no impacts*** related to landslides.

Lateral Spreading. Lateral spreading is a phenomenon where large blocks of intact soil move downslope in a rapid fluid-like flow movement, primarily as a result of liquefaction. The mass moves toward an unconfined area, such as a descending slope or stream-cut bluff, and can occur on slope gradients as gentle as one degree. Lateral spreading often occurs along riverbanks and shorelines where loose, saturated sandy soils are commonly encountered, as well as in liquefaction-prone areas. Lateral spreading could also occur in unsupported walls of pits excavated in the existing fill or loose alluvium. Pursuant to Section 1613 of the CBC, projects located in liquefaction zones shall incorporate seismic design features into grading and construction plans. Furthermore, compliance with the recommendations of the geotechnical report, as well as the LABC, would reduce lateral spreading and other liquefaction-related hazards. Thus, the Proposed Plan would not cause or on or off site lateral spreading or exacerbate existing conditions associated with on- or off-site lateral spreading and would have ***no impacts*** related to lateral spreading.

Subsidence and Collapse. Subsidence is a localized mass movement that involves the gradual downward settling or sinking of the earth's surface resulting from the extraction of mineral resources, subsurface oil, groundwater, or other subsurface liquids, such as natural gas. Collapse is an abrupt depression of the ground cover that is clearly visible to the naked eye which is also principally caused by the extraction of subsurface liquids or mining of mineral resources. The Project Area currently does not contain any subsurface oil extraction facilities. No mining activities or extraction of mineral resources occur within or near the Project Area. Additionally, the proposed changes associated with the Proposed Plan would not introduce any subsurface oil extraction facilities, mining activities, or extraction of mineral resources. Thus, the Proposed

Plan would not cause subsidence or collapse or exacerbate existing conditions associated with subsidence and collapse and would have ***no impacts*** related to subsidence and collapse.

Unstable Soil. Future development occurring under the Proposed Plan could take place on unstable soils, such as alluvium, which is present in the Project Area. The CBC and LABC require a geotechnical report for development in the Project Area where unstable soils may be present. All on-site grading and site preparation activities must comply with the applicable provisions of LAMC Chapter IX, Division 70, which addresses grading, excavations, and fills, and the recommendations of the geotechnical report. The requirements contained within LAMC Chapter IX, Division 70 are considered minimum standards for design and construction of buildings. Additionally, the City requires the recommendations contained within the geotechnical report to be implemented by the individual project applicant. The requirements of LAMC Chapter IX, Division 70 and the recommendations contained within the geotechnical report must be incorporated into any final project designs. Additionally, all earthwork and grading activities require grading permits from the LADBS that include requirements and standards designed to limit potential impacts related to soil instability. Therefore, the Proposed Plan would not cause unstable soils or exacerbate existing conditions associated with unstable soils and would have ***no impacts*** related to unstable soils.

Conclusion

In summary, implementation of the Proposed Plan would not cause impacts related to unstable geologic units or soil or exacerbate existing conditions associated with unstable geologic unit or soil. The Proposed Plan does not involve components that would cause subsidence and collapse. Additionally, compliance with the LABC and the requirements of project-specific geotechnical reports and any specific requirements established by LADPW and/or the City's Engineer would help to minimize the potential risk associated with landslides, lateral spreading, subsidence, collapse, and unstable soil. Thus, the Proposed Plan would have ***no impacts*** associated with unstable geologic units or soil.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

No impact.

IMPACT 4.6-6 Would implementation of the Proposed Plan be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? **No impact.**

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. The ability of clayey soil to change volume can result in uplift or cracking to foundation elements or other rigid structures such as slabs-on-grade, rigid pavements, sidewalks, or other slabs or hardscape founded on these soils. Future development under the Proposed Plan could be constructed in areas of expansive soils, such as alluvium. The existence of expansive soils would be uncovered in the geotechnical report as required by the CBC and LABC. All earthwork and grading activities require grading permits from LADBS that include requirements and standards designed to limit potential expansive soil impacts to acceptable levels. All on-site grading and site preparation must comply with applicable provisions of LAMC Chapter IX, Division 70, which addresses grading, excavations, and fills, and the recommendations of the geotechnical report. Compliance with the recommendations of the geotechnical report as required by LABC are reasonably expected to be sufficient to reduce impacts from expansive soil-related hazards. Because development within the Project Area will be required to implement such appropriate design and construction measures, the Proposed Plan

would not cause substantial risks to life and property from expansive soil or exacerbate existing conditions resulting in substantial risks to life or property from expansive soil and would have ***no impacts*** related to expansive soils.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

No impact.

IMPACT 4.6-7 Would implementation of the Proposed Plan have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? **No impact.**

It is the City's policy that all new development must be connected to a public sewerage system. No development would occur in areas that are not served by sewer service (i.e., undeveloped open space areas within the Santa Monica Mountains) as a result of the Proposed Plan. Therefore, the Proposed Plan would have ***no impacts*** related to construction on soils incapable of adequately supporting septic tanks.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

No impacts.

CUMULATIVE IMPACTS

It is not anticipated that the Proposed Plan would contribute to a cumulatively considerable increase in risk associated with geologic hazards in light of the *CBIA v. BAAQMD* decision and the fact that the geographic context for the analysis of cumulative impacts resulting from geologic hazards is generally site-specific. As discussed above, future development under the Proposed Plan would not exacerbate the Hollywood fault or any other fault in the Project Area; would not exacerbate existing seismic conditions or seismic-related ground failure; would not result in substantial soil erosion or the loss of topsoil; would not exacerbate the risks associated with landslides, lateral spreading, subsidence, collapse, and unstable soil; and would not exacerbate existing soil conditions in the Project Area. Additionally, no development would occur in areas that are not served by sewer service. Therefore, the Proposed Plan would not result in a cumulatively considerable contribution to a significant impact on geology and soils.

The following information is provided for informational purposes.

Seismic-related Impacts. Individual building sites could be affected by ground shaking and seismic-related ground failure. These effects are site-specific, and would not be compounded by additional development. New buildings in the City are required to be sited and designed in accordance with appropriate geotechnical and seismic guidelines and recommendations, consistent with the requirements of the CBC and LABC. Although there is risk from seismic events inherent in all development in seismically active areas in the state of California, compliance with applicable regulations reduces this risk because those regulations have been formulated to preserve public safety. Individual projects that could be developed as a result of the Proposed Plan will be required to comply with the provisions of all applicable codes and regulations and current seismic safety design

requirements. Therefore, there would be no seismic-related impacts as a result of the implementation of the Proposed Plan and impacts would not be cumulatively considerable.

Soils and Geologic-related Impacts. Development in the Project Area and other projects in the vicinity could expose soil surfaces and further alter soil conditions. Development in the City of Los Angeles, including under the Proposed Plan, is required to conform to the provisions of applicable federal, state, and local laws and ordinances pertaining to erosion and sedimentation control. This includes the City's SUSMP requirements, which implement the federal and State NPDES program regulations (refer to Section 4.9, Hydrology and Water Quality). Because the development in accordance with the Proposed Plan would be in compliance with applicable NPDES permit requirements and would implement and maintain the BMPs required by individual project SWPPPs, the Proposed Plan would not make a cumulatively considerable contribution to impacts related to soil erosion. The geographic context for analysis of impacts from unstable soil conditions, including landslides, liquefaction, subsidence, collapse, or expansive, unstable, or corrosive soils is generally site-specific. Development projects are required to undergo analysis of geological and soil conditions applicable to the specific individual project, and restrictions on development would be applied in the event that geological or soil conditions pose a risk to safety as a result of site-specific geologic or soils instability. Because development under the Proposed Plan would be required to implement appropriate design and construction measures, impacts to soils and geologic conditions would not be cumulatively considerable.

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4.7 GREENHOUSE GAS EMISSIONS

This section provides an overview of greenhouse gas (GHG) emissions in the Project Area and evaluates the construction and operational impacts associated with the Proposed Plan. Supporting data and calculations are included in Appendix G of the Draft EIR. Topics addressed include short-term construction and long-term operational emissions.

GHG emissions refer to a group of emissions that are generally believed to affect global climate conditions. The greenhouse effect compares the Earth and the atmosphere surrounding it to a greenhouse with glass panes. The glass panes in a greenhouse let heat from sunlight in and reduce the amount of heat that escapes. GHGs, such as carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O), keep the average surface temperature of the Earth close to 60 degrees Fahrenheit (°F). Without the natural greenhouse effect, the Earth's surface would be about 61°F cooler.[1]

In addition to CO_2, CH_4, and N_2O, GHGs include hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), black carbon (black carbon is the most strongly light-absorbing component of particulate matter emitted from burning fuels such as coal, diesel, and biomass), and water vapor. CO_2 is the most abundant pollutant that contributes to climate change through fossil fuel combustion. The other GHGs are less abundant but have higher global warming potential than CO_2. To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent of CO_2, denoted as "CO_2e." CO_2e is a measurement used to account for the fact that different GHGs have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. This potential, known as the global warming potential (GWP) of a GHG, is dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. **Table 4.7-1** presents the most common GHGs with their atmospheric residence times and associated GWP values.

TABLE 4.7-1: COMMON GREENHOUSE GASES AND PROPERTIES OF ATMOSPHERIC CHEMISTRY

Pollutant	Lifetime (Years) /a/	Global Warming Potential (20-Year) /b/	Global Warming Potential (100-Year) /b/
Carbon Dioxide	100	1	1
Nitrous Oxide	121	264	265
Nitrogen Trifluoride	500	12,800	16,100
Sulfur Hexafluoride	3,200	17,500	23,500
Perfluorocarbons	3,000-50,000	5,000-8,000	7,000-11,000
Black Carbon	days to weeks	270-6,200	100-1,700
Methane	12	84	28
Hydrofluorocarbons	Uncertain	100-11,000	100-12,000

/a/ Lifetime refers to the approximate amount of time it would take for the anthropogenic increment to an atmospheric pollutant concentration to return to its natural level as a result of either being converted to another chemical compound or being taken out of the atmosphere via a sink.
/b/ The United States primarily uses the 100-year GWP as a measure of the relative impact of different GHGs. However, the scientific community has developed a number of other metrics that could be used for comparing one GHG to another. These metrics may differ based on timeframe, the climate endpoint measured, or the method of calculation. For example, the 20-year GWP is sometimes used as an alternative to the 100-year GWP. Just like the 100-year GWP is based on the energy absorbed by a gas over 100 years, the 20-year GWP is based on the energy absorbed over 20 years. This 20-year GWP prioritizes gases with shorter lifetimes, because it does not consider impacts that happen more than 20 years after the emissions occur. Because all GWPs are calculated relative to CO_2, GWPs based on a shorter timeframe will be larger for gases with lifetimes shorter than that of CO_2, and smaller for gases with lifetimes longer than CO_2.
SOURCE: California Air Resources Board, *First Update to the Climate Change Scoping Plan*, May 2014.

[1]California Environmental Protection Agency Climate Action Team, *Climate Action Report to Governor Schwarzenegger and the California Legislator*, March 2006.

REGULATORY FRAMEWORK

International, federal, state and local laws, regulations, plans, and guidelines that are potentially applicable to the Proposed Plan are summarized below.

INTERNATIONAL

U.S.–China Climate Agreement. In November 2014, the United States and China made a joint announcement to cooperate on combating climate change and promoting clean energy. In the United States, President Barack Obama announced a climate target to reduce GHG emissions by 26 to 28 percent below 2005 levels by 2025. In China, President Xi Jinping announced a climate target to reduce peak CO_2 emissions by 2030 and to increase the renewable energy share across all sectors to 20 percent by 2030. China will need to build an additional 800 to 1,000 gigawatts of nuclear, wind, solar, and other zero emission generation capacity by 2030 to reach this target. Together, the United States and China have agreed to: expand joint clean energy research and development at the U.S.-China Clean Energy Research Center (CERC), advance major carbon capture, use and storage demonstrations, enhance cooperation on HFCs, launch a climate-smart/low-carbon cities initiative, promote trade in green goods, and demonstrate clean energy on the ground.[2]

Paris United Nations Framework Convention on Climate Change. A new international climate change agreement was adopted at the Paris United Nations Framework Convention on Climate Change conference in December 2015. The last two climate conferences in Warsaw (2013) and Lima (2014) decided that countries were to submit their proposed emissions reduction targets for the 2015 conference as "intended nationally determined contributions" prior to the Paris conference. The European Union has committed to an economy-wide, domestic GHG reduction target of 40 percent below 1990 levels by 2030. The United States has set its intended nationally determined contribution to reduce its GHG emissions by 26 to 28 percent below its 2005 level in 2025 and to make best efforts to reduce its emissions by 28 percent. These targets are set with the goal of limiting global temperature rise to well below 2 degrees Celsius and getting to the 80 percent emission reduction by 2050.

FEDERAL

The federal government's stance on climate change regulation is in flux under the current Presidential administration. For example, President Trump has signed an executive order announcing a plan to withdraw the U.S. from the Paris Climate Accord at the earliest possible date (although under the terms of the Paris Climate Accord, the withdrawal process can take no less than four years from the initial date of adoption).[3] The following discussion presents court decisions, legislation, and policies pertaining to GHG emissions that are currently in effect.

Supreme Court Ruling. The U.S. Supreme Court ruled in *Massachusetts v. Environmental Protection Agency, 127 S. Ct. 1438 (2007)*, that CO_2 and other GHGs are pollutants under the Clean Air Act (CAA), which the U.S. Environmental Protection Agency (USEPA) must regulate if it determines they pose an endangerment to public health or welfare. On December 7, 2009, the USEPA Administrator made two distinct findings: 1) the current and projected concentrations of the six key GHGs in the atmosphere (i.e., CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6) threaten the public health and welfare of current and future

[2]The White House, *Fact Sheet: U.S.-China Joint Announcement on Climate Change and Clean Energy Cooperation*, November 11, 2014.

[3]United Nations Framework Convention on Climate Change, *Paris Agreement – Article 28*, November 2015.

generations; and 2) the combined emissions of these GHGs from motor vehicle engines contribute to GHG pollution which threatens public health and welfare.

On June 23, 2014, the U.S. Supreme Court ruled in *Utility Air Regulatory Group. v. EPA* that the USEPA exceeded its statutory authority under the CAA when it determined that stationary source emissions of GHGs would trigger permitting obligations under the Prevention of Significant Deterioration (PSD) program and Title V of the CAA. The Court, however, upheld those portions of USEPA's rulemaking that require a source to apply best available control technology (BACT) to GHG emissions where the source would otherwise trigger PSD permitting on account of its emissions of other pollutants. The Supreme Court's decision was limited to USEPA's regulation of GHG emissions under the PSD and Title V provisions of the CAA, and it left unanswered other questions regarding USEPA's permitting and BACT authority under the PSD program, and the USEPA's efforts to regulate GHG emissions from stationary sources.

Energy Independence and Security Act. The Energy Independence and Security Act of 2007 includes several key provisions that will increase energy efficiency and the availability of renewable energy, which will reduce GHG emissions as a result. First, this act sets a Renewable Fuel Standard that requires fuel producers to use at least 36 billion gallons of biofuel by 2022.[4] Second, this act increases Corporate Average Fuel Economy Standards to require a minimum average fuel economy of 35 miles per gallon for the combined fleet of cars and light trucks by 2020. Third, this act includes a variety of new standards for lighting and for residential and commercial appliance equipment. The equipment includes residential refrigerators, freezers, refrigerator-freezers, metal halide lamps, and commercial walk-in coolers and freezers.

National Fuel Efficiency Policy. On May 19, 2009, President Barack Obama announced a new National Fuel Efficiency Policy aimed at increasing fuel economy and reducing GHG pollution.[5] This policy is expected to increase fuel economy by more than five percent by requiring a fleet-wide average of 35.5 miles per gallon by 2016 starting with model year 2012.

Fuel Economy Standards. On September 15, 2009, the USEPA and the Department of Transportation's (DOT) National Highway Traffic Safety Administration (NHTSA) issued a joint proposal to establish a national program consisting of new standards for model year 2012 through 2016 light-duty vehicles that will reduce GHG emissions and improve fuel economy. The proposed standards would be phased in and would require passenger cars and light-duty trucks to comply with a declining emissions standard. In 2012, passenger cars and light-duty trucks would have to meet an average emissions standard of 295 grams of CO_2 per mile and 30.1 miles per gallon. By 2016, the vehicles would have to meet an average standard of 250 grams of CO_2 per mile and 35.5 miles per gallon.[6] The final standards were adopted by USEPA and DOT on April 1, 2010.

On December 7, 2009, the USEPA Administrator signed two distinct findings regarding GHGs under Section 202(a) of the CAA (42 United States Code Section 7521):

- Endangerment Finding: The Administrator finds that the current and projected concentrations of the six key well-mixed GHGs (CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6) in the atmosphere threaten the public health and welfare of current and future generations.

[4]According to the United States Energy Information Administration, 36 billion gallons of fuel represents approximately 26 percent of current gasoline consumption.

[5]The White House, Office of the Press Secretary, http://www.whitehouse.gov/the_press_office/President-Obama-Announces-National-Fuel-Efficiency-Policy/, May 19, 2009.

[6]USEPA, *EPA and NHTSA Propose Historic Nation Program*, 2009.

- Cause or Contribute Finding: The Administrator finds that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution that threatens public health and welfare.

While these findings do not impose additional requirements on industry or other entities, this action is a prerequisite to finalizing USEPA's proposed GHG emissions standards for light-duty vehicles, which were jointly proposed by USEPA and NHTSA.

Heavy-Duty Vehicle Program. The Heavy-Duty Vehicle Program was adopted on August 9, 2011 to establish the first fuel efficiency requirements for medium- and heavy-duty vehicles beginning with the model year 2014.

Executive Order 13693. Issued on June 10, 2015, Executive Order 13693 — Planning for Federal Sustainability in the Next Decade — revokes multiple prior Executive Orders and memoranda including Executive Order 13514. The goal of Executive Order 13693 is to maintain federal leadership in sustainability and GHG emission reductions. This Executive Order outlines forward-looking goals for federal agencies in the area of energy, climate change, water use, vehicle fleets, construction, and acquisition. Federal agencies shall, where life-cycle cost-effective, beginning in 2016:

- Reduce agency building energy intensity as measured in British Thermal Units per square foot by 2.5 percent annually through 2025;
- Improve data center energy efficiency at agency buildings;
- Ensure a minimum percentage of total building electric and thermal energy shall be from clean energy sources;
- Improve agency water use efficiency and management (including storm water management); and
- Improve agency fleet and vehicle efficiency and management by achieving minimum percentage GHG emission reductions.

Executive Order 13783. Issued on March 28, 2017, Executive Order 13783 — Promoting Energy Independence and Economic Growth — revokes multiple prior Executive Orders and memoranda including Executive Order 13653, the Power Sector Carbon Pollution Standards, Presidential Memorandum – Mitigating Impacts on Natural Resources from Development and Encouraging Related Private Investment, and Presidential Memorandum – Climate Change and National Security, as well as other federal reports and provisions. Executive Order 13783 represents a reversal on federal climate policy relative to the work of previous administrations and its objective is to reduce the regulatory framework applicable to GHG emissions to spur fossil fuel production. This Executive Order "established a national policy to promote the clean and safe development of our energy resources while reducing unnecessary regulatory burdens."[7] The order also "directs the USEPA to review existing regulations, orders, guidance documents and policies that potentially burden the development or use of domestically produced energy resources." Future changes to national policy on GHG emissions as a result of Executive Order 13783 cannot be predicted at this time.

Executive Order 13795. Issued on April 28, 2017, Executive Order 13795 — Implementing an America-First Offshore Energy Strategy — directs the "policy of the United States to encourage energy exploration and production, including on the Outer Continental Shelf, in order to maintain the Nation's position as a global energy leader and foster energy security and resilience for the benefit of the American people, while ensuring that any such activity is safe and environmental responsible."[8] The objective of the order is to expand the opportunity for offshore energy development by removing restrictions on resource exploration

[7]Federal Register, *Executive Order 13783 of March 28, 2017: Promoting Energy Independence and Economic Growth*, Vol. 82, No. 61, March 21, 2017.

[8]Federal Register, *Executive Order 13795 of April 28, 2017: Implementing an America-First Offshore Energy Strategy*, Vol. 82, No. 84, May 3, 2017.

and extraction. This Executive Order prioritizes the development of offshore energy resources over the protection of National Marine Sanctuaries and authorizes the review and potential revision or withdrawal of the Bureau of Ocean Energy Management's Proposed Rule entitled "Air Quality Control, Reporting, and Compliance," 81 Federal Register 19718 and any other related rules and guidance. The implications of implementing Executive Order 13795 with regards to the national GHG emissions inventory cannot be reasonably determined at this time.

STATE

California's Energy Efficiency Standards for Residential and Nonresidential Buildings. Located in Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," these energy efficiency standards were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.[9] The California Energy Commission adopted the 2008 changes to the Building Energy Efficiency Standards to respond to the mandates of Assembly Bill (AB) 32 and to pursue California energy policy that energy efficiency is the resource of first choice for meeting California's energy needs. The most recent update to Title 24 is the 2016 Standards which improve upon the 2013 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The 2016 Standards went into effect on January 1, 2017. The Standards are updated on an approximately three-year cycle.

Assembly Bill 1493 (Pavley I). AB 1493 (referred to as Pavley I), adopted in 2002, required the California Air Resource Board (CARB) to develop and adopt standards for vehicle manufacturers to reduce GHG emissions coming from passenger vehicles and light-duty trucks at a "maximum feasible and cost-effective reduction" by January 1, 2005. Pavley I took effect for model years starting in 2009 and extending to 2016 and the Low Emission Vehicle (LEV) III GHG will cover 2017 to 2025. It is estimated that the standard will reduce climate change emissions from the vehicle fleet by 30 percent in 2016 compared to the emissions in the same year without the standards.[10]

Senate Bill 1078 (SB 1078), Senate Bill 107 (SB 107), and Executive Order S-14-08 (Renewables Portfolio Standard). Signed on September 12, 2002, SB 1078 required California to generate 20 percent of its electricity from renewable energy by 2017. SB 107, signed on September 26, 2006 changed the due date for this goal from 2017 to 2010, which was achieved by the state. On November 17, 2008, Executive Order S-14-08, which established a Renewables Portfolio Standard target for California requiring that all retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. Increased use of renewable energy sources will decrease California's reliance on fossil fuels, reducing emissions of GHG from the energy sector.

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

Executive Order S-3-05 calls for the Secretary of California Environmental Protection Agency (Cal-EPA) to be responsible for coordination of state agencies and progress reporting. A recent California Energy Commission report concludes, however, that the primary strategies to achieve this target should be major "decarbonization" of electricity supplies and fuels, and major improvements in energy efficiency.[11]

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[9]California Energy Commission, *2016 Energy Efficiency Standards for Residential and Nonresidential Buildings, Title 24, Part 6, of the California Code of Regulations*, June 2015.

[10]CARB, *Clean Air Standards - Pavley, Assembly Bill 1493*, May 6, 2013.

[11]California Energy Commission, *California's Energy Future – The View to 2050*, May 2011.

In response to the Executive Order S-3-05, the Secretary of the Cal-EPA created the Climate Action Team (CAT). California's CAT originated as a coordinating council and included the Secretaries of the Natural Resources Agency, and the Department of Food and Agriculture, and the Chairs of the CARB, Energy Commission, and Public Utilities Commission. The original council was an informal collaboration between the agencies to develop potential mechanisms for reductions in GHG emissions in the State of California.

The original mandate for the CAT was to develop proposed measures to meet the emission reduction targets set forth in E.O. S-3-05. The CAT has since expanded and currently has members from 18 state agencies and departments. The CAT also has ten working groups, which coordinate policies among their members. The working groups and their major areas of focus are:

- Agriculture: Focusing on opportunities for agriculture to reduce GHG emissions through efficiency improvements and alternative energy projects, while adapting agricultural systems to climate change;
- Biodiversity: Designing policies to protect species and natural habitats from the effects of climate change;
- Energy: Reducing GHG emissions through extensive energy efficiency policies and renewable energy generation;
- Forestry: Coupling GHG mitigation efforts with climate change adaptation related to forest preservation and resilience, waste to energy programs and forest offset protocols;
- Land Use and Infrastructure: Linking land use and infrastructure planning to efforts to reduce GHG from vehicles and adaptation to changing climatic conditions;
- Oceans and Coastal: Evaluating the effects of sea level rise and changes in coastal storm patterns on human and natural systems in California;
- Public Health: Evaluating the effects of GHG mitigation policies on public health and adapting public health systems to cope with changing climatic conditions;
- Research: Coordinating research concerning impacts of and responses to climate change in California;
- State Government: Evaluating and implementing strategies to reduce GHG emissions resulting from state government operations; and
- Water: Reducing GHG impacts associated with the state's water systems and exploring strategies to protect water distribution and flood protection infrastructure.

The CAT is responsible for preparing reports that summarize the state's progress in reducing GHG emissions. The CAT Report was published in December 2010. The CAT Report discusses mitigation and adaptation strategies, state research programs, policy development, and future efforts.

Senate Bill 1 (SB 1) and Senate Bill 1017 (SB 1017) (Million Solar Roofs). SB 1 and SB 1017, enacted in August 2006, set a goal to install 3,000 megawatts of new solar capacity by 2017 - moving the state toward a cleaner energy future and helping lower the cost of solar systems for consumers. The Million Solar Roofs Program is a ratepayer-financed incentive program aimed at transforming the market for rooftop solar systems by driving down costs over time. It provides up to $3.3 billion in financial incentives that decline over time.

Assembly Bill 32 (AB 32). In September 2006, the California Global Warming Solutions Act of 2006, also known as AB 32, was signed into law. AB 32 focuses on reducing GHG emissions in California and requires CARB to adopt rules and regulations that would achieve GHG emissions equivalent to statewide levels in 1990 by 2020. CARB initially determined that the total statewide aggregated GHG 1990 emissions level and 2020 emissions limit was 427 million metric tons of CO_2e. The 2020 target reduction was estimated to be 174 million metric tons of CO_2e.

To achieve the goal, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. Because the intent of AB 32 is to limit 2020 emissions to the equivalent of 1990, it is expected that the regulations

would affect many existing sources of GHG emissions and not just new general development projects. SB 1368, a companion bill to AB 32, requires the California Public Utilities Commission (CPUC) and the California Energy Commission to establish GHG emission performance standards for the generation of electricity. These standards will also apply to power that is generated outside of California and imported into the state.

AB 32 charges CARB with the responsibility to monitor and regulate sources of GHG emissions in order to reduce those emissions. On June 1, 2007, CARB adopted three discrete early action measures to reduce GHG emissions. These measures involved complying with a low carbon fuel standard, reducing refrigerant loss from motor vehicle air conditioning maintenance, and increasing methane capture from landfills.[12] On October 25, 2007, CARB tripled the set of previously approved early action measures. The approved measures include improving truck efficiency (i.e., reducing aerodynamic drag), electrifying port equipment, reducing PFCs emissions from the semiconductor industry, reducing propellants in consumer products, promoting proper tire inflation in vehicles, and reducing SF_6 emissions from the non-electricity sector.

The CARB AB 32 Scoping Plan (Scoping Plan) contains the main strategies to achieve the 2020 emissions cap. The Scoping Plan was developed by CARB with input from CAT and proposes a comprehensive set of actions designed to reduce overall carbon emissions in California, improve the environment, reduce oil dependency, diversify energy sources, and enhance public health while creating new jobs and improving the state economy. The GHG reduction strategies contained in the Scoping Plan include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system. Key approaches for reducing GHG emissions to 1990 levels by 2020 include:

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards;
- Achieving a statewide renewable electricity standard of 33 percent;
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system;
- Establishing targets for transportation-related GHG emissions for regions throughout the state, and pursuing policies and incentives to achieve those targets; and
- Adopting and implementing measures to reduce transportation sector emissions.

CARB has adopted the First Update to the AB 32 Scoping Plan.[13] This Update identifies the next steps for California's leadership on climate change. The First Update to the initial AB 32 Scoping Plan describes progress made to meet the near-term objectives of AB 32 and defines California's climate change priorities and activities for the next several years. It also frames activities and issues facing the state as it develops an integrated framework for achieving both air quality and climate goals in California beyond 2020. Specifically, the Update covers a range of topics:

- An update of the latest scientific findings related to climate change and its impacts, including short-lived climate pollutants.
- A review of progress-to-date, including an update of Scoping Plan measures and other state, federal, and local efforts to reduce GHG emissions in California.
- Potential technologically feasible and cost-effective actions to further reduce GHG emissions by 2020.
- Recommendations for establishing a mid-term emissions limit that aligns with the state's long-term goal of an emissions limit 80 percent below 1990 levels by 2050.
- Sector-specific discussions covering issues, technologies, needs, and ongoing state activities to significantly reduce emissions throughout California's economy through 2050.

[12]CARB, *Proposed Early Action Measures to Mitigate Climate Change in California*, April 20, 2007.
[13]CARB, *First Update to the Climate Change Scoping Plan*, May 2014.

As discussed above, in December 2007, CARB approved a total statewide GHG 1990 emissions level and 2020 emissions limit of 427 million metric tons of CO_2e. As part of the Update, CARB revised the 2020 statewide limit to 431 million metric tons of CO_2e, an approximately one percent increase from the original estimate. The revised estimate includes incorporation of the Pavley standards in the business-as-usual (BAU) forecast. The 2020 BAU forecast in the Update is 509 million metric tons of CO_2e. The state would need to reduce those emissions by 15 percent to meet the 431 million metric tons of CO_2e 2020 limit.

Senate Bill 1368 (SB 1368). SB 1368, adopted September 19, 2006, directs the California Energy Commission and the CPUC to adopt a performance standard for GHG emissions for the future electricity used in California, regardless of whether it is generated in-state or purchased from other states.

Executive Order S-1-07, the Low Carbon Fuel Standard. On January 18, 2007, Executive Order S-1-07 was issued requiring a reduction of at least ten percent in the carbon intensity of California's transportation fuels by 2020. Regulatory proceedings and implementation of the Low Carbon Fuel Standard are CARB's responsibility. The Low Carbon Fuel Standard has been identified by CARB as a discrete early action item in the CARB Scoping Plan. CARB expects the Low Carbon Fuel Standard to achieve the minimum ten percent reduction goal; however, many of the early action items outlined in the Scoping Plan work in tandem with one another. To avoid the potential for double-counting emission reductions associated with AB 1493 (see previous discussion), the Scoping Plan has modified the aggregate reduction expected from the Low Carbon Fuel Standard to 9.1 percent.

Assembly Bill 811 (AB 811). AB 811, enacted July 21, 2008, authorizes California cities and counties to designate districts within which willing property owners may enter into contractual assessments to finance the installation of renewable energy generation and energy efficiency improvements that are permanently fixed to the property.

Senate Bill 375 (SB 375). SB 375, adopted in September 30, 2008, provides a means for achieving AB 32 goals through the reduction in emissions by cars and light trucks. SB 375 requires Regional Transportation Plans (RTPs) prepared by Metropolitan Planning Organizations (MPOs) to include Sustainable Communities Strategies (SCSs). In adopting SB 375, the Legislature found that improved coordination between land use planning and transportation planning is needed in order to achieve the GHG emissions reduction target of AB 32. Further, the staff analysis for the bill prepared for the Senate Transportation and Housing Committee's August 29, 2008 hearing on SB 375 began with the following statement: "According to the author, this bill will help implement AB 32 by aligning planning for housing, land use, transportation and greenhouse gas emissions for the 17 MPOs in the state." Under the Sustainable Communities Act, CARB sets regional targets for GHG emissions reductions from passenger vehicle use. CARB has set the following reduction targets for SCAG: reduce per capita eight percent of GHG emissions below 2005 levels by 2020 and 13 percent below 2005 levels by 2035.

Executive Order S-13-08. On November 14, 2008, Executive Order S-13-08 was signed to direct California to develop methods for adapting to climate change impacts through preparation of a statewide plan. In response to this Executive Order, the California Natural Resources Agency coordinated with ten state agencies, multiple scientists, a consulting team, and stakeholders to develop the first statewide, multi-sector adaptation strategy in the country. The resulting report, 2009 California Climate Adaptation Strategy, summarizes the best-known science to assess the vulnerability of the state to climate change impacts, and outlines possible solutions that can be implemented within and across state agencies to promote resiliency. This strategy is the first step in an evolving process to reduce California's vulnerability to climate change impacts.

Adaptation refers to efforts that prepare the state to respond to the impacts of climate change – adjustments in natural or human systems to actual or expected climate changes to minimize harm or take advantage of beneficial opportunities. California's ability to manage its climate risks through adaptation depends on a number of critical factors. These include its baseline and projected economic resources, technology, infrastructure, institutional support and effective governance, public awareness, access to the best available scientific information, sustainably-managed natural resources, and equity in access to these resources.

CEQA Guidelines Section 15064.4. Requires that, in performing environmental review under CEQA, an agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. The lead agency has discretion to determine whether to use a model or methodology to quantify GHG emissions, and which model or methodology to use, or rely on a qualitative analysis or performance-based standards. The lead agency should consider the following factors, among others, when assessing the significance of impacts from GHG emissions on the environment.

- The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting.
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of GHG emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

Senate Bill 743 (SB 743). SB 743, adopted September 27, 2013, encourages land use and transportation planning decisions and investments that reduce vehicle miles traveled (VMT), which contribute to GHG emissions, as required by AB 32. Key provisions of SB 743 include reforming aesthetics and parking CEQA analysis for certain urban infill projects and eliminating the measurement of auto delay, including Level of Service (LOS), as a metric that can be used for measuring traffic impacts in transit priority areas. SB 743 requires the Governor's Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines establishing criteria for determining the significance of transportation impacts of projects within transit priority areas that promote the "…reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." It also allows OPR to develop alternative metrics outside of transit priority areas.

California Green Building Standard Code (CalGreen). The California Green Building Standard Code, referred to as CalGreen, is the first statewide Green Building Code. It was developed to provide a consistent approach for green building within California and took effect January 2011. CalGreen lays out minimum requirements for newly constructed buildings in California, which will reduce GHG emissions through improved efficiency and process improvements. It requires builders to install plumbing that cuts indoor water use by as much as 20 percent, to divert 50 percent of construction waste from landfills to recycling, and to use low-pollutant paints, carpets, and floors. CalGreen is updated every three years.

Senate Bills 1078/107/X 1-2, Renewables Portfolio Standard and Renewable Energy Resources Act. SB 1078 and 107, California's Renewables Portfolio Standard, obligated investor-owned energy service providers and Community Choice Aggregations to procure an additional one percent of retail sales per year from eligible renewable sources until 20 percent was reached (by 2010). The California Public Utilities Commission and California Energy Commission are jointly responsible for implementing the program. SB X 1-2, called the California Renewable Energy Resources Act, obligates all California electricity providers to obtain at least 33 percent of their energy from renewable resources by 2020.

Executive Order B-30-15. On April 29, 2015, Governor Brown issued Executive Order B-30-15, stating a new statewide policy goal to reduce GHG emissions 40 percent below their 1990 levels by 2030. The Executive Order establishes GHG emissions reduction targets to reduce emissions to 80 percent below 1990 levels by 2050 and sets an interim target of emissions reductions for 2030 as being necessary to guide regulatory policy and investments in California and put California on the most cost-effective path for long-term emissions reductions. The Executive Order orders "all state agencies with jurisdiction over sources of [GHG] emissions [to] ... implement measures, pursuant to statutory authority, to achieve reductions of [GHG] emissions to meet the 2030 and 2050 [GHG] emissions reductions targets."

Executive Order B-30-15 directs CARB to "update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent" ($MMTCO_2e$). It directs the Natural Resources Agency to update "Safeguarding California" (the state's climate adaptation strategy) every three years, as specified; directs state agencies to "take climate change into account in their planning and investment decisions, and employ full life-cycle cost accounting to evaluate and compare infrastructure investments and alternatives;" and orders the "State's Five-Year Infrastructure Plan [to] take current and future climate change impacts into account in all infrastructure projects." Among its other directives, the Executive Order provides that "state agencies' planning and investment shall be guided by the ... principle that priority should be given to actions that both build climate preparedness and reduce GHG emissions."

Senate Bill 32 (SB 32). On September 8, 2016, California signed into law SB 32, which adds Section 38566 to the Health and Safety Code and requires a commitment to reducing statewide GHG emissions by 2020 to 1990 levels and by 2030 to 40 percent less than 1990 levels. SB 32 was passed with companion legislation AB 197, which provides additional direction for developing the Scoping Plan. Recently, CARB released The Proposed 2017 Climate Change Scoping Plan Update (Proposed 2017 Update), which outlines the proposed framework of action for achieving California's new SB 32 2030 GHG target: a 40 percent reduction in GHG emissions by 2030 relative to 1990 levels.[14] The 2030 target is intended to ensure that California remains on track to achieve the goal set forth by Executive Order B-30-15 to reduce statewide GHG emissions by 2050 to 80 percent below 1990 levels. The Proposed 2017 Update identifies key sectors of the implementation strategy, which includes improvements in low carbon energy, industry, transportation sustainability, natural and working lands, waste management, and water.

Through a combination of data synthesis and modeling, CARB determined that the target statewide 2030 emissions limit is 260 MMTCO2e, and that further commitments will need to be made to achieve an additional reduction of 50 MMTCO2e beyond current policies and programs. Key elements of the Proposed 2017 Update include a proposed 20 percent reduction in GHG emissions from refineries and an expansion of the Cap-and-Trade program to meet the aggressive 2030 GHG emissions goal and ensure achievement of the 2050 limit set forth by Executive Order B-30-15. The Proposed 2017 Update indicates that stronger SB 375 reduction targets are needed to meet the state's 2030 and 2050 goals and that, "[m]ore needs to be done to fully exploit synergies with emerging mobility solutions like ridesourcing and more effective infrastructure planning to anticipate and guide the necessary changes in travel behavior, especially among millennials. Stronger SB 375 reduction targets will likely encourage further densification around transit infrastructure.

[14]CARB, *The 2017 Climate Change Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target*, January 20, 2017.

REGIONAL

Southern California Association of Governments (SCAG) 2016–2040 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS). SCAG is the MPO for the six-county region that includes Los Angeles, Orange, Riverside, Ventura, San Bernardino and Imperial counties. The 2016–2040 RTP/SCS includes commitments to reduce emissions from transportation sources to comply with SB 375. Goals and policies included in the 2016–2040 RTP/SCS to reduce GHG emissions consist of adding density in proximity to transit stations, mixed-use development and encouraging active transportation (i.e., non-motorized transportation such as bicycling). SCAG promotes the following policies and actions related to active transportation to help the region confront congestion and mobility issues and consequently reduce emissions:

- Implement Transportation Demand Management (TDM) strategies including integrating bicycling through folding bikes on buses programs, triple racks on buses, and dedicated racks on light and heavy rail vehicles;
- Encourage and support local jurisdictions to develop "Active Transportation Plans" for their jurisdiction if they do not already have one;
- Expand Compass Blueprint program to support member cities in the development of bicycle plans;
- Expand the Toolbox Tuesday's program to encourage local jurisdictions to direct enforcement agencies to focus on bicycling and walking safety to reduce multimodal conflicts;
- Support local advocacy groups and bicycle-related businesses to provide bicycle-safety curricula to the general public;
- Encourage children, including those with disabilities, to walk and bicycle to school;
- Encourage local jurisdictions to adopt and implement the proposed SCAG Regional Bikeway Network; and
- Support local jurisdictions to connect all of the cities within the SCAG region via bicycle facilities.

SB 375 requires CARB to develop regional CO_2 emission reduction targets, compared to 2005 emissions, for cars and light trucks only for 2020 and 2035 for each MPO. SB 375 also requires that each MPO prepare an Sustainable Community Strategy (SCS) as part of the Regional Transportation Plan (RTP) to reduce CO_2 by better aligning transportation, land use, and housing. For SCAG, the targets are to reduce per capita emissions 8 percent below 2005 levels by 2020 and 13 percent below 2005 levels by 2035.[15] The 2016–2040 RTP/SCS states that the region will meet or exceed the SB 375 per capita targets, lowering regional per capita GHG emissions (below 2005 levels) by eight percent by 2020 and 18 percent by 2035. The 2016–2040 RTP/SCS also states that regional 2040 per capita emissions would be reduced by 22 percent, although CARB has not established a 2040 per capita emissions target.

South Coast Air Quality Management District (SCAQMD). SCAQMD adopted a "Policy on Global Warming and Stratospheric Ozone Depletion" on April 6, 1990. The policy commits the SCAQMD to consider global impacts in rulemaking and in drafting revisions to the AQMP. In March 1992, the SCAQMD Governing Board reaffirmed this policy and adopted amendments to the policy.

SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds. SCAQMD proposed the use of a percent emission reduction target (e.g., 30 percent) to determine significance for commercial/residential projects that emit greater than 3,000 metric tons per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where SCAQMD is the lead agency. However, SCAQMD has yet to adopt a GHG significance threshold for land use development or transportation projects and has formed a

[15]SCAG, *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy*, 2016.

GHG CEQA Significance Threshold Working Group to further evaluate potential GHG significance thresholds.

The GHG CEQA Significance Threshold Working Group is tasked with providing guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. Members of the working group included government agencies implementing CEQA and representatives from various stakeholder groups that will provide input to the SCAQMD staff on developing CEQA GHG significance thresholds. The Working Group discussed multiple methodologies for determining project significance. These methodologies included categorical exemptions, consistency with regional GHG budgets in approved plans, a numerical threshold, performance standards, and emissions offsets. The GHG CEQA Significance Threshold Working Group has not convened since 2008.

LOCAL

GreenLA Climate Action Plan. The City of Los Angeles has issued guidance promoting sustainable development to reduce GHG emissions citywide in the form of a Climate Action Plan (CAP). The objective of GreenLA is to reduce GHG emissions 35 percent below 1990 levels by 2030.[16] GreenLA identifies goals and actions designed to make the City a leader in confronting global climate change. The measures would reduce emissions directly from municipal facilities and operations and create a framework to address citywide GHG emissions. GreenLA lists various focus areas in which to implement GHG reduction strategies. Focus areas include energy, water, transportation, land use, waste, port, airport, and ensuring that changes to the local climate are incorporated into planning and building decisions. City goals for each focus area are identified as follows:

Energy
- Increase the generation of renewable energy;
- Encourage the use of mass transit;
- Develop sustainable construction guidelines;
- Increase citywide energy efficiency; and
- Promote energy conservation.

Water
- Decrease per capita water use to reduce electricity demand associated with water pumping and treatment.

Transportation
- Power the city vehicle fleet with alternative fuels; and
- Promote alternative transportation (e.g., mass transit and rideshare).

Other Goals
- Create a more livable City through land use regulations;
- Increase recycling;
- Reduce emissions generated by activity associated with the Port of Los Angeles and regional airports;
- Create more city parks, promoting the environmental economic sector; and
- Adapt planning and building policies to incorporate climate change policy.

In order to provide detailed information on action items discussed in GreenLA, the City published an implementation document titled ClimateLA.[17] ClimateLA presents the existing GHG inventory for the City, describes enforceable GHG reduction requirements, provides mechanisms to monitor and evaluate

[16]City of Los Angeles, *Green LA: An Action Plan to Lead the Nation in Fighting Global Warming*, May 2007.
[17]City of Los Angeles, *CLIMATELA Municipal Program Implementing the GreenLA Climate Action Plan*, 2008.

progress, and includes mechanisms that allow the plan to be revised in order to meet targets. By 2030, the plan aims to reduce GHG emissions by 35 percent from 1990 levels, which were estimated to be approximately 54.1 million metric tons.

Therefore, the City will need to lower annual GHG emissions to approximately 35.1 million metric tons per year by 2030. To achieve these reductions the City has developed strategies that focus on energy, water use, transportation, land use, waste, open space and greening, and economic factors. To reduce emissions from energy usage, ClimateLA proposes the following goals: increase the amount of renewable energy provided by the Los Angeles Department of Water and Power (LADWP); present a comprehensive set of green building policies to guide and support private sector development; reduce energy consumed by City facilities and utilize solar heating where applicable; and help citizens to use less energy. With regard to waste, ClimateLA sets the goal of reducing or recycling 70 percent of trash by 2015. With regard to open space and greening, ClimateLA includes the following goals: create 35 new parks; revitalize the Los Angeles River to create open space opportunities; plant one million trees throughout the City; identify opportunities to "daylight" streams; identify promising locations for stormwater infiltration to recharge groundwater aquifers; and collaborate with schools to create more parks in neighborhoods.

Sustainable City pLAn (pLAn). In addition to GreenLA, Mayor Eric Garcetti released Los Angeles's first-ever pLAn on April 8, 2015.[18] The pLAn is a roadmap to achieving short-term results and sets a path to strengthen and transform the City in future decades. Recognizing the risks posed by climate change, Mayor Garcetti set time-bound outcomes on climate action, most notably to reduce GHG emissions by 45 percent by 2025, 60 percent by 2035, and 80 percent by 2050, all against a 1990 baseline. Through the completion and verification of the GHG inventory update, the City concluded that:

- The City accounted for approximately 36.2 million metric tons of CO_2e in 1990;
- The City's most recent inventory shows that emissions fell to 29 million metric tons of CO_2e in 2013; and
- Los Angeles' emissions are 20 percent below the 1990 baseline as of 2013, putting Los Angeles nearly halfway to the 2025 pLAn reduction target of 45 percent. In addition, the 20 percent reduction exceeds the 15 percent statewide goal listed in the First Update to the AB 32 Scoping Plan.

Green Building Program. The purpose of the City's Green Building Program is to reduce the use of natural resources, create healthier living environments and minimize the negative impacts of development on local, regional, and global ecosystems. The program consists of a Standard of Sustainability and Standard of Sustainable Excellence. The program addresses five key areas:

- Site: location, site planning, landscaping, storm water management, construction and demolition recycling;
- Water Efficiency: efficient fixtures, wastewater reuse, and efficient irrigation;
- Energy & Atmosphere: energy efficiency, and clean/renewable energy;
- Materials & Resources: materials reuse, efficient building systems, and use of recycled and rapidly renewable materials; and
- Indoor Environmental Quality: improved indoor air quality, increased natural lighting, and improved thermal comfort/control.

The Standard of Sustainability establishes a requirement for non-residential projects at or above 50,000 square feet of floor area, high-rise residential (above six stories) projects at or above 50,000 square feet of floor area, or low-rise residential (six stories or less) of 50 or more dwelling units within buildings of at least 50,000 square feet of floor area to meet the intent of the U.S. Green Building Council's Leadership

[18]City of Los Angeles, *Los Angeles Climate Action Report: Updated 1990 Baseline and 2013 Emissions Inventory Summary*, 2015.

in Energy and Environmental Design (LEED) Certified level. The Standard also applies to existing buildings that meet the minimum thresholds described above when redevelopment construction costs exceed a valuation of 50 percent of the existing building's replacement cost.

The voluntary Standard of Sustainable Excellence establishes an incentive program for projects that register with the LEED program, contract with a certified LEED professional, and can demonstrate how the project will achieve LEED certification at a Silver or higher level. These projects are eligible for priority processing services within the Department of City Planning and expedited services within the Bureau of Engineering. The Department of Building and Safety provides priority plan check processing and Priority Service Planning is offered by the LADWP.

Los Angeles Green Building Code. The City has adopted the Green Building Code to reduce the City's carbon footprint. The Green Building Code is applicable to new buildings and alterations with building valuations over $200,000 (residential and non-residential). The Green Building Code is based on the 2010 California Green Building Standards Code, commonly known as CalGreen that was developed and mandated by the state to attain consistency among the various jurisdictions within the state; reduce the building's energy and water use; and reduce waste (see discussion of CalGreen, above).

Existing Buildings Energy and Water Efficiency (EBEWE) Ordinance. Effective in 2017, the EBEWE Ordinance makes public the annual energy and water consumption of all buildings over 20,000 square feet in the City. Beginning in 2017, privately owned buildings that are 20,000 square feet or more and buildings owned by the City that are 7,500 or more are required to be benchmarked, and owners must disclose annual energy and water consumption. Privately owned buildings that are 100,000 square feet or more must begin benchmarking reporting by December 1, 2017, and smaller buildings must begin reporting over the following two years. This Ordinance is designed to facilitate the comparison of buildings' energy and water consumption, and reduce building operating costs, leading to reduced GHG emissions.

EXISTING SETTING

GHGs are the result of both natural and human-influenced activities. Volcanic activity, forest fires, decomposition, industrial processes, landfills, consumption of fossil fuels for power generation, transportation, heating, and cooling are the primary sources of GHG emissions. Without human activity, the Earth would maintain an approximate, but varied, balance between the emission of GHGs into the atmosphere and the storage of GHG in oceans and terrestrial ecosystems. Increased combustion of fossil fuels (e.g., gasoline, diesel, coal, etc.) has contributed to a rapid increase in atmospheric levels of GHGs over the last 150 years.

The primary effect of rising global concentrations of atmospheric GHG levels is a rise in the average global temperature of approximately 0.2 degrees Celsius per decade, determined from meteorological measurements worldwide between 1990 and 2005. Climate change modeling using 2000 emission rates shows that further warming is likely to occur given the expected rise in global atmospheric GHG concentrations from innumerable sources of GHG emissions worldwide (including from economically developed and developing countries and deforestation), which would induce further changes in the global climate system during the current century.[19]

[19]USEPA, *Draft Endangerment Finding*, 74 Fed. Reg. 18886, 18904, April 24, 2009.

Adverse impacts from global climate change worldwide and in California include:

- Declining sea ice and mountain snowpack levels, thereby increasing sea levels and sea surface evaporation rates with a corresponding increase in atmospheric water vapor, due to the atmosphere's ability to hold more water vapor at higher temperatures;[20]
- Rising average global sea levels primarily due to thermal expansion and the melting of glaciers, ice caps, and the Greenland and Antarctic ice sheets;[21]
- Changing weather patterns, including changes to precipitation, ocean salinity, and wind patterns, and more energetic aspects of extreme weather including droughts, heavy precipitation, heat waves, extreme cold, and the intensity of tropical cyclones;[22]
- Declining Sierra Mountains snowpack levels, which account for approximately half of the surface water storage in California, by 70 percent to as much as 90 percent over the next 100 years;[23]
- Increasing the number of days conducive to ozone formation (e.g., clear days with intense sun light) by 25 percent to 85 percent (depending on the future temperature scenario) in high ozone areas located in the Southern California area and the San Joaquin Valley by the end of the 21st Century;[24]
- Increasing the potential for erosion of California's coastlines and seawater intrusion into the Sacramento Delta and associated levee systems due to the rise in sea level;[25] and
- Exacerbating the severity of drought conditions in California such that durations and intensities are amplified, ultimately increasing the risk of wildfires and consequential damage incurred.[26]

Scientific understanding of the fundamental processes responsible for global climate change has improved over the past decade. However, there remain significant scientific uncertainties; for example, in predictions of local effects of climate change, occurrence of extreme weather events, and effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, volcanic activity, and changes in oceanic circulation. Due to the complexity of the climate system, the uncertainty surrounding the implications of climate change may never be completely eliminated. Because of these uncertainties, there continues to be significant debate as to the extent to which increased concentrations of GHGs have caused or will cause climate change, and with respect to the appropriate actions to limit and/or respond to climate change. Given the scale over which climate change occurs, as well as the uncertainties described above, it is not possible to link specific development projects to future specific climate change impacts; though estimating project-specific emissions is possible.

CARB has prepared a statewide emissions inventory covering 2000 to 2014, which demonstrates that GHG emissions have decreased by 7.9 percent over that period.[27] Emissions in 2014 from the transportation sector, which represents California's largest source of GHG emissions and contributed 37 percent of total annual emissions, declined marginally relative to 2011 even while the economy and population continued to grow over that three year time period.[28] The long-term direction of transportation-related GHG emissions is another clear trend, with a 13 percent drop over the past ten years.

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[20]USEPA, *Draft Endangerment Finding*, 74 Fed. Reg. 18886, 18904, April 24, 2009.

[21]Intergovernmental Panel on Climate Change, *Climate Change 2013: The Physical Science Basis, Fifth Assessment Report*, ISBN 978 1 107 05799-1 Hardback; 978 1 66182-0 Paperback. 2013.

[22]*Ibid.*

[23]Cal/EPA, *Climate Action Team Report to Governor Schwarzenegger and the California Legislature*, 2006.

[24]*Ibid.*

[25]*Ibid.*

[26]California State Senate, *Climate Change Impacts and Adaptation Efforts in California: Summary of Oversight and Informational Hearings of the California State Senate Committee on Environmental Quality*, November 2015.

[27]CARB, *California Greenhouse Gas Inventory for 2000-2015 – by Category as Defined in the 2008 Scoping Plan*, June 6, 2017.

[28]*Ibid.*

Table 4.7-2 shows GHG emissions from 2005 to 2015 in California. On a local level, the majority of GHG emissions within the Project Area can be attributed to automobile exhaust associated with the transportation sector. Major freeways and a number of primary roadways are adjacent to or within the limits of the Project Area. There are also a number of primary roadways. Direct sources of emissions include solid waste decomposition, haul trucks, and the use of refrigerant compounds.

TABLE 4.7-2: CALIFORNIA GREENHOUSE GAS EMISSIONS INVENTORY

	Annual CO_2e Emissions (Million Metric Tons)										
Sector	**2005**	**2006**	**2007**	**2008**	**2009**	**2010**	**2011**	**2012**	**2013**	**2014**	**2015**
Transportation	184	184	184	173	166	163	160	159	158	160	165
Industrial	95	93	90	90	87	91	91	91	93	94	92
Electric Power	108	105	114	120	101	90	88	95	90	88	84
Commercial and Residential	42	43	43	43	44	45	45	43	43	37	38
Agriculture	34	36	36	36	34	35	35	36	35	36	35
High Global Warming Potential	9	10	11	12	12	14	15	16	17	18	19
Recycling and Waste	8	8	8	8	8	8	8	8	8	9	9
Emissions Total	**482**	**479**	**486**	**483**	**453**	**446**	**442**	**445**	**445**	**442**	**440**

SOURCE: CARB, *California Greenhouse Gas Inventory for 2000-2015 – by Category as Defined in the 2008 Scoping Plan*, June 6, 2017.

As shown in **Table 4.7-2**, California's GHG emissions have followed a declining trend since 2007. In 2015, emissions from routine emitting activities statewide were 1.5 million metric tons of CO_2e ($MMTCO_2e$) lower than 2014 levels, representing an overall decrease of 10 percent since peak levels in 2004. However, between October 23, 2015 and February 18, 2016, an exceptional natural gas leak event occurred at the Aliso Canyon natural gas storage facility that resulted in unexpected GHG emissions of considerable magnitude. The exceptional incident released approximately 109,000 metric tons of methane (CH_4), which equated to approximately 1.96 $MMTCO_2e$ of unanticipated emissions in 2015 and an additional 0.52 $MMTCO_2e$ in 2016. According to the CARB, these emissions will be mitigated in the future through projects funded by the Southern California Gas Company (SoCalGas) based on legal settlement and are presented alongside but tracked separately from routine inventory emissions.[29,30]

The occurrence of unexpected incidents such as the Aliso Canyon natural gas leak and the exacerbated severity of drought and wildfires throughout the state are impossible to predict and present additional challenges in reducing statewide GHG emissions. While the GHG emissions produced by these atypical circumstances are not included in the state routine inventory emissions, ultimately California must account for and mitigate the emissions to achieve its climate goals. Adaptive policy and program development will be necessary to address the unforeseen setbacks that may occur in the future.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the CEQA Guidelines, the Proposed Plan would have a significant impact related to GHG emissions if it would:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; and/or
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

[29]CARB, *California Greenhouse Gas Inventory for 2000-2015 – Trends of Emissions and Other Indicators*, June 2017.
[30]CARB, *Determination of Total Methane Emissions from the Aliso Canyon Natural Gas Leak Incident*, October 2016.

SCAQMD THRESHOLDS AND PROJECT SPECIFIC THRESHOLD

The City has not adopted GHG significance thresholds. SCAQMD has yet to adopt a GHG significance threshold for land use development projects, although it has adopted significance thresholds for industrial-type projects for which it is the lead agency. Those industrial thresholds are not relevant to the Proposed Plan, as the only projects for which the SCAQMD serves as the lead agency are those involving the adoption of air quality rules or regulations, or projects that have not gone through CEQA environmental review via another lead agency.[31] No such projects would occur under implementation of the Proposed Plan. In the absence of adopted thresholds for land use development projects based on SCAQMD guidance, the City has the discretion to use a significance threshold relevant to the Proposed Plan.

On November 30, 2015, the California Supreme Court issued an opinion on GHG significance thresholds for CEQA in the case *Center for Biological Diversity et al. vs. California Department of Fish and Wildlife*. The following discussion is paraphrased from that case, which assessed the use of GHG significance thresholds.

> *Neither AB 32 nor the CARB Scoping Plan set out a mandate or method for CEQA analysis of GHG emissions from a proposed project. A 2007 CEQA amendment, however, required the preparation, adoption and periodic update of guidelines for mitigation of GHG impacts. The resulting state direction was that a lead agency should attempt to describe, calculate or estimate the amount of GHG the project will emit, but recognizes that agencies have discretion in how to do so. It goes on to provide that when assessing the significance of GHG emissions, the agency should consider these factors among others: (1) the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting; (2) whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with any adopted regulations or requirements, an EIR must be prepared for the project. (Citing to CEQA Guidelines Section 15064.4).*
>
> *The Court recognized that based on the nature of GHG, no single project is likely to have significant impacts and the challenge is to determine whether a project's emissions are cumulatively considerable. The Court also acknowledged that the scope of global climate change and the fact that GHGs, once released into the atmosphere, are not contained in the local area of their emission means that the impacts to be evaluated are global rather than local. For many air pollutants, the significance of their environmental impact may depend greatly on where they are emitted; for GHG, it does not. For projects that are intended to accommodate long-term growth in California's population and economic activity, this fact gives rise to an argument that a certain amount of GHG emissions is as inevitable as population growth. Under this view, a significance criterion framed in terms of efficiency is superior to a simple numerical threshold because CEQA is not intended as a population control measure.*
>
> *This consideration favors consistency with AB 32's statewide goals as a permissible significance criterion for project GHG emissions. Meeting statewide reduction goals does not preclude all new development. Rather, the Scoping Plan, the state's roadmap for meeting AB 32's target, assumes continued growth and depends on increased efficiency and conservation in land use and transportation from all Californians. To the extent a project incorporates efficiency and conservation measures sufficient to contribute its portion of the overall GHG reductions necessary for the entire state, one can reasonably argue that a project's impact is not cumulatively*

[31] SCAQMD, *Lead Agency CEQA Documents*, 2014.

considerable, because it would be helping to solve the cumulative problem of greenhouse gas emissions as envisioned by California law. Given the reality of growth, some GHG emissions from new housing and commercial developments necessary to house and provide jobs for a growing population are inevitable. The critical CEQA question is the cumulative significance of a project's GHG emissions, and from a climate change point of view it does not matter where in the state those emissions are produced. Under these circumstances, evaluating the significance of a project's GHG emissions by their effect on the state's efforts to meet its long-term goals is a reasonable threshold.

The court recognized potential options for analyzing cumulative significance of a project's GHG emissions, including:

- *Business-as-usual (BAU) Model. BAU comparison based on the Scoping Plan methodology if supported by substantial evidence that the metric used supports what level of reduction from business as usual a new land use development at the proposed location must contribute to comply with state goals.*
- *Consistency with AB 32's goal in whole or in part by looking at compliance with regulatory programs designed to reduce GHG; provided the project complies with or exceeds the regulations that were adopted by CARB, or state agencies to comply with Scoping Plan; and provided, the significance analysis only relates to impacts within the area governed by the regulation – e.g., reliance on Title 24 energy efficiency rules that are intended to reduce GHG from building would not address GHG impacts from transportation. And/or showing consistency with local GHG reduction plans, (e.g., climate action plan), to provide a basis for the tiering or streamlining of project-level CEQA analysis, including as consistent with CEQA Guidelines Section 15183.3.*
- *Relying on numerical thresholds for significance for GHG.*

Based on the legal standard above, the City finds analyzing per-capita GHG emissions is not a threshold of significance but a useful indicator as to whether regional GHG impacts are consistent with AB 32 and SB 32. Per-capita GHG emissions reflects on average GHG emissions taking into account population density. As part of its strategy for meeting the 2030 GHG emissions target codified in SB 32, CARB promulgated a community-wide annual goal of 6 metric tons of carbon dioxide equivalent ($MTCO_2e$) per capita by 2030 and 2 $MTCO_2e$ per capita by 2050 to be implemented through a future statewide Climate Action Plan. In accordance with the objectives and requirements of SB 375, the 2016–2040 RTP/SCS assessed regional per-capita GHG emissions from passenger and light duty vehicles. As noted above, CARB established SB 375 targets for passenger vehicles in the SCAG region compared to 2005 emissions: 1) an eight percent reduction in emissions by 2020 and 2) a 13 percent reduction in emissions by 2035. The 2016-2040 RTP/SCS indicates that the SCAG region will achieve an 18 percent reduction in per-capita passenger vehicle GHG emissions by 2035 and a 22 percent reduction in per-capita passenger vehicle GHG emissions by 2040 relative to 2005 levels. With that said, there is no adopted City or CPA per-capital GHG emission target or other numerical criteria adopted as a threshold of significance that would be applicable to the Proposed Plan.

Using consistency with AB 32's statewide goal for GHG reduction as a significance criterion, rather than a numerical threshold, is consistent with the *Center for Biological Diversity* decision and broad guidance provided by Section 15064.4 of the CEQA Guidelines. Section 15064.4 was drafted to reflect that there is no iron-clad definition of significance. Section 15064.4 was not intended to restrict agency discretion in choosing a method for assessing GHG emissions, but rather to assist lead agencies in investigating and disclosing all that they reasonably can regarding a project's GHG emissions impacts.

Based on all of the above, to answer the Appendix G questions above, the City of Los Angeles adopts the following project-specific threshold of significance to assess the environmental impacts associated with GHG emissions for the Proposed Plan:

> **Consistency with AB 32, SB 32, SB 375 (through demonstration of conformance with the 2016–2040 RTP/SCS), the Sustainable City pLAn and GreenLA.**

In this document, GHG emissions within the Project Area are estimated using available factors that do not account for anticipated emissions reductions by sector for the purpose of characterizing the magnitude of emissions that could result from the Proposed Plan in a regional context, but consistency with AB 32, SB 32, SB 375, the Sustainable City pLAn and GreenLA are assessed qualitatively. Consistency with AB 32 is determined based on proactive strategies toward meeting the statewide goals, as described above in Regulatory Framework. SB 375 requires the preparation of an SCS in coordination with the RTP, and consistency with the 2016–2040 RTP/SCS is determined by evaluating the Proposed Plan's effect on regional growth relative to the availability of a sustainable transportation network. Additionally, elements of the Proposed Plan are discussed as they relate to goals and/or objectives in GreenLA to ensure that the Proposed Plan is designed in accordance with citywide sustainability measures.

METHODOLOGY

CEQA Guidelines Section 15064.4(a) provides that lead agencies should make a good faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of GHG emissions resulting from the project. The discussion below provides the methodology as to how the Proposed Plan's GHG emissions were calculated. Although again, as discussed above, there is no adopted numerical threshold of significance to compare the Proposed Plan's emissions against to determine significance it is provided to comply with the CEQA Guidelines.

GHG emissions result from direct and indirect sources. Direct emissions include emissions from fuel combustion in vehicles and natural gas combustion from stationary sources. Indirect sources include off-site emissions occurring as a result of electricity and water consumption and solid waste. In addition, construction activities would result in direct and indirect emissions. As GHGs are evaluated on a regional basis, the following analysis addresses the Project Area as it pertains to the region. Mobile source emissions were estimated using VMT data presented in Section 4.15, Transportation and Traffic, and vehicle emission rates from the CARB's Emission Factors 2014 (EMFAC2014) model. The VMT data included speed information, which allowed the analysis to account for increased congestion in build scenarios.

Area source emissions related to existing and future demand for water, wastewater treatment and conveyance, solid waste disposal, and energy were obtained according to the methodology explained in Appendix A of the Calculation Details for California Emissions Estimator Model (CalEEMod).[32] GHG emissions result from electricity use, natural gas use, water supply, wastewater treatment, and solid waste disposal by landfilling, recycling, or composting as methane and CO_2 gas is emitted in the process. The source of GHG emissions associated with water supply and wastewater treatment is attributed to the electricity required to convey, treat, and distribute potable water to land uses, and the electricity required for wastewater treatment. GHG emissions associated with water resources are included in the assessment of emissions from electricity use. Refer to Section 4.16, Utilities and Service Systems for a detailed estimate of utility use within the Project Area.

[32]California Air Pollution Control Officers Association, *California Emissions Estimator Model (Version 2016.3.1)*, September 2016.

It is anticipated that future conservation (as a result of increased pressure to conserve and increased prices) will result in more efficient energy use by all sectors resulting in reduced energy demand. As energy providers and water suppliers respond to AB 32 and the Scoping Plan, emission rates associated with power and water delivery are anticipated to decrease. However, in order to present a conservative analysis and without specific information on future demand factors, only modest reductions in demand are assumed. It is anticipated that the state and region will comply with AB 32 and SB 32, but at the present time sector-specific improvements cannot be quantified for this analysis.

The Proposed Plan affects the potential location and density of permitted land uses and the number and length of vehicle trips associated with implementation of those uses. Development of individual projects under the Proposed Plan will be subject to the requirements of local policies and programs (i.e., the Los Angeles Green Building Code) that are aimed at improving sustainability, enhancing accessibility to public transit, and increasing density and diversity in neighborhood planning. Advancements in the efficiency of energy and utility generation are the responsibility of the LADWP and the Southern California Gas Company (SoCalGas). GHG emissions released by these sources/sectors are properly controlled/regulated by these other City Departments (that manage sources of the City's energy supply), state and federal regulations (e.g., Title 24 Building Energy Efficiency Program) and local programs and policies such as the Los Angeles Green Building Code and the 2016-2040 RTP/SCS. In accordance with the objectives of SB 375, the primary focus of this assessment with respect to potential reductions in GHG emissions is the mobile source VMT associated with development under the Proposed Plan.

GHG emissions would also be generated by construction activity. No specific development projects have been proposed in this planning analysis, and an annualized quantification of construction emissions would be speculative. In general, construction-related GHG emissions would comprise a minimal percentage of total regional emissions when considering the emissions generated by mobile and other sources. For example, CARB emissions inventories show that emissions associated with construction activities constitute approximately 1.7 percent of California's on-road mobile source GHG emissions annually. A similar percentage is expected for construction emissions related to the Proposed Plan. Construction emissions are discussed below based on this assumption and amortized over 30 years in accordance with SCAQMD recommendations. The analysis in this EIR focuses on consistency with local and state regulations adopted pursuant to the state's Scoping Plan, including those to address impacts from construction and/or energy efficiency of new construction, (e.g., the Green Building Code).

IMPACTS

IMPACT 4.7-1 Would implementation of the Proposed Plan generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment? **Less than significant impact.**

IMPACT 4.7-2 Would implementation of the Proposed Plan conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions? **Less than significant impact.**

AS DISCUSSED ABOVE, TO ANSWER BOTH OF THE ABOVE QUESTIONS, THE CITY EVALUATES WHETHER THE PROJECT IS CONSISTENT WITH AB 32, SB 32, SB 375 (THROUGH DEMONSTRATION OF CONFORMANCE WITH THE 2016–2040 RTP/SCS), THE SUSTAINABLE CITY PLAN AND GREENLA. GHG EMISSIONS ARE QUANTIFIED FOR INFORMATIONAL PURPOSES.

GHG Emissions Generation. Implementation of the Proposed Plan would generate GHG emissions through the construction and operation of future development projects occurring within the Project Area.

GHG emissions would specifically arise from construction activities, as well as from sources associated with operations of development projects within the Project Area. GHG sources from operational activities include direct sources such as motor vehicles and natural gas consumption, and indirect sources such as electricity generation, water supply, wastewater treatment, and solid waste handling/disposal. **Table 4.7-3** displays estimates of annual GHG emissions for the Project Area under Existing Conditions, the Future (2040) No Project/Existing Plan, and the Proposed Plan. The conservative analysis includes known emission control requirements that are required under existing law (e.g. Pavley regulations) but does not account for anticipated laws (such as increasingly stringent Title 24 standards, refinery regulations, and the Cap-and-Trade program) that will further reduce future GHG emissions.

TABLE 4.7-3: ESTIMATED GREENHOUSE GAS EMISSIONS IN PROJECT AREA

Source Type	Annual CO_2e Emissions (Metric Tons per Year)		
	Existing Conditions (2016)	Future No Project/ Existing Plan (2040) /a/	Proposed Plan (2040)
DIRECT SOURCES			
Transportation	888,896	530,804	555,127
Natural Gas	105,553	125,495	133,465
INDIRECT SOURCES			
Electricity, Water, and Wastewater	548,831	664,727	705,234
Solid Waste	63,963	78,999	80,215
Total Annual GHG Emissions	**1,607,243**	**1,400,025**	**1,474,041**
Change Relative to Existing Conditions (2016)	*N/A*	***-207,218***	***-133,202***

Note: N/A = Not Applicable
/a/ The Future No Project Scenario is based on reasonably foreseeable development if the Existing Plan were to remain in place (see discussion in Chapter 5 Alternatives).
SOURCE: TAHA, 2018.

Estimates of emissions in the Project Area are presented for the purposes of characterizing the magnitude of emissions and relative emissions from the different scenarios that could result from the Proposed Plan in order to inform the public and decision makers. The quantified emissions are not used to compare against a numeric threshold, because as explained in "Thresholds of Significance," above, there is no consensus as to an appropriate threshold for individual projects or land use plans and the estimates are based on emission factors that do not take in to account reductions required to occur in different sectors.

As shown in **Table 4.7-3**, annual emissions of GHG within the Project Area based on the 2040 Reasonably Expected Development of the Proposed Plan would be less than existing emissions by approximately 133,202 $MTCO_2e$ per year (or about eight percent less than existing emissions). Although future conditions reflect increased emissions from stationary sources via the Proposed Plan's reasonably expected development and associated energy use and utility demand, future transportation emissions would be less than existing emissions due to lower vehicle exhaust emissions resulting from increased engine efficiency and cleaner burning fuels. CARB has adopted regulatory programs to ensure that mobile source GHG emissions will be reduced in the future, and the implementation of these programs is reflected in the GHG emission rates that are incorporated into EMFAC2014 which has been approved by CARB for mobile source emissions modeling. Compared to the Existing Conditions, the Proposed Plan would result in a reduction in annual GHG emissions within the Project Area. The Proposed Plan is designed to accommodate efficient growth in the SCAG region and maximize utilization of the transportation corridors and public transit opportunities. By guiding development near transit corridors and encouraging creative

mixed land uses, the Proposed Plan creates an efficient strategy for reasonably foreseeable development in the region, consistent with AB 32, SB 32 and the 2016-2040 RTP/SCS.

Regional Perspective. To assess future GHG emission reductions resulting from a development project, the future condition is often compared to a BAU condition – typically the proposed development without the various GHG reduction measures. For a community plan project, BAU is much more difficult to determine and would be entirely speculative to quantify. While the future conditions with the existing community plan identifies what is reasonably foreseeable to occur in the Project Area if the Proposed Plan were not to proceed, it is not a complete picture of BAU for the region. The Proposed Plan is a planned response to forecast growth, so if growth does not occur in the Project Area, it could occur elsewhere in the City or SCAG region. The Proposed Plan combines sustainable strategies (e.g., proximity to transit, mixed-use, increased density) to respond to state, regional and local policies aimed at reducing GHG emissions. If development were to occur elsewhere in a less sustainable fashion (BAU), regional emissions would be greater. However, for land use plans such as the Proposed Plan, full quantification of BAU is not possible because, at this scale, it is not possible to anticipate where growth would go and how different it would be as compared to the project in terms of proximity to transit, mix of uses and density. Therefore, a comparison of the Proposed Plan's emissions in the future to emissions under BAU is not possible.

In consideration of the objectives of SB 375 and the goals of the 2016–2040 RTP/SCS, per-capita CO_2 emissions from passenger and light duty vehicles were analyzed. The 2016–2040 RTP/SCS shows regional per-capita GHG emissions from passenger and light duty vehicles being reduced by 21 percent relative to 2005 levels by 2040. The 2016–2040 RTP/SCS determined that the 2005 per-capita CO_2 emissions from passenger and light duty vehicles within the SCAG region were 23.8 pounds per day.[33]

Table 4.7-4 presents the forecast population, total Project Area daily CO_2 emissions from passenger and light-duty vehicles, and per-capita CO_2 emissions within the Project Area under Existing Conditions, the Future (2040) No Project/Existing Plan, and the Proposed Plan.

TABLE 4.7-4: PROJECT AREA SB 375 PASSENGER VEHICLE PER-CAPITA CO_2 EMISSIONS

	Existing Conditions (2016)	Future (2040) No Project/ Existing Plan	Proposed Plan (2040)
Resident Population	206,000	243,000	264,000
Daily CO_2 Emissions (Pounds)	4,770,815	3,799,615 /a/	3,929,251 /a/
Per Capita Emissions (Pounds)	23.2	15.6	14.9
Percent Reduction from 2005 SCAG Regional Per Capita Emissions Level	-3%	-34%	-37%

/a/ 2040 emissions conservatively estimated to include an average Pavley reduction of 35% for CO_2 emissions from passenger vehicles.
SOURCE: City of Los Angeles Travel Demand Model, 2016 and 2018; CARB, EMFAC2014; SCAG, *Draft PEIR 2016-2040 RTP/SCS*, December 2015.

As shown in **Table 4.7-4**, implementation of the Proposed Plan would reduce per-capita CO_2 emissions from passenger vehicles by approximately 8.3 pounds per day relative to Existing Conditions and by approximately 0.7 pounds per day relative to the Future (2040) No Project/Existing Plan (comparison to existing plan is for information purposes and not for impact analysis). Under the Proposed Plan, per-capita CO_2 emissions would be reduced by approximately 37 percent relative to the 2005 SCAG Regional baseline levels examined under

[33]SCAG, *Draft Program Environmental Impact Report 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy*, December 2015.

SB 375. The 37 percent reduction resulting from the Proposed Plan exceeds the 21 percent reduction target of the 2016–2040 RTP/SCS, and therefore the Proposed Plan is consistent with SB 375.

Based on the plan-level analysis, the Proposed Plan would not increase emissions in the Project Area compared to existing conditions and, therefore, considered in isolation, would contribute to reducing emissions in California below existing emissions and would contribute to the AB 32 goal of reducing future emissions to 1990 levels. The Proposed Plan is not occurring in isolation; it is part of a regional strategy (contained in the 2016–2040 RTP/SCS) to direct growth to urban areas in order to achieve the following:

- Undertake modern, efficient construction techniques that result in using less energy and less water as compared to less dense development;
- Create a mix of uses that encourages pedestrian and bicycle activity, reducing vehicle trips; and
- Develop areas in close proximity to transit in order to reduce vehicular trips.

The Proposed Plan would also be consistent with the City's Sustainable City pLAn by accommodating growth while providing transportation options. This strategy would result in lower per capita emissions than less dense growth and would contribute to the City reaching the 2025 Sustainable City pLAn reduction target of 45 percent.

Consistency with State and Regional Plans, Policies, and Regulations. The State of California has adopted plans and policies designed to reduce regional and local GHG emissions. SB 375 requires that each MPO prepare an SCS in the RTP that demonstrates how the region will meet greenhouse gas emissions targets. SB 375 establishes a collaborative relationship between MPOs and CARB to establish GHG emissions targets for each region in the state. Under the guidance of the goals and objectives adopted by SCAG's Regional Council, the 2016–2040 RTP/SCS was developed to provide a blueprint to integrate land use and transportation strategies to help achieve a coordinated and balanced regional transportation system. The 2016–2040 RTP/SCS represents the culmination of several years of work involving dozens of public agencies, 191 cities, hundreds of local, county, regional and state officials, the business community, environmental groups, as well as various nonprofit organizations. Adoption of the 2016–2040 RTP/SCS substantiated that the growth forecasts for the SCAG region, taking into account efforts to reduce climate change impacts from GHG emissions, were consistent with the goals of SB 375.

The 2016–2040 RTP includes an SCS, as required by SB 375. The primary goal of the SCS is to provide a vision for future growth in southern California that will decrease per capita GHG emissions from passenger vehicles. However, the strategies contained in the 2016–2040 RTP/SCS will produce benefits for the region far beyond simply reducing GHG emissions. The SCS integrates the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The regional vision of the SCS maximizes current voluntary local efforts that support the goals of SB 375. The SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas on existing main streets, in downtowns, and on commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. The underlying purpose of the Proposed Plan is to plan for and accommodate foreseeable growth in the Project Area, consistent with the growth strategies of the City as provided in the City's General Plan Framework Element, as well as the policies of SB 375 and the SCS. The Proposed Plan would allow for concentrated, mixed-use development adjacent to transit corridors in order to conserve resources, protect existing residential neighborhoods, and improve air quality by reducing the use of cars. The Proposed Plan is expected to contribute to reductions in per capita GHG emissions when viewed at the regional level. Thus, the Proposed Plan would be entirely consistent with the SCS and SB 375 goals.

In addition to SB 375, the 2016–2040 RTP/SCS assessed compliance with AB 32.[34] To assess consistency with the AB 32 Scoping Plan, the Proposed Plan is compared against the recommended GHG reduction measures and discrete early action measures found in the First Update to the AB 32 Scoping Plan. The majority of these measures are relevant to statewide policies and not applicable to local analyses. For example, increasing the regional renewable energy portfolio or encouraging sustainable forests are outside a reasonable assessment for a land use plan that targets a specific community within a larger city. However, a number of the GHG reduction measures in the Scoping Plan are applicable to development activities that would occur under the Proposed Plan, such as increasing building/appliance efficiency, showing progress toward regional transportation-related GHG goals, constructing green buildings, and increasing construction recycling rates.

The First Update to the AB 32 Scoping Plan includes detailed discussions related to promoting transit-oriented development (TODs) and alternatives to driving, such as public transportation. It states that,

> *Metropolitan areas are beginning to change and trend toward more dense urban development designed to minimize energy consumption, waste output, air pollution, and water pollution. Business districts are encouraging more infill development that offers a mix of residential space, entertainment, restaurants, shopping, and other amenities within close proximity, which reduces dependence on private vehicles. These trends create opportunities for developers to satisfy changing consumer desires and for land use planners to establish policies for more sustainable development patterns. It takes decades for changes in land use and transportation policies to result in tangible changes, including GHG emission reductions. The next generation of regional integrated plans is expected to result in climate benefits well beyond the 2035 time horizon. Integrated regional planning efforts under SB 375 enable communities to understand the differences between alternative development patterns and to make choices accordingly. Recently approved SCSs reflect regional goals for a more sustainable form of community development that brings with it economic, social, and environmental benefits. The implementation of these regional goals through individual action by local governments and the development community will be essential to meeting the state's ongoing climate objectives.*

The type of compact, urban development along public transportation lines that would be developed with implementation of the Proposed Plan would be entirely consistent with policies in the First Update to the Scoping Plan. The Proposed Plan promotes concentrated, mixed-use development adjacent to transit stations and corridors in order to conserve resources and create more sustainable development pattern by increasing opportunities for active transportation and reducing the use of cars.

The Proposed Plan includes updates to land use designations and zones that are intended to accommodate growth anticipated by the 2016–2040 RTP/SCS. Growth is directed away from hillside areas and lower-density neighborhoods and primarily into the Regional Center, the entertainment and visitor-serving center of the Project Area, and other commercial corridors served by transit. Future growth would be directed around the Red Line Metro Rail stations and Metro Rapid bus lines where new residential and commercial development can be supported by transportation infrastructure and different types of land uses can be intermingled to reduce the length and number of vehicle trips. The Proposed Plan's strategic increase of development potential in transit-rich areas is consistent with the First Update to the AB 32 Scoping Plan. The objectives and project features of the Proposed Plan that are most relevant to the GHG environmental review are shown in **Table 4.7-5**.

[34]SCAG, *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy*, 2016.

TABLE 4.7-5: SUSTAINABILITY OBJECTIVES AND PROJECT FEATURES OF THE PROPOSED PLAN

PURPOSE: Plan for and accommodate foreseeable growth in the Project Area, consistent with the growth strategies of the City as provided in the Framework Element, as well as the policies of SB 375 and the SCS.	
Primary Objective: Accommodate projected population, housing, and employment growth within the Project Area, consistent with the growth strategies of the Framework Element, by implementing the following: 1) Maximizing development opportunities around existing transit systems to encourage sustainable land use while minimizing potential adverse impacts; (2) Directing growth to transit hubs and corridors; (3) Planning for increases to the housing supply; (4) Encouraging balanced jobs and housing growth with mixed-use development; (5) Accommodating commercial uses for future employment opportunities; and (6) Focusing growth into Framework-identified Centers and corridors while preserving single-family neighborhoods, hillsides, and open space.	
Project Features	Amend General Plan Land Use designations, and/or zones and height districts along selected corridors; direct future growth around the Red Line Metro Rail stations and Metro Rapid bus lines; and incentivize mixed-use commercial/residential development near commercial areas, such as the Regional Center and public transit.
	Direct growth away from low-density residential areas to transit nodes helps maintain the existing scale and density of residential neighborhoods.
	Amend General Plan Land Use designations, and/or zones and height districts to support higher density, mixed-use transit neighborhoods at transit nodes and commercial centers that can accommodate increased capacity.
	Promote TODs by directing residential and commercial development to districts, centers and boulevards adjacent to transit, making it possible for residents and visitors to reduce dependence on automobiles.
	Promote the General Plan Framework's transit-oriented development policies which encourage compact, mixed-use development near transit to reduce vehicle trips and improve air quality through Plan policies and removal of zoning limitations on density and intensity.
	Encourage water conservation, energy efficiency, the use of permeable materials for paving, recycling, reduction of waste, and the use of clean, renewable energy through Plan policies.
SOURCE: City of Los Angeles, *Draft Hollywood Community Plan*, 2018.	

As discussed in Section 4.15, Transportation and Traffic, the Citywide Ordinance on TDM and Trip Reduction Measures (Ordinance No. 168,700) would continue to be implemented within the Project Area. This Ordinance calls for several measures to be taken by non-residential developments in an effort to reduce single-occupancy vehicle trips. In addition, the Proposed Plan's allocation of development potential in close proximity to major transit stations would reduce reliance of vehicular travel, decrease the number of vehicle trips per capita, and reduce VMT per capita in order to provide better access and transportation options to residents, workers and visitors in Hollywood. Under Existing Conditions, motorists traveling to, from or within the Project Area travel over 5.62 million vehicle miles on an average weekday. Under the Proposed Plan, daily VMT would increase to approximately 5.77 million, a 3 percent increase from Existing Conditions in the Project Area. But, the VMT per capita is lowered under the Proposed Plan.

Although regional VMT would increase, daily VMT per capita would decrease from 18.3 miles per capita daily under Existing Conditions to 15.6 miles per capita under the Proposed Plan, representing a reduction of 15 percent average VMT per capita. The overall increase in VMT likely reflects increases in the number of residents, employees and visitors in the Project Area largely driven by ambient growth. Overall though, a reduction in VMT per capita indicates a decrease in reliance on automobiles and a measurable step towards reduction in GHG emissions. Furthermore, as attitudes shift in favor to alternative modes of transport such as bicycling and the use of public transportation, GHG emissions are expected to further decrease.

Consistency with Local Plans, Policies, and Regulations. The City of Los Angeles enacted its GreenLA CAP in 2007 to outline strategies for reducing the City's emissions of GHG and consequent effects on climate change. The CAP's primary long-term objective was to establish a framework for implementing GHG emissions reductions efforts that would achieve a goal of reducing City-wide emissions to 35 percent below 1990 levels by 2030. With regards to planning, elements of GreenLA designed to aid in regional GHG reductions include promotion of high-density housing close to major transportation arteries, implementation of TOD, and expanding availability of City land for housing, mixed-use development, parks, and open space. As discussed in Chapter 3.0, Project Description, the Proposed Plan would encourage mixed-use development in the Project Area and increase housing development potential near Metro Red Line rail stations. Furthermore, implementation of the Proposed Plan would encourage pedestrian-friendly, mixed-use neighborhoods that would require less use of passenger vehicles. The combination of these strategies is consistent with the goals of GreenLA.

In April 2015, the Mayor of Los Angeles released the Sustainable City pLAn to expand upon the framework set forth by the original GreenLA CAP. The Sustainable City pLAn focuses on short-term and long-term strategies for how the City of Los Angeles will adapt to the ever-increasing demands of the growing population and employment in the City. The Proposed Plan contains elements and objectives that address the following Strategies & Priority Initiative areas within the Sustainability City pLAn: Local Water, Energy-Efficient Buildings, Housing and Development, and Mobility and Transit. The Proposed Plan would satisfy priority initiatives of the Sustainable City pLAn by implementing the Project Features discussed in **Table 4.7-5**. Under the Proposed Plan, reasonably expected development within the Project Area would be encouraged to embrace strategies to improve water conservation and reduce per-capita use, would comply with the Green Building Code, and direct future growth toward transit corridors. These elements of the Proposed Plan are consistent with the directive of the Mayor's Sustainable City pLAn.

In addition, individual development projects constructed within the Project Area would be required to comply with the Los Angeles Green Building Code. The City's Green Building Code includes energy and water saving measures that reduce GHG emissions below 2013 Title 24 requirements. It promotes sustainable building practices by creating a series of requirements and incentives for developers to meet the U.S. Building Council's Energy and Design standards. The Green Building Code includes the following key mandatory measures for non-residential and high-rise residential buildings related to GHG reduction:

- Short-Term Bicycle Parking: If a development project is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passersby, for five percent of visitor motorized vehicle parking capacity, with a minimum of one two-bike capacity rack.
- Long-Term Bicycle Parking: For buildings with over 10 occupants, provide secure bicycle parking for five percent of motorized vehicle parking capacity, with a minimum of one space. Acceptable parking facilities shall be convenient from the street and may include:
  - Covered, lockable enclosures with permanently anchored racks for bicycles.
  - Lockable bicycle rooms with permanently anchored racks.
  - Lockable, permanently anchored bicycle lockers.
- Designated Parking: Provide designated parking, by means of permanent marking or a sign, for any combination of low-emitting, fuel-efficient, and carpool/van pool vehicles as described in Table 5.106.5.2 of the Green Building Code.
- Energy Conservation: Provide electric vehicle supply wiring for a minimum of five percent of the total number of parking spaces.
- Energy Conservation: A project must exceed the California Energy Code requirements, based on the 2008 Energy Efficiency Standards, by 15 percent using an Alternative Calculation Method approved by the California Energy Commission.

- Energy Conservation: Each appliance provided and installed shall meet Energy Star requirements if an Energy Star designation is applicable for that appliance.
- Renewable Energy: Provide future access, off-grid pre-wiring, and space for electrical solar systems.

As the Proposed Plan would be consistent with the goals of GreenLA and the Sustainable City pLAn, and future development projects within the Project Area would be required to comply with the City's Green Building Code, the Proposed Plan would be consistent with the City's strategies for reducing GHG.

Conclusion

As discussed above, the Proposed Plan would result in a reduction in annual GHG emissions within the Project Area relative to Existing Conditions and would exceed the CO_2 SCAG region per-capita emissions reductions identified in the 2016–2040 RTP/SCS. These quantitative metrics demonstrate the Proposed Plan's compliance with regional, state, and federal efforts to decrease climate impacts related to sustainable development and transportation. Additionally, the Proposed Plan would be consistent with the 2016–2040 RTP/SCS and the City's Sustainable City pLAn.

Additionally, the Proposed Plan would concentrate development around transit, encourage mixed-use development, and better accommodate pedestrians and bicyclists. These characteristics are anticipated to reduce per capita GHG emissions associated with cars and light trucks. The Proposed Plan would be consistent with AB 32, SB 32, SB 375, and the 2016–2040 RTP/SCS, regional and local strategies to reduce GHG, and can be expected to contribute to reductions in per capita GHG emissions when viewed at the regional level. Therefore, impacts related to GHG emissions under the Proposed Plan would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impact after Mitigation

Less than significant.

CUMULATIVE IMPACTS

The State of California, through AB 32, has acknowledged that GHG emissions are a statewide impact. Emissions generated by the Proposed Plan combined with past, present, and reasonably probable future projects could contribute to this impact. The CEQA Guidelines emphasize that the effects of GHG emissions are cumulative in nature and should be analyzed in the context of CEQA's existing cumulative impacts analysis. The Office of Planning and Research (OPR) acknowledges that although climate change is cumulative in nature, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment.[35] CEQA authorizes reliance on previously approved plans and mitigation programs that have adequately analyzed and mitigated GHG emissions to a less than significant level as a means to avoid or substantially reduce the cumulative impact of a project.

[35]California Governor's Office of Planning and Research, *CEQA AND CLIMATE CHANGE: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review*, June 19, 2008.

As discussed above, the Proposed Plan would be consistent with AB 32, SB 375, SB 32, the 2016–2040 RTP/SCS, and the City's local GHG reduction plan, the GreenLA CAP. Additionally, GHG impacts are cumulative in nature, and the Proposed Plan would result in a substantial net decrease in GHG emissions within the Project Area relative to the existing environmental setting. Therefore, the Proposed Plan's incremental contribution to that significant cumulative impact ***would not be cumulatively considerable***.

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4.8 HAZARDS AND HAZARDOUS MATERIALS

This section provides an overview of hazardous conditions in the Project Area and evaluates potential hazards and hazardous materials impacts associated with the Proposed Plan. Topics addressed include the transport, use, disposal, and/or release of hazardous materials; hazardous materials sites; airport hazards; emergency response plans; and wildland fires. This section was prepared utilizing the *EDR DataMap Environmental Atlas*, dated November 29, 2016.[1]

Hazard versus Risk. Workers' health and general public health are potentially at risk whenever hazardous materials have been used or where there could be an exposure to such materials. Inherent in the setting and analyses presented in this section are the concepts of the "hazard" of these materials and the "risk" they pose to human health. Exposure to some chemical substances may harm internal organs or systems in the human body, ranging from temporary effects to permanent disability, or death. Hazardous materials that result in adverse effects are generally considered "toxic." Other chemical materials, however, may be corrosive, or react with other substances to form other hazardous materials, but they are not considered toxic because organs or systems are not affected. Because toxic materials can result in adverse health effects, they are considered hazardous materials, but not all hazardous materials are necessarily "toxic." For purposes of the information and analyses presented in this section, the terms hazardous substances or hazardous materials are used interchangeably and include materials that are considered toxic.

The risk to human health is determined by the probability of exposure to a hazardous material and the severity of harm such exposure would pose. That is to say, the likelihood and means of exposure, in addition to the inherent toxicity of a material, are used to determine the degree of risk to human health. For example, a high probability of exposure to a low toxicity chemical would not necessarily pose an unacceptable human health or ecological risk, whereas a low probability of exposure to a very high toxicity chemical might. Various regulatory agencies, such as the U.S. Environmental Protection Agency (USEPA), California Environmental Protection Agency's (Cal/EPA), State Water Resources Control Board (SWRCB), Cal/EPA Department of Toxic Substances Control (DTSC), and state and federal Occupational Safety and Health Administration (OSHA) are responsible for developing and/or enforcing risk-based standards to protect the public and the environment.

REGULATORY FRAMEWORK

The primary federal, state and local regulations for hazards applicable to the Proposed Plan are summarized below:

FEDERAL

Primary federal agencies with responsibility for hazardous materials management include the USEPA, U.S. Department of Labor's OSHA, and U.S. Department of Transportation (USDOT).

U.S. Environmental Protection Agency (USEPA). The USEPA's mission is to protect human health and the environment. USEPA takes action to reduce risks associated with exposure to chemicals in commerce, indoor and outdoor environments, and products and food. USEPA continues to oversee the introduction and use of pesticides, improve their Integrated Risk Information System (IRIS) program, reduce radon risks, identify and address children's health risks in schools and homes, and improve chemical management

[1]Environmental Data Resources, Inc., *EDR DataMap Environmental Atlas, Hollywood Community Plan Update, Los Angeles, CA,* November 29, 2016.

practices. Oversight of chemical storage and manufacturing in coordination with their interagency partners remains a key focus of USEPA, as well as efforts to reduce urban air toxins.

U.S. Department of Transportation (USDOT) Regulations. USDOT prescribes strict regulations for the safe transportation of hazardous materials, including requirements for hazardous waste containers and licensed haulers who transport hazardous waste on public roads.

The Secretary of the Department of Transportation receives the authority to regulate the transportation of hazardous materials from the Hazardous Materials Transportation Act (HMTA), as amended and codified in 49 U.S. Code (U.S.C.) Section 5101 et seq. The Secretary is authorized to issue regulations to implement the requirements of 49 U.S.C. The Pipeline and Hazardous Materials Safety Administration (PHMSA), formerly the Research and Special Provisions Administration, was delegated the responsibility to write the hazardous materials regulations, which are contained in Title 49 of the Code of Federal Regulations (CFR) Parts 100-180. Title 49 of the CFR, which contains the regulations set forth by the HMTA, specifies requirements and regulations with respect to the transport of hazardous materials. It requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Under the HMTA, the Secretary "may authorize any officer, employee, or agent to enter upon, inspect, and examine, at reasonable times and in a reasonable manner, the records and properties of persons to the extent such records and properties relate to: (1) the manufacture, fabrication, marking, maintenance, reconditioning, repair, testing, or distribution of packages or containers for use by any "person" in the transportation of hazardous materials in commerce; or (2) the transportation or shipment by any "person" of hazardous materials in commerce."

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Enacted in 1980, CERCLA, commonly known as Superfund, creates a tax on the chemical and petroleum industries and provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. The tax goes into a trust fund for cleaning up abandoned or uncontrolled hazardous waste sites. CERCLA:

- Established prohibitions and requirements concerning closed and abandoned hazardous waste sites;
- Provided for liability of persons responsible for releases of hazardous waste at these sites; and
- Established a trust fund to provide for cleanup when no responsible party could be identified.

CERCLA established the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS). The CERCLIS database was renamed to Standardized Emergency Management System (SEMS) by USEPA in 2015 and integrates several EPA database systems into one database. SEMS is the USEPA's system for tracking potential hazardous-waste sites within the Superfund program. In addition, CERCLA authorizes two kinds of response actions:

- Short-term removals, where actions may be taken to address releases or threatened releases requiring prompt response.
- Long-term remedial response actions, that permanently and significantly reduce the dangers associated with releases or threats of releases of hazardous substances that are serious, but not immediately life threatening. These actions can be conducted only at sites listed on the USEPA's National Priorities List (NPL).

CERCLA also enabled the revision of the National Contingency Plan (NCP). The NCP provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The NCP also established the NPL.

Superfund Amendments and Reauthorization Act of 1986 (SARA). SARA amended CERCLA on October 17, 1986 to revise existing provisions of CERCLA and add new authority to the law. SARA reflected USEPA's experience in administering the complex Superfund program during its first six years and made several important changes and additions to the program. Primarily, SARA:

- Stressed the importance of permanent remedies and innovative treatment technologies in cleaning up hazardous waste sites;
- Required Superfund actions to consider the standards and requirements found in other state and federal environmental laws and regulations;
- Provided new enforcement authorities and settlement tools;
- Increased state involvement in every phase of the Superfund program;
- Increased the focus on human health problems posed by hazardous waste sites;
- Encouraged greater citizen participation in making decisions on how sites should be cleaned up; and
- Increased the size of the trust fund to $8.5 billion.

SARA also required USEPA to revise the Hazard Ranking System (HRS) to ensure that it accurately assessed the relative degree of risk to human health and the environment posed by uncontrolled hazardous waste sites that may be placed on the NPL.

Emergency Planning and Community Right–to-Know Act (EPCRA). Authorized by Title III of SARA, EPCRA was enacted by Congress in 1986 as the national legislation on community safety. This law was designated to help local communities protect public health, safety, and the environment from chemical hazards. EPCRA was passed in response to concerns regarding the environmental and safety hazards posed by the storage and handling of toxic chemicals. EPCRA establishes requirements for federal, state and local governments, tribes and industry regarding emergency planning and "Community Right-to-Know" reporting on hazardous and toxic chemicals. The Community Right-to-Know provisions help increase the public's knowledge and access to information on chemicals at individual facilities, their uses, and releases into the environment. States and communities, working with facilities, can use the information to improve chemical safety and protect public health and the environment. To implement EPCRA, Congress required each state to appoint a State Emergency Response Commission (SERC). The SERC is required to divide its state into Emergency Planning Districts and to name a Local Emergency Planning Committee for each district.

Resource Conservation and Recovery Act (RCRA). RCRA gives USEPA the authority to control hazardous waste from "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste by "large quantity generators" (1,000 kilograms/month or more). Under RCRA regulations, hazardous wastes must be tracked from the time of generation to the point of disposal. At a minimum, each (large and small) generator of hazardous waste must register and obtain a hazardous waste activity identification number. If hazardous wastes are stored for more than 90 days or treated or disposed at a facility, any treatment, storage, or disposal unit must be permitted under RCRA. Additionally, all hazardous waste transporters are required to be permitted and must have an identification number. RCRA allows individual states to develop their own program for the regulation of hazardous waste as long as it is at least as stringent as RCRA. USEPA has delegated RCRA enforcement to the State of California.

Toxic Substances Control Act (TSCA). Congress enacted the TSCA of 1976, codified in Title 40 of the CFR, to give USEPA the ability to track the 75,000 industrial chemicals currently produced or imported into the United States. USEPA repeatedly screens these chemicals and can require reporting or testing of those that may pose an environmental or human-health hazard. USEPA can ban the manufacture and import of those chemicals that pose an unreasonable risk. More specifically, in California, polychlorinated biphenyls (PCBs) are regulated by both state (RCRA and Title 22 of the California Code of Regulations [CCR]) and

federal (TSCA) rules. TSCA has banned the manufacture, processing, use, and distribution in commerce of PCBs. TSCA gives USEPA the authority to develop, implement and enforce regulations concerning the use, manufacture, cleanup, and disposal of PCBs. TSCA also establishes USEPA's Lead Abatement Program regulations, which provide a framework for lead abatement, risk assessment, and inspections. Those performing these services are required to be trained and certified by USEPA.[2]

Research and Special Programs Administration (RSPA). RSPA regulations cover definition and classification of hazardous materials, communication of hazards to workers and the public, packaging and labeling requirements, operational rules for shippers, and training. They apply to interstate, intrastate, and foreign commerce by air, rail, ships, and motor vehicles, and also cover hazardous waste shipments. The Federal Highway Administration (FHWA) is responsible for highway routing of hazardous materials and highway safety permits. The U.S. Coast Guard regulates bulk transport by vessel. The hazardous material regulations include emergency response provisions, including incident reporting requirements. Reports of major incidents go to the National Response Center, which in turn is linked with CHEMTREC, a service of the chemical manufacturing industry that provides details on most chemicals shipped in the United States.

Occupational Safety and Health Act of 1970. The U.S. Department of Labor's OSHA was created to assure safe and healthful working conditions by setting and enforcing standards and by providing training, outreach, education, and assistance. OSHA provides standards for general industry and construction industry on hazardous waste operations and emergency response. The Occupational Safety and Health Act, which is implemented by OSHA, contains provisions with respect to hazardous materials handling. Federal Occupational Safety and Health Act requirements, as set forth in Title 29 of the CFR Section 1910, et. seq., are designed to promote worker safety, worker training, and a worker's right-to-know. OSHA has delegated the authority to administer OSHA regulations to the State of California.

Title 49 of the Code of Federal Regulations (CFR), which contains the regulations set forth by the Hazardous Materials Transportation Act of 1975, specifies additional requirements and regulations with respect to the transport of hazardous materials. Title 49 of the CFR requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Drivers are also required to be trained in function and commodity specific requirements.

Other Hazardous Materials Regulations. In addition to the U.S. Department of Transportation (USDOT) regulations for the safe transportation of hazardous materials there are other applicable federal laws that also address hazardous materials:

- Community Environmental Response Facilitation Act (CERFA) of 1992
- Clean Water Act
- Clean Air Act
- Safe Drinking Water Act
- Atomic Energy Act
- Toxic Substances Control Act (TSCA)
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

[2]U.S. Environmental Protection Agency, *40 CFR Park 745, Rules 402 and 404*, August 29, 1996.

STATE

Primary state agencies with jurisdiction over hazardous chemical materials management are CalEPA DTSC and the Los Angeles Regional Water Quality Control Board (LARWQCB). Other state agencies involved in hazardous materials management include California OSHA (Cal/OSHA) and State Office of Emergency Services (Cal OES).

Authority for the statewide administration and enforcement of RCRA rests with Cal/EPA DTSC. While DTSC has primary state responsibility in regulating the generation, storage and disposal of hazardous materials, DTSC may further delegate enforcement authority to local jurisdictions. In addition, DTSC is responsible and/or provides oversight for contamination cleanup and administers state-wide hazardous waste reduction programs. DTSC operates programs to accomplish the following: (1) manage the aftermath of improper hazardous waste management by overseeing site cleanups; (2) prevent releases of hazardous waste by ensuring that those who generate, handle, transport, store, and dispose of wastes do so properly; and (3) evaluate soil, water, and air samples taken at sites.

The storage of hazardous materials in underground storage tanks (USTs) is regulated by SWRCB, which has delegated authority to the Regional Water Quality Control Board (RWQCB) and typically on the local level, to the local fire department.

The Cal/OSHA program is administered and enforced by the Division of Occupational Safety and Health (DOSH). Cal/OSHA is very similar to the federal OSHA program. For example, both programs contain rules and procedures related to exposure to hazardous materials during demolition and construction activities. In addition, Cal/OSHA requires employers to implement a comprehensive, written Injury and Illness Prevention Program (IIPP). An IIPP is an employee safety program for potential workplace hazards, including those associated with hazardous materials.

The Cal OES Hazardous Materials (HazMat) section under the Fire and Rescue Division coordinates statewide implementation of hazardous materials accident prevention and emergency response programs for all types of hazardous materials incidents and threats. In response to any hazardous materials emergency, the HazMat section staff is called upon to provide state and local emergency managers with emergency coordination and technical assistance.

Hazardous Waste Source Reduction and Management Review Act of 1989. This act requires generators of 12,000 kilograms/year of typical/operational hazardous waste to conduct an evaluation of their waste streams every four years and to select and implement viable source reductions alternatives. This Act does not apply to non-typical hazardous waste (such as asbestos and PCBs).

California Vehicle Code Title 13. The California Vehicle Code (Title 13 of the CCR) states that every motor carrier transporting hazardous materials (for which the display of hazardous materials placards is required or in excess of 500 pounds, transported for a fee, which would require placarding if shipped in greater amounts in the same manner) must have a Hazardous Materials Transportation License issued by the California Highway Patrol.

California Health and Safety Code. The transport of hazardous waste materials is further governed by the California Health and Safety Code Section 25163 and Title 22, Chapter 13 of the CCR. Specifically, Section 25163 of the Health and Safety Code requires transporters of hazardous waste to hold a valid registration issued by the DTSC in his/her possession while transporting hazardous waste.

Additionally, Title 22, Chapter 13 of the CCR contains a number of requirements including, but are not limited to, the following:

- Transporters shall not transport hazardous waste without first receiving an identification number and a registration certificate from DTSC.
- Registration as a hazardous waste transporter expires annually, on the last day of the month in which the registration was issued.
- To be registered as a hazardous waste transporter, an application must be submitted.
- Hazardous waste shall not be accepted for transport without a Uniform Hazardous Waste Manifest that has been properly completed and signed by generator and transporter.
- Hazardous waste shall be delivered to authorized facilities only.

California Occupational Safety and Health Administration (Cal/OSHA) Regulations. Cal/OSHA has set forth regulations for the disturbance of Asbestos Containing Construction Materials (ACCMs) including removal operations for all types of ACCMs. Cal/OSHA requires contractors and employers that remove ACCMs to be registered and consultants and technicians who conduct sampling and/or removal to be certified. In addition, the agency has developed standards for general industry and the construction industry hazardous waste operations and emergency response. Cal/OSHA ensures that employers must have controls to reduce and monitor exposure levels of hazardous materials, an informational program describing any exposure during operations and the inspection of drums and containers prior to removal or opening. Decontamination procedures and emergency response plans must be in place before employees begin working in hazardous waste operations.

California Office of Emergency Services (Cal OES) Regulations. The Cal OES HazMat Section under the Fire and Rescue Division coordinates statewide implementation of hazardous materials accident prevention and emergency response programs for all types of hazardous materials incidents and threats. In response to any hazardous materials emergency, the HazMat section staff is called upon to provide state and local emergency managers with emergency coordination and technical assistance.

California Code of Regulations (CCR) Title 8 Section 1529. This section of the CCR regulates asbestos exposure for work identified in Section 1502, including demolition or salvage of structures where asbestos is present; removal or encapsulation of materials containing asbestos; construction, alteration, repair, maintenance, or renovation of structures, substrates, or portions thereof, that contain asbestos, installation of products containing asbestos; asbestos spill/emergency cleanup; transportation, disposal, storage, containment of and housekeeping activities involving asbestos or products containing asbestos, on the site or location at which construction activities are performed; and excavation that may involve exposure to asbestos as a natural constituent which is not related to asbestos mining and milling activities.

California Code of Regulations (CCR) Title 8 Section 1532.1. This section of the CCR applies to all construction work where employees could be occupationally exposed to lead, including demolition or salvage of structures where lead or materials containing lead are present; removal or encapsulation of materials containing lead; new construction, alteration, repair, or renovation of structures, substrates, or portions thereof, that contain lead or materials containing lead; installation of products containing lead; lead contamination/emergency clean-up; transportation, disposal, storage, or containment of lead or materials containing lead on the site or location at which construction activities are performed; and maintenance operations associated with construction activities. This section sets a maximum exposure limit; requires an assessment to determine whether employees may be exposed to lead; requires employees to create a compliance program to ensure that employee exposure to lead are at or below the permissible exposure limit to the extent feasible; and requires that employees with exposure to lead are provided with respiratory protection, protective work clothing and equipment.

Hazardous Waste Control Act. The Hazardous Waste Control Act created the state hazardous waste management program, which is similar to but more stringent than the RCRA program. This act is implemented by regulations contained in Title 26 of the CCR, which describes the following required aspects for the proper management of hazardous waste: identification and classification; generation and transportation; design and permitting of recycling, treatment, storage, and disposal facilities; treatment standards; operation of facilities and staff training; and closure of facilities and liability requirements. These regulations list more than 800 materials that may be hazardous and establish criteria for identifying, packaging, and disposing of such waste. Under this act and Title 26 of the CCR, the generator of hazardous waste must complete a manifest that accompanies the waste from generator to transporter to the ultimate disposal location. Copies of the manifest must be filed with DTSC.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program). This program was established under the amendments to the California Health and Safety Code made by Senate Bill 1082 in 1994. The Unified Program required the administrative consolidation of six hazardous materials and waste programs (Program Elements) under one agency, a Certified Unified Program Agency (CUPA). A CUPA is certified by Cal/EPA to implement the Unified Program. The Program Elements consolidated under the Unified Program are:

- Hazardous Waste Generator and On-site Hazardous Waste Treatment Programs (also known as Tiered Permitting);
- Aboveground Petroleum Storage Tank Spill Prevention Control and Countermeasure Plan (SPCC);
- Hazardous Materials Release Response Plans and Inventory Program (also known as Hazardous Materials Disclosure or "Community-Right-To-Know");
- California Accidental Release Prevention Program (Cal/ARP);
- Underground Storage Tank (UST) Program; and
- Uniform Fire Code Plans and Inventory Requirements.

The Unified Program is intended to provide relief to businesses complying with the overlapping and sometimes conflicting requirements of formerly independently managed programs. The Unified Program is implemented at the local government level by CUPAs. Most CUPAs have been established as a function of a local environmental health or fire department. Some CUPAs have contractual agreements with another local agency, a participating agency, which implements one or more Program Elements in coordination with the CUPA.

Hazardous Materials Release Response Plans and Inventory Act of 1985. This act, also known as the Business Plan Act, requires businesses using hazardous materials to prepare a plan that describes their facilities, inventories, emergency response plans, and training programs. Hazardous materials are defined as unsafe raw or unused materials that are part of a process or manufacturing step. They are not considered hazardous waste. Health concerns pertaining to the release of hazardous materials, however, are similar to those relating to hazardous waste.

Hazardous Waste Source Reduction and Management Review Act of 1989. This act requires generators of 12,000 kilograms/year of typical/operational hazardous waste to conduct an evaluation of their waste streams every four years and to select and implement viable source reduction alternatives. This act does not apply to non-typical hazardous waste (such as asbestos and polychlorinated biphenyls).

2009 State of California Emergency Plan. The 2009 State of California Emergency Plan, also referred to as the State Emergency Plan (SEP), addresses the state's response to extraordinary emergency situations associated with natural disasters or human-caused emergencies. The California Emergency Services Act provides the basic authorities for conducting emergency operations following the proclamation of

emergencies by appropriate local officials and/or the Governor.[3] The provisions of this act are further reflected and expanded upon by local emergency ordinances. In accordance with this act, the SEP describes the methods for carrying out emergency operations, the process for rendering mutual aid, the emergency services of governmental agencies, how resources are mobilized, how the public will be informed and the process to ensure continuity of government during an emergency or disaster. The SEP emphasizes mitigation programs to reduce the vulnerabilities to disaster and preparedness activities to ensure the capabilities and resources are available for an effective response. To assist communities and governments to recover from the disaster, the SEP outlines programs that establish a consistent, statewide framework to enable state, local, tribal governments, federal government and the private sector to work together to mitigate, prepare for, respond to and recover from the effects of emergencies regardless of cause, size, location, or complexity.[4]

Asbestos Regulations. The Clean Air Act regulates asbestos as a hazardous air pollutant, which subjects it to regulation by South Coast Air Quality Management District (SCAQMD) under its Rule 1403. OSHA also regulates asbestos as a potential worker safety hazard. These rules and regulations prohibit emissions of asbestos from demolition or construction activities, require medical examinations and monitoring of employees engaged in activities that could disturb asbestos fibers, and require notice to federal and local government agencies prior to renovation or demolition activities that could disturb asbestos.

Lead Regulations. Because of its toxic properties, lead is regulated as a hazardous material. Lead is also regulated as a toxic air contaminant. State-certified contractors must perform inspection, testing, and removal (abatement) of lead-containing building materials in compliance with applicable health and safety and hazardous materials regulations, including those outlined in Title 17 of the California Code of Regulations (CCR). Other state laws that address lead include:

- Hazardous Waste Control Law
- Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65)
- Carpenter-Presley-Tanner Hazardous Substances Account Act
- Hazardous Waste Management Planning and Facility Siting (Tanner Act)
- Hazardous Materials Release Response Plan and Inventory Law of 1985 (Business Plan Act)
- California Medical Waste Management Act

LOCAL

The primary local agency with responsibility for implementing federal and state laws and regulations pertaining to hazardous materials management is the Los Angeles County Health Department, Environmental Health Division. The Los Angeles County Health Department is the Certified Unified Program Agency (CUPA) for the County of Los Angeles. The Unified Program is the consolidation of six state environmental regulatory programs into one program under the authority of a CUPA. A CUPA is a local agency that has been certified by CalEPA to implement the six state environmental programs within the local agency's jurisdiction. This program was established under the amendments to the California Health and Safety Code made by Senate Bill 1082 in 1994. The six consolidated programs are:

- Hazardous Materials Release Response Plan and Inventory (Business Plans)
- California Accidental Release Prevention (CalARP)
- Hazardous Waste (including Tiered Permitting)
- Underground Storage Tanks (USTs)
- Above Ground Storage Tanks (Spill Prevention Control and Countermeasures [SPCC] requirements)

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[3]California Government Code Section 8560.
[4]California Emergency Management Agency, *State of California Emergency Plan*, July 2009.

- Uniform Fire Code (UFC) Article 80 Hazardous Material Management Program (HMMP) and Hazardous Material Identification System (HMIS)

As the CUPA for County of Los Angeles, the Los Angeles County Health Department Environmental Health Division maintains the records regarding location and status of hazardous materials sites in the county and administers programs that regulate and enforce the transport, use, storage, manufacturing, and remediation of hazardous materials. By designating a CUPA, Los Angeles County has accurate and adequate information to plan for emergencies and/or disasters and to plan for public and firefighter safety.

A Participating Agency is a local agency that has been designated by the local CUPA to administer one or more Unified Programs within their jurisdiction on behalf of the CUPA. The Los Angeles County Health Department, Environmental Health Division has designated the Los Angeles Fire Department (LAFD) as a Participating Agency. The LAFD monitors the storage of hazardous materials in the City for compliance with local requirements. Specifically, businesses and facilities that store more than threshold quantities of hazardous materials as defined in California Health and Safety Code Chapter 6.95 are required to file an Accidental Risk Prevention Program with LAFD. This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. LAFD also has the authority to administer and enforce federal and state laws and local ordinances for USTs. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LAFD Inspectors.

South Coast Air Quality Management District (SCAQMD) Rule 1403. SCAQMD Rule 1403 establishes asbestos survey requirements, notification, and work practice requirements to prevent asbestos emissions from emanating during building renovation and demolition activities. Rule 1403 incorporates the requirements of the federal asbestos requirements found in the National Emission Standards for Hazardous Air Pollutants (NESHAP) found in CFR Title 40, Part 61, Subpart M. USEPA delegated SCAQMD the authority to enforce the federal asbestos NESHAP and SCAQMD is the local enforcement authority for asbestos.

Los Angeles County Operational Area Emergency Response Plan (ERP). The County of Los Angeles developed the ERP to ensure the most effective allocation of resources for the maximum benefit and protection of the public in time of emergency. The ERP does not address normal day-to-day emergencies or the well-established and routine procedures used in coping with them. Instead, the operational concepts reflected in this plan focus on potential large-scale disasters like extraordinary emergency situations associated with natural and man-made disasters and technological incidents which can generate unique situations requiring an unusual or extraordinary emergency response. The purpose of the plan is to incorporate and coordinate all the facilities and personnel of County government, along with the jurisdictional resources of the cities and special districts within the County, into an efficient Operational Area organization capable of responding to any emergency using a Standard Emergency Management System, mutual aid and other appropriate response procedures. The goal of the plan is to take effective life-safety measures and reduce property loss, provide for the rapid resumption of impacted businesses and community services, and provide accurate documentation and records required for cost-recovery.

City of Los Angeles General Plan Safety and Conservation Elements. The Safety Element provides a contextual framework for understanding the relationship between hazard mitigation, response to a natural disaster, and initial recovery from a natural disaster. The Safety Element addresses hazardous materials relative to potential natural hazards.

The intent of the Conservation Element of the General Plan is the conservation and preservation of natural resources. Policies of the Conservation Element address the conservation of petroleum resources (i.e., oil and gas) and appropriate, environmentally sensitive extraction of petroleum deposits to protect the

petroleum resources for the use of future generations and to reduce the City's dependency on imported petroleum and petroleum products.

Goals, objectives, and policies from the Safety and Conservation Elements related to Hazards and Hazardous Materials are listed below in **Table 4.8-1**.

TABLE 4.8-1: RELEVANT GENERAL PLAN HAZARDOUS MATERIALS GOALS, OBJECTIVES, AND POLICIES	
SAFETY ELEMENT – HAZARD MITIGATION	
Policy 1.1.1	Coordination. Coordinate information gathering, program formulation and program implementation between City agencies, other jurisdictions and appropriate public and private entities to achieve the maximum mutual benefit with the greatest efficiency of funds and staff.
Policy 1.1.2	Disruption reduction. Reduce, to the greatest extent feasible and within the resources available, potential critical facility, governmental functions, infrastructure and information resource disruption due to natural disaster.
Policy 1.1.3	Facility/systems maintenance. Provide redundancy (back-up) systems and strategies for continuation of adequate critical infrastructure systems and services so as to assure adequate circulation, communications, power, transportation, water and other services for emergency response in the event of disaster related systems disruptions.
Policy 1.1.4	Health/environmental protection. Protect the public and workers from the release of hazardous materials and protect City water supplies and resources from contamination resulting from accidental release or intrusion resulting from a disaster event, including protection of the environment and public from potential health and safety hazards associated with program implementation.
Policy 1.1.5	Risk reduction. Reduce potential risk hazards due to natural disaster to the greatest extent feasible within the resources available, including provision of information and training.
SAFETY ELEMENT – EMERGENCY RESPONSE (MULTI-HAZARD)	
Policy 2.1.1	Coordination. Coordinate program formulation and implementation between City agencies, adjacent jurisdictions and appropriate private and public entities so as to achieve, to the greatest extent feasible and within the resources available, the maximum mutual benefit with the greatest efficiency of funds and staff.
Policy 2.1.2	Health and environmental protection. Develop and implement procedures to protect the environment and public, including animal control and care, to the greatest extent feasible within the resources available, from potential health and safety hazards associated with hazard mitigation and disaster recovery efforts.
Policy 2.1.3	Information. Develop and implement, within the resources available, training programs and informational materials designed to assist the general public in handling disaster situations in lieu of or until emergency personnel can provide assistance.
Policy 2.1.4	Interim procedures. Develop and implement pre-disaster plans for interim evacuation, sheltering and public aid for disaster victims displaced from homes and for disrupted businesses, within the resources available. Plans should include provisions to assist businesses, which provide significant services to the public and plans for reestablishment of the financial viability of the City.
Policy 2.1.5	Response. Develop, implement, and continue to improve the City's ability to respond to emergency events.
Policy 2.1.6	Standards/fire. Continue to maintain, enforce and upgrade requirements, procedures and standards to facilitate more effective fire suppression. The Fire Department and/or appropriate City agencies shall revise regulations or procedures to include the establishment of minimum standards for location and expansion of fire facilities, based upon fire flow requirements, intensity and type of land use, life hazard, occupancy and degree of hazard so as to provide adequate fire and emergency medical event response. At a minimum, site selection criteria should include the following standards which were contained in the 1979 General Plan Fire Protection and Prevention Plan: • Fire stations should be located along improved major or secondary highways. If, in a given service area, the only available site is on a local street, the site must be on a street which leads directly to an improved major or secondary highway. • Fire station properties should be situated so as to provide drive-thru capability for heavy fire apparatus.

TABLE 4.8-1: RELEVANT GENERAL PLAN HAZARDOUS MATERIALS GOALS, OBJECTIVES, AND POLICIES	
	• If a fire station site is on the side of a street or highway where the flow of traffic is toward a signalized intersection, the site should be at least 200 feet from that intersection in order to avoid blockage during ingress and egress. The total number of companies which would be available for dispatch to first alarms would vary with the required fire flow and distance as follows: (a) less than 2,000 g.p.m. would require not less than 2 engine companies and 1 truck company; (b) 2,000 but less than 4,500 g.p.m., not less than 2 or 3 engine companies and 1 or 2 truck companies; and (c) 4,500 or more g.p.m., not less than 3 engine companies and 2 truck companies.
SAFETY ELEMENT – DISASTER RECOVERY (MULTI-HAZARD)	
Policy 3.1.1	Coordination. Coordinate with each other, with other jurisdictions and with appropriate private and public entities prior to a disaster and to the greatest extent feasible within the resources available, to plan and establish disaster recovery programs and procedures which will enable cooperative ventures, reduce potential conflicts, minimize duplication and maximize the available funds and resources to the greatest mutual benefit following a disaster.
Policy 3.1.2	Health/safety/environment. Develop and establish procedures for identification and abatement of physical and health hazards which may result from a disaster. Provisions shall include measures for protecting workers, the public and the environment from contamination or other health and safety hazards associated with abatement, repair and reconstruction programs.
Policy 3.1.4	Interim services/systems. Develop and establish procedures prior to a disaster for immediate reestablishment and maintenance of damaged or interrupted essential infrastructure systems and services so as to provide communications, circulation, power, transportation, water and other necessities for movement of goods, provision of services and restoration of the economic and social life of the City and its environs pending permanent restoration of the damaged systems.
Policy 3.1.5	Restoration. Develop and establish prior to a disaster short- and long-term procedures for securing financial and other assistance, expediting assistance and permit processing and coordinating inspection and permitting activities so as to facilitate the rapid demolition of hazards and the repair, restoration and rebuilding, to a comparable or a better condition, those parts of the private and public sectors which were damaged or disrupted as a result of the disaster.
CONSERVATION ELEMENT – RESOURCE MANAGEMENT (FOSSIL LIBRARY) - PETROLEUM (OIL AND GAS)	
Policy 1	Continue to encourage energy conservation and petroleum product reuse.
Policy 3	Continue to protect neighborhoods from potential accidents and subsidence associated with drilling, extraction and transport operations, consistent with California Department of Conservation, Division of Oil and Gas requirements.
SOURCE: City of Los Angeles General Plan, *Safety Element*, 1996, and *Conservation Element*, 2001.	

Los Angeles Municipal Code (LAMC). One of the primary purposes of zoning is to segregate uses that are thought to be incompatible. With respect to hazards, the City uses zoning to separate businesses that use, store, transport, treat, or dispose of hazardous materials, or businesses that engage in potentially hazardous activities, such as manufacturing or refining, from residential areas and the general public.

The Methane Seepage Regulations, contained within LAMC Chapter IX, Article 1, Division 71 (Sections 91.7101 through 91.7109), establishes requirements for mitigation and other general building requirements to prevent potential environmental and harmful health effects that could be caused by the construction of buildings located in a defined Methane Hazard Zone within the City of Los Angeles. All new buildings and paved areas located in a Methane Zone or Methane Buffer Zone must comply with the requirements of LAMC Sections 91.7103 and 91.7104 and the Methane Mitigation Standards established by the Superintendent of Building. The Methane Mitigation Standards identify installation procedures, design parameters and test protocols for the methane gas mitigation system. As established under LAMC Section 91.106.4.1, LADBS has the authority to withhold permits on projects located within a Methane Zone or Methane Buffer Zone. Building permits may be issued upon submittal of detailed plans that show adequate protection against flammable gas incursion by providing the installation of suitable methane mitigation and monitoring systems.

Section 91.7109.2 of the LAMC requires LAFD notification when an abandoned oil well is encountered during construction activities, and requires that any abandoned oil well not in compliance with existing regulations be re-abandoned in accordance with applicable rules and regulations of the California Division of Oil, Gas, and Geothermal Resources (DOGGR).

Los Angeles Fire Department (LAFD). The LAFD monitors the storage of hazardous materials in the city for compliance with local requirements. Specifically, businesses and facilities which store more than threshold quantities of hazardous materials as defined in Chapter 6.95 of the California Health and Safety Code are required to file an Accidental Risk Prevention Program with the LAFD. This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. The LAFD also has delegated authority to administer and enforce Federal and State laws and local ordinances for USTs. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LAFD Inspectors.

Los Angeles Fire Code. Chapter V, Article 7 of the LAMC contains the Los Angeles Fire Code. The purpose of the Fire Code is to prescribe laws for the safeguarding of life and property from fire, explosion, panic, or other hazardous conditions that may arise in the use or occupancy of buildings, structures, or premises and other laws that may be the duty of LAFD to enforce.

EXISTING SETTING

HAZARDOUS MATERIALS

The term "hazardous material" can have varying definitions for different regulatory programs. For the purpose of the Proposed Plan, the term "hazardous materials" refers to both hazardous materials and hazardous waste. The California Health and Safety Code Section 25501(n)(1) defines hazardous materials as any material that "because of its quantity, concentrations, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment." Hazardous materials include but are not limited to hazardous substances, hazardous waste, and any material which a handler or the administering agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or environment.

A material is hazardous if it exhibits one or more of the following characteristics: toxicity, ignitability, corrosivity, and reactivity.[5] These types of hazardous materials are defined below:

- *Toxic Substances:* Toxic substances may cause short-term or long-lasting health effects, ranging from temporary effects to permanent disability, or even death. For example, such substances can cause disorientation, acute allergic reactions, asphyxiation, skin irritation, or other adverse health effects if human exposure exceeds certain levels. (The level depends on the substances involved and is chemical-specific.) Carcinogens (substances that can cause cancer) are a special class of toxic substances. Examples of toxic substances include benzene (a component of gasoline and suspected carcinogen) and methylene chloride (a common laboratory solvent and a suspected carcinogen).
- *Ignitable Substances:* Ignitable substances are hazardous because of their ability to burn. Gasoline, hexane, and natural gas are examples of ignitable substances.
- *Corrosive Materials:* Corrosive materials can cause severe burns. Corrosives include strong acids and bases such as sodium hydroxide (lye) or sulfuric acid (battery acid).

[5]Title 22, California Code of Regulations, Division 4.5, Chapter 11, Article 3, Section 66261.20-66261.24.

- *Reactive Materials:* Reactive materials may cause explosions or generate toxic gases. Explosives, pure sodium or potassium metals (which react violently with water), and cyanides are examples of reactive materials.

Soil and groundwater can become contaminated by hazardous material releases in a variety of ways, including permitted or illicit use and accidental or intentional disposal or spillage. Before the 1980s, most land disposal of chemicals was unregulated, with the result that numerous industrial properties and public landfills became dumping grounds for unwanted chemicals. The largest and most contaminated of these sites became Superfund sites, so named for their eligibility to receive cleanup money from a federal fund established under CERCLA. The NPL is the list of national priorities among the known releases or threatened releases of hazardous substances, pollutants, or contaminants throughout the United States and its territories. The NPL is intended primarily to guide the USEPA in determining which sites warrant further investigation. Sites are added to the NPL following a hazard ranking system. As discussed further below, under "Hazardous Materials Sites," the Project Area contains three NPL sites.

Smaller properties have been designated as contaminated sites. Often these are gas station sites where leaking USTs were upgraded under a federal requirement in the late 1980s. Another category of sites which may have some overlap with the types already mentioned is "brownfields" – previously used, often abandoned, sites that because of actual or suspected contamination are undeveloped or underused. Both the USEPA and DTSC maintain lists of known brownfields sites. These sites are often difficult to inventory due to their owners' reluctance to publically label their property as potentially contaminated. As discussed further below, under "Hazardous Materials Sites," the Project Area contains two brownfields sites.

Asbestos Containing Materials (ACMs). Asbestos is a naturally occurring fibrous material that was widely used in structures built between 1945 and 1978 for its fireproofing and insulating properties. ACMs were banned by USEPA between the early 1970s and 1991 under the authority of the federal Clean Air Act (CAA) and TSCA as exposure to ACMs increases the risk of developing lung disease and cancers. Common ACMs include vinyl flooring and associated mastic, wallboard and associate joint compound, plaster, stucco, acoustic ceiling spray, ceiling tiles, heating system components, and roofing materials. Commercial/industrial structures are affected by asbestos regulations if damage occurs or if remodeling, renovation, or demolition activities disturb ACMs. Since a majority of the structures within the Project Area were constructed before 1978, there is a potential for the presence of ACMs to exist in a wide variety of building materials within the Project Area.

Lead and Lead-Based Paint (LBP). Lead is a naturally occurring metallic element. Because of its toxic properties, lead is regulated as a hazardous material. Excessive exposure to lead can result in the accumulation of lead in the blood, soft tissues, and bones. Children are particularly susceptible to potential lead-related health problems, because it is easily absorbed into developing systems and organs. Among its numerous uses and sources, lead can be found in paint, water pipes, solder in plumbing systems, and in soils around buildings and structures painted with LBP. LBP was primarily used during the same time period as ACMs. Commercial/industrial structures are affected by lead-based paint regulations if the paint is in a deteriorated condition or if remodeling, renovation, or demolition activities disturb LBP surfaces. Since a majority of the structures within the project Area were constructed before 1978, there is potential for structures within the Project Area to contain paints and coatings with detectable or elevated concentrations of lead.

Polychlorinated Biphenyls (PCBs). PCBs are mixtures of up to 209 individual chlorinated compounds. There are no known natural sources of PCBs. PCBs have been used as coolants and lubricants in transformers, capacitors, and other electrical equipment because they do not burn easily and are good insulators. The manufacture of PCBs was stopped in the United States in 1977 because of evidence that they build up in the environment and can cause cancers and other harmful health effects, including to the immune system, reproductive system, nervous system, and endocrine system. Products made before 1977

that may contain PCBs include old fluorescent lighting fixtures and electrical devices containing PCB capacitors, and old microscope and hydraulic oils.

HAZARDOUS MATERIALS SITES

The locations where hazardous materials are used, stored, treated and/or disposed of comes to the attention of regulatory agencies through various means, including licensing and permitting, enforcement actions, and anonymous tips. To the extent possible, the locations of these businesses and operations are recorded in several database lists maintained by various state, federal, and local regulatory agencies. In some cases, businesses that use hazardous materials in quantities greater than certain established thresholds are required to file business plans with the LAFD. Other businesses that engage in the transport, storage, treatment, or disposal of hazardous materials are required to maintain detailed records of all their hazardous materials-related activities. Federal, state, and local agencies enforce regulations applicable to hazardous waste generators and users, and the Los Angeles County Fire Department Health Hazardous Materials Division tracks and inspect hazardous materials handlers to ensure appropriate reporting and compliance.

Permitted uses of hazardous materials include those facilities that use hazardous materials or handle hazardous wastes in accordance with current hazardous materials and hazardous waste regulations. The use and handling of hazardous materials from these sites is considered low, although there can be instances of unintentional chemical releases. In such cases, the site would be tracked in the environmental databases as an environmental case. Permitted sites without documented releases are, nevertheless, potential sources of hazardous materials in the soil and/or groundwater (compared to sites where there are no hazardous materials used or stored) because of accidental spills, incidental leakage, or spillage that may have gone undetected. Many of the facilities are permitted for more than one hazardous material use and, therefore, could appear in more than one database.

The EDR records search reviewed 120 federal, state, local, tribal and EDR proprietary databases to determine the environmental regulatory status of all properties within and in the vicinity of the Project Area.[6] **Table 4.8-2** provides a summary of the databases searched and the number of recorded hazardous material sites within the search area. The search identified a total of 9,588 properties within and in the vicinity of the Project Area with potential hazardous concerns. Some properties are locations where hazardous materials are used and/or generated; some of these sites may never need remediation. Although several of the properties identified have been remediated, the records continue to be maintained in the databases until the reporting period expires.

The following discussion focuses on six major environmental regulatory databases that identify properties where there may be ongoing utilization of chemicals of concern or where remediation activities are being implemented within and in the immediate vicinity of the Project Area. These databases are: 1) National Priorities List (NPL); 2) Superfund Enterprise Management System (SEMS); 3) Resource Conservation and Recovery Act (RCRA)-Large Quantity Generator (LQG); 4) RCRA-Small Quantity Generator (SQG); 5) U.S. Brownfields; and 6) Cortese sites.

Based on the EDR Report, 3 NPL sites, 11 SEMS sites, 75 RCRA-LQG sites, 404 RCRA-SQG sites, one U.S. Brownfield site, and 6 Cortese sites were identified within and in the vicinity of the Project Area. The locations of the sites are identified in **Figure 4.8-1**.

[6] Environmental Data Resources, Inc., *EDR DataMap Environmental Atlas, Hollywood Community Plan Update, Los Angeles, CA,* November 29, 2016.

TABLE 4.8-2: IDENTIFIED HAZARDOUS MATERIAL SITES WITHIN AND IN THE VICINITY OF THE PROJECT AREA		
Description/Type	**Definition**	**No. of Sites**
FEDERAL RECORDS		
NPL	The National Priority List (NPL) is a subset of the CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund Program. NPL sites may encompass relatively large areas. As such, EDR provides polygon coverage for over 1,000 NPL site boundaries produced by USEPA's Environmental Photographic Interpretation Center (EPIC) and regional USEPA offices	3
Proposed NPL	The Proposed National Priority List Sites (Proposed NPL) identify sites that have been proposed for listing on the NPL through the issuance of a proposed rule in the Federal Register. USEPA then accepts public comments on the site, responds to the comments, and places on the NPL those sites that continue to meet the requirements for listing.	0
Delisted NPL	The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establish the criteria that USEPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425(e), sites may be deleted from the NPL where no further response is appropriate.	0
NPL LIENS	Under the authority granted to USEPA by CERCLA of 1980, USEPA has the authority to file liens against real property in order to recover remedial action expenditures or when the property owner received notification of potential liability. USEPA compiles a listing of filed notices of Superfund Liens.	0
SEMS	SEM (Superfund Enterprise Management System) tracks hazardous waste sites, potentially hazardous waste sites, and remedial activities performed in support of USEPA's Superfund Program across the United States. The list was formerly known as CERCLIS, renamed to SEMS by USEPA in 2015. The list contains data on potentially hazardous waste sites that have been reported to USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of CERCLA. This dataset also contains sites which are either proposed to or on the NPL and the sites which are in the screening and assessment phase for possible inclusion on the NPL.	11
SEMS-ARCHIVE	SEMS-ARCHIVE (Superfund Enterprise Management System Archive) tracks sites that have no further interest under the Federal Superfund Program based on available information. The list was formerly known as the CERCLIS-NFRAP, renamed to SEMS ARCHIVE by USEPA in 2015. USEPA may perform a minimal level of assessment work at a site while it is archived if site conditions change and/or new information becomes available. Archived sites have been removed and archived from the inventory of SEMS sites. Archived status indicates that, to the best of USEPA's knowledge, assessment at a site has been completed and that USEPA has determined no further steps will be taken to list the site on the NPL, unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. The decision does not necessarily mean that there is no hazard associated with a given site; it only means that. based upon available information, the location is not judged to be potential NPL site.	10
LEINS 2	A Federal CERCLA ('Superfund') lien can exist by operation of law at any site or property at which USEPA has spent Superfund monies. These monies are spent to investigate and address releases and threatened releases of contamination. CERCLIS provides information as to the identity of these sites and properties.	0
CORRACTS	CORRACTS is a list of handlers with RCRA Corrective Action Activity. This report shows which nationally-defined corrective action core events have occurred for every handler that has had corrective action activity.	3

TABLE 4.8-2: IDENTIFIED HAZARDOUS MATERIAL SITES WITHIN AND IN THE VICINITY OF THE PROJECT AREA		
Description/Type	**Definition**	**No. of Sites**
RCRA-TSDF	RCRA-TSDF: RCRAInfo is EPA's comprehensive information system, providing access to data supporting RCRA of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined RCRA. Transporters are individuals or entities that move hazardous waste from the generator off-site to a facility that can recycle, treat, store, or dispose of the waste. RCRAInfo provides information on TSDFs, which treat, store, or dispose of hazardous waste.	1
RCRA-LQG	RCRAInfo provides information on Large quantity generators (LQGs), which are facilities that generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month.	75
RCRA-SQG	RCRAInfo provides information on Small quantity generators (SQGs), which are facilities that generate between 100 kg and 1,000 kg of hazardous waste per month.	404
RCRA-CESQG	RCRAInfo provides information on Conditionally exempt small quantity generators (CESQGs), which are facilities that generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month.	6
RCRA NonGen / NLR	RCRAInfo provides information on Non-Generators, which are facilities that do not presently generate hazardous waste.	53
US ENG CONTROLS	A listing of sites with engineering controls in place.	2
US INST CONTROL	A listing of sites with institutional controls in place. Institutional controls include administrative measures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions are generally required as part of the institutional controls.	1
ERNS	The Emergency Response Notification System (ERNS) records and stores information on reported releases of oil and hazardous substances. The source of this database is USEPA.	73
HMIRS	The Hazardous Materials Incident Report System (HMIRS) contains hazardous material spill incidents reported to the Department of Transportation. The source of this database is USEPA.	1
DOT OPS	Department of Transportation, Office of Pipeline Safety Incident and Accident data.	3
US CDL	A listing of clandestine drug lab locations. The U.S. Department of Justice (DOJ) provides this website as a public service. It contains addresses of some locations where law enforcement agencies reported they found chemicals or other items that indicated the presence of either clandestine drug laboratories or dumpsites. In most cases, the source of the entries is not the DOJ, and the DOJ has not verified the entry and does not guarantee its accuracy. Members of the public must verify the accuracy of all entries by, for example, contacting local law enforcement and local health departments.	1
US BROWNFIELDS	The USEPA's listing of brownfields properties from the Cleanups in My Community program, which provides information on brownfields properties for which information is reported back to USEPA, as well as areas served by brownfields grant programs.	1
DOD	Department of Defense Sites	0
FUDS	The Listing includes locations of Formerly Used Defense Sites Properties where the US Army Corps of Engineers is actively working or will take necessary cleanup actions.	2
LUCIS	Land Use Control Information System	0

TABLE 4.8-2: IDENTIFIED HAZARDOUS MATERIAL SITES WITHIN AND IN THE VICINITY OF THE PROJECT AREA

Description/Type	Definition	No. of Sites
CONSENT	Major Legal settlements that establish responsibility and standards for cleanup at NPL superfund sites. Released periodically by U.S. District Courts after settlement by parties to litigation matters.	1
ROD	Record of Decision (ROD) documents mandate a permanent remedy at an NPL superfund site containing technical and health information to aid the cleanup.	2
UMTRA	Uranium Mill Tailings Sites	0
ODI	Open Dump Inventory	0
DEBRIS REGION 9	Torres Martinez Reservation Illegal Dump Site Locations	0
US MINES	Mines Master Index File	0
TRIS	The Toxic Chemical Release Inventory System (TRIS) identifies facilities that release toxic chemicals to the air, water, and land in reportable quantities under SARA Title III, Section 313. The source of this database is USEPA.	2
TSCA	Toxic Substances Control Act	0
FTTS	FTTS tracks administrative cases and pesticide enforcement actions and compliance activities related to FIFRA, TSCA and EPCRA (Emergency Planning and Community Right-to-Know Act) over the previous five years. To maintain currency, EDR contacts the Agency on a quarterly basis.	12
HIST FTTS	A complete administrative case listing from the FIFRA/TSCA Tracking System (FTTS) for all ten USEPA regions. The information was obtained from the National Compliance Database (NCDB). NCDB supports the implementation of FIFRA (Federal Insecticide, Fungicide, and Rodenticide Act) and TSCA. Some USEPA regions are now closing out records. Because of that, and the fact that some USEPA regions are not providing USEPA Headquarters with updated records, it was decided to create a HIST FTTS database. It included records that may not be included in the newer FTTS database updates. This database is no longer updated.	12
SSTS	Section 7 Tracking Systems	0
ICIS	The Integrated Compliance Information System (ICIS) supports the information needs of the national enforcement and compliance program as well as the unique needs of the National Pollutant Discharge Elimination System (NPDES) program.	19
PADS	The PCB Activity Database identifies generators, transporters, commercial storers and/or brokers and disposers of PCBs who are required to notify USEPA of such activities. The source of this database is USEPA.	2
MLTS	Material Licensing Tracking System	0
RADINFO	Radiation Information Database	0

TABLE 4.8-2: IDENTIFIED HAZARDOUS MATERIAL SITES WITHIN AND IN THE VICINITY OF THE PROJECT AREA

Description/Type	Definition	No. of Sites
FINDS	The Facility Index System contains both facility information and "pointers" to other sources of information that contain more detail. These include: RCRIS; Permit Compliance System (PCS); Aerometric Information Retrieval System (AIRS); FATES (FIFRA [Federal Insecticide Fungicide Rodenticide Act] and TSCA Enforcement System, FTTS [FIFRA/TSCA Tracking System]); CERCLIS; DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes); Federal Underground Injection Control (FURS); Federal Reporting Data System (FRDS); Surface Impoundments (SIA); TSCA Chemicals in Commerce Information System (CICS); PADS; RCRA-J (medical waste transporters/disposers); TRIS; and TSCA. The source of this database is USEPA/NTIS.	554
RAATS	RCRA Administrative Action Tracking System	0
RMP	When Congress passed the Clean Air Act Amendments of 1990, it required USEPA to publish regulations and guidance for chemical accident prevention at facilities using extremely hazardous substances. The Risk Management Program Rule (RMP Rule) was written to implement Section 112(r) of these amendments. The rule, which built upon existing industry codes and standards, requires companies of all sizes that use certain flammable and toxic substances to develop a Risk Management Program, which includes a(n): Hazard assessment that details the potential effects of an accidental release, an accident history of the last five years, and an evaluation of worst-case and alternative accidental releases; Prevention program that includes safety precautions and maintenance, monitoring, and employee training measures; and Emergency response program that spells out emergency health care, employee training measures and procedures for informing the public and response agencies (e.g., the fire department) should an accident occur.	4
ECHO	ECHO provides integrated compliance and enforcement information for about 800,000 regulated facilities nationwide.	480
FUELS PROGRAM	USEPA Fuels Program Registered Listing	0
DOCKET HWC	Hazardous Waste Compliance Docket Listing	0
UXO	Unexploded Ordnance Sites	0
FUSRAP	DOE established the Formerly Utilized Sites Remedial Action Program (FUSRAP) in 1974 to remediate sites where radioactive contamination remained from Manhattan Project and early U.S. Atomic Energy Commission (AEC) operations.	1
COAL ASH DOE	Steam-Electric Plant Operation Data	0
2020 COR ACTION	2020 Corrective Action Program List	0
PRP	A listing of verified Potentially Responsible Parties	7
EPA WATCH LIST	USEPA maintains a "Watch List" to facilitate dialogue between USEPA, state and local environmental agencies on enforcement matters relating to facilities with alleged violations identified as either significant or high priority. Being on the Watch List does not mean that the facility has actually violated the law only that an investigation by USEPA or a state or local environmental agency has led those organizations to allege that an unproven violation has in fact occurred. Being on the Watch List does not represent a higher level of concern regarding the alleged violations that were detected, but instead indicates cases requiring additional dialogue between USEPA, state and local agencies - primarily because of the length of time the alleged violation has gone unaddressed or unresolved.	1

TABLE 4.8-2: IDENTIFIED HAZARDOUS MATERIAL SITES WITHIN AND IN THE VICINITY OF THE PROJECT AREA		
Description/Type	**Definition**	**No. of Sites**
US FIN ASSUR	All owners and operators of facilities that treat, store, or dispose of hazardous waste are required to provide proof that they will have sufficient funds to pay for the clean up, closure, and post-closure care of their facilities.	1
PCB TRANSFORMER	PCB Transformer Registration Database	0
US HIST CDL	Delisted National Clandestine Laboratory Register	0
SCRD DRYCLEANERS	State Coalition for Remediation of Drycleaners Listing	0
IHS OPEN DUMPS	Open Dumps on Indian Land	0
ABANDONED MINES	An inventory of land and water impacted by past mining (primarily coal mining) is maintained by OSMRE to provide information needed to implement the Surface Mining Control and Reclamation Act of 1977 (SMCRA). The inventory contains information on the location, type, and extent of AML impacts, as well as, information on the cost associated with the reclamation of those problems. The inventory is based upon field surveys by State, Tribal, and OSMRE program officials. It is dynamic to the extent that it is modified as new problems are identified and existing problems are reclaimed.	2
COAL ASH EPA	Coal Combustion Residues Surface Impoundments List	0
FEMA UST	Underground Storage Tank Listing	0
FEDERAL FACILITY	Federal Facility Site Information listing	0
US AIRS	The database is a sub-system of Aerometric Information Retrieval System (AIRS). AFS contains compliance data on air pollution point sources regulated by USEPA and/or state and local air regulatory agencies. This information comes from source reports by various stationary sources of air pollution, such as electric power plants, steel mills, factories, and universities, and provides information about the air pollutants they produce. Action, air program, air program pollutant, and general level plant data. It is used to track emissions and compliance data from industrial plants.	7
LEAD SMELTERS	A listing of former lead smelter site locations.	1
STATE AND LOCAL RECORDS		
CA HIST Cal-Sites	Formerly known as ASPIS, this database contains both known and potential hazardous substance sites. The source is DTSC and is no longer updated. The CA HIST Cal-Sites has been replaced by EnviroStor.	6
CA BOND EXP. PLAN	Department of Health Services developed a site-specific expenditure plan as the basis for an appropriation of Hazardous Substance Cleanup Bond Act funds. It is not updated.	5
CA SCH	This category contains proposed and existing school sites that are being evaluated by DTSC for possible hazardous materials contamination. In some cases, these properties may be listed in the Cal/Sites category depending on the level of threat to public health and safety or the environment they pose.	26
CA Toxic Pits	The Toxic Pits Cleanup Act Sites database identifies sites suspected of containing hazardous substances where cleanup has not yet been completed. The data come from SWRCB.	1
CA SWF/LF	The Solid Waste Facilities/Landfill Sites records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. The data come from the Integrated Waste Management Board's Solid Waste Information System (SWIS) database.	19
CA UIC	UIC Listing	0

TABLE 4.8-2: IDENTIFIED HAZARDOUS MATERIAL SITES WITHIN AND IN THE VICINITY OF THE PROJECT AREA

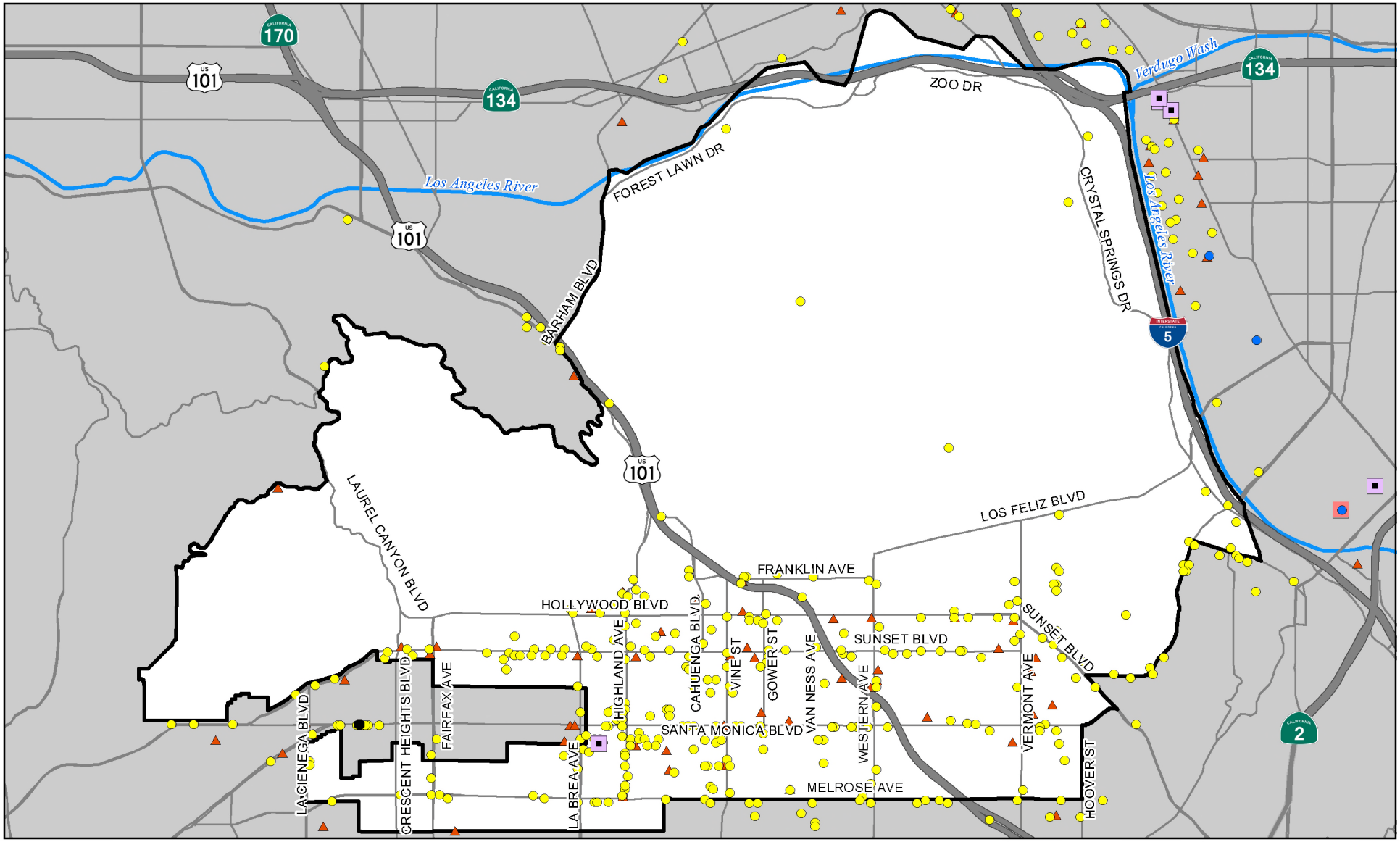
Description/Type	Definition	No. of Sites
CA WDS	California Water Resources Control Board - Waste Discharge System	35
CA NPDES	A listing of NPDES permits, including stormwater.	97
CA Cortese	The sites for the list are designated by SWRCB (LUST database), the Integrated Waste Board (SWF/LS database), and DTSC (Cal-Sites database).	6
CA HIST CORTESE	The sites for the list are designated by SWRCB (LUST database), the Integrated Waste Board (SWF/LS database), and DTSC (Cal-Sites database). This listing is no longer updated by the State agency.	222
CA SWRCY	A listing of recycling facilities in California.	7
CA LUST	Leaking Underground Storage Tank (LUST) Sites included in GeoTracker. GeoTracker is the Water Boards data management system for sites that impact, or have the potential to impact, water quality in California, with emphasis on groundwater.	353
CA FID UST	The Facility Inventory Database contains active and inactive underground storage tank locations. The source is the SWRCB.	370
CA SLIC	Cleanup Program Sites (CPS; also, known as Site Cleanups [SC] and formerly known as Spills, Leaks, Investigations, and Cleanups [SLIC] sites) included in GeoTracker. GeoTracker is the Water Boards data management system for sites that impact, or have the potential to impact, water quality in California, with emphasis on groundwater.	111
CA UST	The Underground Storage Tank database contains registered USTs. USTs are regulated under Subtitle I of RCRA. The data come from the SWRCB's Hazardous Substance Storage Container Database.	135
CA HIST UST	Historical UST Registered Database	247
CA LIENS	Environmental Liens Listing	0
CA CUPA Listings	CUPA Resources List	0
WI MANIFEST	Hazardous waste manifest information	1
NJ MANIFEST	Hazardous waste manifest information	1
NY MANIFEST	Manifest is a document that lists and tracks hazardous waste from the generator through transporters to a TSDF.	5
AZ MANIFEST	Manifest is a document that lists and tracks hazardous waste from the generator through transporters to a TSDF.	1
CA SWEEPS UST	Statewide Environmental Evaluation and Planning System. This underground storage tank listing was updated and maintained by a company contacted by the SWRCB in the early 1990's. The listing is no longer updated or maintained. The local agency is the contact for more information on a site on the SWEEPS list.	413
CA CHMIRS	The California Hazardous Material Incident Report System contains information on reported hazardous material incidents, i.e., accidental releases or spills. The source is the California Office of Emergency Services.	156
CA LDS	Land Disposal sites (Landfills) included in GeoTracker. GeoTracker is the Water Boards data management system for sites that impact, or have the potential to impact, water quality in California, with emphasis on groundwater.	4

TABLE 4.8-2: IDENTIFIED HAZARDOUS MATERIAL SITES WITHIN AND IN THE VICINITY OF THE PROJECT AREA

Description/Type	Definition	No. of Sites
CA MCS	Military sites (consisting of: Military UST sites; Military Privatized sites; and Military Cleanup sites [formerly known as DoD non-UST]) included in GeoTracker. GeoTracker is the Water Boards data management system for sites that impact, or have the potential to impact, water quality in California, with emphasis on groundwater.	1
CA AST	A listing of aboveground storage tank petroleum storage tank locations.	36
CA Notify 65	Listings of all Proposition 65 incidents reported to counties by SWRCB and RWQCB. This database is no longer updated by the reporting agency.	5
CA DEED	The use of recorded land use restrictions is one of the methods DTSC uses to protect the public from unsafe exposures to hazardous substances and wastes.	5
CA VCP	Contains low threat level properties with either confirmed or unconfirmed releases and the project proponents have request that DTSC oversee investigation and/or cleanup activities and have agreed to provide coverage for DTSC's costs.	15
CA DRYCLEANERS	A list of drycleaner related facilities that have EPA ID numbers. These are facilities with certain SIC codes: power laundries, family and commercial; garment pressing and cleaners' agents; linen supply; coin-operated laundries and cleaning; drycleaning plants except rugs; carpet and upholster cleaning; industrial launderers; laundry and garment services.	66
CA WIP	Well Investigation Program case in the San Gabriel and San Fernando Valley area.	227
CA CDL	A listing of drug lab locations. Listing of a location in this database does not indicate that any illegal drug lab materials were or were not present there, and does not constitute a determination that the location either requires or does not require additional cleanup work.	11
CA ENF	A listing of Water Board Enforcement Actions. Formal is everything except Oral/Verbal Communication, Notice of Violation, Expedited Payment Letter, and Staff Enforcement Letter.	72
CA RESPONSE	Identifies confirmed release sites where DTSC is involved in remediation, either in a lead or oversight capacity. These confirmed release sites are generally high-priority and high potential risk.	3
CA HAZNET	The data is extracted from the copies of hazardous waste manifests received each year by the DTSC. The annual volume of manifests is typically 700,000-1,000,000 annually, representing approximately 350,000-500,000 shipments. Data from non-California manifests & continuation sheets are not included at the present time. Data are from the manifests submitted without correction, and therefore many contain some invalid values for data elements such as generator ID, TSD ID, waste category, & disposal method. The source is the Department of Toxic Substance Control is the agency. This database begins with calendar year 1993.	2,684
CA EMI	Toxics and criteria pollutant emissions data collected by CARB and local air pollution agencies.	319

TABLE 4.8-2: IDENTIFIED HAZARDOUS MATERIAL SITES WITHIN AND IN THE VICINITY OF THE PROJECT AREA		
Description/Type	**Definition**	**No. of Sites**
CA ENVIROSTOR	The DTSC's Site Mitigation and Brownfields Reuse Program's (SMBRP's) EnviroStor database identifies sites that have known contamination or sites for which there may be reasons to investigate further. The database includes the following site types: Federal NPL Superfund sites; State Response, including Military Facilities and State Superfund; Voluntary Cleanup; and School sites. EnviroStor provides similar information to the information that was available in CalSites, and provides additional site information, including, but not limited to, identification of formerly-contaminated properties that have been released for reuse, properties where environmental deed restrictions have been recorded to prevent inappropriate land uses, and risk characterization information that is used to assess potential impacts to public health and the environment at contaminated sites.	102
CA HAULERS	A listing of registered waste tire haulers.	2
CA WMUDS/SWAT	The Waste Management Unit Database System is used for program tracking and inventory of waste management units. The source is SWRCB	5
CA PROC	A listing of certified processors.	1
CA PEST LIC	A listing of licenses and certificates issued by the Department of Pesticide Regulation (DPR). The DPR issues licenses and/or certificates to: persons and businesses that apply or sell pesticides; pest control dealers and brokers; and persons who advise on agricultural pesticide applications.	10
CA HWP	Detailed information on permitted hazardous waste facilities and corrective action ("cleanups") tracked in EnviroStor.	5
CA BROWNFIELDS	A listing of sites the SWRCB considers to be brownfields since these are sites have come to them through the MOA Process.	5
CA MINES	A listing of mine site locations from the Office of Mine Reclamation.	1
CA HWT	A listing of hazardous waste transporters in California. Unless specifically exempted, it is unlawful for any person to transport hazardous wastes unless the person holds a valid registration issued by DTSC. A hazardous waste transporter registration is valid for one year and is assigned a unique registration number.	2
CA ICE	Contains data pertaining to the Permitted Facilities with Inspections / Enforcements sites tracked in Envirostor.	1
CA WASTEWATER PITS	Oil Wastewater Pits Listing	0
CA MWMP	Medical Waste Management Program Listing	0
TRIBAL RECORDS		
INDIAN RESERV	Indian Reservations	0
INDIAN ODI	Report on the Status of Open Dumps on Indian Lands	0
INDIAN LUST	Leaking Underground Storage Tanks on Indian Land	0
INDIAN UST	Underground Storage Tanks on Indian Land	0
INDIAN VCP	Voluntary Cleanup Priority Listing	0

TABLE 4.8-2: IDENTIFIED HAZARDOUS MATERIAL SITES WITHIN AND IN THE VICINITY OF THE PROJECT AREA		
Description/Type	**Definition**	**No. of Sites**
EDR PROPRIETARY RECORDS		
EDR MGP	The EDR Proprietary Manufactured Gas Plant Database includes records of coal gas plants (manufactured gas plants) compiled by EDR's researchers. Manufactured gas sites were used in the United States from the 1800's to 1950's to produce a gas that could be distributed and used as fuel. These plants used whale oil, rosin, coal, or a mixture of coal, oil, and water that also produced a significant amount of waste. Many of the byproducts of the gas production, such as coal tar (oily waste containing volatile and non-volatile chemicals), sludges, oils and other compounds are potentially hazardous to human health and the environment. The byproduct from this process was frequently disposed of directly at the plant site and can remain or spread slowly, serving as a continuous source of soil and groundwater contamination.	1
EDR Hist Auto	EDR has searched selected national collections of business directories and has collected listings of potential gas station/filling station/service station sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include gas station/filling station/service station establishments. The categories reviewed included, but were not limited to gas, gas station, gasoline station, filling station, auto, automobile repair, auto service station, service station, etc. This database falls within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches.	958
EDR Hist Cleaner	EDR has searched selected national collections of business directories and has collected listings of potential dry cleaner sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include dry cleaning establishments. The categories reviewed included, but were not limited to dry cleaners, cleaners, laundry, laundromat, cleaning/laundry, wash & dry etc. This database falls within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches.	750
CA RGA LUST	The EDR Recovered Government Archive Leaking Underground Storage Tank database provides a list of LUST incidents derived from historical databases and includes many records that no longer appear in current government lists. Compiled from records formerly available from the State Water Resources Control Board in California.	318
CA RGA LF	The EDR Recovered Government Archive Landfill database provides a list of landfills derived from historical databases and includes many records that no longer appear in current government lists. Compiled from records formerly available from the Department of Resources Recycling and Recovery in California.	3
SOURCE: Environmental Data Resources, Inc., *The EDR DataMap Environmental Atlas,* 2016.		



LEGEND:

- Hollywood CPA
- CORTESE
- NPL Superfund Sites
- U.S. Brownfields
- SEMS Sites
- RCRA: SQG
- RCRA: LQG

N W E S

0 2,700 5,400 Feet

SOURCE: EDR, 2016; TAHA, 2018.

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FIGURE 4.8-1

LOCATION OF HAZARDOUS MATERIALS SITES

National Priorities List (NPL)-Federal Superfund. In 1980, Congress established a process by which locations that have been determined to pose an unacceptable risk to human health could be cleaned up. This process is CERCLA. CERCLA was formally known as the "Superfund" program. Superfund was the program administered by USEPA to clean hazardous material sites with the cooperation of state and local governments. The CERCLA process has multiple steps in the process by which a site is identified, assessed and eventually cleaned. **Table 4.8-3** lists the three identified NPL-Federal Superfund sites within a one-mile radius of the Project Area, per ASTM minimum search distance standards.

TABLE 4.8-3: NPL SUPERFUND SITES WITHIN AND IN THE VICINITY OF THE PROJECT AREA

No.	Site	Location
1	San Fernando Valley	Crystal Springs Well
2	San Fernando Valley	Pollock Wellfield
3	San Fernando Valley	North Hollywood Well

SOURCE: Environmental Data Resources, Inc., *The EDR DataMap Environmental Atlas*, November 2016.

SEMS. The SEMS tracks hazardous waste sites, potentially hazardous waste sites, and remedial activities performed in support of USEPA's Superfund Program across the United States. The list was formerly known as CERCLIS, renamed to SEMS by USEPA in 2015. The list contains data on potentially hazardous waste sites that has been reported to USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of CERCLA. This dataset also contains sites that are either proposed to be or on the NPL and the sites that are in the screening and assessment phase for possible inclusion on the NPL. SEMS sites are individually assessed by USEPA for possible remediation activities based on the level of hazard, funding, and reports of potential violations. If the sites are found to be contaminated, a work plan for remediation activities to clean up issues potentially present on-site is assigned. **Table 4.8-4** lists the 11 SEMS sites identified within a 0.5-mile radius of the Project Area per ASTM minimum search distance standards.

TABLE 4.8-4: SEMS SITES WITHIN AND IN THE VICINITY OF THE PROJECT AREA

No.	Site	Location
1	San Fernando Valley	Crystal Springs Well
2	San Fernando Valley	Pollock Wellfield
3	All Metals Processing	264 W. Spazier Ave.
4	K & L Anodizing	1200 S. Victory Blvd.
5	Harrington Tools	5420-5440A-C W. San Fernando Rd.
6	Sunland Chemical	5440A-C W. San Fernando Rd.
7	MTA Vermiculite Rail	5440 W. San Fernando Rd.
8	PRC-DESOTO International	5430-5454 San Fernando Rd.
9	Nelson Name Plate Co	3191 Casitas Ave.
10	San Fernando Valley	North Hollywood Well
11	Highland Plating Firm	1001 N. Orange Dr.

SOURCE: Environmental Data Resources, Inc., *The EDR DataMap Environmental Atlas*, November 2016.

Resource Conservation and Recovery Act-Large Quantity Generator (RCRA-LQG). A large quantity generator is defined as a facility that produces and stores 1,000 kilograms/ or more of hazardous and acutely hazardous waste material on a monthly basis. Large quantity generators are required to adhere to strict guidelines with regard to the hazardous materials transported, handled, processed and stored on-site. Standards that govern the manner in which a large generator must operate their facility can be found in 40 CFR Chapter 1 Section 262. **Table 4.8-5** lists the 75 RCRA-LQG sites identified within and in the vicinity of the Project Area, including subject properties and adjoining properties, per ASTM minimum search distance standards.

TABLE 4.8-5: RCRA-LQG SITES WITHIN AND IN THE VICINITY OF THE PROJECT AREA /a/		
No.	**Site**	**Location**
1	J&M Anodizing, Inc	525 S. Flower St.
2	Automation Plating C	927 Thompson Ave.
3	Vons Store 2214	1110 W. Alameda Ave.
4	Chevron Station No. 9	1655 Victory Blvd.
5	Air Transport Mfg Co	1100 Grand Central Ave.
6	Active Supply Co.	5433 San Fernando Rd.
7	Sun Valley Extrusion	4626 Sperry St.
8	Warner Bros Studio F	400 Warner Blvd.
9	Former Drilube Broad	711 W. Broadway
10	Former Hawkes Finish	4626 Brazil St.
11	Huntsman Advanced Materials	5121 San Fernando Rd.
12	Baxalta Us Inc	4501 Colorado Blvd.
13	Pacific Energy-Toyon	5050 Mt. Hollywood Dr.
14	Dba Mccann's Engineering	4570 W. Colorado Blvd.
15	Excello Plating Co	4057 Goodwin Ave.
16	Central Service Yard	3900 Chevy Chase Dr.
17	Valley View Elementary	6921 Woodrow Wilson
18	Wonderland Avenue Elementary	8510 Wonderland Ave.
19	Safety-Kleen Systems	2918 Worthen Ave.
20	Service Station - 13	6420 Franklin/Cahuenga Blvd.
21	CVS Pharmacy No 9624	1747 N. Cahuenga Blvd.
22	Exxonmobil Oil Corp	6230 Franklin Ave.
23	Chevron 90624	1787 N. Highland Ave.
24	CVS Pharmacy #10433	6201 Hollywood Blvd.
25	CVS Pharmacy #7086	5500 Hollywood Blvd.
26	CVS Pharmacy #9144	7021 Hollywood Blvd.
27	Exxonmobil Oil Corp.	5700 Hollywood Blvd.
28	Rite Aid #5435	1637 N. Vermont Ave.
29	Rite Aid No 5435	1637 N. Vermont Ave.
30	Selma Ave Elementary	6611 Selma Ave.
31	Sunset And Vine Tower	1480 Vine St.
32	Rite Aid No 6491	6726 W. Sunset Blvd.
33	Kaiser Permanente Los Angeles	4867 W. Sunset Blvd.
34	Exxonmobil Oil Corp.	7100 W. Sunset Blvd.
35	Exxonmobil Oil Corp.	7100 W. Sunset Blvd.
36	Chevron 95008	8101 W. Sunset Blvd.
37	Rite Aid No 5438	6130 W. Sunset Blvd.
38	Exxonmobil Oil Corp.	7865 W. Sunset Blvd.
39	Rite Aid #5452	7900 W. Sunset Blvd.
40	Rite Aid #5452	7900 W. Sunset Blvd.
41	Hollywood Palladium	6215 W. Sunset Blvd.
42	Children's Hospital O	4650 Sunset Blvd.
43	Hollywood Presbyterian	1300 N. Vermont Ave.
44	Deluxe Laboratories	1377 N. Serrano Ave.
45	Metromedia Technology	1320 Wilton Pl.
46	Bernstein High School	1309 Wilton Pl.
47	Tosco 30550	1300 N. Western Ave.
48	Exxonmobil Oil Corp.	1277 N. Western Ave.
49	The Argyle Hotel	8358 Sunset Blvd.
50	Marshall New P C No	4564 W. Lexington Ave.
51	Pacific Bell Telephone	1149 N. Gower St.
52	Rite Aid No 5439	4633 Santa Monica Blvd.

TABLE 4.8-5: RCRA-LQG SITES WITHIN AND IN THE VICINITY OF THE PROJECT AREA /a/		
No.	**Site**	**Location**
53	Rite Aid #5439	4633 Santa Monica Blvd.
54	Kingsley Elementary	5200 W. Virginia Ave.
55	Exxonmobil Oil Corp.	6301 Santa Monica Blvd.
56	Hollywood Primary Center	1115 Tamarind Ave.
57	Faith Plating Co.	7141 Santa Monica Blvd.
58	Target #1884	7100 Santa Monica Blvd.
59	Chevron 98744	1107 N. La Cienega Blvd.
60	Highland Plating	1001 N. Orange Dr.
61	CVS Pharmacy No 9652	8491 Santa Monica Blvd.
62	West Hollywood Elementary	970 N. Hammond St.
63	Southern California Gas Company	7171 Romaine St.
64	LAUSD- Bancroft Middle School	929 N. Las Palmas Ave.
65	Consolidated Film Industries	959 N. Seward St.
66	CVS Pharmacy #2801	8607 Santa Monica Blvd.
67	Los Angeles City College	855 N. Vermont Ave.
68	CVS Pharmacy #9732	861 N. Vine St.
69	Laser Pacific Media	835 N. Seward St.
70	Exxonmobil Oil Corp.	6601 Melrose Ave.
71	Paramount Pictures	5555 Melrose Ave.
72	Dayton Heights Childcare	3917 Clinton St.
73	Rosewood Ave Elementary	503 N. Croft Ave.
74	Whitman Continuation High School	7795 Rosewood Ave.
75	Cedars Sinai Medical Center	8700 Beverly Blvd.
/a/ Information presented herein may include duplicates based on the database search provided by EDR. **SOURCE**: Environmental Data Resources, Inc., *The EDR DataMap Environmental Atlas,* November 2016.		

Resource Conservation and Recovery Act-Small Quantity Generator (RCRA-SQG) Database. This database is compiled by USEPA of reporting facilities that transport, treat, store, or dispose of hazardous waste in the category of SQG. By far, most of the facilities are small generators that consist of businesses like automobile repair shops, dry cleaners, photography and printing businesses. A small quantity generator is defined as a facility that generates more than 100 kilograms, but less than 1,000 kilograms of hazardous waste per month. All hazardous waste generated by the small generator that is not treated on-site must be sent to an off-site treatment, storage, and disposal facility permitted to handle hazardous waste, or to an approved designated facility (e.g., a recycling facility). There are 404 RCRA-SQG sites within and in the vicinity of the Project Area, including subject properties and adjoining properties, per ASTM minimum search distance standards.

U.S. Brownfields. According to USEPA, a brownfield is "a property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant." **Table 4.8-6** lists the one U.S. Brownfield site identified within a 0.5-mile radius of the Project Area per ASTM minimum search distance standards.

TABLE 4.8-6: U.S. BROWNFIELDS WITHIN 0.5-MILE RADIUS OF THE PROJECT AREA		
No.	**Site**	**Address**
1	La Brea Gateway	1100 Sweetzer Ave. N
SOURCE: Environmental Data Resources, Inc., *The EDR DataMap Environmental Atlas,* November 2016.		

Cortese. The Cortese database list includes tank leaks compiled by SWRCB, Integrated Waste Board, and DTSC. The CA CORTESE database identifies active contaminated sites; it identifies six sites within the Project Area. The CA HIST CORTESE database identifies sites that have been listed in the past and is also compiled by SWRCB, Integrated Waste Board, and DTSC, though is no longer updated by the state agency. The CA HIST CORTESE (California Historical Cortese) database identifies 222 sites within the Project Area. **Table 4.8-7** lists the six active cleanup sites that may pose potential hazards identified in the CA CORTESE database located within and in the vicinity of the Project Area, including subject properties and adjoining properties, per ASTM minimum search distance standards.

TABLE 4.8-7: ACTIVE CLEANUP SITES IDENTIFIED ON THE CORTESE LIST WITHIN AND IN THE VICINITY OF THE PROJECT AREA

No.	Site	Location	Type of Action
1	San Fernando Valley	Crystal Springs Well	Cleanup Status: Active
2	San Fernando Valley	Pollock Wellfield	Cleanup Status: Certified / Operation & Maintenance
3	Former Excello Plati Franciscan Ceramics	4057 & 4059 Goodwin Ave.	Cleanup Status: Certified / Operation & Maintenance – Land Use Restrictions
4	Former Excello Plati Franciscan Ceramics	2901 Los Feliz Blvd.	Cleanup Status: Certified / Operation & Maintenance – Land Use Restrictions
5	San Fernando Valley	North Hollywood Well	Cleanup Status: Active
6	Taylor Yard – Parcel	2800 Kerr St.	Cleanup Status: Active

SOURCE: Environmental Data Resources, Inc., *The EDR DataMap Environmental Atlas*, November 2016.

USE, TRANSPORT, AND ABATEMENT OF HAZARDOUS MATERIALS

The use of hazardous materials is typically associated with industrial land uses. Activities, such as manufacturing, plating, cleaning, refining, and finishing, frequently involve chemicals that are considered hazardous when accidentally released into the environment. There are several clusters of low-intensity industrial uses scattered throughout the Project Area. The largest is the entertainment industry's Media District, generally bounded by Santa Monica Boulevard to the north, Vine Street to the east, Melrose Avenue to the south, and La Brea Avenue to the west. The Media District is the center of pre- and post-production, such as set construction, still photography, film and tape editing, film archiving and storage, studio equipment manufacture, rental and storage, sound recording, film projection and screening, prop houses, lumber yards, rehearsal and broadcast studios and production offices.

To a lesser extent, hazardous materials may also be used by various commercial enterprises, as well as residential uses. Dry cleaners, in particular, use cleaning agents considered to be hazardous materials. Hardware stores typically stock paints and solvents, as well as fertilizers, herbicides and pesticides. Swimming pool supply stores stock acids, algaecides, and caustic agents. In fact, most commercial businesses occasionally use commonly available cleaning supplies which, when used in accordance with manufacturers' recommendations, are considered safe by the State of California, but when not handled properly can be considered hazardous. Private residences also use and store commonly available cleaning materials, paints, solvents, swimming pool and spa chemicals, as well as fertilizers, herbicides, and pesticides.

If improperly handled, hazardous materials can result in public health hazards through human contact with contaminated soils or groundwater, or through airborne releases in vapors, fumes, or dust. There is also the potential for accidental or unauthorized releases of hazardous materials that would pose a public health concern. The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state and local regulations. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate

licensing. Additionally, hazardous waste transporters are required to complete and carry a hazardous waste manifest (which is a set of forms, reports, and procedures designed to seamlessly track hazardous waste).

Most transportation of hazardous materials through and within the Project Area consists of trucks that traverse along freeways, such as Interstate 5 (I-5), State Route 134 (SR-134), and US-101, and major thoroughfares in the Project Area. Major thoroughfares in the Project Area include Sunset, Hollywood, Santa Monica, La Cienega and Cahuenga Boulevards, and Fairfax, Highland, La Brea, Vermont, Vine and Western Avenues.

HOUSEHOLD HAZARDOUS WASTE

The USEPA defines household hazardous waste as "leftover products such as paints, cleaners, oils, batteries, and pesticides that contain potentially hazardous ingredients that could be corrosive, toxic, ignitable, or reactive." According to USEPA, Americans generate approximately 1.6 million tons of household waste per year, while the average home can accumulate as much as 100 pounds of household hazardous waste in the basement or garage or in storage closets. Methods of improper disposal of household hazardous wastes commonly include pouring them down the drain, on the ground, into the storm sewers, or in some cases, putting them out with the trash. Though the dangers of such disposal methods might not be immediately obvious, improper disposal of these wastes can pollute the environment and pose a threat to human health.

OIL FIELDS AND WELLS

Oil fields and oil production activities present a variety of hazards in urbanized areas, including toxic air contaminants and dust from oil production, and the potential of contaminant release into an aquatic environment. Unconstrained oil seepage from oil fields and wells can contaminate the soil and groundwater aquifers. As further discussed in Section 4.11, Mineral Resources, of this Draft EIR, the only petroleum sources located within the Project Area is the Salt Lake Field. The Salt Lake Field was discovered in the 1890s by Arthur F. Gilmore with oil production activities occurring from the early 1920's until 1935 in which several inactive oil wells are located and penetrate for the first 50 to 100 feet or more below ground. The Salt Lake Field extends to and underlies the La Brea Tar Pits, which continues to produce tar but not oil.[7] Existing uses within the Project Area that are located within the Salt Lake Field include a high school, commercial uses, and residential uses. The Project Area does not have any existing uses that involves oil or gas drilling or oil or gas production activities. Areas of the City in which drilling of oil wells or the production from the wells of oil, gases or other hydrocarbon substances are permitted in the City's Supplemental Use Oil Drilling District ("O" District).

As shown in further detail in Table 4.11-2 of Section 4.11, Mineral Resources, 17 oil wells sites are located within the Project Area and identified as plugged, idle, or buried and idle. Plugged wells prevent fluid from migrating between underground rock layers. Idle wells are identified as not having produced oil or natural gas for six consecutive months of continuous operation during the last five or more years. Buried-idle wells are characterized the same as idle wells and are also buried. No active oil wells are identified in the Project Area.

[7]United States Geological Survey, *Petroleum Gas, The Salt Lake Oil Field Near Los Angeles, Cal.,* by Ralph Arnold, page 357, https://pubs.usgs.gov/bul/0285g/report.pdf, accessed November 2016.

METHANE GAS

Methane gas is produced by anaerobic decay of organic matter deep under the Earth's surface and is the major component of natural gas, about 87 percent by volume.[8] In common usage, deposits rich in natural gas (i.e., methane) are called natural gas fields. At room temperature and standard pressure, methane is a colorless, odorless gas. While not toxic, it is highly flammable and may form explosive mixtures with air. Methane is also an asphyxiant and may displace oxygen in an enclosed space. The concentrations at which flammable or explosive mixtures form are much lower than the concentration at which asphyxiation risk is significant. When structures are built on or near landfills or naturally occurring natural gas fields, methane gas can penetrate the buildings' interiors and expose occupants to significant levels of methane.

As shown in **Figure 4.8-2**, several areas within the Project Area are located within a Methane Zone and Methane Buffer Zone. Generally, the northeastern, northern, and southern portions of the Project Area are identified to be within a Methane Zone or Methane Buffer Zone. Parcels within the Methane Zone are subject to more restrictive mitigation requirements, and parcels within the Methane Buffer Zone are subject to less restrictive mitigation requirements, though requirements are site-specific and can vary.

SCHOOLS

An analysis of hazardous materials in relation to schools is required as part of the CEQA Guidelines to determine if the Proposed Plan could expose schools to hazardous materials, substances, or waste. As discussed in Section 4.14, Public Services, of this Draft EIR, a total of 38 LAUSD public schools serve the Project Area, including two primary/early education centers, 22 elementary schools, 5 middle schools, 5 high schools, and 4 independent charter schools under LAUSD. Approximately 31 private schools are located in the Project Area. The database search of hazardous sites revealed that several of the public schools include chemistry labs, automobile repair shops, print shops and photography labs as part of the educational curriculum and are listed as either large or small generators of hazardous materials. Nonetheless, regulatory compliance for the specialized handling of hazardous materials by school program administrators would ensure that students' exposure to toxins is minimized. **Figure 4.8-3** shows the locations of schools and their proximity to hazardous sites listed in the six environmental regulatory databases identifying properties where ongoing utilization of chemicals of concern are identified or where remediation activities are being implemented within the Project Area.

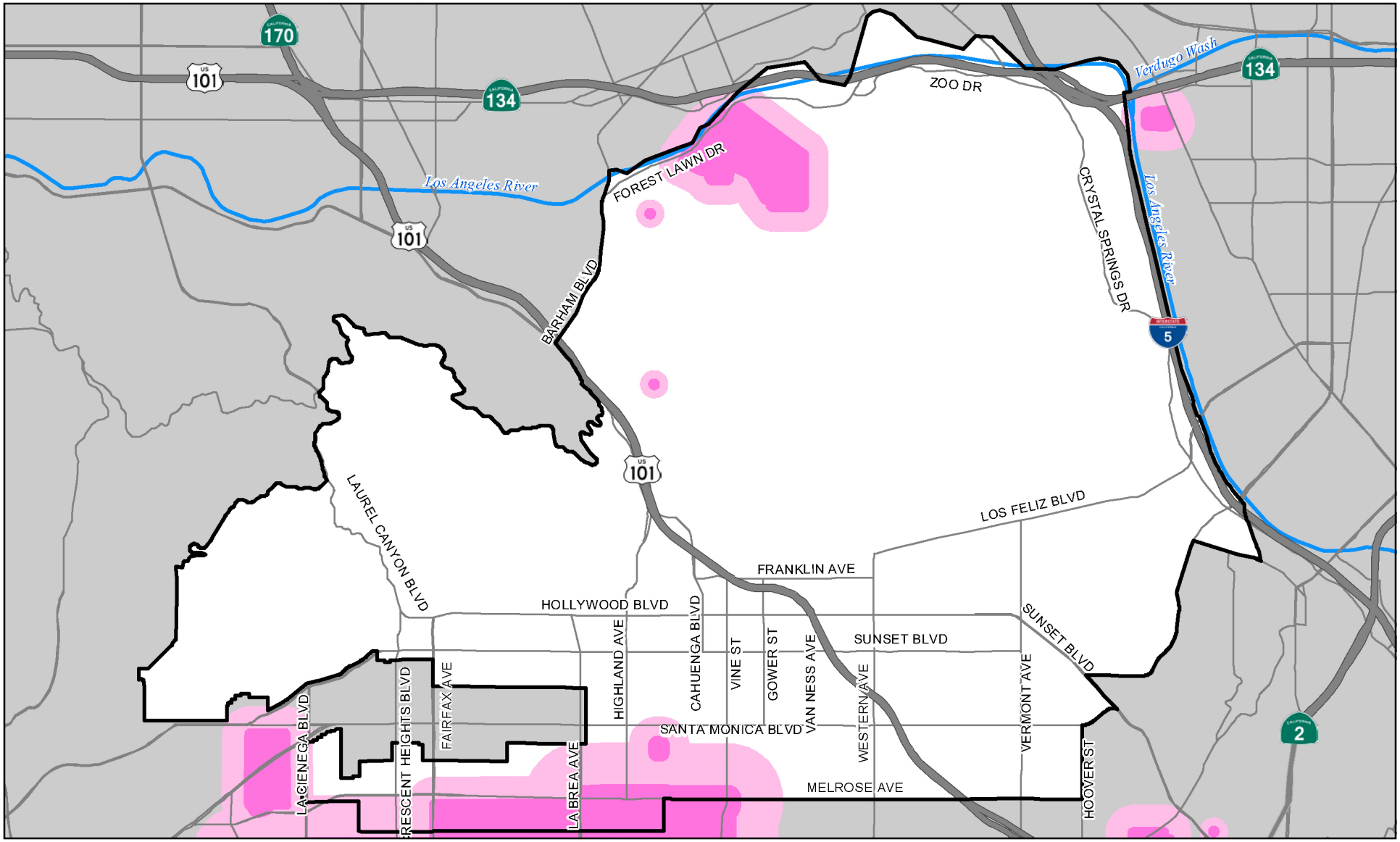
AIRPORT HAZARDS

The nearest airports located in proximity to the Project Area include Bob Hope Airport located at 2627 N. Hollywood Way, in the City of Burbank; Whiteman Airport located at 12653 Osborne Street in Pacoima, and Van Nuys Airport located at 16461 Sherman Way in Van Nuys. These airports are approximately 3.7 miles north, 9.0 miles north, and 8.0 miles northwest from the nearest Project Area boundary, respectively. Los Angeles International Airport is the nearest international airport and is located approximately 6.0 miles southwest of the nearest Project Area boundary. To prevent the creation of airport hazard zones, restrictions are placed on development in the immediate vicinity of airport runways where take-off and final approach maneuvers occur. There are no airports located within the Project Area, and the Project Area is not located within the Los Angeles County Airport Land Use Commission (ALUC) planning boundaries of the airports.[9]

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[8]Anaerobic decay is the process by which microorganisms break down biodegradable material in the absence of oxygen.

[9]Los Angeles County Airport Land Use Commission, *Los Angeles International Airport Map*, http://planning.lacounty.gov/assets/upl/project/aluc_airport-lax.pdf, accessed December 14, 2016.



LEGEND:

Hollywood CPA | Methane Buffer Zone | Methane Zone

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0 2,750 5,500 Feet

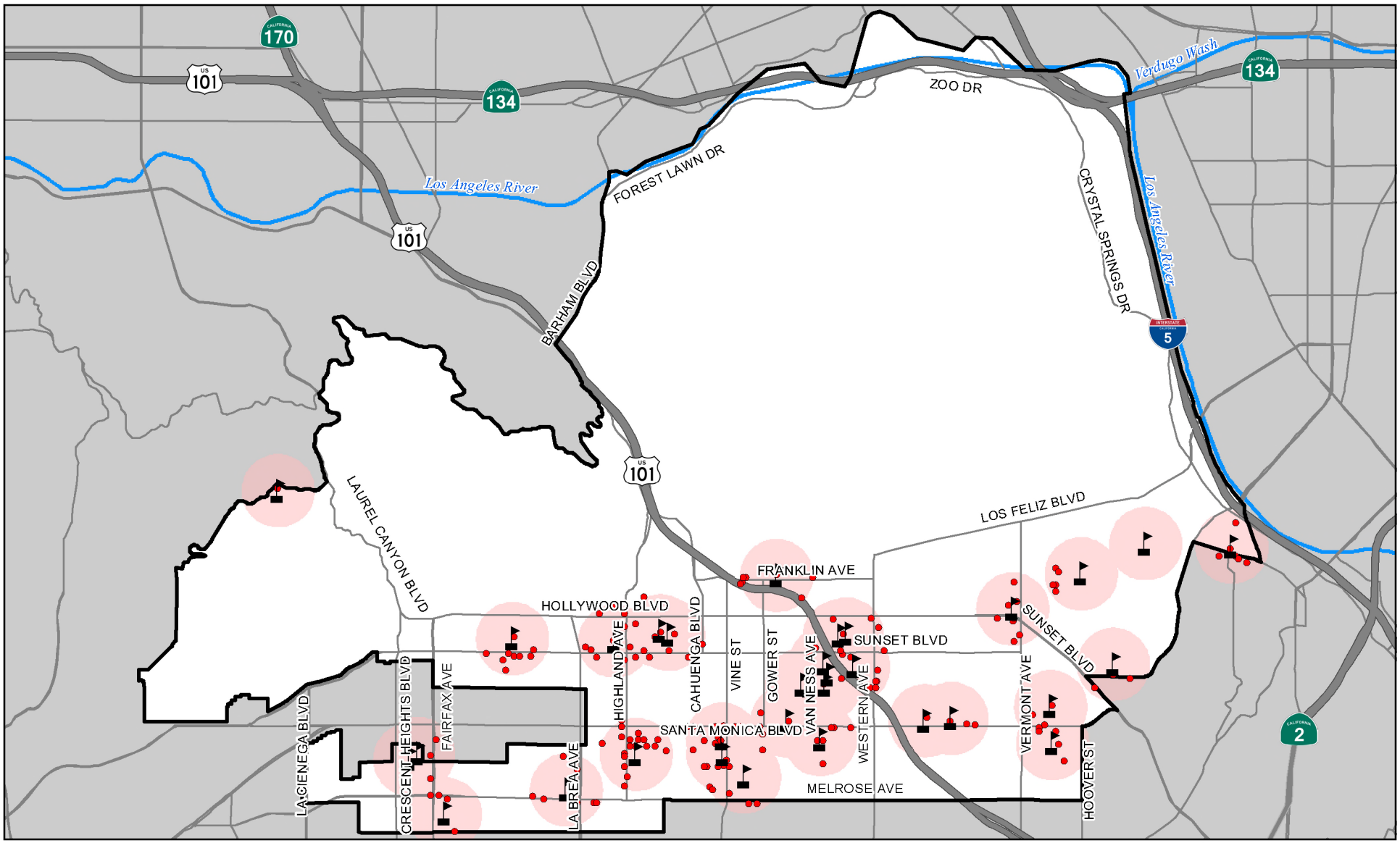
SOURCE: City of Los Angeles, 2016; TAHA, 2017.

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FIGURE 4.8-2

METHANE AND
METHANE BUFFER ZONES



LEGEND:

Hollywood CPA | LAUSD School | 0.25-Mile Buffer from LAUSD School | Hazardous Sites

N
W E
S

0 2,700 5,400 Feet

SOURCE: EDR, 2016; TAHA, 2017.

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FIGURE 4.8-3

HAZARDOUS SITES LOCATED WITHIN
0.25 MILES OF LAUSD SCHOOLS

FIRE HAZARDS

Wildland Fires. Brush fires continue to be a major threat to life and property throughout the region due to unique fuel, terrain, and climatic conditions. The hazard is especially great when dry "Santa Ana" winds arrive, usually in the fall and winter seasons, as evidenced by the recent 2017 wildfires referred to as the "Skirball Fire" in the Bel Air neighborhood of the City of Los Angeles, "Creek Fire" in the Sylmar neighborhood of the City of Los Angeles, and the "Thomas Fire" in Ventura and Santa Barbara Counties. The "Skirball Fire" affected approximately 422 acres in the Bel Air neighborhood, destroying six structures and damaging 12 structures.[10] The "Creek Fire" affected the area four miles east of Sylmar in the San Gabriel Mountains, burning 15,619 acres, destroying 123 structures, and damaging 81 structures.[11] The "Thomas Fire" affected the areas of Ojai, Santa Paula, Ventura, Montecito, Carpinteria, Santa Barbara, and Fillmore in the Ventura and Santa Barbara Counties. As of January 2018, the Thomas Fire affected an estimated 282,000 acres, destroyed 1,063 structures, and damaged 280 structures.[12]

The Project Area contains both the developed and undeveloped portions of the Santa Monica Mountains, as well as the urbanized areas south of the Santa Monica Mountains. As shown in **Figure 4.8-4**, the northern and eastern portions of the Project Area are located within a Fire Brush Clearance Zone and Very High Fire Hazard Severity (VHFHS) Zone, as identified by LAFD. The Santa Monica Mountains within and adjacent to the Project Area and other hillside areas in the Plan Area are located in these zones.

Properties located within VHFHS and Fire Brush Clearance Zones are required to minimize fire risks during the high fire season through vegetation clearance; maintenance of landscape vegetation to minimize fuel supply that would spread the intensity of a fire; compliance with provisions for emergency vehicle access, use of approved building materials and design; and compliance with LAFD hazardous vegetation clearance requirements.[13]

Urban Fires. The developed portions of the Project Area and its surrounding areas are characterized by features typical of the urban landscape and include commercial, industrial, and residential uses. Urban fires can result from a number of causes, including arson, carelessness, home or industrial accidents, or from ignorance of proper safety procedures. The International Building Code regulates developments and requires certain built-in fire protection devices when maximum allowable uses or heights are exceeded, or the building use presents a life or property protection problem. In addition, LAFD has guidelines to lessen the impacts of fire hazards such as inspection programs.

EMERGENCY RESPONSE PLANS

The City of Los Angeles Emergency Management Department (EMD) is comprised of four divisions and two units including administrative services division, communications division, community emergency management division, operations division, planning unit, and training exercise unit. The EMD works with City departments, municipalities and with community-based organizations to ensure that the City and its residents have the resources and information they need to prepare, respond, and recover from emergencies, disasters and significant events.[14]

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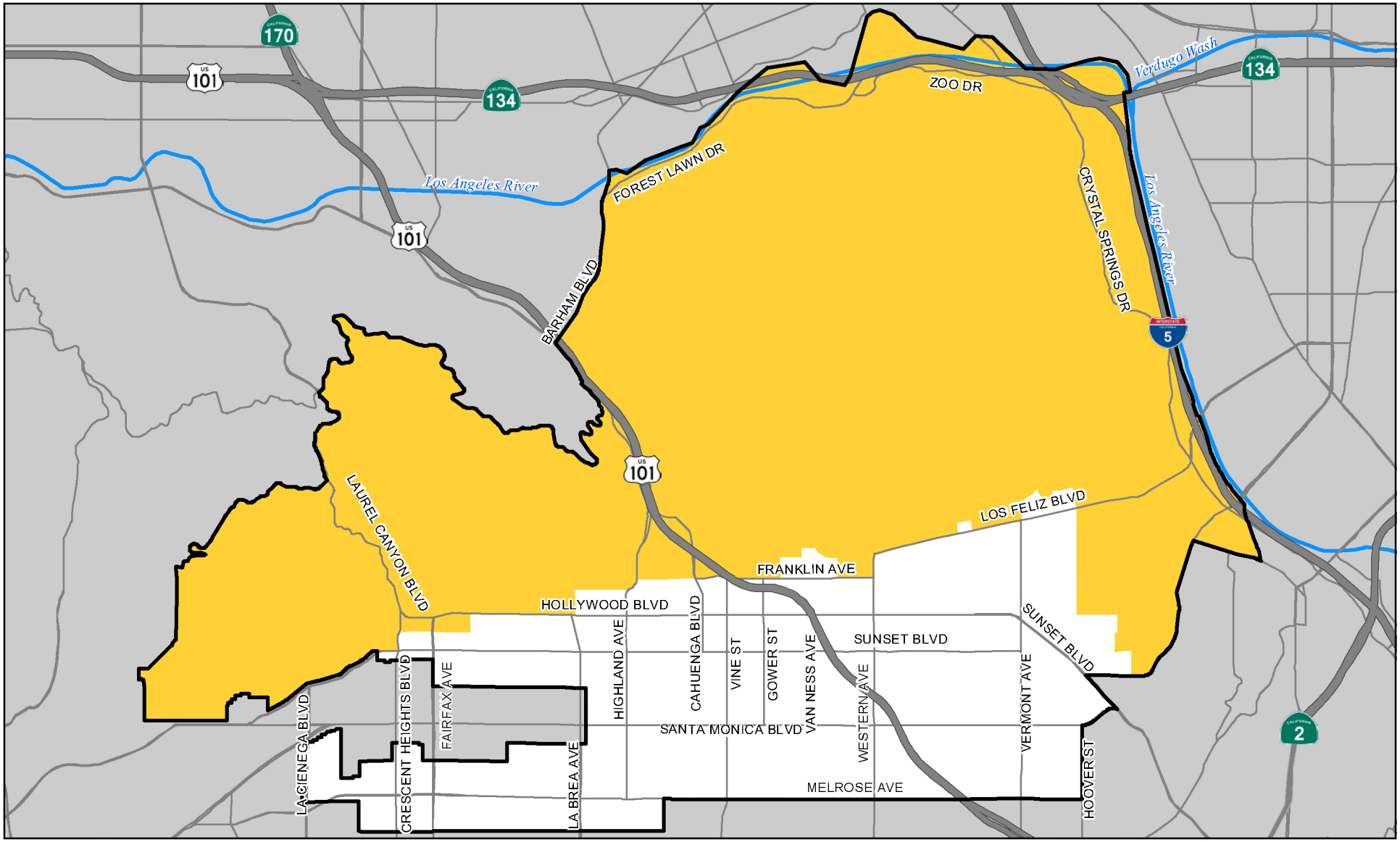
[10]Los Angeles Fire Department, *Skirball Fire Update,* http://www.lafd.org/news/skirball-fire-update, accessed February 22, 2018.

[11] National Wildfire Coordinating Group, InciWeb Incident Information System, *Creek Fire,* https://inciweb.nwcg.gov/incident/5669/, accessed February 22, 2018.

[12] National Wildfire Coordinating Group, InciWeb Incident Information System, *Thomas Fire,* https://inciweb.nwcg.gov/incident/5670/, accessed February 22, 2018.

[13]Los Angeles Fire Department, *Fire Zone – Very High Fire Hazard Severity Zone*, http://www.lafd.org/fire-prevention/brush/fire-zone, accessed December 14, 2016.

[14]City of Los Angeles Emergency Management Department, *About EMD*, http://www.emergency.lacity.org/about-emd, accessed on December 14, 2016.



LEGEND:

Hollywood CPA

Very High Fire Hazard Severity (VHFHS) Zone

N
W E
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0 2,750 5,500 Feet

SOURCE: City of Los Angeles GeoHub, 2016; TAHA, 2017.

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taha 2010-073

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FIGURE 4.8-4

FIRE HAZARD ZONES

The Emergency Operations Organization (EOO) is the operational department responsible for the City's emergency preparations (planning, training and mitigation), response and recovery operations. The EOO centralizes command and information coordination to enable its unified chain-of-command to operate efficiently and effectively in managing the City's resources.

The Emergency Operation Center (EOC) is the focal point for coordination of the City's emergency planning, training, response and recovery efforts. EOC processes follow the National All-Hazards approach to major disasters such as fires, floods, earthquakes, acts of terrorism and large-scale events in the City that require involvement by multiple City departments. Rescue and provision of medical care to victims of fires and other emergencies are the responsibilities of LAFD. However, the Project Area adjoins other jurisdictions (i.e., the Cities of Burbank, Glendale, West Hollywood, and Beverly Hills). As such, the City has several joint-use agreements with other jurisdictions for cooperative response and management of fires and other emergency incidences. Under such agreements, the first respondents would usually be the nearest fire or police units, regardless of jurisdictional boundaries. Key to a successful rapid response is LAFD's goal of maintaining adequate response distances from any given fire outbreak to the closest fire station. See Section 4.14, Public Services, of this Draft EIR, for further discussion about LAFD.

Disaster Routes. The City's General Plan Safety Element specifies several disaster routes in the Project Area. Disaster routes typically parallel major north-south and east-west corridors in the Project Area. Disaster routes within and adjacent to the Project Area include US-101; SR-134; I-5; the north-south corridors of La Cienega Boulevard (south of Santa Monica Boulevard), Laurel Canyon Road (north of Santa Monica Boulevard), La Brea Avenue (south of Santa Monica Boulevard), Highland Avenue (north of Santa Monica Boulevard), Cahuenga Boulevard, Barham Boulevard, and Western Avenue (south of Santa Monica Boulevard); and the east-west corridors of Santa Monica Boulevard.[15]

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, the Proposed Plan would have a significant impact if it would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school:
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard for people residing or working in the Project Area;
- For a project within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the Project Area;
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or

[15]County of Los Angeles Department of Public Works, *Disaster Route Maps - Los Angeles Central Area*, http://dpw.lacounty.gov/dsg/disasterroutes/city.cfm, accessed December 14, 2016.

- Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are adjacent to urbanized areas or where residences are intermixed with wildlands.

METHODOLOGY

The analysis in this section includes a focus on the use, disposal, transport, or management of hazardous or potentially hazardous materials resulting from potential development or redevelopment resulting from the implementation of the Proposed Plan. Disposal options, the probability for risk of upset, and the severity of consequences to people or property associated with the increased use, handling, transport, and/or disposal of hazardous materials associated with the implementation of the Proposed Plan is also analyzed. This section addresses potential short-term construction impacts resulting from demolition of existing (usually older) structures, as well as from disturbance of contaminated soils, and impacts related to the operation of development in the Project Area over time. Operational impacts would generally be associated with the type of uses proposed and the materials that operation of these uses would entail. In determining the level of significance, the analysis assumes that any development under the Proposed Plan would comply with relevant federal and State laws and regulations, as well as the LAMC.

This discussion of hazards and hazardous materials addresses impacts in and outside the Project Area that have the potential to be impacted by the Proposed Plan. The impact analysis was based on several factors, including the policies and land uses of the Proposed Plan, the degree to which land uses would change, and the thresholds of significance for hazards and hazardous materials.

IMPACTS

IMPACT 4.8-1 Would implementation of the Proposed Plan create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? **Less than significant impact.**

Hazardous materials to be used or stored associated with occupancy of future uses within the Project Area are generally anticipated to be typical household cleaning products and minor industrial related chemicals. The types of hazardous materials that could be present during operation of commercial, residential and industrial uses of the Proposed Plan are anticipated to include maintenance products (e.g., paints and solvents); oils, lubricants and refrigerants associated with building mechanical and HVAC systems; and grounds and landscape maintenance products formulated with hazardous substances, including fuels, cleaners and degreasers, solvents, paints, lubricants, adhesives, sealers, pesticides/herbicides, and industrial related chemicals.

Industrial uses, including media-related industrial uses, may also be associated with, but not limited to, hazardous materials that are concentrated on stages, paint and sign shops, manufacturing and special effects workshops, and wood molding and millwork workshops. Such hazardous materials may include the use, storage, and handling of oil and water-based paints; assorted coatings and primers; adhesives, resins, and glues (including isocyanate polyether foam); aerosol spray paint; compressed gases (oxygen, carbon dioxide, acetylene, argon, and nitrogen); cleaning products (e.g., ammonia, scouring powder, surfactants, bleach, and caustic cleaner); various non-chlorinated and chlorinated solvents and finish strippers; ink; acetone; oil; various gases (e.g., propane); film/photo developer solutions; small quantities of fireworks/explosives and other materials used in special effects, small quantities of acids; cooking oil and grease; and fuels (in underground storage tanks).

The Proposed Plan would preserve existing light industrial uses associated with the entertainment industry and would promote light industrial land use for media- and studio-related uses by allowing more floor area ratio (FAR) than what is currently permitted in a few of the industrial areas if targeted media-related industrial uses are incorporated. The routine transport, use, or disposal of hazardous materials within the industrial areas, as with the entire Project Area, would be subject to applicable federal, state, and local regulations. Specifically, the USDOT Office of Hazardous Materials Safety prescribes strict regulations for the safe transportation of hazardous materials, as described in CFR Titles 40, 42, 45, and 49 and implemented by CCR Titles 17, 19, and 27, which states that appropriate documentation for all hazardous waste that is transported off site in connection with activities would be provided. Adherence to these regulations would reduce the likelihood and severity of accidents that have the potential to occur during transit.

Demolitions/construction activities in the Project Area may encounter hazardous and/or toxic waste, such as ACMs and LBPs, depending on the age of structures to be redeveloped or other potential soil or groundwater contamination based on previous uses. The removal of ACMs and LBPs, and other toxic wastes are regulated by federal, state, and local regulations. ACMs and LBP were widely used in structures built between 1945 and 1978 and PCBs in structures built or renovated between 1950 and 1979. It is reasonable to assume that these materials would be encountered during rehabilitation and demolition of some of these structures.

Prior to any rehabilitation or demolition activities involving structures within the time periods identified above, any development project within the Project Area will be required to retain a Certified Asbestos Consultant to determine the presence of asbestos and ACMs in compliance with Cal/OSHA requirements and a state-certified Lead Inspector/Assessor to conduct LBP testing in compliance with Title 17 of the CCR. If asbestos and/or LBPs are discovered, a licensed asbestos and/or LBP/materials abatement contractor is required to be retained to safely remove ACM in accordance with Cal/OSHA regulations and SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities) and/or lead-based paint in accordance with USEPA's Lead Abatement Program regulations under the TSCA. Similarly, prior to any rehabilitation or demolition activities for any development project within the Project Area, inspections for PCB-containing electrical features will be required. In California, USEPA enforces the federal regulations for PCB disposal and storage (under the TSCA), and DTSC administers and enforces the State's additional requirements for PCB hazardous waste (under RCRA). Mandatory compliance with Title 40 of the CFR and Title 22 of the CCR would ensure that proper procedures are followed to minimize potential exposure to significant health hazards associated with PCBs.

To ensure that workers and others at individual development sites within the Project Areas are not exposed to unacceptable levels of risk associated with the use and handling of hazardous materials, employers and businesses are required to implement existing hazardous materials regulations, with compliance monitored by the state (e.g., OSHA in the workplace or DTSC for hazardous waste) and the City. Additionally, before construction activities can take place at documented hazardous materials sites, contamination must be remediated and cleaned up under the supervision of DTSC.

Implementation of the Proposed Plan would require compliance with existing safety standards related to the handling, use, and storage of hazardous materials, and compliance with the safety procedures mandated by applicable federal, state, and local laws and regulations. Therefore, compliance with all applicable federal, state, and local regulations would ensure that impacts related to the use, transport, and disposal of hazardous materials under the Proposed Plan would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

IMPACT 4.8-2 Would implementation of the Proposed Plan create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? **Less than significant impact with mitigation.**

As previously discussed in **Impact 4.8-1**, all future development projects in the Project Area would be required to conform with environmental regulations related to new construction and hazardous materials storage, use and transport.

Operational Effects. The precise potential future increase in the amount of hazardous materials utilized in the Project Area cannot be predicted as specific development projects are not identified. Development under the Proposed Plan involving residential, commercial, industrial, public facilities, and open space would include the use of and storage of common hazardous materials similarly used today with similar hazardous risks, such as paints, solvents, and cleaning products. Additionally, building mechanical systems, and grounds and landscape maintenance could also use a variety of products formulated with hazardous materials, including fuels, cleaners, lubricants, adhesives, sealers, and pesticides/herbicides. The extent and exposure of individuals to hazardous materials would be limited by the relatively small quantities of these materials that would be stored and used on individual project sites throughout the Project Area. Although common maintenance products and chemicals would also be used in new development projects, these hazardous materials would not pose any greater risk compared to other similar development or to existing conditions. Compliance with warning labels and storage recommendations from the individual manufacturers would ensure people in the Project Area would not be exposed to unusual or significant risks from hazardous materials.

Furthermore, businesses are required to comply with health and safety, and environmental protection laws and regulations previously described, which require businesses handling or storing certain amounts of hazardous materials to prepare a hazardous materials business plan. The plan includes an inventory of hazardous materials used or stored on-site, and procedures to be used in the event of a significant or threatening significant release of a hazardous material. The hazardous materials plan must include a Material Safety Data Sheet (MSDS) for each hazardous material used or stored on-site. To accomplish this, and to otherwise provide a safe and healthy environment, businesses that use hazardous materials must implement health and safety policies and procedures. In addition, future development within the Project Area would be required to complete all applicable environmental review processes and to conform with environmental regulations related to new construction and hazardous materials storage, use and transport. Existing hazardous materials regulations would minimize the potential for the public to be exposed to adverse health or safety effects associated with the release of hazardous materials into the environment. Therefore, impacts related to operational effects would be ***less than significant***.

Construction Impacts

Lead and Asbestos. Implementation of the Proposed Plan would likely result in the demolition of older buildings as uses are redeveloped according to the land uses and densities that are permitted in the Proposed Plan. Due to the age of development in the Project Area, some properties likely have structures that contain ACMs and LBPs. Future development in the Project Area would be required to comply with federal and state regulations regarding materials containing AMCs and LBPs. These requirements include: SCAQMD Rules and Regulations pertaining to asbestos abatement (including Rule 1403), Construction Safety Orders 1529 (pertaining to asbestos) and 1532.1 (pertaining to lead) from CCR Title 8 and CFR Title 40, Part 61,

Subpart M (pertaining to asbestos), and lead exposure guidelines provided by the U.S. Department of Housing and Urban Development (HUD). Asbestos and lead abatement must be performed and monitored by contractors with appropriate certifications from the State Department of Health Services. In addition, Cal/OSHA has regulations concerning the use of hazardous materials, including requirements for safety training, availability of safety equipment, hazardous materials exposure warnings, and emergency action and fire prevention plan preparation. Cal/OSHA enforces the hazard communication program regulations, which include provisions for identifying and labeling hazardous materials, describing the hazards of chemicals, and documenting employee-training programs. All demolition that could result in the release of lead and/or asbestos must be conducted according to Cal/OSHA standards. Adherence to existing regulations would require appropriate testing and abatement actions for hazardous materials. Compliance with existing regulations would ensure that construction workers and the general public would not be exposed to any unusual or excessive risks related to lead and asbestos during construction activities. Therefore, impacts related to lead and asbestos would be ***less than significant***.

Methane Zones. As shown in **Figure 4.8-2**, Methane Zones and Methane Buffer Zones are generally located in the northeastern, northern, and southern portions of the Project Area. As previously discussed, any new construction would be required to comply with the DOGGR requirements, Methane Mitigation Standards, and the City of Los Angeles Methane Seepage Regulations. Compliance with existing regulations would ensure construction workers and the general public would not be exposed to any unusual or excessive risks related to methane during construction activities. Therefore, impacts related to methane zones would be ***less than significant***.

Existing Contaminated Sites. As previously discussed, **Figure 4.8-1** identifies the location of the hazardous material sites within the Project Area that were identified in the NPL, SEMS, RCRA-LQG, RCRA-SQG, U.S. Brownfields, and Cortese Sites database. Specifically, 3 NPL sites, 11 SEMS sites, 75 RCRA-LQG sites, 404 RCRA-SQG sites, 2 U.S. Brownfield sites, and 6 Cortese sites are identified in the Project Area.

Any new development occurring on these documented hazardous materials sites would have to be preceded by remediation and cleanup under the supervision of DTSC before construction activities could begin, if such actions have not already occurred. Compliance with existing regulations would reduce any impact and ensure construction workers and the general public would not be exposed to any unusual or excessive risks related to the release of hazardous materials into the environment during construction activities on these sites with known, documented contamination. Therefore, impacts related to existing contaminated sites would be ***less than significant***.

Underground Storage Tanks (USTs). It is possible that old USTs that were in use prior to permitting and record-keeping requirements may be present in the Project Area. If an unidentified UST were uncovered or disturbed during construction activities, it would be closed in place or removed pursuant to existing regulations. Potential risks, if any, posed by USTs would be minimized by managing the tank according to existing Los Angeles County standards as enforced and monitored by the Department of Environmental Health. If groundwater contamination is identified, remediation activities would be required by LARWQCB prior to the commencement of any new construction activities. Therefore, impacts related to USTs would be ***less than significant***.

Soil and Groundwater Contamination. Aside from the potential release of hazardous materials from demolition of existing structures on individual sites, implementation of the Proposed Plan may result in grading and excavation of sites for future development in the Project Area. If any unidentified sources of contamination are encountered during grading or excavation, removal activities could pose health and safety risks from exposure to hazardous materials or vapors. In addition, exposure to contaminants could occur if the contaminants migrate from the contaminated zone to surrounding areas either before or after the surrounding areas are developed, or if contaminated zones are disturbed by future development at the

contaminated location. Therefore, impacts related to unknown contamination could be ***potentially significant***.

Future development projects within the Project Area would be required to conform with all applicable environmental regulations related to new construction and hazardous materials storage, use and transport. Hazardous materials would be used and stored in accordance with applicable regulations and such uses would be required to comply with federal and state laws to eliminate or reduce the consequences of hazardous materials accidents. Furthermore, as discussed above, potential hazards related to lead, asbestos, methane zones, and USTs are less than significant with compliance with existing regulations. In addition, development of sites with known contaminants would be required to undergo remediation and cleanup before construction activities could begin.

Implementation of the Proposed Plan would allow development on sites currently or historically used for industrial uses that may have used hazardous materials in their operations. Because unknowns may exist with regard to existing soil or other contaminants in the areas currently or historically zoned as industrial in the Project Area, there is the possibility that future development may uncover previously undiscovered soil and other forms of contamination. While all demolition and construction within the Project Area would be required to comply with all local, state, and federal regulations, further mitigation may be required to reduce risks associated with the potential for unknown toxic substances existing on sites previously used for industrial uses that used hazardous materials in the Project Area. These sites could have been previously occupied by hazardous materials generating facility and would have the potential to create a significant hazard to the public or the environment unless an environmental site assessment is conducted to determined potential risks and appropriate mitigation. Therefore, without mitigation, the Proposed Plan could result in a ***potentially significant*** impact related to unknown hazardous materials before mitigation.

Mitigation Measures

HM1 Discretionary projects or projects in a CPIO Subarea District that involve construction-related soil disturbance located on land that is currently or was historically zoned as industrial or, previously had a gas station or dry-cleaning facility on-site, shall conduct a comprehensive search of databases of sites containing hazardous waste or hazardous materials, including on lists prepared pursuant to Government Code Section 65962.2. A report setting forth the results of this database search shall be provided to the City and shall be made publicly available (e.g., historical environmental reports prepared by Enviroscan, EDR or similar firms). If the report indicates the project site or property within one-quarter mile of the project site has the potential to be contaminated with hazardous waste or hazardous materials for any reason, Phase I and, as needed, Phase II Environmental Site Assessments shall be prepared by a qualified Environmental Professional (as defined in Title 40 Code of Federal Regulations Section 312.10 Definitions). Applicants of the development project shall implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action. All remediation shall be subject to City review and approval. Applicants shall consult with appropriate oversight agencies, including the Department of Toxic Substances Control and the Los Angeles Regional Water Quality Control Board, and implement remediation measures to minimize human exposure and prevent further environmental contamination. No development shall occur until a letter of No Further Action is obtained, if required, by an appropriate agency.

HM2 For any project not subject to Mitigation Measure **HM1** that seek to excavate below previously disturbed soils, DBS should issue the following notice and obtain an acknowledgement of the receipt of the following notice to all applicants.

Hazardous Materials are regulated at the federal, state and local level through numerous regulatory schemes. Applicants are legally required to comply with these laws when development activities

involve soils contaminated with hazardous materials. Best management practices to ensure compliance with these federal, state and local laws may include the following:

- Prior to doing any soil disturbing activities, a comprehensive search of databases of sites containing hazardous waste or hazardous materials (e.g., historical environmental reports prepared by Enviroscan, EDR or similar firms) is conducted, including on lists prepared pursuant to Government Code Section 65962.2.
- If the database search indicates the project site, or property is within one-quarter mile of the project site, has the potential to be contaminated with hazardous waste or hazardous materials for any reason, Phase I and, as needed, Phase II Environmental Site Assessments shall be prepared by a qualified Environmental Professional (as defined in Title 40 Code of Federal Regulations Section 312.10 Definitions).
- Recommendations provided in any Phase II Environmental Site Assessment report for the project site shall be implemented for remedial action.
- Property owners and/or applicants consult with appropriate oversight agencies, including the Department of Toxic Substances Control and the Los Angeles Regional Water Quality Control Board, and implement remediation measures to minimize human exposure and prevent further environmental contamination.
- No development occurs until a letter of No Further Action is obtained, if required, by an appropriate agency.

Significance of Impacts after Mitigation

Mitigation Measure **HM1** requires that discretionary projects that involve construction-related soil disturbance located on land that is currently or was historically zoned as industrial or, previously had a gas station or dry-cleaning facility on-site, shall conduct a comprehensive search of databases of sites containing hazardous waste or hazardous materials, including on lists prepared pursuant to Government Code Section 65962.2, and prepare a Phase I and a Phase II and remediate the site if necessary. For all non-discretionary projects that involve construction related soil disturbance applicants will be required to acknowledge receipt of a notice of hazardous material laws and suggested best management practices to comply with those laws.

L***ess than significant with mitigation.***

IMPACT 4.8-3 Would implementation of the Proposed Plan emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? **Less than significant impact.**

As discussed above and as shown in **Figure 4.8-3**, several schools are located within 0.25 miles of existing industrial and commercial land uses that may contain hazardous materials or are themselves generators or storage facilities that utilize hazardous materials. Implementation of the Proposed Plan would preserve and promote light industrial land for media and studio-related uses, such as studios and media production, as well as entertainment support uses such as storage. To ensure that workers and others at individual development sites within the Project Areas are not exposed to unacceptable levels of risk associated with the use and handling of hazardous materials, employers and businesses are required to implement existing hazardous materials regulations, with compliance monitored by the state (e.g., OSHA in the workplace or DTSC for hazardous waste) and the City. Similarly, future development within the Project Area will be required to comply with all applicable federal, state, and local environmental regulations related to new

construction and hazardous materials storage, use and transport. California Health and Safety Code Chapter 6.95 "Hazardous Materials Release Response Plans and Inventory" requires businesses that handle more than a specified amount of hazardous materials on-site to submit a Hazardous Materials Business Plan. Such businesses are required to provide emergency response plans and procedures, training program information, and a hazardous material chemical inventory disclosing hazardous materials stored, used, or handled on site. In addition, various federal, state, and local regulations and guidelines pertaining to abatement of, and protection from, exposure to asbestos, lead, and other hazardous materials have been adopted for demolition activities and would apply to all new development. All demolition that could result in the release of lead and/or asbestos must be conducted according to Cal/OSHA standards. Compliance with existing regulations would ensure that schools and the general public would not be exposed to any unusual or excessive risks related to hazardous materials during construction and operational activities.

Compliance with all applicable local, state, and federal laws and regulations, as described in the Regulatory Framework, would regulate, control, or respond to hazardous waste, transport, storage, disposal, and clean-up in order to ensure that hazardous materials do not pose a significant risk to nearby receptors. Thus, impacts related to hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

IMPACT 4.8-4 Would development under the Proposed Plan be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result has the potential to create a significant hazard to the public or the environment? **Less than significant impact with mitigation.**

As previously discussed and as shown in **Table 4.8-2**, the Project Area contains sites that have been identified on various regulatory databases as being contaminated from the release of hazardous substances in the soil or groundwater as pursuant to Government Code Section 65962.5. However, the potential remains for USTs or contaminated soils to be uncovered or encountered during redevelopment of sites within the Project Area. Discovery of such contaminants would go through the process of being listed on hazardous materials site databases. The Proposed Plan does not restrict development on identified contaminated sites. Thus, implementation of the Proposed Plan could lead to the location of new development on a site listed as a hazardous materials site. Although future development could be located on a site previously occupied by a hazardous material generating facility with a potential to create a significant hazard to the public or the environment, development of such sites would be required to comply with applicable federal, state, and local regulations requiring appropriate site investigation and remediation activities, as necessary. Project-specific site investigation and remediation activities of contaminated sites prior to development is required by law, and all contaminated sites are required to be remediated prior to development, but without mitigation ensuring sites are discovered and reported, impacts related to hazardous materials sites compiled pursuant to Government Code Section 65962.5 would be ***potentially significant***.

Mitigation Measures

See Mitigation Measure **HM1**.

Level of Significance of Impacts after Mitigation

Mitigation Measure **HM1** requires that discretionary projects that involve construction-related soil disturbance located on land that is currently or was historically zoned as industrial or, previously had a gas station or dry-cleaning facility on-site, shall conduct a comprehensive search of databases of sites containing hazardous waste or hazardous materials, including on lists prepared pursuant to Government Code Section 65962.2 and prepare a Phase I and Phase II and remediate if necessary. For all non-discretionary projects that involve construction related soil disturbance applicants will be required to acknowledge receipt of a notice that there are federal, state, and local hazardous material laws that implicate contaminated soils and suggested best management practices to comply with those laws.

Less than significant with mitigation.

IMPACT 4.8-5 Would implementation of the Proposed Plan result in a safety hazard for people residing or working in the project area within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport? **No impact.**

The Project Area is not located within two miles of a public airport or public use airport and is not located within the Los Angeles County ALUC planning boundaries of nearby airports. Therefore, implementation of the Proposed Plan would not result in a safety hazard or be exposed to safety hazards related to the operation of an airport. ***No impact*** would occur.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

No impact.

Impact 4.8-6 Would implementation of the Proposed Plan result in a safety hazard for people residing or working in the project area within the vicinity of a private airstrip? **No impact.**

No private airstrips are located within or in proximity to the Project Area. Therefore, implementation of the Proposed Plan would not interfere with a private airstrip, nor would it result in a safety hazard or expose people to safety hazards related to the operation of a private airstrip. ***No impact*** would occur.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

No impact.

Impact 4.8-7 Would the Proposed Plan impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? **Less than significant impact.**

Construction and operational activities associated with future development in the Project Area could interfere with adopted emergency response or evacuation plans as a result of temporary construction activities within right-of-ways, primarily by temporary construction barricades or other obstructions that could impede emergency access, or increased intensity during operation that could result in additional traffic within roadways. However, the goals, objectives, and policies of the Safety Element of the Los Angeles City General Plan and the Los Angeles County Operational Area ERP provide guidance during unique situations requiring an unusual or extraordinary emergency response. Implementation of the ERP would also incorporate and coordinate all the facilities and personnel of County government, along with the jurisdictional resources of the cities and special districts within the County, into an efficient Operational Area organization capable of responding to any emergency using a Standard Emergency Management System, mutual aid and other appropriate response procedures. The City's General Plan Safety Element Policies 1.1.1, 1.1.2, 1.1.3, 2.1.1, and 3.1.1 provide procedures for coordination among City agencies and other jurisdictions to provide mutual assistance in the event of an emergency or natural disaster and establishment of disaster recovery programs.[16] Compliance with these policies and plans would minimize potential interference with the City and County emergency response plans from construction and operational activities resulting from implementing the Proposed Plan.

The City's EOO implements the goals and policies of the Safety Element. The Safety Element outlines the scope of the EOO's on-going efforts to use experiences and new information to improve the City's hazard program. The EOO Master Plan and individual agency Emergency Response Plans set forth procedures for City personnel to follow in the event of an emergency situation stemming from natural disasters, technological incidents and nuclear defense operations, and other unforeseeable disasters or crises. The City of Los Angeles Department of Transportation and LAFD would be responsible for ensuring that future development does not impair or physically interfere with an adopted emergency response or evacuation plan. As part of standard development procedures, plans would be submitted for review and approval to ensure all new development has adequate emergency access and escape routes (clearly marked and delineated) in compliance with existing City regulations. The Proposed Plan would not introduce any features that would preclude implementation of or alter these policies or procedures in any way, or impair implementation of, or physically interfere with the SEP or the ERP.

Construction and operation activities within the Project Area with respect to emergency response or evacuation plans due to temporary construction barricades or other obstructions that could impede emergency access would be subject to the City's permitting process. Compliance with existing regulations would ensure that implementation of the Proposed Plan would not impair or physically interfere with adopted emergency response plans or emergency evacuation plans. Therefore, impacts related to emergency response plans and emergency evacuation plans are ***less than significant***.

Mitigation Measures

No mitigation measures are required.

[16]City of Los Angeles General Plan *Safety Element,* http://planning.lacity.org/cwd/gnlpln/SaftyElt.pdf, accessed September 29, 2013.

Significance of Impacts after Mitigation

Less than significant.

Impact 4.8-8 Would implementation of the Proposed Plan expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? **Less than significant impact.**

Areas identified within a Fire Brush Clearance Zone and VHFHS Zone continue to be at risk for wildfires resulting from a combination of weather, topography, native vegetation, and seasonal Santa Ana winds. Due to enduring drought conditions and development in fire-prone lands, the risk of wildfires has increased.[17] Impacts from wildfires may include loss or damage to structures and properties, impacts to health as a result of poor air quality, bodily injury or death, and secondary impacts such as mudslides or soil erosion due to the loss of natural plant material that prevents erosion. As previously discussed and as shown in **Figure 4.8-4**, the northern and eastern portion of the Project Area (including the Santa Monica Mountains) are located within a Fire Brush Clearance Zone and VHFHS Zone as identified by LAFD. The Project Area contains both developed hillside properties and undeveloped portions of the Santa Monica Mountains, as well as the urbanized areas at foothills of the Santa Monica Mountains. The undeveloped portions of the Santa Monica Mountains are generally designated for Open Space and, thus, development opportunities in these areas are limited. Development opportunities in the developed hillside areas are also limited in part because of single-family residential density regulations, slope density restrictions, and the topography. Per City and LAFD requirements, the properties located within VHFHS and Fire Brush Clearance Zones are required to minimize fire risks during the high fire season through vegetation clearance, maintenance of landscape vegetation to minimize fuel supply that would spread the intensity of a fire, comply with provisions for emergency vehicle access, use of approved building materials and design, and compliance with LAFD hazardous vegetation clearance requirements. Implementation of the Proposed Plan would direct growth away from low-density neighborhoods, including hillside areas. Thus, very limited new development is projected in the hillside areas, and the Proposed Plan would not further expose people or structures to a significant risk of loss, injury or death involving wildland fires. In addition, all existing and future development within a Fire Brush Clearance Zone and VHFHS Zone will be required to implement brush fire safety measures during the high fire season and comply with the IBC and CBC, which requires certain built-in fire protection devices when maximum allowable uses or heights are exceeded, or the building use presents a life or property protection problem. In addition, LAFD has guidelines, such as inspection programs, that would lessen the impacts of fire hazards. As development in the hillside areas and other VHFHS and Fire Brush Clearance Zones are limited with implementation of the Proposed Plan, future conditions in the hillside areas would be comparatively the same as current baseline, Thus, impacts related to wildland fires are ***less than significant***.

Mitigation Measures

No mitigation measures are required.

[17]National Oceanic and Atmospheric Association, *Assessing Fire Hazard Risk in Southern California*, https://coast.noaa.gov/digitalcoast/stories/californiafire.html, accessed February 22, 2018.

Significance of Impacts after Mitigation

Less than significant.

CUMULATIVE IMPACTS

The geographic context for the cumulative analysis of hazards and hazardous materials is Los Angeles County, based on the geographic area that could be affected by accidental release into the environment. The cumulative context for the hazards analysis includes future development within the City of Los Angeles, as well as the County of Los Angeles pursuant to applicable planning documents including the Regional Transportation Plan/Sustainable Communities Strategy and adjacent Community Plans.

Routine Transport, Use, or Disposal of Hazardous Materials. The Proposed Plan along with cumulative projects could result in significant impacts related to the transport, use, or disposal of hazardous materials if such activities resulted in a substantial risk to the public. Cumulative development within the City of Los Angeles and Los Angeles County would include land uses that could involve the use of greater quantities and variety of hazardous products. Residential, commercial, and public facilities development could increase the use of hazardous materials. However, industrial uses tend to utilize hazardous materials in larger quantities than other types of land uses. Hazardous materials use, storage, disposal, and transport could potentially result in a foreseeable number of spills and accidents. All new development would be subject to hazardous materials regulations codified in Titles 8, 22, and 26 of the CCR, as well as Cal/OSHA, SCAQMD, and Cal/EPA regulations concerning the release, use, and transport of hazardous materials. Compliance with all federal, state, and local regulations during the construction and operation of new developments in the County would ensure that cumulative impacts from the routine transportation, use, disposal, or release of hazardous materials and impacts related to the handling of hazardous materials would be less than significant. Therefore, the Proposed Plan would not make a cumulatively considerable contribution related to routine transport, use, or disposal of hazardous materials.

Accidental Release of Hazardous Materials. The Proposed Plan along with cumulative projects could result in construction and operational activities that could potentially involve the release of hazardous materials into the environment and result in significant impacts if the release of such hazardous materials resulted in a substantial health risk to the public. Cumulative development could occur on properties listed on hazardous materials sites or involve the demolition of existing structures, which may contain hazardous materials such as LBP and ACMs. Various regulations and guidelines pertaining to abatement of, and protection from, exposure to asbestos and lead have been adopted for demolition activities and would apply to all new development in the City and County. All demolition that could result in the release of lead and/or asbestos must be conducted according to Cal/OSHA standards. In addition, all businesses that handle or transport hazardous materials would be required to comply with the provisions of federal, state, and local regulations for hazardous wastes. Businesses that handle more than a specified amount of hazardous materials on-site are required to submit a Hazardous Materials Business Plan. Compliance with applicable regulations and guidelines pertaining to abatement of, and protection from, exposure to ACMs, LBPs, and other hazardous materials would ensure that the general public would not be exposed to any unusual or excessive risks related to hazardous materials during construction and operational activities. Mitigation Measure **HM1** requires projects that involve construction-related soil disturbance located on land that is currently or was historically zoned as industrial or, previously had a gas station or dry cleaning facility on-site, shall conduct a comprehensive search of databases of sites containing hazardous waste or hazardous materials, including on lists prepared pursuant to Government Code Section 65962.2 and that any contaminated sites be remediated as appropriate. Accidental release of hazardous materials is often

localized and in addition, with this Mitigation Measure **HM1** the Proposed Plan would not make a cumulatively considerable contribution related to the accidental release of hazardous materials.

Hazards in Proximity to Schools. The Proposed Plan along with cumulative development could expose schools to hazardous emissions, depending on the specific location and type of use proposed, resulting in significant impacts to nearby schools if the hazardous emissions could result in health risks to students and staff at local schools. Compliance with applicable regulations and guidelines pertaining to abatement of, and protection from, exposure to hazardous materials would ensure that schools would not be exposed to any unusual or excessive risks related to hazardous materials during construction and operational activities. Therefore, the Proposed Plan would not make a cumulatively considerable contribution to impacts related to school hazards.

Hazardous Materials Sites. Existing regulations ensure that either new development does not occur on hazardous materials sites or such sites are cleaned up to appropriate levels. With the implementation of Mitigation Measure **HM1** for development projects within the Project Area that would be located on a listed hazardous materials site, impacts would be mitigated to a less than significant level. Mitigation Measure **HM1** requires projects that involve construction-related soil disturbance located on land that is currently or was historically zoned as industrial or, previously had a gas station or dry cleaning facility on-site, shall conduct a comprehensive search of databases of sites containing hazardous waste or hazardous materials, including on lists prepared pursuant to Government Code Section 65962.2 and that any contaminated sites be remediated as appropriate. As all known contaminated sites are well regulated and required to be remediated prior to development, this cumulative impact would be less than significant with mitigation. Contaminated sites would be required to comply with all local, state and federal regulations and would ensure that contaminated sites undergo remediation activities prior to development activities. Contamination is often localized and with Mitigation Measure **HM1** impacts would be further reduced such that the Proposed Plan would not make a cumulatively considerable contribution to impacts related to contaminated sites.

Airports and Airstrips. There are no airports or airstrips within the immediate vicinity of the Project Area. There are no impacts related to airports/air strips. The Proposed Plan would not make a cumulatively considerable contribution to hazard impacts related to airports and airstrips.

Impacts to Adopted Emergency Response Plans. The Proposed Plan along with construction and operation associated with cumulative development could result in activities that interfere with adopted emergency response or evacuation plans, primarily by temporary construction barricades or other obstructions that could impede emergency access and result in significant impacts if such barricades resulted in substantial delays to emergency vehicles. If a development project requires the use of temporary construction barricades in the public right-of-way, the applicant would be required to obtain City approval. Compliance with federal, state, and local regulations would ensure that the Proposed Plan would not make a cumulatively considerable contribution to impacts related to interference with adopted emergency plans, including temporary street closures, remain less than significant.

Wildland Fires. The Proposed Plan along with cumulative development could expose people or structures to a significant risk of loss, injury or death involving wildland fires depending on the location of the future development. The potential for future development under the Proposed Plan in areas that are located in or around the VHFHS zone would be relatively minor, such as the hillside communities located in at the foothills of the Santa Monica Mountain. Nonetheless, the Proposed Plan with cumulative development could result in significant impacts if development substantially increases risks associated with wildland fires. Compliance and implementation of applicable City and LAFD requirements, as well as IBC and CBC, for properties located within VHFHS and Fire Brush Clearance would ensure impacts are minimized and that the Proposed Plan would not make a cumulatively considerable contribution to impacts related to wildland fires.

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4.9 HYDROLOGY AND WATER QUALITY

This section analyzes the potential environmental effects on hydrology and water quality in the Project Area from implementation of the Proposed Plan. Topics addressed include stormwater runoff and urban pollutants, flood hazards, drainage and groundwater resources. The evaluation of the Proposed Plan's effects on water supplies, including groundwater, is analyzed in Section 4.16, Utilities and Service Systems, of this Draft EIR.

REGULATORY FRAMEWORK

Some of the principal federal, state and local regulations for hydrology and water quality applicable to the Proposed Plan are summarized below:

FEDERAL

Federal Water Pollution Control Act (Clean Water Act [CWA]). The federal CWA was first enacted in 1948 to (1) restore and maintain the chemical, physical, and biological integrity of the Nation's waters by preventing point and non-point pollution sources, (2) provide assistance to publicly owned treatment works for the improvement of wastewater treatment, and (3) maintain the integrity of wetlands. With subsequent amendments, current regulations provide that discharges of stormwater to waters of the United States from industrial and construction activities that encompass one acre or more of soil disturbance are effectively prohibited unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. In November 1990, the U.S. Environmental Protection Agency (USEPA) published final regulations that established stormwater permit application requirements for specified categories of industries. With subsequent amendments, current regulations provide that discharges of stormwater to "waters of the United States" from industrial activities and from construction activities that encompass one acre or more of soil disturbance are effectively prohibited unless the discharge is in compliance with a NPDES permit. Federal regulations allow two permitting options for stormwater discharges, individual permits and general permits. The State Water Resource Control Board (SWRCB) has elected to adopt one statewide general permit for construction activity at this time. The General Construction Activities Stormwater Permit (GCASP) applies to all stormwater discharges associated with construction activity, except for those on tribal lands, those in the Lake Tahoe Hydrologic Unit, and those performed by the California Department of Transportation (Caltrans). Currently, the GCASP requires all dischargers where construction activity disturbs one acre or more to conduct the following:

- Develop and implement a Stormwater Pollution Prevention Plan (SWPPP), which specifies Best Management Practices (BMPs) that will prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving off-site into receiving waters;
- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the United States; and
- Perform inspections of all BMPs.

The CWA directs states to establish water quality standards for all waters of the United States and to review and update such standards on a triennial basis. The USEPA has delegated responsibility for implementation of portions of the CWA, including water quality control planning and control programs, in California to SWRCB, and the nine Regional Water Quality Control Boards (RWQCB). CWA Section 303(c)(2)(B) requires states to adopt water quality standards for all surface waters of the United States based on the water body's designated beneficial use. Where multiple uses exist, water quality standards must protect the most

sensitive use. Water quality standards for the Los Angeles region are set forth in the *Water Quality Control Plan: Los Angeles Region Basin Plan* (2014) and are administered by the Los Angeles Regional Water Quality Control Board (LARWQCB).

The goal of the NPDES diffuse-source regulations is to improve the quality of stormwater discharged to receiving waters to the "maximum extent practicable" through the use of BMPs. The NPDES permit system was established in the CWA to regulate point source discharges (a municipal or industrial discharge at a specific location or pipe) and certain types of diffuse source dischargers. As defined in the federal regulations, non-point sources are generally exempt from federal NPDES permit program requirements. Non-point pollution sources are diffuse and originate over a wide area rather than from a definable point. Non-point pollution often enters receiving water in the form of surface runoff and is not conveyed by way of pipelines or discrete conveyances. Urban stormwater runoff and construction site runoff, however, are diffuse-sources regulated under the NPDES permit program because they discharge to receiving waters at discrete locations in a confined conveyance system. CWA Sections 401 and 402 contain general requirements regarding NPDES permits. CWA Section 307 describes the factors that the USEPA must consider in setting effluent limits for priority pollutants. For point source discharges, each NPDES permit contains limits on allowable concentrations and mass emissions of pollutants contained in the discharge. For diffuse-source discharges (e.g., municipal stormwater and construction runoff), the NPDES program establishes a comprehensive stormwater quality program to manage urban stormwater and minimize pollution of the environment to the maximum extent practicable. The NPDES program consists of (1) characterizing receiving water quality, (2) identifying harmful constituents, (3) targeting potential sources of pollutants, and (4) implementing a Comprehensive Stormwater Management Program. State implementation of the NPDES program as it relates to the Proposed Plan is discussed below under State and regional regulations.

CWA Section 401 requires water quality certification from the SWRCB or from a RWQCB when the project requires a CWA Section 404 permit. CWA Section 404 requires a permit from the U.S. Army Corps of Engineers (USACE) to discharge dredged or fill material into waters of the United States.

CWA Section 303(d) and Total Maximum Daily Loads (TMDLs). CWA Section 303(d) bridges the technology-based and water quality-based approaches for managing water quality. CWA Section 303(d) requires that states make a list of waters that are not attaining standards after technology-based limits are put in place. For waters on this list (and where the USEPA administrator deems they are appropriate), the states are to develop TMDLs. TMDLs are established at the level necessary to implement applicable water quality standards. A TMDL must account for all sources of pollutants that cause the water to be listed. Federal regulations require that TMDLs, at a minimum, account for contributions from point sources and nonpoint sources.

National Flood Insurance Program (NFIP). In response to Executive Order 11988 (Flood Plain Management), Congress acted to reduce the costs of disaster relief by passing two acts that resulted in the NFIP, which is administered by the Federal Emergency Management Agency (FEMA). FEMA issues Flood Insurance Rate Maps (FIRMs), which delineate flood hazard zones in communities participating in the NFIP. The maps indicate the risk premium zones applicable in a community, and when those rates are effective, and if a proposed action is located in the base or critical action flood plain. The City of Los Angeles is a participating member of the NFIP, and flood insurance is available to property owners in the Project Area.

STATE

Porter-Cologne Water Quality Control Act. The Porter-Cologne Water Quality Control Act establishes the SWRCB and each RWQCB as the principal State agencies for coordinating and controlling water quality in California. Specifically, the Porter-Cologne Water Quality Control Act authorizes SWRCB to adopt, review, and revise policies for all waters of the State (including both surface water and groundwater)

and directs RWQCBs to develop regional Basin Plans. Section 13170 of the California Water Code (CWC) also authorizes SWRCB to adopt water quality control plans on its own initiative. The Porter-Cologne Act is administered in the Project Area by the LARWQCB and is implemented at the city-level through various programs.

California State Water Resource Control Board (SWRCB). The SWRCB was established through the California Porter Cologne Water Quality Act of 1969. At the State level, SWRCB has responsibility for the protection of water quality and sets Statewide policies and regulations for the implementation of water quality control programs mandated by federal and State water quality statutes and regulations. The SWRCB delegates to the nine RWQCBs the responsibility for the protection of water quality in each major drainage basin throughout the state. The LARWQCB has jurisdiction over the coastal drainages between Rincon Point (on the coast of western Ventura County) and the eastern Los Angeles County line. A more detailed discussion of the LARWQCB is presented below.

NPDES General Construction Activity Stormwater Permit (GCASP). Pursuant to CWA Section 402(p) and the Porter-Cologne Water Quality Control Act, SWRCB has issued a Statewide NPDES General Permit, or GCASP, under Order No. 2009-0009-DWQ, NPDES No. CAR000002, which was adopted on September 2, 2009.[1] The Order requires that prior to the beginning of construction activities, the permit applicant must obtain coverage under a GCASP permit by preparing and submitting a Notice of Intent (NOI) along with the appropriate fee to SWRCB. Construction activities subject to GCASP include clearing, grading, and disturbances to the ground, such as stockpiling or excavation, that result in soil disturbances of one acre of total land area or more.

Prior to obtaining the GCASP, an adequate SWPPP has to be prepared. The SWPPP specifies BMPs that will prevent construction pollutants from contacting stormwater with the intent of keeping all products of erosion from moving off-site into receiving waters. BMPs are intended to diminish impacts to the Maximum Extent Practicable (MEP), which is a standard developed by Congress to allow regulators the flexibility needed to shape programs to the site-specific nature of municipal stormwater discharges. The SWPPP has two major objectives: (1) to help identify the sources of sediment and other pollutants that affect the quality of stormwater discharges and (2) to describe and ensure the implementation of BMPs to reduce or eliminate sediment and other pollutants in stormwater as well as non-stormwater discharges. The SWPPP includes a description of: (1) the site, (2) erosion and sediment controls, (3) means of waste disposal, (4) implementation of approved local plans, (5) control of post-construction sediment and erosion control measures and maintenance responsibilities, and (6) non-stormwater management controls. Dischargers are also required to inspect their construction sites before and after storms to identify stormwater discharge associated with construction activity and to identify and implement controls where necessary.

BMPs are intended to diminish impacts to the MEP, which is a standard developed by Congress to allow regulators the flexibility needed to shape programs to the site-specific nature of municipal stormwater discharges. Reducing impacts to the MEP generally relies on BMPs that emphasize pollution prevention and source control, with additional structural controls as needed

Within the City of Los Angeles, SWPPP requirements are enforced through the City's Building and Safety Department plan review and approval process. During the review process, development project plans are reviewed for compliance with the stormwater requirements. Plans and specifications are reviewed to ensure that the appropriate BMPs are incorporated to address stormwater pollution prevention goals.

[1] *California Water Code Section 13263(i).*

Regional Dewatering General Waste Discharge Requirements (WDR). CWC Section 13263(i) authorizes RWQCBs to issue WDRs for a category of discharges if it finds or determines that the discharges in that category: 1) are produced by the same or similar operations, 2) involve the same or similar types of waste, 3) require the same or similar treatment standards, and 4) are more appropriately regulated under general discharge requirements than individual discharge requirements. LARWQCB has issued a general permit for construction dewatering (Waste Discharge Requirements for Discharges of Groundwater from Construction Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties Order No. R4-2008-0032, and NPDES No. CAG994004). Discharges covered by this permit include, but are not limited to, treated or untreated groundwater generated from permanent or temporary dewatering operations (removing or draining water from ground or surface water), treated or untreated wastewater from permanent or temporary construction dewatering operations; subterranean seepage dewatering; and incidental collected stormwater from basements.

Cobey-Alquist Flood Plain Management Act. CWC Sections 8400 et seq. documents the state's intent to support local governments in their use of land use regulations to accomplish floodplain management and to provide assistance and guidance, as appropriate.

Sustainable Groundwater Management Act (SGMA). Effective in 2015, SGMA creates a framework for sustainable, local groundwater management in California. SGMA allows local agencies to customize groundwater sustainability plans to their regional economic and environmental needs. This act requires local regions to create a groundwater sustainability agency (GSA) and to adopt groundwater management plans for groundwater basins or sub-basins that are designated as medium or high priority. High-priority and medium-priority basins or sub-basins must adopt groundwater management plans by 2020 or 2022, depending upon whether the basin is in critical overdraft. GSAs will have until 2040 or 2042 to achieve groundwater sustainability. The Proposed Plan is located within the Hollywood Sub-basin of the Coastal Plain of Los Angeles Basin (south of the Santa Monica Mountains) and San Fernando Valley Basin (the northern and eastern foothills of the Santa Monica Mountains). The Hollywood Sub-basin is classified as very low priority and the San Fernando Valley Basin is classified as medium priority.

The act defines "sustainable groundwater management" as the "management and use of groundwater in a manner that can be maintained during the planning and implementation horizon without causing undesirable results. "Undesirable result" means any of the following effects caused by groundwater conditions occurring throughout the basin: chronic lowering of groundwater levels, but excluding reductions in groundwater levels during a drought if they are offset by increases in groundwater levels during other periods; significant and unreasonable reductions in groundwater storage; significant and unreasonable seawater intrusion; significant and unreasonable degradation of water quality; significant and unreasonable land subsidence; and/or surface water depletions that have significant and unreasonable adverse impacts on beneficial uses.

LOCAL

Los Angeles Regional Water Quality Control Board (LARWQCB) and Water Quality Control Plan for the Los Angeles Region (Basin Plan). The Project Area is within the jurisdiction of the LARWQCB, which is one of the nine RWQCBs in California. LARWQCB protects ground and surface water quality in the Los Angeles Region, including the coastal watersheds of Los Angeles and Ventura Counties, along with very small portions of Kern and Santa Barbara Counties. LARWQCB provides permits for projects that may affect surface waters and groundwater locally. LARWQCB is responsible for preparing the Basin Plan, which is updated as necessary every three years. The Latest Basin Plan was updated in 2014. The Basin Plan establishes water quality objectives for surface waters and groundwater within the Los Angeles region. The Basin Plan designates the beneficial uses of inland surface waters, including the Hollywood Reservoir and Los Angeles River, and specifies both narrative and numerical water quality objectives for these surface waters in Los Angeles County. Water quality objectives, as defined by the CWA Section

13050(h), are the "limits or levels of water quality constituents or characteristics which are established for the reasonable protection of beneficial uses or the prevention of nuisance within a specific area."

The Basin Plan, under CWA Section 303(d), is intended to protect surface waters and groundwater from both point and nonpoint sources of pollution within the Project Area, and for establishing water quality standards and objectives in its Basin Plan that protect the beneficial uses of various waters. To do this, the Basin Plan designates beneficial uses for surface water and groundwater, sets narrative and numerical water quality objectives that must be attained (or maintained) to protect the designated beneficial uses, and describes implementation programs to protect all waters in the region. According to the Basin Plan:

> *Beneficial uses form the cornerstone of water quality protection under the Basin Plan. Once beneficial uses are designated, appropriate water quality objectives can be established and programs that maintain or enhance water quality can be implemented to ensure the protection of beneficial uses. The designated beneficial uses, together with water quality objectives (referred to as criteria in federal regulations), form water quality standards.*

The State has developed TMDLs, which are a calculation of the maximum amount of a pollutant that a water body can have and still meet Water Quality Objectives (WQOs) established in the Basin Plan, in order to protect the valuable uses of its waters.

Municipally-Owned Separate Storm Sewer Systems (MS4) Permit and Stormwater Quality Management Plan (SQMP). The Project Area falls within the jurisdiction of the LARWQCB. Thus, discharges of urban runoff into MS4s are regulated under the general NPDES stormwater permit that has been issued by LARWQCB for the Los Angeles Region (MS4 Permit). The City is a co-permittee under the MS4 Permit and, therefore, has joint/concurrent legal authority to enforce the terms of the permit within its jurisdiction. The MS4 Permit is intended to ensure that combinations of site planning, source control and treatment control practices are implemented to protect the quality of receiving waters. The permit requires that new development employ BMPs designed to control pollutants in stormwater runoff to the MEP, details specific sizing criteria for BMPs, and specifies flow control requirements. These BMPs include structural practices, source control and treatment techniques and systems, and site design planning principles addressing water quality.

Site design or planning management BMPs are used to minimize runoff from new development and to discourage development in environmentally sensitive areas that are critical to maintaining water quality. The MS4 Permit also requires co-permittees to prepare a SQMP, specifying the BMPs that will be implemented to reduce the discharge of pollutants in stormwater. The SQMP is expected to reduce pollutants in stormwater and urban runoff. Within the City of Los Angeles, which includes the Project Area, SQMP is implemented through the City's Standard Urban Stormwater Mitigation Plan (SUSMP).

Standard Urban Stormwater Mitigation Plan (SUSMP) Requirements. On March 8, 2000, SUSMP requirements were approved by LARWQCB as part of the MS4 permit to address stormwater pollution from new construction and redevelopment projects. SUSMP is a comprehensive stormwater quality program to manage urban stormwater and minimize pollution of the environment. The purpose of SUSMP is to reduce the discharge of pollutants in stormwater by outlining BMPs that must be incorporated into the design plans of new development and redevelopment. The SUSMP requirements contain a list of minimum BMPs that must be employed to infiltrate or treat stormwater runoff, control peak flow discharge, and reduce the post-project discharge of pollutants from stormwater conveyance systems. The SUSMP requirements define, based upon land use type, the types of practices that must be included and issues that must be addressed as appropriate to the development type and size.

The SUSMP requirements apply to all development and redevelopment projects that fall into one of the following categories:

- Single-family hillside residences
- One acre or more of impervious surface area for industrial/commercial developments
- Automotive service facilities
- Retail gasoline outlets
- Restaurants
- Ten or more residential units
- Parking lots of 5,000 square feet or greater or with 25 or more spaces
- Projects located in or directly discharging to an Ecologically Sensitive Area

The SUSMP requirements are enforced through the City's Building and Safety Department plan review and approval process. During the review process, development project plans are reviewed for compliance with stormwater requirements. Plans and specifications are reviewed to ensure that the appropriate BMPs are incorporated to address stormwater pollution prevention goals.

County of Los Angeles Hydrology Manual. Drainage and flood control within the Project Area is regulated by the City of Los Angeles Department of Public Works (LADPW) and the Los Angeles County Department of Public Works (LACDPW). The County has jurisdiction over regional drainage facilities. The County's Hydrology Manual requires a storm drain system be designed for a 25-year storm event and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event.[2] The County also limits the allowable discharge into existing storm drain facilities based on the MS4 Permit and is enforced on all new developments that discharge directly into the County's storm drain system.

Enhanced Watershed Management Plans (EWMPs). On November 8, 2012, RWQCB adopted the current municipal stormwater permit (NPDES Permit No. CAS004001, Order No. R4-2012-0175), which contains the most extensive provisions to date with 32 incorporated TMDLs, of which 22 affect the City, expanded programs for Minimum Control Measures, development and implementation of watershed management plans, and expanded monitoring provisions. The NPDES permit provides for the development of EWMPs by the MS4 permittees to implement the requirements of the permit on a watershed scale through customized strategies, control measures, and BMPs. EWMPs also address compliance requirements of the 22 TMDLs that currently are effective, as well as other elements of the City's Stormwater Program.

Los Angeles Stormwater and Urban Runoff Pollution Control Ordinance (Los Angeles Municipal Code [LAMC], Chapter VI, Article 4.4). The Stormwater and Urban Runoff Pollution Control Ordinance contains requirements for construction activities and facility operations of development and redevelopment projects to comply with the requirements of the SUSMP, integrate low impact development practices and standards for stormwater pollution mitigation, and maximize open, green and pervious space on all developments and redevelopments consistent with the City's landscape ordinance and other related requirements in the Development BMPs Handbook. Provisions include prohibitions of illicit discharges, illicit connections, and spills, dumping and disposals to the MS4; pollutant control requirements from sites of industrial activities; and requirements for construction activity stormwater measures. The ordinance also promulgates requirements for stormwater BMPs, which include the following:

- For parking lots with more than 25 spaces, BMPs must be implemented to reduce the discharge of pollutants to the MEP.

[2]County of Los Angeles Department of Public Works, *Hydrology Manual*, January 2006.

- For other premises exposed to stormwater, BMPs, if they exist, or other steps shall be used to reduce the discharge of pollutants to the MEP. This includes the removal and lawful disposal from all parts of the premises exposed to stormwater of any solid waste or any other substance, which if discharged to the MS4, would be a pollutant.

Any proposed drainage improvements within the street right-of-way or any other property owned by, to be owned by, or under the control of the City requires the approval of a B-permit (LAMC Section 62.106.b). Under the B-permit process, storm drain installation plans are subject to the review and approval by LADPW Bureau of Engineering (BOE). Additionally, any connections to the City's storm drain system from a property line to a catch basin or a storm drain pipe requires a storm drain permit from BOE.

Proposition O. Proposition O, a $500 million bond, authorized the City to fund projects that protect public health, capture stormwater for reuse and meet the federal CWA through removal and prevention of pollutants entering regional waterways. Proposition O projects include but are not limited to: the Temescal Canyon Park Stormwater BMP, Los Angeles Zoo Parking Lot, the Westchester Stormwater BMP, Echo Park Lake Rehabilitation Project, and the Hansen Dam Recreational Area Parking Lot and Wetlands Restoration. In addition, Proposition O funds were utilized for the Catch Basin Screen Cover and Insert Project, which provided for the installation of catch basin inserts and screen covers throughout the City beginning in 2005 with completion on September 30, 2007 (Phase I and Phase II). Phase III began in the spring of 2008 and will retrofit approximately 34,000 remaining catch basins with opening screen covers.[3]

Low Impact Development (LID) Ordinance. The LID Ordinance was adopted in 2011. The intent of the LID Ordinance is to expand the applicability of the existing SUSMP requirements. It provides stormwater and rainwater LID strategies for all projects that require building permits in order to maintain or restore the natural hydrologic character of a development site, reduce off-site runoff, improve water quality, and provide groundwater recharge. The LID Ordinance requires a variety of BMPs to manage stormwater and urban runoff and reduce runoff pollution. It incorporates environmental practices including infiltration, capture and use, and biofiltration.

Flood Control Authority within the City of Los Angeles. In general, flood control authority can be summarized as follows: (1) the U.S. Army Corps of Engineers (USACE) oversees construction of projects associated with navigable bodies of water, including the Los Angeles River-related flood control systems and ocean harbors; (2) LACDPW oversees construction of ancillary Los Angeles County Flood Control District (LACFCD) facilities and designs and/or maintains the flood control drainage facilities, including the Los Angeles River system (under the guidance of USACE) to mitigate 100- and 500-year storms; and (3) LADPW BOE oversees construction and maintenance of the City's storm drainage system which is designed to mitigate 50-year magnitude storms. Various City agencies implement development permit, slope stability, and watershed protection regulations.

City of Los Angeles 2017 Local Hazard Mitigation Plan. The Hazard Mitigation Plan serves as a guide for decision makers as they commit City resources to minimize the effects of natural hazards. The Hazard Mitigation Plan integrates planning disciplines to identify hazard vulnerabilities, create community disaster mitigation priorities, and develop subsequent mitigation strategies and projects. The Hazard Mitigation Plan provides hazard mitigation to reduce risks from disasters to the people, property, economy and environment within the City as a result of natural disasters, including flooding, dam failures, landslides, and tsunamis.

Los Angeles Specific Plan for the Management of Flood Hazards (Flood Hazards Specific Plan). The Flood Hazards Specific Plan was originally established by Ordinance No. 154,405 and amended most recently in July 1998 by Ordinance No. 172,081. This ordinance governs permit review and mitigation

[3]City of Los Angeles Stormwater Program, *Proposition O*, http://www.lastormwater.org/green-la/proposition-o/, accessed December 13, 2016.

procedures for issuance of development permits in areas prone to flooding, mudflow, or coastal inundation. Mitigation measures include relocation of structures within a property, increased base elevation, additional structural reinforcement, anchoring, and installation of protective barriers. A permit can be denied if mitigation is deemed insufficient to protect human life. Ordinance No. 172,081 designates the City Engineer as the Flood Hazard Mitigation Coordinator for the City. The Flood Hazard Specific Plan specifies the responsibilities of City agencies that process the permits to ensure consistency with applicable FEMA requirements for NFIP coverage. This plan qualifies property owners for greater coverage limits and generally lower flood insurance premium rates.[4]

Floodplain Management Plan. The Floodplain Management Plan was prepared in October 2015 and presents measures to mitigate potential flood problems in the City of Los Angeles. The purpose of the measures is to reduce or alleviate the loss of life, personal injury, and property damage that can result from flooding. Measures identified in the Floodplain Management Plan involve long- and short-term strategies such as planning, policy changes, programs, projects, and other activities to mitigate the impacts of floods. The plan also identifies resources to help guide and coordinate mitigation activities.[5]

Water Quality Compliance Master Plan for Urban Runoff (WQCMP). In 2009, the City adopted the WQCMP, a 20-year strategy for clean stormwater and urban runoff in the City and to meet all water quality regulations for the City's rivers, lakes, and coastal waters. The Master Plan provides an overview of the existing status of urban runoff management in the City, including a description of watersheds in the City, urban runoff pollutant sources, regulatory requirements for water quality, existing watershed management, and plans for compliance with regulatory requirements. In addition, the Master Plan plans for the future of urban runoff management in the City and discusses three initiatives: Water Quality Management Initiative, Citywide Collaboration Initiative, and Outreach Initiative. The WQCMP also contains a financial outlook that evaluates current and future revenues, provides an estimate of the costs needed for implementing the strategies proposed, and presents opportunities for funding.

Los Angeles River Revitalization Master Plan (LARRMP). Adopted in April 2007, the LARRMP contains goals in the creation of parks, paths, and open spaces along the Los Angeles River. The LARRMP includes recommendations for physical improvements along the Los Angeles River corridor; policies for managing public access and management structure; and short- and long-term priority projects and potential funding strategies.

River Improvement Overlay (RIO) District. Following the adoption of the LARRMP, the RIO District (Ordinance Nos. 18314 and 183145), effective August 2014 and revised in January 2015, was established to help implement the vision and goals of the LARRMP by focusing on sustainable environments in the surrounding neighborhoods, including guidelines for both private property and public rights-of-way. The RIO provides guidelines for new "complete" streets and includes mobility strategies to meet the needs of pedestrians, bicyclists, transit riders, and vehicle drivers. The RIO District includes all of the neighborhoods within the City of Los Angeles that are adjacent to the Los Angeles River, and generally extends 0.5-mile on either side of the River, creating an area that is potentially 32 miles long and one mile wide. Sections of the north, northeastern, and eastern boundaries of the Hollywood CPA are located in a RIO District.

City of Los Angeles General Plan Safety, Conservation, and Framework Elements. The Safety Element provides a contextual framework for understanding the relationship between hazard mitigation, response to a natural disaster, and initial recovery from a natural disaster. The policies of the Safety Element reflect the comprehensive scope of the City's Emergency Operations Organization, which is tasked with integrating the City's emergency operations into a single operation. The intent of the Conservation Element

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[4] City of Los Angeles, Department of Building and Safety, *Flood Hazard Management Specific Plan Guidelines, Ordinance No. 172,081.*

[5] City of Los Angeles, Bureau of Engineering, *Floodplain Management Plan*, October 2015.

is the conservation and preservation of natural resources. Policies of the Conservation Element address the effect of erosion on such natural resources as beaches, watersheds, and watercourses. The General Plan Framework Element is a more general, long-term, programmatic element. The Framework Element is a long-range, Citywide, comprehensive growth strategy. The policies in the Framework Element address infrastructure and public service systems, many of which are interrelated, and all of which support the City's population and economy. Relevant objectives and policies of the Safety, Conservation, and Framework Elements related to hydrology and water quality are listed in **Table 4.9-1**.

TABLE 4.9-1: RELEVANT GENERAL PLAN HYDROLOGY AND WATER QUALITY OBJECTIVES AND POLICIES

Objective/Policy	Objective/Policy Description
SAFETY ELEMENT– HAZARD MITIGATION	
Policy 1.1.6	State and federal regulations. Assure compliance with applicable State and federal planning and development regulations, e.g., Alquist-Priolo Earthquake Fault Zoning Act, State Mapping Act and Cobey-Alquist Flood Plain Management Act.
SAFETY ELEMENT – EMERGENCY RESPONSE (MULTI-HAZARD)	
Policy 2.1.2	Health and environmental protection. Develop and implement procedures to protect the environment and public, including animal control and care, to the greatest extent feasible within the resources available, from potential health and safety hazards associated with hazard mitigation and disaster recovery efforts.
CONSERVATION ELEMENT – EROSION	
Policy 2	Continue to prevent or reduce erosion that will damage the watershed or beaches or will result in harmful sedimentation that might damage beaches or natural areas.
CONSERVATION ELEMENT – OCEAN	
Policy 1	Continue to reduce pollutant discharge into the bays from both natural and human sources.
FRAMEWORK ELEMENT – CHAPTER 9 INFRASTRUCTURE AND PUBLIC SERVICES	
Policy 9.3.2	Consider the use of treated wastewater for irrigation, groundwater recharge, and other beneficial purposes.
Objective 9.5	Ensure that all properties are protected from flood hazards in accordance with applicable standards and that existing drainage systems are adequately maintained.
Policy 9.5.1	Develop a stormwater management system that has adequate capacity to protect its citizens and property from flooding which results from a 10-year storm (or a 50-year storm in sump areas, a pit or hollow in which liquid collects).
Policy 9.5.2	Assign the cost of stormwater system improvements proportionately to reflect the level of runoff generated and benefits.
Policy 9.5.3	Implement programs to correct any existing deficiencies in the stormwater collection system.
Policy 9.5.4	Ensure that the City's drainage system is adequately maintained.
Objective 9.6	Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.
Policy 9.6.1	Pursue funding strategies which link the sources of revenues for stormwater system improvement to relevant factors including sources of runoff and project beneficiaries.
Policy 9.6.2	Establish standards and/or incentives for the use of structural and non-structural techniques which mitigate flood-hazards and manage stormwater pollution.
Policy 9.6.3	The City's watershed-based approach to stormwater management will consider a range of strategies designed to reduce flood hazards and manage stormwater pollution. The strategies considered will include, but not necessarily be limited to: a. Support regional and City programs which intercept runoff for beneficial uses including groundwater recharge; b. Protect and enhance the environmental quality of natural drainage features; c. Create stormwater detention and/or retention facilities which incorporate multiple-uses such as recreation and/or habitat; d. On-site detention/retention and reuse of runoff; e. Mitigate existing flood hazards through structural modifications (floodproofing) or property by-out;

TABLE 4.9-1: RELEVANT GENERAL PLAN HYDROLOGY AND WATER QUALITY OBJECTIVES AND POLICIES	
	f. Incorporate site design features which enhance the quality of off-site runoff; and g. Use land use authority and redevelopment to free floodways and sumps of inappropriate structures which are threatened by flooding and establish appropriate land uses which benefit or experience minimal damages from flooding.
Policy 9.6.4	Proactively participate in inter-agency efforts to manage regional water resources, such as the Santa Monica Bay Restoration Project, the Los Angeles River Master Plan, the Los Angeles River Parkway Project and the Los Angeles County Drainage Area Water Conservation and Supply Feasibility Study.
Objective 9.7	Continue to develop and implement management practices based stormwater program which maintains and improves water quality.
Policy 9.7.1	Continue the City's active involvement in the regional NPDES municipal stormwater permit.
Policy 9.7.2	Continue to aggressively develop and implement educational outreach programs designed to foster an environmentally-aware citizenry.
Policy 9.7.3	Investigate management practices which reduce stormwater pollution to identify technically feasible and cost effective-approaches, through: a. Investigation of sources of pollution using monitoring, modeling and special studies; b. Prioritization of pollutants and sources; c. Conducting research and pilot projects to study specific management practices for the development of standards; and d. Developing requirements which establish implementation standards for effective management practices.
Objective 9.9	Manage and expand the City's water resources, storage facilities, and water lines to accommodate projected population increases and new or expanded industries and businesses.
Policy 9.9.3	Protect existing water supplies from contamination, and clean up groundwater supplies so those resources can be more fully utilized.
Policy 9.9.4	Work to improve water quality and reliability of supply from the State Water Project and other sources.
Policy 9.9.5	Maintain existing rights to groundwater and ensure continued groundwater pumping availability.
Objective 9.11	Ensure, to the maximum extent possible, the continued provision of water capacity, quality and delivery after an earthquake or other emergency.
Policy 9.11.1	Provide for the prompt resumption of water service with adequate quantity and quality of water after an emergency.
SOURCE: City of Los Angeles, *City of Los Angeles General Plan*, *Safety Element*, adopted 1996; *Conservation Element*, adopted 2001,;and *Framework Element*, re-adopted 2001.	

EXISTING SETTING

For planning purposes, LARWQCB divides surface waters within the region into hydrologic units. The Los Angeles-San Gabriel Hydrologic Unit covers most of Los Angeles County and small areas of southeastern Ventura County. This hydrologic unit, or drainage area, totaling 1,608 square miles is highly urbanized and much of the area is covered with semi-permeable or non-permeable material (i.e., paved surfaces). The Los Angeles River, San Gabriel River, and Ballona Creek, which are the major drainage systems in Los Angeles County, drain the coastal watersheds of the Transverse Ranges, including the Santa Monica Mountains and Hollywood Hills, both of which are located within the Project Area. These surface waters also recharge large reserves of groundwater that exist in alluvial aquifers underlying the San Fernando and San Gabriel Valleys and the Los Angeles Coastal Plain.

Groundwater and surface water are inter-dependent and are physically connected by the hydrologic cycle. The hydrologic cycle refers to the circulation of water from the ocean through the atmosphere to the land and ultimately back to the ocean.

SURFACE WATER HYDROLOGY

A watershed carries water "shed" from the land after rain falls and snow melts (surface water) and channels it into soils, groundwater, creeks, streams, or rivers, and eventually the ocean. Watersheds in the strictest sense are geographic areas draining into a river system, ocean, or other body of water through a single outlet and include the receiving waters. They are usually bordered, and separated from, other watersheds by mountain ridges or other naturally elevated areas. The City of Los Angeles has four watersheds: Los Angeles River, Ballona Creek, Dominguez Channel, and Santa Monica Bay. The Project Area is located within the Los Angeles River and Ballona Creek Watersheds, as shown in **Figure 4.9-1**, and discussed in further detail below.

Los Angeles River Watershed. The Los Angeles River Watershed, one of the largest watersheds in the Los Angeles Region consisting of 834 square miles, extends between the Santa Monica Mountains and the San Gabriel Mountains and covers the entirety of the Los Angeles River's length (from the coastal plains to the San Pedro Bay).[6] The eastern portion spans from the Santa Monica Mountains to the Simi Hills and in the west from the Santa Susana Mountains to the San Gabriel Mountains. The watershed encompasses and is shaped by the path of the Los Angeles River, which flows from its headwaters in the mountains eastward to the northern corner of Griffith Park. Here the channel turns southward through the Glendale Narrows before it flows across the coastal plain and into San Pedro Bay near Long Beach. The Los Angeles River Watershed also includes the coastal interface zone and coastal waters of Marina del Rey, the Venice Canals, Ballona Lagoon, Del Rey Lagoon, and Oxford Lagoon.

Several tributaries make up the Los Angeles River Watershed, including the Upper Los Angeles River, Rio Hondo, Arroyo Seco, Tujunga Wash, and Compton Creek.[7] Approximately 324 square miles of the watershed are covered by forest or open space land including the area near the headwaters, which it originates, and approximately 205 miles of the Los Angeles River Watershed system is made of engineered channels. Specifically, land uses within the Los Angeles River Watershed consist of 37 percent residential, 8 percent commercial, 11 percent industrial, and 44 percent open space.[8] Because the watershed is highly urbanized, MS4 discharges and illegal dumping are major contributors to impaired water quality in the Los Angeles River and tributaries.

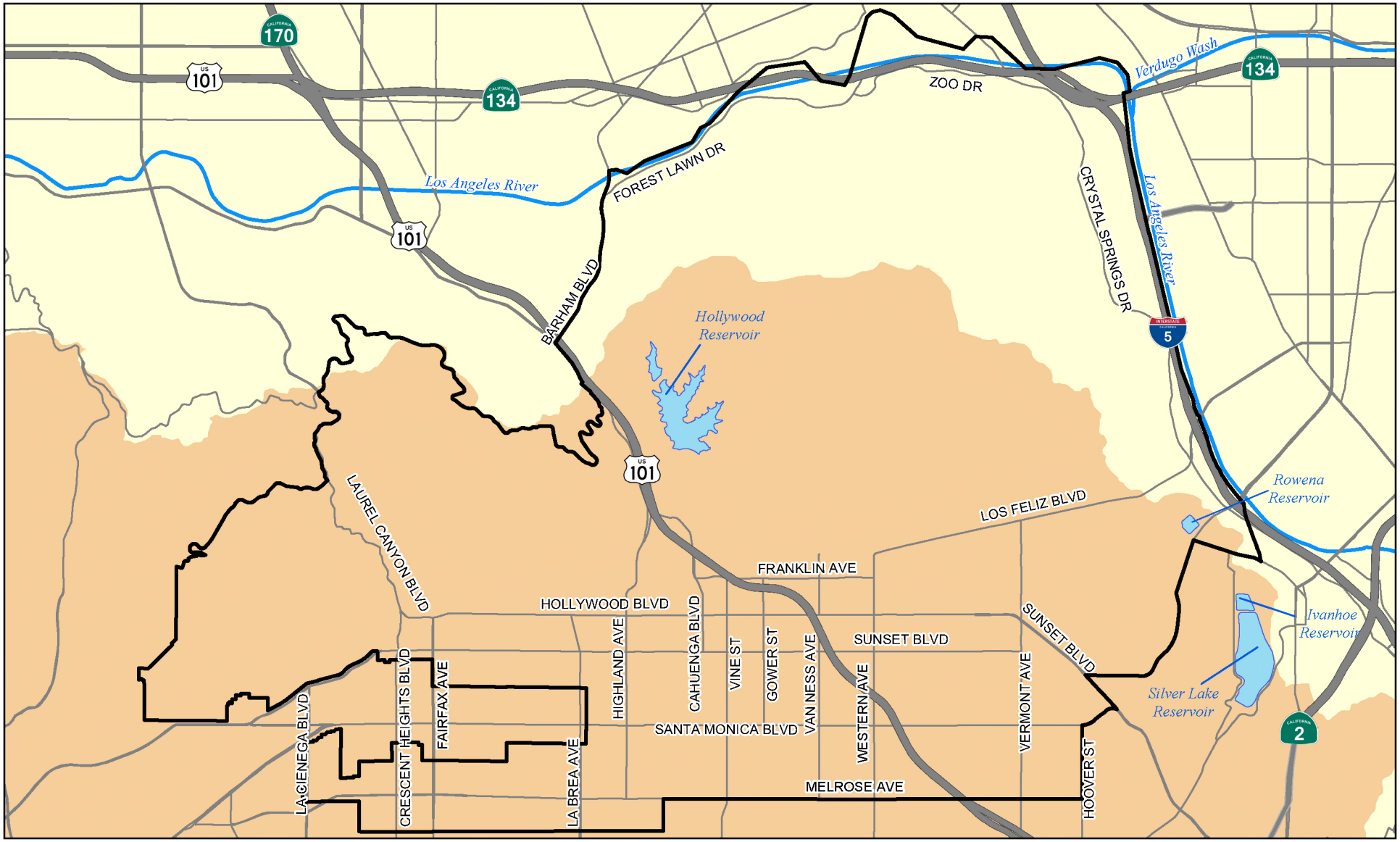
The Los Angeles River traverses adjacent to the Project Area's northern and eastern boundaries. It also traverses adjacent to and near the Project Area's northern boundary. The upper reaches of the river flows from the San Fernando Valley, where it conveys MS4 discharges. Below the Sepulveda Basin, flows are dominated by tertiary-treated effluent from three municipal wastewater treatment plants. Near the Project Area, the Los Angeles River flows through residential, commercial and industrial areas; studio-related uses; cemeteries; developed and undeveloped open space areas; recreational areas; and two major freeways (Interstate 5 (I-5) and State Route 134 (SR-134)). From the Arroyo Seco, north of downtown Los Angeles, to the confluence with the Rio Hondo, the river flows through industrial and commercial areas and is bordered by rail yards, freeways, and storage facilities. From the Rio Hondo to the Pacific Ocean, the river flows through industrial, residential, and commercial areas, including major refineries and petroleum products storage facilities, major freeways, and rail yards serving the Ports of Los Angeles and Long Beach.

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[6]County of Los Angeles Department of Public Works, *Los Angeles River Watershed,* http://ladpw.org/wmd/watershed/LA/, December 2016.

[7]City of Los Angeles, LA Stormwater Program, *Los Angeles River Watershed*, http://www.lastormwater.org/about-us/about-watersheds/los-angeles-river/.

[8] County of Los Angeles Department of Public Works, *Los Angeles River Watershed,* http://www.ladpw.org/wmd/watershed/LA/, December 2016.



LEGEND:

Hollywood CPA | Ballona Creek Watershed | Los Angeles River Watershed

N W E S

0 2,700 5,400 Feet

SOURCE: USGS, 2016; TAHA, 2017.

taha environmental planners

taha 2010-073

Hollywood Community Plan Update
Draft Environmental Impact Report

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FIGURE 4.9-1

WATERSHEDS

A 6.8-mile long reach in the narrows area (in the middle portion of the river system), where groundwater rises into the streambed, is mostly unlined along the stream bottom and provides natural habitat for fish and other wildlife in an otherwise concrete conveyance. Within and adjacent to the Project Area, a narrow band of willow riparian habitat has developed along the bed of the Los Angeles River in two areas where the water table was too high to cement the river bottom: 1) near the I-5/SR-134 interchange and 2) downstream of Colorado Boulevard. See Section 4.4, Biological Resources for further discussion on the habitats and species that can be found along the Los Angeles River.

Ballona Creek Watershed. The Ballona Creek Watershed totals approximately 127 square miles and is the largest drainage tributary to the Santa Monica Bay, discharging to the ocean adjacent to the entrance of the Marina del Rey Harbor. Specifically, the Ballona Creek is a nine-mile long flood protection channel that drains the Los Angeles basin from the Santa Monica Mountains on the north, Harbor Freeway (I-110) on the east, and Baldwin Hills on the south. The mostly channelized creek collects runoff from several partially urbanized canyons on the south slopes of the Santa Monica Mountains, as well as from intensely urbanized areas of West Los Angeles, Culver City, Beverly Hills, the Hollywood CPA, Inglewood, Santa Monica, and parts of central Los Angeles.

The Ballona Creek Watershed encompasses an area that historically consisted of extensive wetlands, which are located near the mouth of the creek and represents one of the few remaining regionally significant coastal wetlands along the Santa Monica Bay. A large number of pollutants associated with urban development are found in the creek and, in turn, impact the nearby beaches and ocean. Land uses within the Ballona Creek Watershed consist of approximately 64 percent residential, 8 percent commercial, 4 percent industrial, 17 percent open space, 4 percent public facilities, and 3 percent other urban uses. Major tributaries to the Ballona Creek include Centinela Creek, Sepulveda Canyon Channel, Benedict Canyon Channel, and numerous storm drains.[9]

SURFACE WATER QUALITY

Water quality in the watersheds of the Project Area is influenced by a number of factors, including climate, circulation, biological activity, surface runoff, and effluent discharges. Water column contaminants include metals (particularly cadmium, chromium, copper, lead, mercury, nickel, silver, and zinc), oil and grease, chlorinated hydrocarbons (DDT and DDE), and polychlorinated biphenyls (PCBs). Other water quality parameters such as phosphates and nitrates change from day to day and are influenced by factors that include biological processes, wastewater discharge, and storm runoff. Urban runoff and illegal dumping are major contributors to impaired water quality. Pollution originating over a large land area without a single point of origin and generally carried by stormwater is considered non-point pollution.

The Los Angeles River and Ballona Creek Watersheds are highly urbanized, contributing to urban runoff. The Basin Plan sets water quality objectives that must be attained to protect the designated beneficial uses for surface water and groundwater. Accordingly, uncontrolled pollutants from nonpoint sources are believed to be the greatest threats to rivers and streams within the Los Angeles Region. The RWQCB has established TMDLs in the watersheds to implement applicable water quality standards. The TMDL represents the assimilative capacity of a receiving water to absorb a pollutant and is the sum of the individual wasteload allocations for point sources, load allocations for nonpoint sources plus an allotment for natural background loading, and a margin of safety. A TMDL is implemented by reallocating the total allowable pollution among the different pollutant sources (through the permitting process or other regulatory means)

[9]County of Los Angeles Department of Public Works, *Ballona Creek Watershed Management Plan*, September 2004.

to ensure that the water quality objectives are achieved. TMDLs have been established for the Los Angeles River and Ballona Creek Watersheds and include sediment, nutrients, toxics, bacteria, metals, and trash.[10]

SURFACE WATER RESOURCES AND DAMS

The nearest surface water resource is the Los Angeles River, which borders the northern and eastern boundaries of the Project Area. In addition, the Hollywood Reservoir, also known as Lake Hollywood, is located in the Hollywood Hills area of the Project Area, which is situated in the Santa Monica Mountains. The reservoir is created by Mulholland Dam, which collects water from various aqueducts and is part of the City's water storage and supply system. The Hollywood Reservoir has a storage capacity of 7,900-acre feet and is maintained by the City of Los Angeles Department of Water and Power (LADWP).

The Silver Lake Reservoirs are two concrete-lined basins, Ivanhoe Reservoir and Silver Lake Reservoir. The two basins are divided by a spillway. The Silver Lake Reservoir is located approximately 0.4 miles east of the Project Area boundaries.

GROUNDWATER

The Project Area overlies the Hollywood Sub-basin, which is located in the northeastern part of the Coastal Plain of the Los Angeles Groundwater Basin, and the San Fernando Groundwater Basin, as shown in **Figure 4.9-2**. The portion of the Project Area south of the Santa Monica Mountains is located in the Hollywood Sub-basin, and the northern and eastern foothills of the Santa Monica Mountains within the Project Area are located in the San Fernando Groundwater Basin. The Hollywood Sub-basin is managed by the Water Replenishment District of Southern California, and the San Fernando Groundwater Basin is managed by the Upper Los Angeles River Area Watermaster.

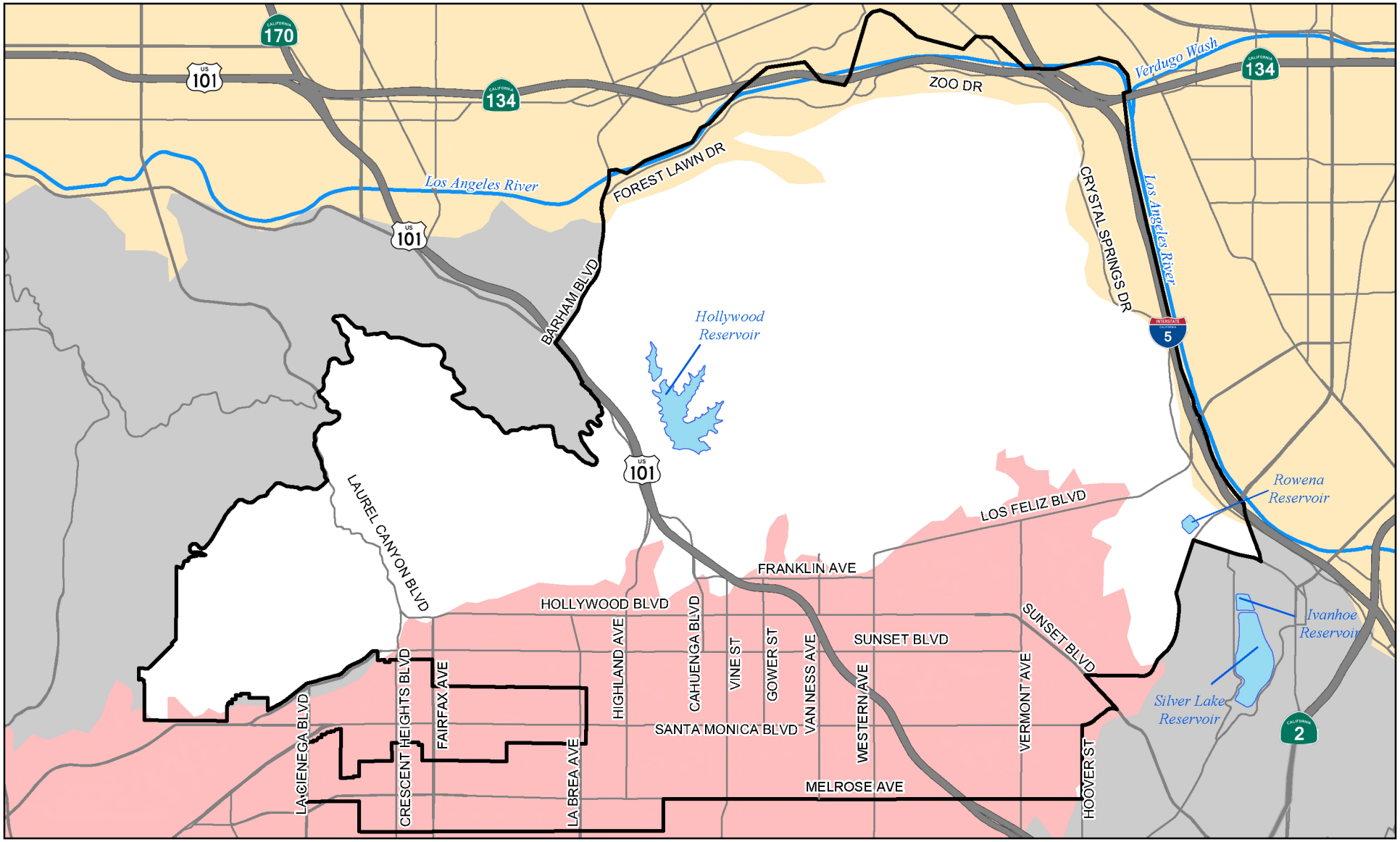
Coastal Plain of Los Angeles Groundwater Basin, Hollywood Sub-basin. The Los Angeles Groundwater Basin comprises the Hollywood, Santa Monica, Central, and West Coast Sub-basins. The Hollywood Sub-basin is bounded on the north by the Santa Monica Mountains and the Hollywood fault, the Elysian Hills on the east, the Inglewood fault zone on the west, and by a surface divide called the La Brea High on the south formed by an anticline that brings impermeable rocks close to the surface. The Hollywood Sub-basin is a natural groundwater basin encompassing a surface area of approximately 10,500 acres. Groundwater in the Hollywood Sub-basin is replenished naturally by percolation from precipitation, receiving an average annual precipitation ranging from 12 to 14 inches, and by surface stream flows and subsurface inflows from the Santa Monica Mountains to the north. Total storage capacity of the Hollywood Sub-basin is approximately 200,000 acre-feet.

The Hollywood Sub-basin is mostly urbanized and soil surfaces have been paved to construct roads, buildings, and flood channels. As a result, the surface area open to direct percolation has decreased substantially and, therefore, replenishment to the Hollywood Sub-basin's water formations is limited to only a small portion of soils in the Sub-basin. As the Hollywood Sub-basin does not receive any artificial recharge through injection wells or spreading basins, groundwater production is limited by low safe-yield limits.[11] Water-bearing formations of the Hollywood Sub-basin include unconsolidated and semi-consolidated marine and alluvial sediments deposited over time. Semi-perched groundwater, which ranges in thickness from 5 to 35 feet, may occur in the alluvium and covers about half of the Hollywood Sub-basin.

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[10] California Environmental Protection Agency, Los Angeles Regional Water Quality Control Board, *TMDL,* http://www.swrcb.ca.gov/losangeles/water_issues/programs/tmdl/tmdl_list.shtml, accessed December 2016.

[11] Metropolitan Water District. *Groundwater Assessment Study*, Chapter IV—Groundwater Basin Reports, Los Angeles County Coastal Plain Basins, September 2007.



LEGEND:

Hollywood CPA | Hollywood Sub-Basin | San Fernando Valley Basin

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0 2,700 5,400 Feet

SOURCE: City of Los Angeles, 2017; TAHA, 2017.

taha environmental planners
taha 2010-073

Hollywood Community Plan Update
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FIGURE 4.9-2

GROUNDWATER BASINS

Historically high groundwater levels within the Project Area in the Hollywood Sub-basin range from 20 to 150 feet below ground surface.[12] Limited groundwater is produced from this zone but water from this zone can percolate into the underlying aquifers. The main potable production aquifers include the deeper aquifers of the San Pedro Formation and the shallower aquifers of the Lakewood Formation (including aquifers Exposition and Gage). The Gage aquifer of the Lakewood Formation is the major water-bearing member of the Hollywood Sub-basin.[13] The San Pedro Formation is only found in the westernmost portion of the Hollywood Sub-basin in the Beverly Hills area. However, in general, aquifers in the Hollywood Sub-basin are not highly transmissive and do not yield significant groundwater except in the western portion where the basin encounters deeper aquifers of the San Pedro Formation. The groundwater in the Hollywood Sub-basin generally flows westward from the Santa Monica Mountains through the Hollywood Sub-basin toward the Inglewood fault, out into the Santa Monica Sub-basin, and toward the Central Basin to the south.[14]

San Fernando Valley Groundwater Basin. The San Fernando Valley Groundwater Basin includes the water-bearing sediments beneath the San Fernando Valley, Tujunga Valley, Browns Canyon, and the alluvial areas surrounding the Verdugo Mountains near La Crescenta and Eagle Rock. The San Fernando Groundwater Basin is located in the Upper Los Angeles River Area and is bounded on the north and northwest by the Santa Susana Mountains, on the north and northeast by the San Gabriel Mountains, on the east by the San Rafael Hills, on the south by the Santa Monica Mountains and Chalk Hills, and on the west by the Simi Hills. The valley is drained by the Los Angeles River and its tributaries. Precipitation in the San Fernando Valley ranges from 15 to 23 inches per year and averages about 17 inches. The San Fernando Groundwater Basin is a natural groundwater basin encompassing a surface area of approximately 145,000 acres. The total storage capacity is approximately 3,670,000-acre feet. Recharge of the San Fernando Groundwater Basin is from the spreading of imported water and runoff in the Pacoima, Tujunga, and Hansen Spreading Grounds. The runoff contains natural streamflow from the surrounding mountains, precipitation falling on impervious areas, reclaimed wastewater, and industrial discharges. Other sources of recharge include water flowing in surface washes which in the eastern portion of the basin.

Several structures disturb the flow of groundwater through this basin, including a step in the basement resulting from movement on the Verdugo fault and/or the Eagle Rock fault, causing a groundwater cascade down to the south near the mouth of Verdugo Canyon. Other unnamed faults also cause changes in levels of basement and groundwater in the Sunland, Chatsworth, and San Fernando areas and at the mouths of the Little Tujunga and Big Tujunga Canyons, including the Little Tujunga syncline, Northridge Hills, Mission Hills and the Lopez faults.

Water levels in this basin vary from approximately five feet to 40 feet below ground surface in the western part of the basin, approximately 40 feet below ground surface in the southern and northern parts of the basin, and approximately 80 feet below ground surface in the eastern part of the basin. Historically high groundwater levels of the Project Area within the San Fernando Valley Groundwater Basin range from 10 to 200 feet below ground surface. Groundwater near the Los Angeles River is generally shallow.[15,16]

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[12]City of Los Angles, Bureau of Engineering, *NavigateLA, Plate 1.2 Historically Highest Groundwater Contours and Borehole Log Data Locations, Hollywood Quadrangle,* http://navigatela.lacity.org/common/mapgallery/pdf/highest_groundwater_contours_and_boreholes/holly_eval_Page_601.pdf, and http://navigatela.lacity.org/navigatela/, January 5, 2016.

[13]*Ibid.*

[14]California Department of Water Resources (DWR). California's Groundwater Bulletin 118—*South Coast Hydrologic Region, Coastal Plain of Los Angeles Groundwater Basin, Hollywood Subbasin*, 2004.

[15]City of Los Angles, Bureau of Engineering, *NavigateLA, Plate 1.2 Historically Highest Groundwater Contours and Borehole Log Data Locations, Hollywood Quadrangle*, http://navigatela.lacity.org/common/mapgallery/pdf /highest_groundwater_contours_and_boreholes/holly_eval_Page_601.pdf, and http://navigatela.lacity.org/navigatela/, January 5, 2016.

[16]City of Los Angles, Bureau of Engineering, NavigateLA, *Plate 1.2 Historically Highest Groundwater Contours and Borehole Log Data Locations, Burbank Quadrangle*, http://navigatela.lacity.org/common/mapgallery/pdf/highest_groundwater_contours_and_boreholes/bur_eval_Page_621.pdf, and http://navigatela.lacity.org/navigatela/, January 5, 2016.

Generally, groundwater flows are gravity directed. Groundwater flows generally from the edges of the basin toward the middle of the basin, then beneath the Los Angeles River Narrows into the Central Sub-basin of the Coastal Plain of Los Angeles Basin. In the northeastern part of the basin, groundwater moves from the La Crescenta area southward beneath the surface of Verdugo Canyon toward the Los Angeles River near Glendale, whereas the groundwater in the Tujunga area flows west following the Tujunga Wash around the Verdugo Mountains to join groundwater flowing from the west following the course of the Los Angeles River near Glendale.[17]

FLOOD CONTROL AND DRAINAGE FACILITIES

The Los Angeles General Plan Safety Element explains that the purpose of local flood control and drainage facilities is to quickly route storm waters to the Santa Monica and San Pedro Bays in order to prevent flooding in the City. The City's storm drain system, maintained by the BOE, consists of an extensive network of underground pipes and open channels that were designed to prevent flooding. The City's storm drain system consists of approximately 1,500 miles of storm drains beneath the streets, approximately 35,000 catch basins that collect runoff, spreading grounds, and pumping facilities. Spreading grounds are facilities that re-absorb stormwater into the ground and re-supply the underground water system. Reservoirs, dams, and stormwater management ponds collect and store stormwater. The City's system is designed to accommodate 50-year magnitude storms. During dry weather, the combined County and City storm drainage systems carry tens of millions of gallons of runoff daily. During storms, the system carries billions of gallons of storm runoff per day. As it flows over the land surface, stormwater picks up potential pollutants that may include sediment, nutrients (from lawn fertilizers), bacteria (from animal and human waste), pesticides (lawn and garden chemicals), metals (from rooftops and roadways), and petroleum by-products (from leaking vehicles). Stormwater runoff is carried via open flood control channels directly to the ocean or to collection systems. The storm drain system receives no treatment or filtering process and is completely separate from the City's sewer system.

With the exception of undeveloped open space areas within the Santa Monica Mountains and parks, most of the Project Area is covered with impervious surfaces including roadways, parking lots, hardscaping, and rooftops that generate stormwater runoff. Stormwater runoff within the Project Area is directed toward Los Angeles River via storm drains, curbs and gutters, and urban sheet flow. Runoff in the Project Area drains from the street into gutters and enters the City's storm drain system through catch basins. From catch basins, runoff flows into underground tunnels that empty into flood control channels, which discharge to over 65 shoreline outfalls rimming the Los Angeles area coastline. Los Angeles River is a major flood control facility for draining stormwater from the Project Area and directing it safely to the ocean.

FLOODING AND INUNDATION

Flood Plains. Los Angeles County is subject to a wide range of flood hazards, including those caused by intense storms, earthquakes, and failure of man-made structures. Storm conditions, topography, drainage patterns, and the adequacy of the stormwater system combine under certain conditions to create areas of flooding. FEMA considers land that is subject to inundation by a 100-year flood to be a Special Flood Hazard Area. The City's Safety Element defines a 100-year flood as a flood which results from a severe rainstorm with a probability of occurring approximately once every 100 years, and a 500-year flood as a flood that results from a severe rainstorm with a probability of occurring once every 500 years.

[17]California Department of Water Resources (DWR). California's Groundwater Bulletin 118—*South Coast Hydrologic Region, San Fernando Valley Groundwater Basin*, 2004.

Figure 4.9-3 identifies areas located within a 100-year and 500-year flood plain within the vicinity of the Project Area. Special Flood Hazard Areas designated within and adjacent to the Project Area include the following areas:

- The vicinity of the Hollywood Reservoir;
- Along Vermont Avenue and Vermont Canyon Road (north of Aberdeen Avenue);
- Normandie Avenue (primarily south of Santa Monica Boulevard)
- Laurel Canyon Road and Laurel Canyon Boulevard;
- South of Santa Monica Boulevard between Gower Street and Van Ness Avenue (within the parcel boundaries of Hollywood Forever Cemetery and Paramount Picture Studio);
- South along Myra Avenue towards Virgil Avenue;
- Portions of the Los Angeles River located along the eastern border of the Project Area; and
- Silver Lake Reservoir southeast of the Project Area.

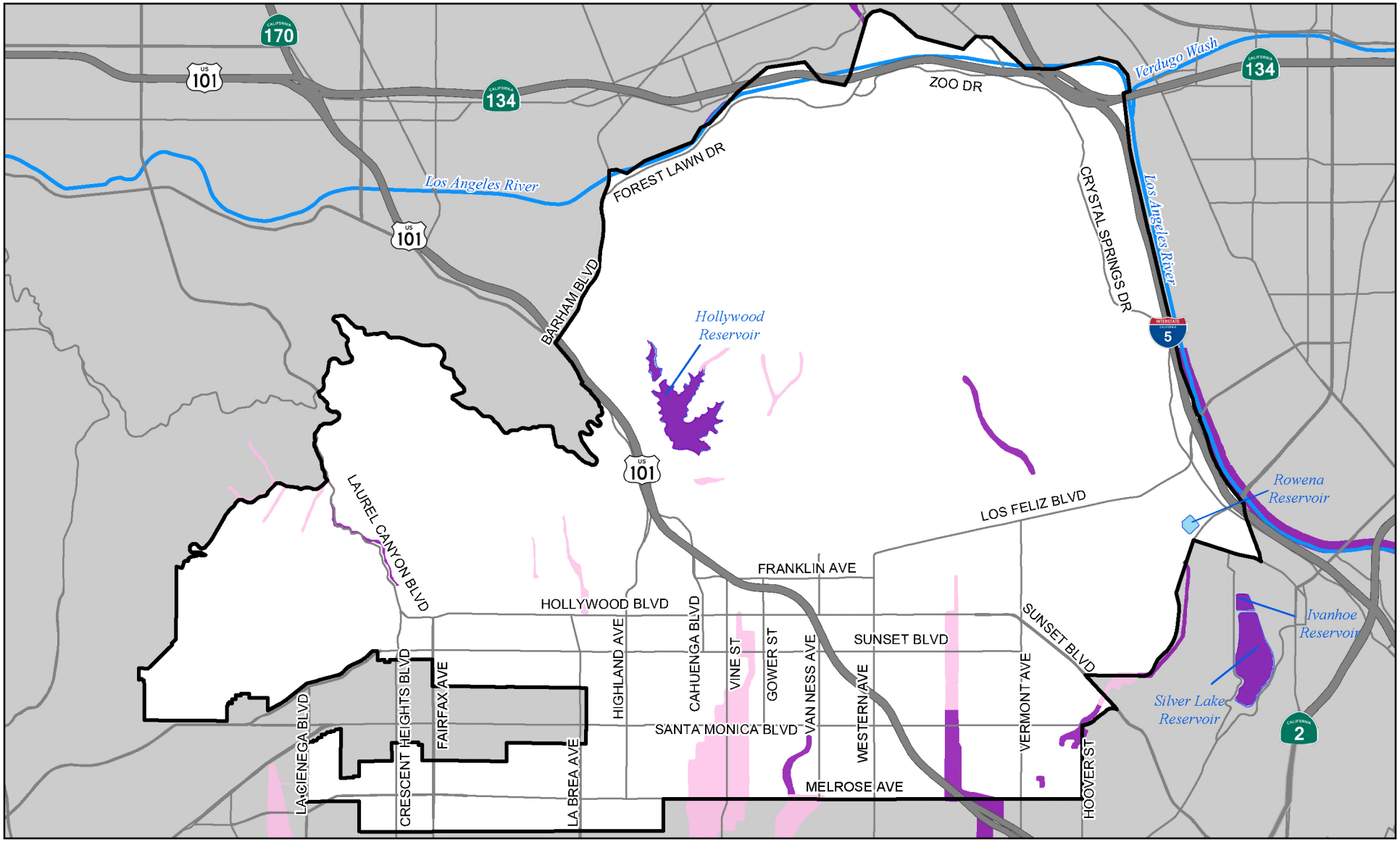
Areas identified within a 500-year flood plain within and adjacent to the Project Area include the following areas:

- North of Hollywood Boulevard and east of Highland Avenue (within and adjacent to Runyon Canyon Park);
- Areas northeast, east and south of the Hollywood Reservoir,
- Areas encompassing Vine Street south of Hollywood Boulevard;
- Area around Normandie Avenue and north of Santa Monica Boulevard; and
- An area west of La Cienega Boulevard near the southwestern boundary of the Project Area.

The City is a participating community in the NFIP. The City floodplain management ordinance includes flood-proofing requirements for new construction within a Special Flood Hazard Area at defined base flood elevations, which are based on FEMA guidelines.

Inundation. Dam inundation is defined as the flooding that occurs as the result of structural failure of a dam. The area south of the Hollywood Reservoir is designated as a potentially inundated area that could result from dam failure. Within the Project Area, most of the area west of US-101 (primarily in the foothills and flatland portions of the Project Area) is located within the dam inundation areas associated with the Hollywood Reservoir and the Mulholland Dam. A narrow portion of land east of US-101 is also located within dam inundation area. Further, the area along and to the east of Hyperion Avenue (the eastern Project Area boundary), as well as the southeastern-most portion of the Project Area (generally east of Vermont Avenue and south of Santa Monica Boulevard), is designated as a potentially inundated area associated with the Silver Lake Reservoir. Additionally, the City's General Plan Safety Element identifies the area along and adjacent to the Los Angeles River as potential inundation areas. Within the Project Area, the areas that are identified as potential inundation areas associated with the Los Angeles River are used as open space or are generally along the I-5 Freeway.

Seiches. Seiches are oscillations generated in enclosed bodies of water which can be caused by ground shaking associated with an earthquake. The City of Los Angeles General Plan Safety Element designates areas susceptible to inundation. As noted above, the Project Area includes a City-designated potential inundation area associated with the Hollywood Reservoir. The Hollywood Reservoir was built in 1924 and designed to hold 2.5 billion gallons of water. Pursuant to the CWC, the California Division of Safety of Dams oversees the design and construction of dams and conducts yearly inspections to ensure that the dams are performing and being maintained in a safe manner. The Hollywood Reservoir is regularly inspected and meets current safety regulations.



LEGEND:

Hollywood CPA | 100-Year Flood Zone | 500-Year Flood Zone

N W E S

0 2,700 5,400 Feet

SOURCE: City of Los Angeles, 2017; TAHA, 2017.

taha environmental planners

taha 2010-073

Hollywood Community Plan Update
Draft Environmental Impact Report

CITY OF LOS ANGELES

FIGURE 4.9-3

FLOOD ZONES

In addition, the City's Local Hazard Mitigation Plan provides a list of existing programs, proposed activities, and specific projects that may assist the City in reducing risks and injury from natural and human-made hazards, including dam failure.[18]

Tsunamis. Tsunamis are large ocean waves generated by sudden water displacement caused by a submarine earthquake, landslide, or volcanic eruption. The Project Area is located more than 10 miles inland from the Pacific Ocean. According to the Safety Element of the General Plan, the Project Area is not located within a Tsunami Hazard Mitigation Zone.

Mudflow/Mudslides. Mudflows develop when saturated, loose surface materials (e.g., soil, colluvium/slopewash, and weathered bedrock formations) in hillside areas become unstable and, due to gravitational forces, slide down the hillside slopes. The Project Area consists of mountain, hillsides, and flat topography. Development occurring within the mountain and hillsides are required to comply with the Baseline Hillside Ordinance during construction to minimize risks related to construction in high risk hillside areas.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, the Proposed Plan would have a significant impact related to hydrology and water quality if it would:

- Violate any water quality standards or waste discharge requirements;
- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted);
- Substantially alter the existing drainage pattern of the area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site;
- Substantially alter the existing drainage pattern of the area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
- Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;
- Otherwise substantially degrade water quality;
- Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;
- Place within a 100-year flood hazard area structures which would impede or redirect flood flows;
- Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; or
- Inundation by seiche, tsunami, or mudflow.

CITY OF LOS ANGELES CEQA THRESHOLDS GUIDELINES

The following threshold from the 2006 Los Angeles CEQA Thresholds Guide (Thresholds Guide) supplements the State CEQA Guidelines Appendix G thresholds. Implementation of the Proposed Plan would have a significant impact related to hydrology and water quality if it would:

[18]City of Los Angeles, *Hazard Mitigation Plan*, adopted July 2011.

- Cause flooding during the projected 50-year storm event, which would have the potential to harm people or damage property or sensitive biological species.

METHODOLOGY

Baseline information for the analysis was compiled from a review of data and reports published by state agencies, environmental documents for projects in the vicinity, as well as information compiled and evaluated by the City of Los Angeles in conjunction with its stormwater management and hazard mitigation programs. The result of the effort is a general and qualitative analysis of the types of hydrologic and water quality changes that could be expected relative to the implementation of the Proposed Plan.

The analysis of water quality impacts identifies the types of pollutants potentially associated with future development as a result of implementation of the Proposed Plan and considers their effects on water quality. Consideration is given to BMPs, which would serve to minimize pollutants in stormwater runoff. Further, the Proposed Plan's consistency with relevant regulatory permits/requirements is evaluated to demonstrate how compliance would protect water quality.

Independent of the CEQA process, there is a comprehensive regulatory framework implemented at the state and City level to reduce the impacts of effects related to storm drainage, urban pollutants, and flood hazards. Compliance with these regulations is required, not optional. Compliance must be demonstrated by the project proponent to have been incorporated in the project's design before permits for project construction would be issued. Based upon the comprehensiveness of the regulations and the requirement that compliance must be demonstrated to have been incorporated in the project's design before permits are issued, the assumption that compliance with all applicable laws, regulations, and standards is reasonable. Therefore, the analysis presented herein assumes compliance with all applicable laws, regulations, and standards. Development permitted under the Proposed Plan potentially having significant impacts to hydrology and water quality would be subject to further analysis and environmental review.

This discussion of hydrology and water quality addresses impacts within the area that would be affected by the Proposed Plan including inside and outside the Project Area. The impact analysis was based on several factors, including the policies and land uses of the Proposed Plan, the degree to which existing land uses in the Project Area would change, and the thresholds of significance for hydrology and water quality.

IMPACTS

IMPACT 4.9-1 Would implementation of the Proposed Plan violate any water quality standards or waste discharge requirements? **Less than significant impact.**

Hydrology and water quality resources of concern within the Project Area are subject to the federal, State, and local standards and regulations. The Proposed Plan and its implementing ordinances do not contain any specific guidelines or changes that would violate any water quality standards or waste discharge requirements.

Under the Proposed Plan, the undeveloped open space areas within the Santa Monica Mountains would remain undeveloped. Thus, the rate and volume of stormwater runoff within the Santa Monica Mountains would remain unchanged. Within the developed portions of the Project Area, only a small portion of the land in the Project Area is vacant or undeveloped. As such, any new development or redevelopment within this portion of the Project Area, whether more intense than existing conditions or not, would not result in a substantial increase of impervious surfaces contributing to runoff. The rate and volume of stormwater

runoff as an indirect result of the Proposed Plan would not result in a substantial increase in stormwater flows to the City's system that discharges to Ballona Creek or the Los Angeles River. In addition, because the overall land use patterns of the Project Area would remain relatively unchanged, this would limit potential changes in the types of pollutants in stormwater runoff, compared to existing conditions.

Construction. Grading, excavation, and other construction activities associated with development projects within the Project Area could impact water quality due to erosion resulting from exposed soils that may be transported from the Project Area in stormwater runoff. In addition, construction activities have the potential to generate short-term water pollutants, including sediment, trash, construction materials, and equipment fluids. However, all construction activities are subject to NPDES GCASP permit requirements and the City's Stormwater and Urban Runoff Pollution Control Ordinance, which requires construction activities to comply with the requirements of the SUSMP to address stormwater pollution from construction and redevelopment projects.

The City enforces its SUSMP per NPDES permit requirements, to the maximum extent practicable through BMPs. As required by the SUSMP, all development projects (as applicable), including development projects that could be constructed in the Project Area, will be required to implement BMPs to control release of pollutants in stormwater runoff. The SUSMP identifies the types and size of private development projects that are subject to these requirements (see the Regulatory Framework subsection above for the types of development that are subject to SUSMP requirements). Required elements of the SUSMP include provisions for:

- Peak stormwater runoff discharge rates
- Conservation of natural areas
- Minimization of stormwater pollutants of concern
- Protection of slopes and channels
- Storm drain system stenciling and signage
- Properly designed outdoor material storage areas
- Properly designed trash storage areas
- Proof of ongoing BMP maintenance
- Design standards for structural or treatment control BMPs
- Provisions for individual priority project categories
- Limitations on use of infiltration BMPs

Requirements of the SUSMP are enforced through the City's plan approval and permit process, and all new development projects are subject to City inspection. Compliance with the LAMC would ensure that construction does not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality.

For development projects where construction activities would disturb more than one acre of land, construction activities are also subject to NPDES GCASP requirements, which require the preparation and implementation of a SWPPP. Compliance with the City's Stormwater and Urban Runoff Pollution Control Ordinance, SUSMP requirements, and GCASP requirements would ensure that construction within the Project Area does not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Thus, impacts during construction would be ***less than significant***.

Operations. All development projects within the Project Area are required to comply with the LID Ordinance, Stormwater and Urban Runoff Pollution Control Ordinance, and NPDES permit requirements, which prohibit the discharge of pollutants, into the storm drain system or receiving waters, and require the implementation of BMPs to prevent, control and reduce stormwater pollutants. The City's Stormwater and Urban Runoff Pollution Control Ordinance requires future development to comply with the SUSMP

requirements; integrate LID practices and standards for stormwater pollution mitigation; and maximize open, green, and pervious space on all development consistent with the City's landscape ordinance and other related requirements. Therefore, implementation of LID and NPDES requirements, as well as compliance with the Stormwater and Urban Runoff Pollution Control Ordinance would ensure future development projects occurring under the Proposed Plan does not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality.

Furthermore, discharges associated with the Proposed Plan would not create pollution, contamination or nuisance as defined in CWC Section 13050 or cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. Implementation of the Proposed Plan would not compromise the beneficial uses of waterbodies within and adjacent to the Project Area (i.e. Hollywood Reservoir and Los Angeles River), or the facilities that serve those beneficial uses, or impair the waters of the State in a way that creates a hazard to public health or diminishes the community enjoyment of property. Implementation of the Proposed Plan would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Thus, impacts would be ***less than significant***.

Conclusion

Compliance with federal, state and local regulations would serve to reduce impacts resulting from future development in the Project Area due to implementation of the Proposed Plan. Furthermore, the Proposed Plan does not introduce any features that would preclude implementation of or alter these policies and procedures in any way. Therefore, implementation of the Proposed Plan would not violate any water quality standards or waste discharge requirements, and impacts would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

IMPACT 4.9-2 Would implementation of the Proposed Plan substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)? **Less than significant impact.**

Construction. While construction activities may use water (typically provided by LADWP) for varying purposes, the duration of such activities and the amount of water used is generally limited and would not have the potential to deplete groundwater supplies as construction activities are short-term and generally use less water than the future site use. Section 4.16 Utilities and Service Systems of this EIR addresses sources of LADWP water as well as temporary increases in water use associated with construction activities and indicates that such uses would not be substantial in relation to groundwater supplies. Use of groundwater for construction would not reduce the yields of groundwater wells or well fields.

Future development in the Project Area would be subject to the stormwater quality BMPs. Implementation of BMPs would ensure that surface water quality is effectively maintained so that stormwater infiltration, if any, would not represent a substantial risk to groundwater quantity or quality. In addition, compliance

with the City's Stormwater and Urban Runoff Pollution Control Ordinance and NPDES GCASP permit requirements is mandatory. These regulations would ensure construction activities associated with future development would not substantially deplete groundwater supplies or interfere with groundwater recharge. Thus, implementation of the Proposed Plan would not have a significant impact on groundwater level in a way that would change potable water levels sufficiently. Thus, impacts related to groundwater supplies during construction would be ***less than significant***.

Operations. The Project Area overlies the Hollywood Sub-basin of the Los Angeles Coastal Plain Groundwater Basin and the San Fernando Groundwater Basin. Groundwater from the Los Angeles Coastal Plain Groundwater Basin and San Fernando Groundwater Basin are not substantial sources of water for the region. Implementation of the Proposed Plan would not involve direct groundwater withdrawal or injection that would create a net deficit in aquifer volume, yields, change the rate or direction of groundwater, or deplete groundwater supplies. In addition, implementation of the Proposed Plan would not result in a demonstrable or sustained reduction of groundwater recharge capacity, such that there would be a lowering of the local groundwater table level.

Water supply for residential and commercial uses in the Project Area is provided by LADWP. While LADWP does obtain some of its water from groundwater sources within the City of Los Angeles (approximately 12 percent in 2015), the majority of water is provided by the Los Angeles Aqueduct and Metropolitan Water District (MWD). The Project's impact on water supply is discussed in Section 4.16, Utilities and Service Systems, of this Draft EIR.

Permeable surfaces within the Project Area are limited to open space areas, including the undeveloped open space areas within the Santa Monica Mountains, parks, and fields. Permeable open space areas within the Project Area would be expected to remain unchanged with implementation of the Proposed Plan.

The Project Area is not considered a significant area for groundwater recharge because the developed portions of the Project Area are covered largely by non-permeable surfaces (buildings, road, parking lots, etc.) that currently interfere with groundwater recharge. Although the Proposed Plan would increase development density in various Active Change Areas, and some non-change areas may see redevelopment with more intense development, the developed portions are largely covered by impermeable surfaces. Thus, any new development occurring during the lifetime of the Proposed Plan, whether more intense than existing conditions or not, would not result in a substantial increase in impervious surfaces that would further impact groundwater recharge. Thus, operational impacts related to groundwater supplies would be ***less than significant***.

Conclusion

Implementation of the Proposed Plan would not deplete the groundwater supply, or interfere substantially with groundwater recharge. Compliance with applicable water quality and stormwater regulations would ensure that impacts related to groundwater would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

IMPACT 4.9-3 Would implementation of the Proposed Plan substantially alter the existing drainage pattern of the area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site? **Less than significant impact.**

The channelized Los Angeles River is located within and adjacent to the northern and eastern boundaries of the Project Area. Additionally, the Santa Monica Mountains within the Project Area support seasonal and perennial streams. The streams are typically found at the bottom of canyons.

Construction. Construction activities occurring during the life of the Proposed Plan would occur within the developed portions of the Project Area. In these areas, grading for new structures is expected to consist of grading for foundations, building pads, access roads, and utility trenches. These types of construction activities could result in small, localized changes in surface drainage patterns that could cause increased erosion potential when soils are exposed during construction.

All earthwork and grading activities would require grading permits from the Department of Building and Safety that include requirements and standards designed to limit potential erosion and siltation. Additionally, earthwork and grading activities would be required to comply with applicable provisions of LAMC Chapter IX, Division 70, which addresses grading, excavations, and fills. This section of the LAMC also requires the preparation of a site-specific geotechnical report to evaluate soils issues for new development. Applicants of development projects will be required to comply with the recommendations contained within the geotechnical report. Additionally, all applicable development must comply with LAMC Chapter VI, Article 4.4, Section 664.72, which governs pollutant control requirements and construction activity. Compliance with these precautions within the LAMC would reduce erosion and siltation potential within the Project Area.

As noted above in the Regulatory Framework discussion, all future development would be required to develop a SWPPP and SUSMP per NPDES permit requirements, which would ensure that future development within the Project Area would not result in changes to surface drainage patterns that could cause substantial increased erosion or siltation. The NPDES permit sets erosion control standards and requires implementation of nonpoint source control of surface drainage through the application of a number of BMPs to decrease the effects of erosion and sedimentation associated with grading. These BMPs are meant to reduce the amount of constituents, including eroded sediment, that enter streams and other water bodies. An SWPPP, as required by RWQCB as part of the NPDES permitting, describes the stormwater BMPs that would control the quality and quantity of stormwater runoff for any project that would potentially cause sedimentation to a receiving water body. NPDES permit requirements would ensure that future development within the Project Area would not result in changes to surface drainage patterns that could cause increased erosion or siltation. Thus, construction impacts related to drainage patterns would be ***less than significant***.

Operations. Stormwater runoff is influenced by rainfall intensity, ground surface permeability, watershed size and shape, and physical barriers. The introduction of impermeable surfaces greatly reduces natural infiltration, allowing for a greater volume of runoff. In addition, paved surfaces and drainage conduits can accelerate the velocity of runoff, concentrating peak flows in downstream areas faster than under natural conditions. Significant increases to runoff and peak flow can overwhelm drainage systems and alter flood elevations in downstream locations.

No Active Change Areas are proposed within the Santa Monica Mountains or along the Los Angeles River. The Santa Monica Mountains include a few subareas where consistency corrections are proposed. The consistency corrections involve changes that would reflect the existing use and/or are for consistency between the land use designation and zoning. These changes would not alter the undeveloped portions of the Santa Monica Mountains, where the majority of permeable surfaces within the Project Area are found.

Although the Proposed Plan does not propose any development in these undeveloped areas, which are primarily designated as open space, some of the undeveloped areas could be developed with structures or other improvements that are associated with recreational uses. The types of structures and improvements that could potentially be developed in these open space areas are limited since permitted uses in open space designated areas are most restrictive. Additionally, implementation of the Proposed Plan would serve to protect and preserve natural resources and natural features of the environment; to provide outdoor recreation opportunities and advance the public health and welfare; to encourage the management of public lands in a manner which protects environmental characteristics; and to encourage the maintenance of open space uses on all publicly-owned park and recreation land and on open space public land which is essentially unimproved. Thus, future improvements on existing vacant sites in this area would not change the existing drainage patterns of the area that would result in erosion or siltation.

Most of the developed portions of the Santa Monica Mountains are designated for and are developed with low density single-family residential use. Some vacant lots are located in this area, and some of these lots could be developed with single-family houses while these lots may not be developed due to topography and other constraints. Where vacant lots are developed, future development in these areas would reasonably be expected to result in single-family houses on single parcels. This type of development would not be expected to substantially alter the existing drainage patterns of the area. In addition, future development in Non-Change Areas in the developed and undeveloped portions of the Santa Monica Mountains is not anticipated to alter the existing drainage pattern of the area. Additionally, the Proposed Plan does not include components that would alter the course of streams or rivers, including the Los Angeles River, or alter the existing drainage patterns within the Santa Monica Mountains and Los Angeles River in a manner that would result in erosion or siltation.

Within the developed foothills and flatland portions of the Project Area, the Proposed Plan would increase development potential in various Active Change Areas. Other proposed land use changes would create consistency between existing and surrounding land uses, zoning and General Plan land use designations and preserve certain industrial areas for employment use. Future development within the Project Area, in both Change and Non-Change Areas, would occur primarily as infill on previously developed or, to a lesser extent, vacant sites. Any new development within the Project Area, regardless of building densities and lot coverage, would not result in a substantial increase in non-permeable surfaces such that surface drainage patterns would cause erosion or siltation as the area is already highly urbanized and covered largely by paved and other non-permeable surfaces. Thus, operational impacts related to drainage patterns would be ***less than significant***.

Conclusion

Compliance with state NPDES permit and applicable LAMC regulatory requirements, in combination with the City's standard grading and building permit requirements would minimize any potential water quality impacts from erosion and siltation. Additionally, future development during the lifetime of the Proposed Plan, regardless of building densities and lot coverage, would not result in a substantial increase in non-permeable surfaces such that surface drainage patterns would cause erosion or siltation. Therefore, implementation of the Proposed Plan would not cause changes in surface drainage patterns and surface water bodies in a manner that could cause erosion or siltation. Impacts related to erosion and siltation would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

IMPACT 4.9-4 Would implementation of the Proposed Plan substantially alter the existing drainage pattern of the area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site? **Less than significant impact.**

As discussed in Impact 4.9-3, the Proposed Plan would not alter the existing drainage pattern of the Project Area through the alteration of the course of a stream or river. The Proposed Plan would preserve existing open space areas. The existing drainage patterns of open space would remain unchanged. The Proposed Plan would increase development potential, with the most potential proposed in the Active Change Areas. Future development would be concentrated in areas of the Project Area containing impervious surfaces; therefore, implementation of the Proposed Plan would result in a negligible increase in impervious surfaces compared to existing conditions.

Future development would be subject to the City's building codes, which establish design standards that deal with flood prevention and control. The City's zoning codes that establish zoning designations that allow for floodplains and flood control facilities and the City's LID Ordinance, which requires all development or redevelopment that is 500 square feet or more in size to capture and manage 100 percent of the first three-quarter-inch of stormwater on-site by implementing best management practices for on-site infiltration, capture and use, and biofiltration/bio-treatment to the maximum extent feasible. Through the building permit application review and approval process, the City would be able to monitor and ensure the availability of sufficient drainage capacity. Compliance with the City's ordinances and regulations, as well as compliance with NPDES permit requirements, would ensure that future development during the lifetime of the Proposed Plan would not cause a substantial increase in the peak flow rates or volumes of stormwater runoff that would cause on-site or off-site flooding. Therefore, impacts related to surface runoff that would result in flooding are ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

IMPACT 4.9-5 Would implementation of the Proposed Plan create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? **This impact is less than significant.**

Development within the Active Changes Areas is expected to result in the most development activity since the Proposed Plan would increase allowable intensity and density in these areas. Future development within the Project Area, in both the Change and Non-Change Areas, would occur primarily as infill on previously developed sites containing impervious surfaces. Therefore, because future development would primarily be infill in nature, flows from areas of future development would already be accounted for in the system capacity. Implementation of the Proposed Plan would not substantially reduce or increase the amount of surface water; or result in a permanent, adverse change to the movement of surface water sufficient to

produce a substantial change in the current or direction of water flow. Stormwater runoff within the Project Area would continue to be directed toward Ballona Creek and Los Angeles River via storm drains, curbs and gutters (street flows), and urban sheet flow.

Implementation of the Proposed Plan would not affect the rate or change the direction of movement of existing contamination; expand the area affected by contaminants; or result in an increased level of groundwater contamination (including that from direct percolation, injection or salt water intrusion). Future development occurring during the lifetime of the Proposed Plan would have the potential to minimally increase the amount of impermeable surfaces in the Project Area, and thereby increasing the amount of water reaching the storm drain system and possibly the groundwater supply. However, on-site improvements incorporated into individual project design according to existing City standards would be implemented to maintain system capacity. As previously discussed, compliance with the City's LID Ordinance, NPDES requirements, and SUSMP through site design or planning management BMPs would minimize runoff from new development and prevent sediment and other pollutants from entering the storm drain system.

As a result, the Proposed Plan would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Compliance with applicable water quality and stormwater regulations, including stormwater BMPs as part of the SUSMP, would ensure that impacts would remain less than significant. Therefore, impacts related to stormwater drainage and polluted runoff would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

IMPACT 4.9-6 Would implementation of the Proposed Plan otherwise substantially degrade water quality? **This impact is less than significant.**

Water quality is regulated at the federal, state, and local levels and full compliance with these requirements would ensure impacts to water quality are minimized to the maximum extent possible. At the local level, future development within the Project Area would be subject to the City's stormwater quality BMPs that aid in ensuring that surface water is effectively maintained so that stormwater infiltration, if any, would not represent a substantial risk to groundwater quantity or quality.

Compliance with the City's Stormwater and Urban Runoff Pollution Control Ordinance and NPDES GCASP permit would ensure construction activities associated with future development would not adversely affect groundwater. The SWPPP, which is required under the GCASP, would identify sources of sediment and other pollutants that affect the quality of stormwater discharges. The SWPPP would identify the BMPs that would reduce or eliminate sediment and other pollutants in stormwater, as well as non-stormwater discharges during construction activities. Furthermore, SUSMP requirements are enforced through the City's plan approval and permit process and all new development projects are subject to City inspection prior to operation. In addition to federal and state regulations, compliance with the LAMC (including LAMC Chapter VI, Article 4.4, Section 64.72 which provides pollution control requirements for construction activities and development projects) would ensure that any construction occurring in the Project Area as a result of the Proposed Plan does not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Therefore, the Proposed Plan would not

substantially degrade the existing water quality of the Project Area and their surroundings. Impacts related to water quality would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

IMPACT 4.9-7 Would implementation of the Proposed Plan place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? **Less than significant impact.**

FEMA considers land that is subject to inundation by a 100-year flood to be a Special Flood Hazard Area. As previously discussed, **Figure 4.9-3** identifies areas located within a 100-year flood plain within the vicinity of the Project Area. Land uses designated within the 100-year floodplains include open space, commercial, limited industrial, and residential. All future development that would occur in the 100-year flood hazard zones would be subject to restrictions and requirements as part of the City's existing permitting process. Future development within the 100-year flood plain or floodway would be required to incorporate appropriate City and FEMA flood plain management measures in the design of new buildings, as specified in the Flood Hazard Specific Plan Guidelines and Floodplain Management Plan and enforced by the Department of Building and Safety. Flood plain management measures include, but are not limited to, constructing new residences so that the lowest floor is at least one foot above the 100-year flood level, and requiring nonresidential development in flood prone areas to be anchored and flood-proofed to prevent damage from a 100-year flood or elevated to at least one foot above the 100-year flood level. These measures are expected to ensure against reasonably foreseeable damage and loss of property and human life.

The City of Los Angeles is subject to a wide range of flood hazards, including those caused by intense storms, earthquakes, and failure of man-made structures. The City participates in NFIP and provides emergency response services for flood events. The City's hazard mitigation planning and emergency response programs would continue to be implemented to reduce potential losses.

Compliance with the existing regulatory requirements related to flood plain management would ensure implementation of the Proposed Plan would not place housing within a flood hazard area without incorporating proper floodplain management measures that are designed to ensure against foreseeable risk of loss or damage to property and human life. Therefore, implementation of the Proposed Plan for the Project Area would not exacerbate existing conditions and impacts related to placing housing within a 100-year flood hazard area is ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

IMPACT 4.9-8 Would implementation of the Proposed Plan place structures, which would impede or redirect flood flows within a 100-year flood hazard area? **Less than significant impact.**

The Proposed Plan does not include components that would result in development within the undeveloped portions of the Santa Monica Mountains. Single-family residential development on large lots could occur in the foothills of the mountains but this type of development would not be expected to impede or redirect flood flows within a 100-year flood hazard area. Within the developed portions of the Project Area, including underutilized and vacant sites, changes in runoff direction could occur as the Proposed Plan could result in the construction of more intense new development. However, such development on vacant urban land is expected to be limited since new development would occur primarily as infill on underutilized multi-family residential, commercial or industrial lots. These changes would represent a negligible increase in impervious surfaces compared to existing conditions, and the runoff characteristics of the Project Area would remain unchanged. Any new development, regardless of building densities and lot coverage, does not have the potential to significantly impede or redirect flood flows within a 100-year flood hazard area from existing conditions because the developed portions of the Project Area is covered largely by paved and other impermeable surfaces.

As previously described in Impact 4.9-7, any new development that occurs within the 100-year flood hazard area would be subject to restrictions and requirements as part of the City's existing permitting process. Compliance with these existing regulatory requirements related to flood zones would ensure that the Proposed Plan would not place structures that would impede or redirect flood flows within a flood hazard zone without incorporating proper floodplain management measures. Therefore, implementation of the Proposed Plan would result in ***less than significant*** impacts related to structures impeding or redirecting flood flows in a 100-year flood hazard area.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

IMPACT 4.9-9 Would implementation of the Proposed Plan expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? **No impact.**

In 2015, the California Supreme Court in *CBIA v. 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 a project. However, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze the impact of that exacerbated condition on future residents and users of a project, as well as other impacted individuals. The impact thresholds of significance is analyzed consistent with this decision below.

Within the Project Area, the City has designated the areas generally to the east of US-101, as well as along and adjacent to the Los Angeles River as potential inundation areas. Seismic activity could result in structural failure and/or inundation could result from the action of a seismically induced wave, which could overtop the Mulholland Dam (that helps form the Hollywood Reservoir). Inundation from water released suddenly from the Los Angeles River, the Hollywood Reservoir, or due to a dam failure could occur within the Project Area to some extent, although the degree of effect would diminish with distance from the river or dam failure.

Pursuant to CWC, the California Division of Safety of Dams oversees the design and construction of dams and conducts yearly inspections to ensure that the dams are performing and being maintained in a safe manner. The Hollywood Reservoir is regularly inspected and meet current safety regulations. In addition, the City's Local Hazard Mitigation Plan provides a list of existing programs, proposed activities, and specific projects that may assist the City in reducing risks and injury from natural and human-made hazards, including dam failure. Thus, given that the Hollywood Reservoir and Mulholland Dam are regularly inspected by the California Division of Safety of Dams and existing programs and activities are in place to reduce possible risks of dam failure, the failure of the dam during a catastrophic event, such as a severe earthquake, is considered unlikely.

The type of development expected to occur under the Proposed Plan is typical of urban environments. Under the Proposed Plan, the open space areas within the Project Area would be preserved. No development would occur within the potential inundation areas associated with the Los Angeles River. As previously discussed in Impact 4.9-7, portions of the Project Area are within the 100-year flood plain. While the Proposed Plan would increase development capacity in various Active Change Areas, and there could be some more intense redevelopment in non-change areas or non-active change areas, thereby potentially increasing the number of people and structures exposed to potential flooding, including flooding as a result of a levee or dam failure, the Proposed Plan would not cause or accelerate this existing hazard. This condition already exists within the Project Area. Future development under the Proposed Plan would not exacerbate existing flood hazards in the Project Area, including from sudden release of water from the Hollywood Reservoir or the Mulholland Dam.

In light of the California Supreme Court ruling in CBIA v. BAAQMD, which 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 a project, the potential for substantial adverse effects on people or structures from flooding, including flooding as a result of the failure of a levee or dam, is not an impact under CEQA, unless the Proposed Plan exacerbates the risk.

The Proposed Plan would not exacerbate existing conditions or increase the risk of loss, injury or death involving flooding, including flooding as a result of the Mulholland Dam, and there would be ***no impacts*** with respect to the risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

No impact.

IMPACT 4.9-10 Would implementation of the Proposed Plan result in inundation by seiche, tsunami, or mudflow/mudslides? **No impact.**

In 2015, the California Supreme Court in *CBIA v. 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 a project. However, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze the impact of that exacerbated condition on future residents and users of a project, as well as other impacted individuals. The impact thresholds of significance is analyzed consistent with this decision below.

Seiches. The Project Area includes a City-designated potential inundation area associated with the Hollywood Reservoir/Mulholland Dam and Los Angeles River. As previously discussed in Impact 4.9-9, no development would occur within the potential inundation areas associated with the Los Angeles River since these areas have open space land use designations or are within the I-5 right-of-way. Further, the Proposed Plan would not intensify or change the land use designations in this area. As for the potential inundation areas associated with the Hollywood Reservoir/Mulholland Dam, the California Division of Safety of Dams oversees the design and construction of dams and conducts yearly inspections to ensure that the dams are performing and being maintained in a safe manner. The Hollywood Reservoir and Mulholland Dam are regularly inspected and meet current safety regulations. In addition, the City's Local Hazard Mitigation Plan provides a list of existing programs, proposed activities, and specific projects that may assist the City in reducing risks and injury from natural and human-made hazards, including dam failure.[19] The Proposed Plan would not exacerbate the existing conditions (i.e. the Proposed Plan would not make seiche, tsunami or mudflow/mudslides more likely or more intense when and if they do occur). The Hollywood Reservoir and Mulholland Dam are regularly inspected and meet current safety regulations, implementation of the Proposed Plan would not increase the risk of exposure to seiche and would not intensify or change the existing land use in the area compared to existing conditions. Additionally, the type of development expected to occur under the Proposed Plan is typical of urban environments and would be located outside of the potential inundation areas. The Proposed Plan would increase development potential in some Active Change Areas and some areas of the non-Active Change Areas may redevelop with more intense development, thereby potentially increasing the number of people and structures exposed to risks from seiches, the Proposed Plan would not cause or accelerate this existing hazard. Therefore, ***no impacts*** related to seiche would occur.

Tsunamis. The Project Area is located more than 10 miles inland from the Pacific Ocean. According to the Safety Element of the General Plan, the Project Area is not located within a Tsunami Hazard Mitigation Zone. The Project Area is not located within an area that is designated by the City as having the potential to be impacted by a tsunami.[20] Thus, ***no impacts*** related to tsunami hazards would occur.

Mudflow/Mudslides. The Project Area consists of mountains, hillsides, and flat topography. Mudflow/mudslides occur on slopes and are generally caused by unusually heavy rains and/or seismic activity combined with limited vegetation (sometimes as a result of fires). Mudflow is a concern in the Santa Monica Mountains and the hillsides at the eastern end of the Project Area. No Active Change Areas are proposed within the Santa Monica Mountains; however, vacant lots could be redeveloped under the existing land use and zoning designations. Development in open space designated areas is restricted and any potential development or improvements to these open space areas would be limited. Single-family residential uses are primarily located within the Santa Monica Mountains and on the hillsides at the eastern end of the Project Area. One of the primary goals of the Proposed Plan is to direct growth away from low-density neighborhoods and preserve single-family and low-density residential neighborhoods. As such, intensified development within the mountains and hillsides is unlikely to occur with implementation of the Proposed Plan. If residential development were to occur within these areas, development would be required to comply with applicable Building and Safety Code design guidelines and applicable City of Los Angeles planning requirements. Development occurring within the Santa Monica Mountains and other hillsides within the Project Area also would be required to comply with the City's Hillside Ordinance during construction to minimize risks related to construction in high risk hillside areas. Additionally, when specific development is identified in the mountains and hillsides, slope stability and mudflow issues would be further evaluated and resolved in the required project-specific geotechnical and soils engineering investigation to minimize potential greater impacts related to mudflow and mudslides as a result of development. Mudflows and mudslides originating from terrain in or near the Project Area are not expected

[19]City of Los Angeles, *Hazard Mitigation Plan*, adopted August 2017.
[20]City of Los Angeles, *General Plan Safety Element, Exhibit G,* adopted by the City Council, November 26, 1996.

to pose a greater hazard in the future compared to existing conditions. Therefore, compliance with applicable regulations and design guidelines would ensure implementation of the Proposed Plan would not increase or exacerbate the risk of exposure of people or structures to mudflow/mudslides. Thus, there would be no impacts related to mudflow/mudslide.

Conclusion

The Project Area is not located within an area that is designated by the City as having the potential to be impacted by a tsunami. Thus, ***no impacts*** related to tsunami hazards would occur. Future development under the Proposed Plan would not exacerbate existing risks from seiches or mudflows/mudslides. Therefore, there would be ***no impacts*** related to seiches and mudflows/mudslides.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

No impact.

Impact 4.9-11 Would implementation of the Proposed Plan cause flooding during the projected 50-year storm event, which would have the potential to harm people or damage property or sensitive biological species? **Less than significant impact.**

The Proposed Plan does not substantially change the overall land use patterns in the Project Area. As a result, new development in the Project Area, including the Active Changes Areas, where the greatest amount of new development or redevelopment would foreseeably occur, would not result in large amounts of new impervious surfaces that would substantially alter existing drainage patterns in the Project Area, therefore resulting in flooding. Changes in runoff direction could occur as the Proposed Plan could result in the construction of new development on vacant urban land; however, such development on vacant urban land is expected to be limited since new development would occur primarily as infill on underutilized multi-family residential, commercial or industrial lots. These changes would represent a negligible increase in impervious surfaces compared to existing conditions, and the runoff characteristics of the Project Area would remain unchanged. Therefore, change in the volume of stormwater runoff that could potentially cause flooding would be limited.

As previously discussed, BOE oversees construction and maintenance of the City's storm drain system, which is designed to provide sufficient capacity to manage up to at least a 50-year magnitude storm. The network of natural and constructed channels that convey stormwater flows, debris basins, pump plants, underground pipelines and catch basins are designed to handle an excess of water during localized street flooding or heavy rainfall. LAMC Section 17.05(M) prescribes performance standards for storm drain systems. Future development under the Proposed Plan would be required to demonstrate to the satisfaction of the City that appropriate capacity is available, and that storm drain facilities are designed to incorporate proper drainage design to the satisfaction of the City Engineer. Storm drains must be of sufficient capacity in all cases to prevent flooding of building sites from a storm of a 50-year frequency. Considering both the existing highly developed nature of the Project Area and the existing requirements for complying with applicable regulations, the Proposed Plan would not cause a substantial increase in the peak flow rates or volumes of stormwater runoff in a manner that would cause on-site or off-site flooding during a 50-year storm event or exceed the drainage capacity of existing or planned drainage systems. Therefore, impacts related to flooding during the projected 50-year developed storm event would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

CUMULATIVE IMPACTS

The analysis of hydrology and water quality impacts resulting from the adoption and implementation of the Proposed Plan considers the effects of future growth and development throughout the geographic extent of the Proposed Plan. The cumulative context for the analysis of hydrology and water quality impacts is a function of the type of impact and geographic considerations. Some cumulative impacts may have a broad, regional context, while others may be limited by site-specific conditions or location. Cumulative development resulting from planning efforts that include the Regional Transportation Plan/Sustainable Communities Strategy, adjacent community plans, and the Proposed Plan contribute to cumulative impacts.

Water Quality Impacts. The Proposed Plan along with cumulative projects could result in significant impacts related to water quality if development were to result in substantial decreases in water quality. All development within the Los Angeles River and Ballona Creek Watersheds is required to conform to applicable Waste Discharge Requirements (WDRs) that are imposed by the City and County of Los Angeles. Stormwater runoff from cumulative development in the watershed, including development that could be facilitated by the Proposed Plan, could contribute to water quality impairments if measures are not implemented to minimize pollutant levels in runoff. However, all future development, including projects that could be constructed in the Project Area (as applicable), are required to implement operational BMPs to control the release of pollutants in stormwater runoff per NPDES GCASP permit and SUSMP requirements, and also comply with all applicable local regulations. Requirements of the SUSMP are enforced through the City's plan approval and permit process, and all new development projects are subject to City inspection. Furthermore, all applicable projects must comply with LAMC Chapter VI, Article 4.4, Section 64.72, which governs pollutant control requirements and construction activity requirements. Future development resulting from implementation of the Proposed Plan would occur primarily as infill on previously developed or vacant sites, the nature of which would not significantly change the types or amounts of pollutants in stormwater runoff. Therefore, the Proposed Plan would not make a cumulatively considerable contribution to impacts on water quality.

Groundwater Impacts. The Proposed Plan along with cumulative projects could result in significant impacts related to groundwater supply and recharge if development substantially impeded groundwater recharge and/or resulted in contaminated groundwater. Future development in the Project Area and in the City would be subject to the City's stormwater quality BMPs, Stormwater and Urban Runoff Pollution Control Ordinance, and NPDES GCASP permit requirements. These regulations would ensure construction activities associated with future development would not substantially deplete groundwater supplies or interfere with groundwater recharge. Other jurisdictions located within the groundwater basin would also be subject to federal, State regional, and local regulations and requirements, including NPDES GCASP permit. Furthermore, based on the urbanized state of the City, future development in already developed areas would not result in demonstrable or sustained reduction of groundwater recharge capacity, such that there would be a lowering of the local groundwater table level. Future development in the City would occur primarily as infill on previously developed or vacant sites. Therefore, the Proposed Plan would not make a cumulatively considerable contribution related to groundwater supply and recharge.

Drainage, Runoff, and Localized Flooding Impacts. The Proposed Plan along with cumulative projects could result in significant impacts related to drainage, runoff, and localized flooding if such development significantly increased the need for drainage, significantly increased runoff and/or localized flooding or if it made conditions worse than they would otherwise be. The area of impact for cumulative impacts would be the extensive storm drain system operated by the City of Los Angeles, which is described in the Environmental Setting above. Stormwater flows from the Project Area currently combine with those from surrounding development in the greater Los Angeles area and are discharged into the storm drain system that conveys flows to Ballona Creek and Los Angeles River. LAMC Section 17.05(M) prescribes performance standards for storm drain systems, which would apply to cumulative development contributing flows to the system. Open space areas in the Project Area would be preserved, and future development would be concentrated in areas of the Project Area already containing impervious surfaces. Therefore, flows from areas of future development are already accounted for in system capacity. Potential development projects that could be implemented under the Proposed Plan would not result in substantial increases in impervious surfaces. Therefore, the rate and volume of stormwater flows from the Proposed Plan would represent a negligible contribution to system flows. The Proposed Plan would not make a cumulatively considerable contribution related to drainage, runoff, and flooding.

Impacts Related to 100-year Flood Hazard Areas. The Proposed Plan along with cumulative projects could result in significant impacts related to 100-year flood hazard areas if such development increased the likelihood of a 100-year storm event or if it made such an event worse. The area of impact for cumulative impacts would be the incorporated boundary of the City of Los Angeles, which participates in the NFIP and provides emergency response services for flood events. Other adjacent jurisdictions that have areas within a 100-year flood plain also participate in NFIP and provide emergency response service for flood events. As previously discussed and as shown in **Figure 4.9-3**, several areas within the Project Area are within a 100-year flood plain zone, including areas within the vicinity of the Hollywood Reservoir. The immediate area surrounding the Project Area also include areas within a 100-year flood plain, such as the Los Angeles River stretch located along the eastern border of the Project Area and the Silver Lake Reservoir located southeast of the Project Area.

New development within the Project Area, including the Active Change Areas and non-active change areas, could change building footprints and potentially increase the number of people who could be exposed to flood hazard. All future development would be subject to restrictions and requirements as part of the City's existing permitting process. Future development within the 100-year flood plain or floodway would be required to incorporate appropriate City and FEMA flood plain management measures in the design of new buildings as specified in the Flood Hazard Specific Plan Guidelines and Floodplain Management Plan and enforced by the Department of Building and Safety. Compliance with these existing regulatory requirements would ensure the Proposed Plan would not place housing within a flood hazard area without incorporating proper measures and reducing this impact to less than significant. In addition, the City's hazard mitigation planning and emergency response programs would also continue to be implemented to reduce potential losses. As previously discussed under Impacts 4.9-7 through 4.9-11, the Proposed Plan would not make a cumulatively considerable contribution related to 100-year flood hazard areas.

Inundation and Mudslide Impacts. The Proposed Plan along with cumulative projects could result in significant impacts related to seiche, inundation, and mudslides if such development increased the likelihood of seiche, inundation and/or mudlsides or made such events worse. The City of Los Angeles and nearby jurisdictions participate in the NFIP and provide emergency response services for flood events. Cumulative development could be at risk of dam failure inundation or mudflow/mudslide, depending on location. However, the Proposed Plan would not result in physical changes that would alter or redirect dam flooding or flow directions for mudslides/mudflows or exacerbate existing conditions with respect to the risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. The location of future development and potential impact related to dam failure or mudflow/mudslide

would be evaluated on a case-by-case basis during the permitting process to ensure proper siting of facilities and project design. Cumulative population growth could result in an increase in the number of people and structures exposed to hazards; however, the City and other nearby jurisdictions' hazard mitigation planning and emergency response programs would continue to be implemented to reduce potential losses. The Proposed Plan would have no impact related to physical changes that would alter or redirect dam flooding or flow directions for mudslides/mudflows or exacerbate existing conditions with respect to the risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. The Proposed Plan would not make a cumulatively considerable contributions to impacts related to seiche, inundation, and mudslides.

Impacts Related to 50-year Storm Event. The Proposed Plan along with cumulative projects could result in a significant impact related to flooding during a 50-year storm event if such development increased the likelihood of a 50-year storm event or if it made such an event worse. The area of impact for cumulative impacts would be the incorporated boundary of City of Los Angeles, in which BOE oversees maintenance and operations of the City's storm drain system. Future development in the City would be required to demonstrate to the satisfaction of the City that appropriate capacity is available, and that storm drain facilities are designed to incorporate proper drainage design to the satisfaction of the City Engineer, on a case-by-case basis. Other jurisdictions that are adjacent to or near the Plan area have similar requirements for their storm drain facilities. Compliance with applicable regulations and individual project evaluation by the City Engineer on a case-by-case basis during the permitting process would ensure that future development would not cause on-site or off-site flooding during a 50-year storm event or exceed the drainage capacity of existing or planned drainage systems. The Proposed Plan would not make cumulatively considerable contributions to impacts related to flooding during a projected 50-year storm event.

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4.10 LAND USE AND PLANNING

This section provides an overview of the existing land uses, land use designations, zoning, and planning policies in the Project Area and evaluates the potential for the implementation of the Proposed Plan to result in environmental impacts related to land uses. Topics addressed include the division of an established community, consistency with applicable land use plans, policies, regulations, and applicability of habitat conservation plans or natural community conservation plans. This section was prepared utilizing information from a variety of sources, including the City of Los Angeles' General Plan and the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

REGULATORY FRAMEWORK

Regulations and plans applicable to the Proposed Plan are summarized below.

STATE

State Planning Law. State planning law (California Government Code Section 65300) requires every city and county in California to adopt a comprehensive, long-term general plan for the physical development of the jurisdiction and of any land outside its boundaries that, in the planning agency's judgment, bears relation to its planning (sphere of influence). A general plan should consist of an integrated and internally consistent set of goals and policies grouped by topic into a set of elements and guided by a jurisdiction-wide vision. State law requires that a general plan address seven elements or topics (land use, circulation, housing, conservation, open space, noise, and safety), but allows some discretion on the arrangement and content. Additionally, each of the specific and applicable requirements in the state planning law should be examined to determine if there are environmental issues within the community that the general plan should address, such as hazards or flooding.

Senate Bill (SB) 375. The Sustainable Communities and Climate Protection Act of 2008 (Sustainable Communities Act, SB 375, Chapter 728, Statutes of 2008) supports the state's climate action goals to reduce greenhouse gas (GHG) emissions through coordinated transportation and land use planning with the goal of creating more sustainable communities.

Under the Sustainable Communities Act, the California Air Resources Board (CARB) sets regional targets for GHG emissions reductions from passenger vehicle use. In 2010, CARB established these targets for 2020 and 2035 for each region covered by one of the state's metropolitan planning organizations (MPO). CARB periodically reviews and updates the targets.

Relevant to the City's land use plans, SCAG, the local MPO, was required to prepare a "sustainable communities strategy (SCS)" as part of its regional transportation plan (RTP). The SCS contains land use, housing, and transportation strategies that, if implemented, are intended to allow the SCAG region to meet its GHG emission reduction targets. The RTP/SCS guides the transportation policies and investments for the region. CARB must review the adopted SCS to confirm and accept SCAG's determination that the SCS, if implemented, would meet the regional GHG targets.[1]

[1]CARB, *Sustainable Communities*, https://www.arb.ca.gov/cc/sb375/sb375.htm.

Complete Streets Act. Assembly Bill (AB) 1358, the Complete Streets Act (Government Code Sections 65040.2 and 65302), was signed into law by former Governor Arnold Schwarzenegger in September 2008. As of January 1, 2011, the law requires cities and counties, when updating the part of a local general plan that addresses roadways and traffic flows, to ensure that those plans account for the needs of all roadway users. Specifically, the legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians and transit riders, as well as motorists. At the same time, the California Department of Transportation (Caltrans) unveiled a revised version of Deputy Directive 64, an internal policy document that now explicitly embraces Complete Streets as the policy covering all phases of state highway projects, from planning to construction to maintenance and repair.

REGIONAL

2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2016-2040 RTP/SCS, the most recent SCAG RTP/SCS, was adopted in April 2016. It was approved by the CARB. It is the transportation and overall land use vision for Los Angeles, Orange, San Bernardino, Imperial, Riverside, and Ventura Counties.[2] The RTP portion of the 2016-2040 RTP/SCS identifies priorities, goals and policies, and performance measures for transportation planning and improvements to ensure that future projects are consistent with other planning goals for the area. Transportation projects being constructed within the SCAG region must be listed in the 2016-2040 RTP/SCS. The SCS portion of the 2016-2040 RTP/SCS presents an overall land use concept for the region with increasing focus on long-term emission reduction strategies for rail and trucks; expanding the region's high-speed and commuter rail systems; expanding active transportation; leveraging technological advances for transportation; addressing further regional reductions in greenhouse gas (GHG) emissions; and making the region more resilient to climate change. The RTP/SCS is intended to aid local jurisdictions in developing local plans and addressing local issues of regional significance.

Regional Housing Needs Assessment (RHNA). The RHNA is the state-mandated process to identify the total number of housing units (by affordability level) that each jurisdiction must accommodate in its Housing Element. As part of this process, the California Department of Housing and Community Development (HCD) identifies the total housing need for the region for an eight-year period (in the current cycle, from 2013 to 2021). The RHNA Allocation Plan is produced periodically by SCAG, as mandated by state law, to coincide with the region's schedule for preparing housing elements. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods and is a key tool for SCAG and its member governments to plan for growth. The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment. The fifth cycle Final RHNA Allocation Plan was adopted by the SCAG Regional Council on October 4, 2012 and distributes housing allocations for each jurisdiction between 2013 and 2021. Communities then plan and determine how they will address this need through the process of completing the housing elements of their general plans. The City's Housing Element 2013-2021, which is discussed below was adopted in December 2013.

LOCAL

City of Los Angeles General Plan. State law requires that cities prepare and adopt a comprehensive, integrated, long-term General Plan to direct future growth and development. The City's General Plan is the fundamental policy document of a City. It defines how a City's physical and economic resources are to be managed and utilized over time. Decisions by a City with regard to the use of its land, design and character of buildings and open spaces, conservation of existing and provision of new housing, provision

[3]SCAG, *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*, adopted April 2016.

of supporting infrastructure and public and human services, and protection of residents from natural and man-caused hazards are guided by and must be consistent with the General Plan. State law requires that the General Plan must contain seven mandatory elements: land use, transportation, housing, conservation, open space, noise, and safety. Cities can also adopt additional General Plan elements. Mandated General Plan elements are the Land Use Element, Mobility Element, Housing Element, Conservation Element, Open Space Element, Noise Element, and Safety Element. The Land Use Element of the City's General Plan is composed of the 35 community plans, which are the official guide to the future development of the City. The 35 community plans guide the location and intensity of private and public uses of land; direct the arrangement of land uses, streets, and services; and encourage the economic, social, and physical health, safety, welfare, and convenience of people who live and work in the community. The City's additional elements include the Framework Element, Service Systems Element/Public Recreation Plan, Plan for a Healthy Los Angeles – Health and Wellness Element, and the Air Quality Element.

Framework Element

Vision for Growth and Guide for Community Plan Updates

The City's General Plan Framework Element is the citywide plan that establishes the overarching guide for how Los Angeles will grow in the future. Adopted in 1996, the Framework Element is a strategy for long-range growth and development, setting a citywide context for the update of community plans and citywide elements. The Framework Element responds to state and federal mandates to plan for the future by providing goals, policies, and objectives on a variety of topics, such as land use, housing, urban form, open space, transportation, infrastructure, and public services. The Framework Element's key guiding principles, summarized below, are advanced at the community-level through the community plans:

- *Grow strategically*. Should the City's population continue to grow, as is forecasted by the SCAG, growth should be focused in a number of higher-intensity commercial and mixed-use districts, centers, and boulevards, particularly in proximity to transportation corridors and transit stations. This type of smart, focused growth links development with available infrastructure and encourages more walkable, transit-friendly neighborhoods, helping to ease reliance on the automobile, and minimize the need for new, costly infrastructure.
- *Conserve existing residential neighborhoods*. By focusing much of the City's growth in centers and along commercial corridors, the City can better protect the existing scale and character of stable single- and multi-family neighborhoods. The elements that contribute to the unique character of different residential neighborhoods should be identified and preserved whenever possible.
- *Balance the distribution of land uses*. Maintaining a variety of land uses is crucial to the long-term sustainability of the City. Commercial and industrial uses contribute to a diverse local economy, while residential uses provide necessary housing for the community. Integrating these uses within smaller geographical areas can better allow for a diversity of housing types, jobs, services, and amenities.
- *Enhance neighborhood character through better development standards*. Better development standards are needed to both improve the maintenance and enhancement of existing neighborhood character, and ensure high quality design in new development. These standards are needed for all types of development; residential, commercial, and industrial uses.
- *Create more small parks, pedestrian districts, and public plazas*. While regional parks and green networks are an important component of the City's open space strategy, more small-scale, urban open spaces must be developed as well, as they are crucial to the quality of life of the City's residents. There are many opportunities at the community level to create public "pocket" parks as part of new developments, to enhance pedestrian orientation in key commercial areas, and to build well-designed public plazas.

- *Improve mobility and access*. The City's transportation network should provide adequate accessibility to jobs, services, amenities, open space, and entertainment, and maintain acceptable levels of mobility for all those who live, work, travel, or move goods in Los Angeles. Attainment of this goal necessitates a comprehensive program of physical infrastructure improvements, traffic systems management techniques, and land use and behavioral changes that reduce vehicle trips. An emphasis should be placed on providing for and supporting a variety of travel modes, including walking, bicycling, public transit, and driving.

- *Identify a hierarchy of commercial districts and centers*. The Framework Element provides an overall structure and hierarchy for the City's commercial areas. This hierarchy, which includes Neighborhood Districts, Community Centers, Regional Centers, and Mixed-Use Boulevards, has helped shape the development and urban form of the City and will continue to do so in the future. Understanding this hierarchy helps us better understand the roles that these different types of "activity centers" play within our communities so that their unique characteristics can be enhanced.

City of Los Angeles Mobility Plan 2035 (MP 2035). MP 2035, adopted in August 2015 and re-adopted in January 2016, now serves as the circulation element of the General Plan. MP 2035 establishes new street designations, classifies each of the City's arterial streets, and incorporates "complete street" policy framework, thus providing a foundation for future policies and principles related to resident interaction with their streets.

2013 to 2021 Housing Element. Because housing needs are recognized as a statewide concern, the Housing Element is required by California state law to be a component of every City's General Plan. The Housing Element is the only Element in the General Plan that is mandated to be updated every five to eight years. Updates to the Housing Element are subject to the statutory provisions in the Government Code Section 65583[3] that guide the preparation of the document. Adoption of the Housing Element requires that the City consider economic, environmental, fiscal, and community goals. Pursuant to state law, the Housing Element must identify how the City will meet the needs identified in the RHNA Allocation Plan, the sites that can accommodate these needs, and the policies and programs to assure that the housing units necessary to meet these needs could be provided. The primary goal of the City's Housing Element is to provide policies, objectives and programs that encourage a range of housing opportunities for all income groups. It proactively directs long-range citywide policy goals and objectives by quantifying growth in terms of housing needs. As discussed above, the RHNA Allocation Plan is produced periodically by SCAG to coincide with the region's schedule for preparing housing elements. The RHNA Allocation Plan was adopted by the SCAG Regional Council on October 4, 2012 and quantifies the need for housing within each jurisdiction between 2013 and 2021.

Los Angeles Municipal Code (LAMC). Development in the City is also governed by the City's Zoning Code (Chapter 1 of the LAMC), which regulates development through zoning classifications and development standards. The Comprehensive Zoning Plan of the City's (Zoning Ordinance) set forth in LAMC Section 12.00 *et seq.* includes development standards for zoning districts in the City. LAMC Section 13.00 *et seq.* includes development standards for various supplemental use districts in the City that apply specifically to parcels (as distinguished from regulations of general applicability with which all projects must comply). The LAMC is currently undergoing a comprehensive update to all Zoning Code sections as part of the "Re:Code LA" effort. Re:Code LA, which started in 2014 and will continue through 2019, will update the current Zoning Ordinance in order to make the code more streamlined, visual, and easy to use. The Proposed Plan does not include implementing the Re:Code LA zoning in the Project Area and there are no proposed amendments to the Code for the Re:Code LA project that have been initiated or are anticipated to apply in the Project Area at this time.

[3]California Land Use and Planning Law, Barclay and Grey, 35th Edition, Solano Press Books, 2016.

Redevelopment Project Area. The CPA contains one active redevelopment project area that was managed by the Community Redevelopment Agency of the City of Los Angeles (CRA/LA). In 2012, with the passage of AB 1x-26 by the California Legislature, the CRA/LA was abolished but the City's redevelopment project areas and their associated plans continue to exist until the original expiration dates. Since the dissolution of the CRA/LA, activities in the redevelopment project areas have been administered through the Designated Local Authority (DLA). The active redevelopment project area within the CPA is the Hollywood Redevelopment Project Area, located generally in the center of the CPA. This redevelopment plan provides policies for removing blight and strengthening the economic base in Hollywood, and includes goals that promote the entertainment industry, revitalize the historic core, preserve and expand housing for all income groups, meet the social needs of area residents, and preserve historically significant structures.

Section 502 of the Hollywood Redevelopment Plan states that the land uses permitted in the Project Area shall be those permitted by the General Plan, applicable Community Plan, and any applicable City zoning ordinance, as they existed when the Redevelopment Plan was adopted or as thereafter amended or supplemented. Therefore, the land use designations and zoning ordinances of the Proposed Plan would supersede Redevelopment Plan policies and provisions that are inconsistent with the Proposed Plan. Under the Redevelopment Plan and the existing structure for the enforcement of the Redevelopment Plan, all projects, including building permits, in the plan boundaries are required to be reviewed by the DLA for consistency with the Redevelopment Plan.

SPECIFIC PLANS AND OVERLAY ZONES

There are several specific plans, supplemental use districts and overlay zones that apply in the Hollywood CPA that customize the regulations of the LAMC to plan the land use and zoning of specific geographic areas. The Specific Plans, which are shown in **Figure 4.10-1**, are utilized for systematic implementation of the General Plan goals and policies for particular geographic areas. Specific plans and overlay zones create new zoning regulations that implement unique districts. The Hollywood CPA contains four specific plans, one supplemental use district for signage, and four overlay zones.

Vermont/Western Transit Oriented District Specific Plan (Station Neighborhood Area Plan [SNAP]). The Vermont/Western Transit Oriented District Specific Plan, adopted in March 2001, covers an approximately 2.2 square mile area within the Hollywood and neighboring Wilshire CPAs and was created to make the neighborhood more livable, economically viable, and encourage transit-oriented development around the Los Angeles County Metropolitan Transportation Authority (Metro) Red Line in East Hollywood. The Specific Plan features different planning rules for six different subareas: Subarea A – Neighborhood Conservation, Subarea B – Mixed-Use Boulevards, Subarea C – Community Center, Subarea D – Light Industrial/Commercial, Subarea E – Public Facility[4] and Subarea F – Large Scale Commercial Node.[5]

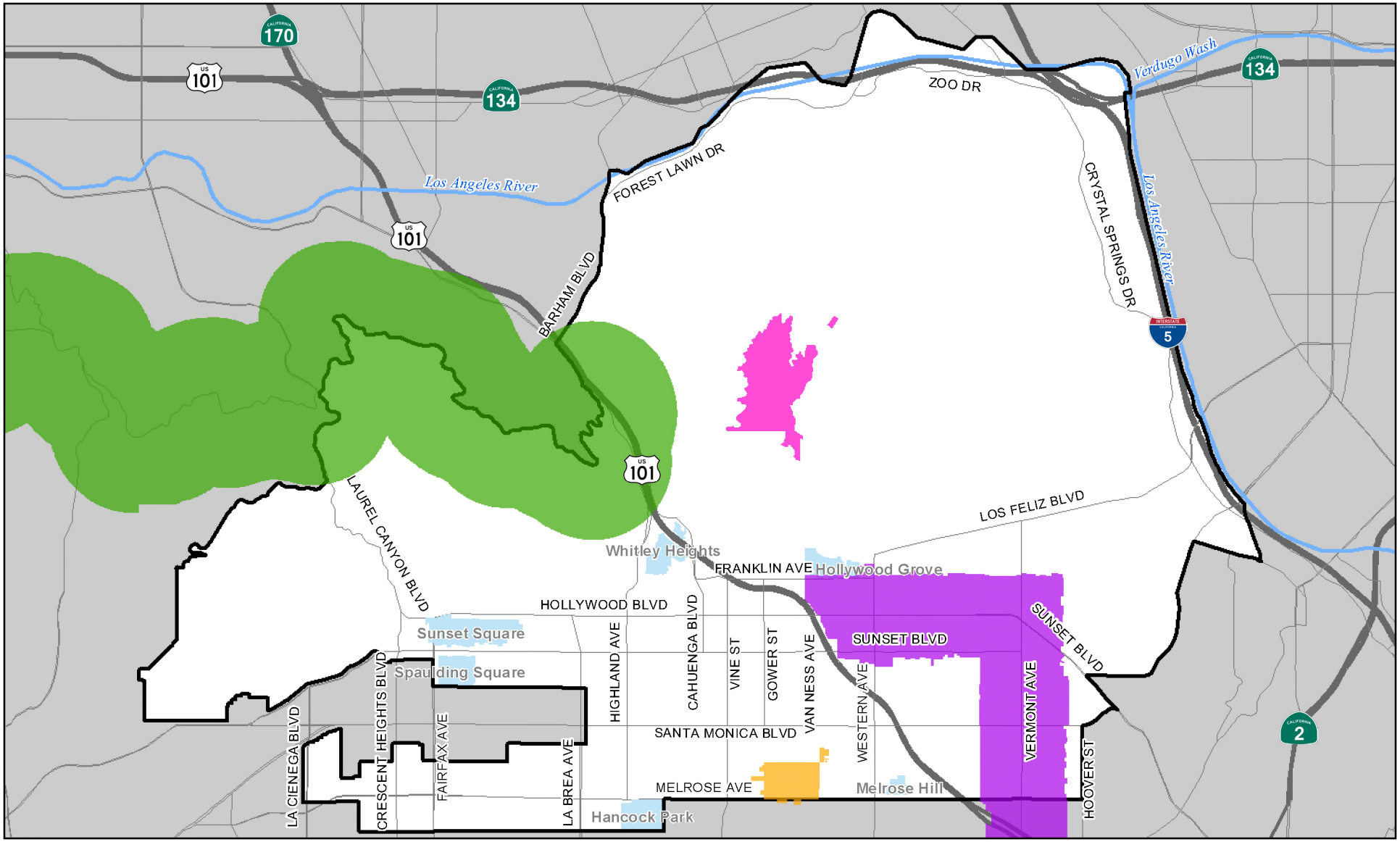
Hollywoodland Specific Plan. The Hollywoodland Specific Plan, effective July 1992, was established to protect the unique architectural styles and "European village" character of Hollywood; protect the undeveloped ridgelines enclosing Hollywoodland; preserve and build upon the community's natural environment, unique history and architectural character; ensure and permit new development that is compatible with the community and enhances the character of the community rather than comprise its integrity; protect against out-of-scale development; and improve fire protection and safety.[6]

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[4]City of Los Angeles, *Vermont/Western Transit Oriented District Specific Plan (Station Neighborhood Area Plan), Ordinance 173,749*, effective March 1, 2001.

[5]City of Los Angeles, *Vermont/Western Transit Oriented District Specific Plan (Station Neighborhood Area Plan), Ordinance 184,414,* effective August 16, 2016 and *Ordinance 184888*, effective June 7, 2017.

[6]City of Los Angeles, *Hollywoodland Specific Plan, Ordinance No. 168,121*, effective July 8, 1992.



LEGEND:

- Hollywood CPA
- HPOZs
- Hollywoodland Specific Plan
- Mulholland Scenic Parkway Specific Plan
- Vermont / Western Station Neighborhood Area Plan (SNAP)
- Paramount Pictures Specific Plan

N W E S

0 2,700 5,400 Feet

SOURCE: City of Los Angeles, 2017; TAHA, 2017.

taha environmental planners
taha 2010-073

Hollywood Community Plan Update
Draft Environmental Impact Report
CITY OF LOS ANGELES

FIGURE 4.10-1
SPECIFIC PLANS AND HPOZs

Mulholland Scenic Parkway Specific Plan. The Mulholland Scenic Parkway Specific Plan, adopted in May 1992, was created to preserve and enhance the parkway's scenic features and resources; preserve and enhance recreational opportunities; ensure compatible land use and development; preserve existing residential character; protect the natural, geological, and historic environment; and provide development standards along Mulholland Drive.[7] The western portion of the Project Area extending from the US-101 westward along Mulholland Drive is located within the Specific Plan area.

Paramount Pictures Specific Plan. The Paramount Pictures Specific Plan, adopted in 2016, was created to guide the modernization and future development of the Paramount Pictures property, an approximately 62-acre site comprised of the main studio property, generally bounded by Melrose Avenue to the south, Gower Street to the west, a cemetery to the north and Van Ness Avenue to the east, and six surrounding properties. The main studio property and four of the surrounding properties north of Melrose Avenue are located within the Project Area; a few properties are located in the adjacent Wilshire CPA. The Specific Plan will allow for the continued development of the site as a major studio/entertainment institution and creates seven planning areas with specific design regulations. The Specific Plan also establishes permitted uses, quantifies net new floor area for stage, production office, office, retail and support uses, sets height restrictions, and has historic preservation regulations.[8]

Hollywood Signage Supplemental Use District (SUD). The Hollywood Signage SUD was established in 2004 to acknowledge and promote the continuing contribution of signage to the distinctive aesthetics of Hollywood Boulevard, as well as control blight created by poorly placed, badly designed signs throughout Hollywood. The purpose of the Hollywood Signage SUD is to provide for the systematic execution of the Hollywood Community Plan; promote appropriate and economically viable signage; limit visual clutter by regulating the number, size and location of signs; minimize potential traffic hazards and protect public safety; protect public street views and public scenic views of the Hollywood Sign and the Hollywood Hills; and protect and enhance major commercial corridors and properties.[9]

Historic Preservation Overlay Zones (HPOZs). The City of Los Angeles has developed an expansive program of HPOZs that provide for review of proposed exterior alterations and additions to historic properties within designated districts. Currently, citywide there are more than 30 designated HPOZs that range in size from neighborhoods of approximately 50 parcels to areas with more than 3,000 properties. An HPOZ is an area of the City that is designated as containing structures, landscaping, natural features or sites having historic, architectural, cultural, or aesthetic significance. Upon area designation as an HPOZ, an HPOZ overlay is added to the zoning and are subject to special regulations under Section 12.20.3 of the LAMC, which ensure that the rehabilitation of historic houses is performed in a manner which respects the historic integrity of the structures and the neighborhood.[10] New development is also reviewed to assure that the character of the historic neighborhood is maintained. The Hollywood CPA contains six HPOZs (Spaulding Square, Sunset Square, Whitley Heights, Melrose Hill, Hollywood Grove, and Hancock Park). The locations of the HPOZs within the Project Area are shown in **Figure 4.10-1** above, and are discussed in detail in Section 4.5, Cultural Resources, of this Draft EIR.

Los Angeles Promise Zone. Implemented by the U.S. Department of Housing and Urban Development (HUD), the Promise Zone initiative was created with the goal of revitalizing high-poverty urban, rural, and tribal communities through public-private partnerships. The Hollywood CPA is located within the boundaries of the federally-designated Los Angeles Promise Zone, which includes the communities of Hollywood, East Hollywood (within the Hollywood CPA, east of US-101), Koreatown, Pico Union, and

[7]City of Los Angeles, *Mulholland Scenic Parkway Specific Plan, Ordinance No. 167,943*, adopted May 13, 1992.
[8]City of Los Angeles, *Paramount Pictures Specific Plan, Ordinance No. 184539*, effective December 11, 2016.
[9]City of Los Angeles, *Hollywood Signage Supplemental Use District, Ordinance No. 176172, effective October 4, 2004.* A subsequent amendment was adopted, *Ordinance No. 181340,* effective November 17, 2010.
[10]City of Los Angeles Office of Historic Resources, *About the HPOZ Program*, http://preservation.lacity.org/hpoz/homepage/about-hpoz-program, accessed September 19, 2016.

Westlake. The Los Angeles Promise Zone, designated by the federal government in 2014, collectively works with government leaders, local institutions, non-profits, and community organizations with the goal of creating jobs and healthy businesses, improving educational opportunities, creating safe neighborhoods, and promoting more sustainable and livable communities through better housing opportunities for residents and neighborhoods.[11]

Los Angeles River Revitalization Master Plan (LARRMP). Adopted in April 2007, the LARRMP contains goals in the creation of parks, paths, and open spaces along the Los Angeles River. The LARRMP includes recommendations for physical improvements along the Los Angeles River corridor; policies for managing public access and management structure; and short- and long-term priority projects and potential funding strategies.

River Improvement Overlay (RIO) District. Following the adoption of the LARRMP, the RIO District (Ordinance Nos. 183,144 and 183,145), effective August 2014 and revised in January 2015, was established to help implement the vision and goals of the LARRMP by focusing on sustainable environments in the surrounding neighborhoods, including guidelines for both private property and public rights-of-way. The RIO provides guidelines for new "complete" streets and includes mobility strategies to meet the needs of pedestrians, bicyclists, transit riders, and vehicle drivers. The RIO District includes all of the neighborhoods within the City of Los Angeles that are adjacent to the Los Angeles River, and generally extends 0.5-mile on either side of the Los Angeles River, creating an area that is potentially 32 miles long and one mile wide. Sections of the north, northeastern, and eastern boundaries of the Hollywood CPA are located in a RIO District.

Hillside Construction Regulation (HCR). The Hillside Construction Regulation Supplemental Use District, effective March 2017, was established by Ordinance No. 184,827 to provide additional protections that would address the cumulative construction related impacts of multiple single-family houses in hillside areas. New single-family home developments in HCR districts are required to comply with grading limits, hauling truck operation standards, and specific operating hours for construction activity. In addition, any single-family home development exceeding 17,500 square feet in a HCR district will need to file for a Site Plan Review discretionary approval. Properties located within HCR districts are identified with the HCR suffix as part of the zoning string. There are currently two HCR districts in the western part of the CPA: the Bel Air Beverly Crest neighborhood (Ordinance 184,828, effective March 2017) and the Bird Streets and Laurel Canyon neighborhood (Ordinance 185,491, effective May 28, 2018).

EXISTING SETTING

OVERVIEW

The Project Area consists of the Hollywood CPA, which is located in the City of Los Angeles approximately 2.5 miles northwest of downtown Los Angeles. The Project Area contains approximately 13,962 acres or 21.8 square miles and extends along the Cities of Burbank and Glendale and the US-101 to the north, the I-5 to the east, Melrose Avenue to the south, and Mulholland Drive and the Cities of West Hollywood and Beverly Hills, including a strip of land south of the City of West Hollywood and north of Rosewood Avenue, between La Cienega Boulevard and La Brea Avenue to the west. Adjoining City of Los Angeles community plan areas include Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass CPA to the north, Silver Lake-Echo Park-Elysian Valley CPA and Northeast Los Angeles CPA to the east, Wilshire CPA to the south, and Bel Air-Beverly Crest CPA to the west.

[11]City of Los Angeles, *Promise Zone Goals,* http://www.lamayor.org/promise-zone-goals, accessed September 20, 2016.

The Project Area contains large single-family and multi-family residential neighborhoods, as well as multiple centers of commercial and industrial activity. The hillside area north of Franklin Avenue (i.e., Santa Monica Mountains) is divided between single-family neighborhoods and two regional parks: Runyon Canyon and Griffith Park. The western half of the hills contain the single-family neighborhood known as Hollywood Hills and Runyon Canyon. The eastern section of the hills encompasses Griffith Park (the largest municipal park with urban wilderness area in the United States) and the Los Feliz neighborhood.

The flatlands consist of a grid of streets lined with commercial centers and corridors. The flatlands are densely populated with multi-family residential neighborhoods and a few low-density residential neighborhoods around the northwestern, southern, and eastern edges of the Project Area.

The heart of Hollywood, also known as the Regional Center, is generally located in the center of the Project Area between La Brea Avenue to the west and Gower Street to the east, and Franklin Avenue/Yucca Street to the north and Sunset Boulevard/Fountain Avenue to the south). This area has a mixture of both historic and modern low-to-high rise buildings ranging from one-story to more than 20 stories (occupied primarily by tourist and entertainment-related uses), other commercial uses, and multi-family residential development. Landmarks are located along Hollywood Boulevard, including the Hollywood Walk of Fame, historic theaters, and the Hollywood and Highland entertainment center.

The Project Area also contains an established cluster of hospitals in East Hollywood near the Metro Red Line Vermont/Sunset station, various public schools and educational facilities, including Los Angeles City College, and several cemeteries, including Hollywood Forever. There are also numerous entertainment-related studios and uses in the CPA, including Paramount Pictures, Hollywood Center Studios, and Sunset Bronson Studios.

The Project Area's transportation system includes a circulation network of freeways, highways and surface roadways; a public transit system (the Metro Red Line rail and bus routes); bicycle routes; and a pedestrian circulation system of sidewalks and crosswalks. State Highway 134 (SR-134) traverses through the Project Area near the northern Project Area boundary, and US-101 cuts across the Project Area from Melrose and Normandie Avenues in the south to Barham Boulevard and Cahuenga Boulevard in the Hollywood Hills. I-5 defines a large portion of the easterly boundary. The street network is composed of arterial streets (Boulevards and Avenues), collectors, City-designated scenic highways, divided streets and local streets. Streets in the flatlands are laid out in a grid pattern, mainly oriented on primarily compass points. Streets in the hillsides wind through the canyons and follow topographic features.

The public transit system consists of the Metro Red Line rail, Metro Rapid Bus lines, one Commuter Express Bus, and numerous local bus lines, including regular and 24-hour lines and neighborhood DASH lines.

A network of bicycle routes includes the Los Angeles River Bike Path, a Class I Bike Path, separated from vehicles; Class II Bike Lanes, which are special lanes for bicycles identified by pavement markings; Sharrowed Routes, which are bike lanes shared with cars, identified by a pavement marking; and Class III Signed Bike Routes, which are bike routes identified by signs. The bicycle routes are primarily located along or near the northern boundaries of the Project Area.

EXISTING GENERAL PLAN DESIGNATED LAND USES AND ZONING

The existing General Plan land use designations for the Project Area is shown in Figure 3-4 in the Project Description. Table 3-10 in Chapter 3.0, Project Description, lists the land use designation acreages and their percentages for the Existing Plan (as well as the Proposed Plan).

Residential Neighborhoods. Nearly half of the total acreage of the Project Area has been, and continues to be, planned for residential uses. The Project Area contains approximately 6,900 acres of land that are designated for residential use, which is equivalent to nearly 50 percent of the land area for the Project Area. Single-family neighborhoods comprise approximately one-third of the total acreage of the Project Area, and multi-family neighborhoods comprise approximately 16 percent of the land area.

The single-family neighborhoods are diverse in architectural style and topography. Single-family housing stock is located in the hillside communities in the north and northwest portions of the Project Area, as well as in the flatlands of Hollywood. Single-family properties range generally from newly built to over 100 years in age and the Project Area contains several single-family neighborhoods that have been designated as HPOZs, to protect homes well in excess of 70 years. The HPOZs within the Project Area are shown in **Figure 4.10-1** above, and are discussed in detail in Section 4.5, Cultural Resources, of this Draft EIR.

Multi-family residential neighborhoods are generally located throughout the southern half of the Project Area. The hillsides have the most restrictive zoning by permitting only one residence on lots nearly one acre in size in some instances, whereas the flatlands allow more density, resulting in mid-rise multi-family buildings. Hollywood has both lower-density multi-family areas and higher-density multi-family areas with buildings that generally range between two- to six- stories. A portion of the multi-family housing stock was built during the early studio boom, taking the form of low-scale bungalows. Other historic multi-family buildings are considerably taller than six-stories, such as the Madison Apartments and the Fontenoy Apartments. The denser multi-family areas are generally located in neighborhoods west of La Brea Avenue near the City of West Hollywood and portions of East Hollywood. Multi-family structures within the Project Area range in age from newly built to approximately 95 years old.

Commercial Districts. The Project Area has a mix of commercial intensities that allow both low-scale mom-and-pop businesses and office towers, depending on the commercial land use designation and zone. Because of Hollywood's historic pattern of development, commercial districts are diverse and include a mix of uses and a variety of character. Residential uses are allowed in commercial districts, and contribute to the rise of mixed-use buildings that generally have retail on the ground floor and residences above.

Land designated for commercial use represents approximately six percent of the Project Area, or approximately 849 acres, and is concentrated in the heart of Hollywood in the Regional Center and along commercial corridors, including Hollywood Boulevard, Sunset Boulevard, Santa Monica Boulevard, Melrose Avenue, La Cienega Boulevard, La Brea Avenue, Vine Street, Western Avenue, and Vermont Avenue. The Regional Center permits the most intense development in the Project Area, which is reflected in the zoning in terms of floor area ratio (FAR) and height. The Regional Center contains office towers, hotels, and mixed-use projects. However, due to historic patterns of development, the Regional Center also contains numerous historic buildings, especially along Hollywood Boulevard. Several of the major commercial corridors run through the eastern portion of the Project Area, including Western Avenue, Vermont Avenue and Santa Monica Boulevard. Various medical complexes consisting of hospitals and medical facilities are centered around and near the Vermont Avenue/Sunset Boulevard intersection in the Vermont/Western Transit Oriented District Specific Plan. This intersection area has the second most intense commercial land use designation (Community Commercial) in the Project Area.

Industrial Area. Hollywood has several industrial districts, and land designated for industrial uses represents approximately two percent, or 277 acres of the Project Area. The largest industrial area consists of a cluster of pre- and post-production media-related facilities located south of Santa Monica Boulevard between La Brea Avenue and Gower Avenue in the western portion of the Project Area. Most industrial buildings in the CPA are low-rise but buildings differ in size depending on the lot or project size as there is a mix of entertainment-related uses, from small sound recording and digital editing studios to large historic

storage prop warehouses. On the large studio campuses in the CPA, the buildings are larger in scale and more mid-rise in height.

Open Space. Nearly 38 percent of the Project Area is designated for open space, which includes Griffith Park, Runyon Canyon Park, Barnsdall Art Park, Hollywood Forever Cemetery, and Forest Lawn Memorial Park. Griffith Park makes up a majority of the 5,256 acres of open space within the Project Area and is the largest municipal park with an urban wilderness area in the country.

Public Facilities. The Project Area also includes approximately 677 acres of public facilities, which represents approximately five percent of the Project Area. Uses designated as public facility include public libraries, schools, colleges, police and fire stations, the freeway and City maintenance yards. The Los Angeles City College campus is located at the southeastern portion of the Project Area.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the CEQA Guidelines, the Proposed Plan would have a significant impact if it would:

- Physically divide an established community;
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; and/or
- Conflict with any applicable Habitat Conservation Plan or Natural Community Conservation Plan.

METHODOLOGY

The discussion in this impact section serves two purposes, identifying significant impacts related to land use, and compliance with CEQA Guidelines Section 15125(d).

CEQA Guidelines Section 15125(d) requires that an EIR include a discussion of any inconsistencies with applicable plans. Additionally, a conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a "significant environmental effect" as defined by Section 15382. An excerpt from the legal practice guide, CEB, Practice Under the California Environmental Quality Act, Section 12.34 illustrates the point:

> …if a project affects a river corridor, one standard for determining whether the impact is *significant* might be whether the project violates plan policies protecting the corridor; the environmental *impact,* however, is the physical impact on the river corridor.

Analysis of conflicts and consistency with applicable plans is included in this impact section. Under State Planning and Zoning law (Government Code Section 65000, et seq.) strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests and agencies are given great deference to determine consistency with their own plans. A proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies. Office of Planning and Research (OPR), State of California General Plan Guidelines (2003). Generally, given that land use plans reflect a range of competing interests, a project should be compatible with a plan's overall goals and objectives but need not be in perfect conformity with every plan policy.

For purpose of identifying significant impacts related to land use impacts, they can be either direct or indirect. Direct impacts result in division of neighborhoods or communities; or interference with land use plans, including habitat or wildlife conservation plans that result in significant environmental effects. Land use compatibility is typically addressed based on direct physical environmental impacts – primarily noise and air quality but also aesthetics, traffic, hazards, water quality and other physical environmental issues, i.e. where one use generates physical impacts that could significantly adversely affect another use. These issues are generally addressed through existing regulations and policies and are comprehensively addressed in each environmental issue area in this document and summarized as applicable and appropriate in the discussion of Impact 4.10-2, below. As related to impact analysis, this section focuses on direct land use impacts. Indirect impacts are secondary effects resulting from land use policy implementation are generally addressed in other topical sections of this Draft EIR. For example, traffic impacts resulting from increased traffic as a result of reasonably expected development under the Proposed Plan would be discussed in the transportation section of this Draft EIR; public service impacts resulting from increased demand from increased development under the Proposed Plan is discussed in public services section of this Draft EIR.

PROPOSED PLAN

The Proposed Plan is a comprehensive update of the current adopted Hollywood Community Plan, one of the City's 35 community plans that make up the City's Land Use Element. The Hollywood Community Plan was first adopted in 1973 and last updated in 1988. The Proposed Plan is intended to guide development through 2040. It creates new housing and employment opportunities in selected areas near transit, consistent with the comprehensive growth strategy identified in the City's Framework and Housing Elements, while preserving existing stable residential neighborhoods, open space areas, and public facilities parcels.

The Proposed Plan is composed of several components including:

GENERAL PLAN AMENDMENTS

- Community Plan (Land Use Element) Text
- Community Plan (Land Use Element) Land Use Map
- Other General Plan Amendments (Mobility, Framework)

ZONING ORDINANCES

- Zone and Height District
- Vermont/Western Station Neighborhood Area Plan (SNAP) amendment
- Community Plan Implementation Overlay (CPIO)

The Community Plan Text document for the CPA contains the vision for the Project Area and lays out goals, policies, and programs to achieve that vision. The community plan policies call for promoting compatible multi-family housing opportunities; improving the economic vitality and mixed-use development potential in the Regional Center and commercial districts; and, strengthening Hollywood's media- and entertainment-related industry. In addition, the proposed policies address the preservation of single-family neighborhoods, hillsides, and historical resources. Policies also emphasize sustainability by directing development potential near Metro stations and bus lines, which would encourage a mix of uses near transit and reduce reliance on automobiles by facilitating walking. The Proposed Plan includes a General Plan Land Use map that shows the distribution of land uses in the CPA. The Proposed Plan adopts land use designation changes (officially called General Plan Amendments) and zone changes, as well as establishes the CPIO District. The CPIO has regulatory protections for commercially zoned properties with designated historical resources in the Project Area, as discussed in Section 4.5, Cultural Resources, of the Draft EIR. See Appendix E for more information. The CPIO boundaries would generally follow Franklin Avenue to the north, the US-101 to the

east, portions of Santa Monica Boulevard and Fountain Avenue to the south and La Brea Avenue to the west. It covers an area in the center of the Project Area, including the Regional Center, which has a number of identified of historical resources (see Section 4.5, Cultural Resources, of this Draft EIR). The minor amendment to the SNAP would decrease the maximum height limit for a few areas located adjacent to Barnsdall Art Park.

The Proposed Plan also includes administrative naming updates to land use designations. Nomenclature only changes would not result in a change in development potential as they do not change the existing zoning regulations. Three nomenclature changes are proposed for the Project Area: 1) Neighborhood Office Commercial will be updated to Neighborhood Commercial, 2) Highway Oriented Commercial will be updated to General Commercial or Community Commercial as appropriate, and 3) Limited Manufacturing will be updated to Limited Industrial. Nomenclature-only changes are not identified at the parcel level.

The Proposed Plan components are described in more detail below.

PROPOSED LAND USE AND ZONE CHANGES

The policies and programs contained in the Proposed Plan apply to the entire Hollywood CPA. Within the CPA, the Proposed Plan would change the land use designation and/or zone of certain geographic areas. The selected geographic areas are referred to as "Change Areas" and are further classified as either an Active Change or Administrative Change area, described below. Each Change Area is assigned a subarea number for identification and administrative purposes, such as 1:4, and is referred to as subarea 1:4. The CPIO district boundary includes both Change Areas and Non-Change Areas. The CPIO regulatory protections include demolition delay for all buildings or structures on commercially zoned properties that are 45 years or older and also restrict applicants from obtaining a demolition permit without an approved replacement project. The CPIO also includes pedestrian-oriented design standards for commercial-zoned properties that would help create a safe pedestrian experience that would encourage people to choose walking as a way to get around, especially along corridors near Metro stations and bus lines. The proposed height limit decreases surrounding Barnsdall Art Park that requires amending the SNAP are classified as Active Change Areas.

The remainder of the Project Area not in a Change Area will retain the existing General Plan land use designations and zoning. These areas where no changes are proposed include single-family residential neighborhoods, hillside properties, low-scale multi-family residential areas, open space areas, and some commercial areas. Areas that are not proposed for Active Change may still redevelop to more intense uses or density than currently developed. Future development in areas where changes are not proposed would continue to be subject to applicable City regulations and standards and would be guided by policies and programs of the Proposed Plan.

Table 4.10-1 summarizes the proposed changes associated with the Proposed Plan. Of the total 13,962-acre Project Area, Change Areas consist of approximately 1,076 acres, or approximately eight percent of the Project Area. Non-change areas make up the remainder of the Project Area, or approximately 92 percent of the CPA. Changes in the land use designation and zoning would result in increases and/or decreases in allowable density and intensity.

TABLE 4.10-1: SUMMARY OF NET CHANGE IN LAND USE IN PROJECT AREA /a/

Land Use Designation & Subcategory	Existing Plan (Acres) /a/	Proposed Plan (Acres) /a/	Net Change (Acres) /a,b/
Residential	**6,904**	**6,717**	**-187**
Single-Family	***4,702***	***4,528***	***-174/c/***
Minimum	901	770	-131
Very Low II	1,463	1,463	0
Low I	389	353	-36
Low II	1,949	1,942	-7
Multi-Family	***2,202***	***2,189***	***-13***
Low Medium I	364	367	3
Low Medium II	788	801	13
Medium	837	784	-53
High Medium	97	158	61
High	116	79	-37
Commercial	**849**	**852**	**3**
Limited Commercial	48	44	-4
Highway Oriented/General	250	59	-191
Neighborhood	244	234	-10
Community	63	251	188
Regional Center	244	264	20
Industrial	**277**	**269**	**-8**
Commercial Manufacturing	37	38	1
Hybrid Industrial	0	7	7
Limited Industrial	240	224	-16
Public Facilities	**677**	**700**	**23**
Public Facilities	466	489	23
Public Facilities – Freeway	211	211	0
Open Space	**5,256**	**5,424**	**168**
Open Space	5,255	5,423	168
Public/Quasi Public	1	1	0
TOTAL	**13,962**	**13,962**	**0**

/a/ Total acreage for each land use designation reflects rounding to the nearest whole number, which results in a slight difference from 13,962 acres.

/b/ Acreage change between Existing Plan and Proposed Plan includes strategic subarea changes to land use designations, for consistency between land use designation and zoning, and to reflect existing uses.

/c/ The adjustments in the single-family residential land use category are to primarily revise the land use designation from Minimum Residential and Low I Residential to Open Space. These changes are located on parcels within Griffith Park, and the change will reflect existing use and consistency of land use designation and zoning.

/d/ The acreage change in the Community Commercial and General Commercial land use categories is to update the land use designation nomenclature from Highway Oriented Commercial to Community Commercial based on Framework land uses.

SOURCE: City of Los Angeles Department of City Planning, 2018.

The proposed changes would primarily increase commercial and residential development potential in and near the Regional Center and along selected corridors in the Project Area. The decreases in development potential would be primarily focused on low to medium scale multi-family residential neighborhoods and/or commercial corridors abutting those neighborhoods to maintain the existing density and intensity of those neighborhoods. These selected multi-family residential and commercial lots are being maintained for one or more of the following reasons: historical preservation or compatibility with the surrounding area in terms of use, density, or height.

Active Change Areas. Active Change Areas consist of General Plan land use designation amendments and/or zone changes that would allow for an increase in currently permitted development density, height limits, and/or uses. There are also some changes that reduce the currently permitted development density, height limits, and/or uses. Approximately 863 acres, or six percent, of the Project Area are proposed Active Change Areas. These changes would allow for infill development of additional housing and job-producing

uses in areas with or near existing transportation infrastructure. Many areas are located near Metro stations, along major corridors with bus lines, and in or near job-producing areas where increases in residential units, population and employment are directed.

Administrative Changes. The Proposed Plan includes some land use designation and zone changes that would not directly result in physical changes with impacts to the environment. These changes correct land use designation and/or zoning to reflect existing use or correct land use and zoning mismatches. Administrative Changes account for approximately two percent of the total Project Area acreage.

Figures 3-5 and 3-6a through 3-6g in Chapter 3.0, Project Description show the proposed General Plan land use designations for the Project Area and identify proposed Change Areas in the Project Area where land use designations and/or zone changes are proposed. The proposed changes can be categorized as 1) land use designation and zoning changes that can accommodate growth and increase development potential, 2) land use designation and zoning changes to preserve existing scale in selected areas, 3) preservation and promotion of light industrial land for media and studio-related uses, 4) SNAP specific plan consistency changes, and 5) land use designation and zoning consistency corrections. SNAP's specific development regulations were adopted in 2001 for lots located in the SNAP boundary. The regulations have been in effect ever since, however, changes to the underlying land use designation and/or zone of some parcels in the SNAP have lagged. The Proposed Plan will update the consistency of such parcels. The Change Areas classified as Active Change Areas are the first four categories described above. Consistency corrections are for 1) AB 283 parcels, 2) open space and public facilities, and 3) other selected parcels. These three administrative corrections reflect the existing uses and scale of buildings on the selected parcels, which are developed with buildings such as housing and schools or are parks.

IMPACTS

IMPACT 4.10-1 Would implementation of the Proposed Plan physically divide an established community? **No impact.**

Hollywood is an established community. With the exception of its large open space areas, including Griffith Park, and hillsides zoned for single-family homes on large lots, the Hollywood CPA is largely urbanized with a mix of residential, commercial, and light industrial uses at varying densities and intensities. The open space areas are preserved by the Proposed Plan as primarily undeveloped open space and parks/recreation. As described previously, the Hollywood CPA already has a robust transportation system, including five Metro subway stations and a freeway.

Development in Hollywood sprouted with the studio boom in the early 1900s that led to additional employment, residential, and tourism uses. Development slowed in the 1970s and 1980s and blight increased, and the Hollywood Redevelopment Project Area was formed to spur economic development. Revitalization occurred after the opening of the Metro stations but anticipated growth stalled with the Great Recession. Today, renewed development is filling in underutilized areas, such as surface parking lots, and redevelopment is also occurring. Hollywood is a built community that continues to evolve.

An established community can be physically divided with the construction of a new road, freeway or railway or other use that physically cuts off one part of the community from another. An established community may be physically divided when major land use and zoning changes result in radically different land use patterns that can physically divide a neighborhood by creating a new street pattern that impedes access from one area to another.

The Proposed Plan does not propose any new freeways, roadways or transit infrastructure in the CPA that could physically divide or isolate existing neighborhoods. The Proposed Plan does not propose any substantial changes to connectivity in the Project Area. The discussion below focuses on the policies, land use designations, and zoning of the Proposed Plan and whether the reasonably expected development from the Proposed Plan could result in land use patterns that could physically divide an established community.

The reasonably expected development of the Proposed Plan is not expected to result in land use patterns that physically divide an established community because:

- The Proposed Plan does not propose any changes to land use designation, zoning, or policies that would promote or support the construction of any barriers that would physically divide or separate any neighborhood from another in the Project Area. The Proposed Plan supports mobility and connectivity in the Project Area through transit use and pedestrian-oriented design.

- Of the total acreage in the Project Area, more than 90 percent will keep its existing land use designation. The Proposed Plan does not propose changes to single-family residential neighborhoods and directs anticipated growth away from them into areas such as the Regional Center and selected commercial corridors near transit infrastructure, consistent with the guiding principles of the Framework Element. A majority of the low-scale multi-family residential areas are also excluded from any proposed changes under the Proposed Plan. Existing Open Space areas are maintained as well. The land use pattern for a large majority of the established community is not changing.

- The portions proposed for change, known as Change Areas, consist of Active Changes and Administrative Changes. The Administrative Changes correct or update lots where the existing land use designation and/or zoning does not reflect the existing use. For example, a school may carry over a non-Public Facilities land use designation from the past and under the Proposed Plan, the land use designation will be changed to Public Facilities. The Active Changes focus on selected lots and parcels located in the Regional Center, along commercial corridors, in entertainment support industry areas, and in multi-family areas where underutilized parcels can be incentivized for jobs, housing, and mixed-use and accommodate additional development potential. Many of these parcels are located near Metro stations or Metro bus lines, and developing jobs and housing near them would promote mobility and less auto reliance. The Proposed Plan's potential to increase density or intensity in areas that can support anticipated growth and correct land use designations and/or zoning to reflect existing uses would not radically change the existing land use pattern of Hollywood. The Active Changes also include some lots where the proposed land use designation and/or zoning would make the lots more compatible with the existing built environment.

The Proposed Plan does not propose any new major transportation infrastructure in the Project Area or any other kind of physical barrier and therefore, would not physically divide the established community. Furthermore, the Proposed Plan would not divide or isolate any neighborhoods as it generally maintains land uses and land use patterns as those that currently exist, although with increased development potential around transit stations and selected corridors that would support new, infill development of already urbanized areas. Therefore, there will be ***no impacts*** related to the division of an established community.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

No impact.

IMPACT 4.10-2 Would implementation of the Proposed Plan conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? **Less than significant impact.**

In addition to analyzing the threshold question above, which is intended to focus on conflicts in plans, policies or regulations that were adopted for the purposes of avoiding or mitigating environmental impacts, the following evaluation is intended to satisfy the requirements of Guidelines Section 15125(d) to identify any inconsistencies between the Proposed Project and the applicable general, specific and regional plans. As discussed below, the Proposed Plan is consistent with all applicable plans and the City has not identified any inconsistencies with applicable general plans, specific plans and regional plans.

Applicable land use plans that direct or guide development in the CPA include the 2016-2040 RTP/SCS and the Complete Streets Act, the 2016 Air Quality Management Plan (AQMP), and the Metro Congestion Management Program (CMP) as well as the City's General Plan. A consistency analysis is provided for the 2016-2040 RTP/SCS and General Plan below. As discussed in Section 4.3, Air Quality, of this Draft EIR the Proposed Plan would be consistent with the 2016 AQMP. Consistency with the CMP is discussed in detail in Section 4.15, Transportation and Traffic, of this Draft EIR.

Senate Bill 375 (SB 375). The Proposed Plan would be consistent with state goals to reduce greenhouse gas emissions, in particular SB 375's goals to reduce GHG emissions through coordinated transportation and land use planning. The Proposed Plan accommodates anticipated growth by strategically creating additional development potential around existing Metro stations and along commercial corridors served by bus lines, in order to coordinate land use planning and transportation for the purpose of creating a more sustainable Hollywood. The close proximity of housing, services, entertainment, and goods to transit would promote transit use, reducing the dependency on automobiles for travel and therefore, would reduce greenhouse gas emissions.

The Proposed Plan also responds to SB 743 as it focuses development in Transit Priority Areas (TPA) around transit stations. TPAs are located within a half mile radius of major transit stops and this proximity to transit makes them ideal for infill development. While SB 743 provides for a major overhaul on how transportation impacts are evaluated, it also limits the extent to which certain impacts are evaluated under CEQA. Specifically, Section 21099(d)(1) of the Public Resources Code (PRC) states that, a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if a development project is located in a TPA and it is a residential, mixed-use or employment center project.[12]

Complete Streets/Mobility Plan 2035. The 2008 Complete Streets Act (AB 1358) mandates that the circulation element of the General Plan be modified to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation. The Complete Streets Act specifically encourages an increase in non-driving modes of travel while also recognizing the value that streets play in facilitating the vehicular movement of goods and people. The City's MP 2035 was prepared and adopted to address the Complete Streets Act.

The Proposed Plan would enhance mobility by focusing future growth in areas well-served by transit and by establishing pedestrian-oriented development standards for new development in order to encourage transit ridership, walking, and bicycling. Mixed-use development around Metro stations and transit corridors offers residents, employees and visitors mobility choices that enable them to reduce the number

[12] "Employment center project," is defined as a project located on property zoned for commercial uses with a floor area ration of no less than 0.75 and that is located within a TPA (PRC Section 21099(a)(1)).

and length of vehicle trips. Therefore, the Proposed Plan would be consistent with the Complete Streets Act and the City's MP 2035.

SCAG Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). The CPA is located within the six-county region that comprises the SCAG planning area. SCAG has adopted RTPs since 1976 but the Sustainable Communities and Climate Protection Act of 2008, also known as SB 375, began requiring SCAG to prepare an SCS as an integral part of its RTP. The 2012-2035 RTP/SCS, placed a greater emphasis on sustainability and integrated planning of land use and transportation. It also embraced a vision encompassing three principles that collectively work together as the key to the region's future: mobility, economy, and sustainability. The newly adopted 2016-2040 RTP/SCS continues the vision set by the 2012-2035 RTP/SCS. The overarching strategy for the 2016-2040 RTP/SCS envisions growing more compact communities in existing urban areas with efficient public transit and safe mobility opportunities, and preserving open space and natural lands. Major themes include integrating transportation investments and future land use patterns, striving for sustainability, providing more transportation choices, responding to demographic and housing market demand for smaller housing and a more walkable lifestyle, supporting economic growth with infrastructure, and improving public health. The Proposed Plan meets SCAG's criteria for a regionally significant project; therefore, an analysis is done with respect to the 2016-2040 RTP/SCS. **Table 4.10-2** provides an analysis of the Proposed Plan's consistency with the 2016-2040 RTP/SCS.

TABLE 4.10-2: CONSISTENCY OF PROPOSED PLAN WITH SCAG RTP/SCS

Goal	Project Consistency
2016-2040 RTP/SCS	
Goal 1: Align the plan investments and policies with improving regional economic development and competiveness.	**Consistent**: The Proposed Plan would accommodate a variety of housing and commercial opportunities near the Metro Red Line rail stations and along major corridors with bus lines and would preserve and promote light industrial land uses for employment opportunities, including entertainment and media-related jobs. The maintenance and growth of Hollywood's entertainment and media-related jobs are crucial for both the local and regional economy. The proposed land use designation and zone changes would promote a better balance of housing units and jobs near transit that would improve regional economic development and competitiveness.
Goal 2: Maximize mobility and accessibility for all people and goods in the region.	**Consistent**: Proposed land use and zoning changes would allow for jobs, housing, and community-serving uses to be located within close proximity to existing public transit. People would have improved access to different mobility options whether they are residents or visitors to the region in addition to using automobile-oriented infrastructure, such as the freeway. The proposed land use and zone changes would promote pedestrian-friendly environments, especially along corridors near transit and in the Regional Center near the Metro stations. These actions would serve to improve and maximize mobility and accessibility.
Goal 3: Ensure travel safety and reliability for all people and goods in the region.	**Not Applicable**: The Proposed Plan does not include any components that would influence travel safety or reliability.
Goal 4: Preserve and ensure a sustainable regional transportation system.	**Consistent**: See response to Goal 2. The Metro Red Line stations and bus lines in Hollywood are part of Metro's regional transportation system. Riders can board trains from the Red Line stations in Hollywood to reach other parts of the City, such as Downtown Los Angeles, or transfer to other Metro lines to visit nearby jurisdictions and vice versa, especially once the Regional Connector becomes operational. Increased coordination of land use and transportation planning by strategically directing development potential near transit under the Proposed Plan would help preserve and enhance a sustainable regional transportation system.

TABLE 4.10-2: CONSISTENCY OF PROPOSED PLAN WITH SCAG RTP/SCS	
Goal	**Project Consistency**
Goal 5: Maximize the productivity of our transportation system.	**Consistent**: Allowing for more jobs, retail, restaurants, entertainment uses, community services, and housing near existing Metro stations and bus lines would serve to maximize the productivity of the transportation system. Residents and visitors will be able to use Metro's transportation system to reach destinations in the CPA as well as depart for other surrounding communities and cities.
Goal 6: Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation (e.g., bicycling and walking).	**Consistent**: See response to Goal 2. By allowing for jobs, housing, and community serving uses at greater densities and supporting the creation of a pedestrian-oriented environment along transit corridors, the Proposed Plan encourages transit ridership, walking, and biking as mobility alternatives to reduce automobile dependence, thereby improving air quality, and encouraging active transportation. The Proposed Plan would implement pedestrian-friendly design standards for new development in the Regional Center and other commercial zoned properties in the CPIO and along commercial corridors near transit.
Goal 7: Actively encourage and create incentives for energy efficiency, where possible	**Not Applicable**: The Proposed Plan encourages energy efficiency but does not include any components that would create incentives for energy efficiency. The City addresses energy efficiency through a number of other plans and ordinances, including Sustainable City pLAn and Green Building Codes.
Goal 8: Encourage land use and growth patterns that facilitate transit and non-motorized transportation.	**Consistent**: See response to Goal 2.
Goal 9: Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	**Not Applicable**: The Proposed Plan does not include any components that would influence the security of the regional transportation system.
SOURCE: SCAG, 2016-2040 RTP/SCS, 2016.	

CITY OF LOS ANGELES GENERAL PLAN

Framework Element

The Framework Element contains goals, objectives, and policies related to land use that address the issues of distribution of land use, policies specific to Framework land use designations, and density. The primary objectives of the policies in the Framework Element's Land Use chapter are to support the viability of the City's residential neighborhoods and commercial districts, and, when growth occurs, to encourage sustainable growth in a number of higher-intensity commercial and mixed-use districts, centers and boulevards and industrial districts, particularly in proximity to transportation corridors and transit stations. The Framework's key guiding principles, along with their relationship to the Proposed Plan, are listed below:

- *Grow strategically.* Growth should be focused in a number of higher-intensity commercial and mixed-use districts, centers, and boulevards, particularly in proximity to transportation corridors and transit stations. This type of focused growth links development with available infrastructure and encourages more walkable, transit-friendly neighborhoods, helping to ease our reliance on the automobile and minimize the need for new, costly infrastructure.
    - **The Proposed Plan** would accommodate a variety of housing and commercial development opportunities near the Metro Red Line rail stations in the Regional Center and along major corridors served by bus lines. New growth is directed to these areas of the CPA in the future. The Proposed

Plan fosters thriving transit-oriented development areas by creating walkable, attractive and complete transit areas that provide a mix of jobs, goods and services, and housing.

- *Conserve existing residential neighborhoods.* By focusing much of the City's growth in centers and along commercial corridors, the City can better protect the existing scale and character of its stable single- and multi-family neighborhoods. The elements that contribute to the unique character of different residential neighborhoods should be identified and preserved whenever possible.
    - **The Proposed Plan** preserves single-family residential areas by maintaining the existing use and zone regulations for these neighborhoods. Growth is generally directed away from these low-density neighborhoods. Stable multi-family neighborhoods are generally maintained, consistent with the Framework, under the Proposed Plan. The opportunity areas for multi-family residential development under the Proposed Plan were selected consistent with Objective 3.7 of the Framework: "allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved." The selected multi-family residential opportunity areas are served by transit, near employment areas such as entertainment-related studios, and some will have new and improved design standards.
- *Balance the distribution of land uses.* Maintaining a variety of land uses is crucial to the long-term sustainability of the City. Commercial and industrial uses contribute to a diverse local economy, while residential uses provide necessary housing for the community. Integrating these uses within smaller geographical areas can better allow for a diversity of housing types, jobs, services, and amenities.
    - **The Proposed Plan** maintains a variety of land uses by preserving single-family neighborhoods, hillsides, public facilities and open space. It also generally maintains the existing light industrial areas, which contain studio uses and entertainment support uses, for employment purposes. The Proposed Plan promotes residential and commercial development opportunities in areas served by transit and would improve the jobs-housing ratio.
- *Enhance neighborhood character through better development standards.* Better development standards will improve both the maintenance and enhancement of existing neighborhood character, and ensure a high level of design quality in new development.
    - **The Proposed Plan** promotes and creates pedestrian-friendly environments near transit areas, such as along selected commercial corridors and commercially-zoned properties in the CPIO. These design standards cover regulations such as ground floor location, window transparency, and location of parking, and would be required for new projects. These design standards aim to support a pedestrian scale environment in the Regional Center.
- *Create more small parks, pedestrian districts, and public plazas.* While regional parks and green networks are an important component of the City's open space strategy, more small-scale, urban open spaces must be developed as well, as they are crucial to the quality of life of the City's residents. There are many opportunities at the community level to create public "pocket" parks as part of new developments, to enhance pedestrian orientation in key commercial areas, and to build well-designed public plazas.
    - **The Proposed Plan** supports the creation of additional small parks and public plazas. Larger project sites within the CPIO boundary would be required to provide a minimum amount of publicly accessible open space on the ground floor. The Proposed Plan envisions pedestrian-oriented design and walkability near transit areas and would require pedestrian-oriented design for new projects in appropriate locations, such as the Regional Center, and along commercial corridors with transit. Pedestrian-oriented scale is a key consideration of the CPIO's proposed design standards.

- *Improve the connection of public and private space through good urban design.* Good urban design improves the relationship between private development and the public realm. The placement of architectural features, windows, entrances, walkways, street trees, landscaping, and lighting all help to establish either a positive or negative interaction between a building and its surroundings. Good urban design practices help to create successful public and private spaces where people feel comfortable and that foster a sense of community.
    - See consistency analysis above re small parks, pedestrian districts and public plazas, which is also applicable here. Additionally, **the Proposed Plan** improves the function and design of neighborhoods throughout the Project Area by preserving and strengthening the appearance of the overall Project Area to promote pedestrian-friendly environments, nurture neighborhood character, improve economic vitality, create identity, and integrate a combination of land uses to create positive visual experiences.
- *Improve mobility and access.* The City's transportation network should provide adequate access to jobs, services, amenities, open space, and entertainment, and maintain acceptable levels of mobility for all those who live, work, travel, or move goods in Los Angeles.
    - **The Proposed Plan** enhances mobility by focusing future growth in areas well-served by transit and by establishing pedestrian-oriented development standards for new development in order to encourage transit ridership, walking, and bicycling. Mixed-use development around Metro stations and transit corridors offers residents, employees and visitors mobility choices that enable them to reduce the number and length of vehicle trips.
- *Identify a hierarchy of commercial Districts and Centers.* The Framework Element provides an overall structure and hierarchy for the City's commercial areas. Our City's commercial areas serve a variety of roles and functions, from small neighborhood gathering places with local cafes and shops to major job centers and entertainment hubs. Although these areas are typically designated for commercial use, they often contain residential and mixed-use buildings as well.
    - **The Proposed Plan** primarily directs additional development opportunities around transit stations in the Regional Center, the most intense commercial land use designation, and also along mixed-use corridors with bus lines. Less intense commercial areas are being maintained as neighborhood serving places with mostly low-rise buildings.

In summary, the Proposed Plan would improve the link between the locations of land use and transportation in a manner that is consistent with the City's Framework Element. As previously discussed, implementation of the Proposed Plan would direct growth to transit hubs and corridors, away from low density neighborhoods. The Proposed Plan would accommodate a variety of housing and commercial opportunities near the Metro Red Line rail stations and along major corridors with bus lines and would preserve light industrial land uses for employment opportunities, including entertainment and media-related jobs. A vision of concentrated, mixed-use development adjacent to transit areas is promoted in order to conserve resources, protect existing stable residential neighborhoods and improve air quality by reducing the use of cars. Therefore, the Proposed Plan would be consistent with the Framework Element of the City's General Plan.

2013-2021 Housing Element. The Housing Element update embodies the City's housing goals and policies and identifies the more detailed strategies the City will implement to achieve them. The update also ensures that housing goals are integrated and consistent with all other Elements of the General Plan. One of the primary goals of the Housing Element is to encourage a range of housing opportunities for all income groups. The Proposed Plan accommodates housing opportunities for a range of income levels, including mixed-income and affordable housing. The Proposed Plan also furthers the creation of housing units pursuant to SCAG's RHNA allocation and growth projections, thereby implementing the goals of the Housing Element. Therefore, the Proposed Plan would be consistent with the City's Housing Element.

Hollywood Redevelopment Plan. The Redevelopment Plan was originally adopted in 1986 and subsequently amended in 2003 (Ordinance No. 175,236). As of 2013, the Redevelopment Plan is implemented and enforced by the DLA. The Hollywood Redevelopment Plan, which will sunset in 2028, provides policies for removing blight and strengthening the economic base in Hollywood, and includes goals that promote the entertainment industry, revitalize the historic core, preserve and expand housing for all income groups, meet the social needs of area residents, and preserve historically significant structures. The Proposed Plan has similar goals and policies for the Hollywood Redevelopment Plan area, which includes the entire Regional Center, three Metro station areas along Hollywood Boulevard, a few Limited Industrial parcels, and a considerable number of parcels zoned for multi-family housing, ranging from low to high density. The Proposed Plan would increase additional development potential in the Regional Center, thereby strengthening the economic base. The Proposed Plan also seeks to preserve Limited Industrial parcels primarily to promote entertainment industry jobs. Many policies support the preservation and provision of housing for people with all income levels. The Proposed Plan also has policies to preserve historical buildings and the CPIO has historic preservation and design standards. Therefore, the Proposed Plan would be in large part consistent with the Hollywood Redevelopment Plan in terms of broad goals and policies.

The Proposed Plan, however, would not be entirely consistent with the Hollywood Redevelopment Plan in terms of 1) land use regulations; and 2) project review and approval procedures. The Redevelopment Plan's land use regulations, goals, and procedures for development review were written in the 1980s with a "limited updating" in 2003. Although the broad goals and policies between the Redevelopment Plan and the Proposed Plan are similar, certain regulations and procedures in the Redevelopment Plan are inconsistent or conflict with goals, objectives, and policies of the Proposed Plan:

1) Land Use Regulations

The Redevelopment Plan has regulations and numerical caps for residential density, floor area ratio, height, and types of land uses that are not consistent with the Proposed Plan. These types of limits would deter the implementation of the Proposed Plan and incentives for affordable housing, which would allow for more housing development and housing incentive units in the Redevelopment Plan Area than envisioned by the Redevelopment Plan. Residential density in the City, including the CPA, is determined by each lot's zoning and lot area per the Los Angeles Municipal Code, whereas the Redevelopment Plan uses a different range of densities by residential land use designation and determines density based on gross acres instead of lot area. For some properties, the number of dwelling units allowed under the Redevelopment Plan would be less than what the Proposed Plan would permit, impeding the implementation of the Proposed Plan's policies and goals, including ones that promote housing near transit. The Redevelopment Plan also limits incentive housing density to no more than 30 percent above what is allowed by the residential land use designation, but existing affordable housing incentives, that are supported or incorporated into the Proposed Plan policies, allow for density increases above 30 percent for providing affordable housing.

Another example of a discrepancy between the Proposed Plan and the Redevelopment Plan is how they address the Regional Center Commercial land use designation in Hollywood. Although both plans have goals and policies for regional economic development, historic preservation, and housing in the Regional Center, the Redevelopment Plan has caps on development in this area that would not allow for the full implementation of the policies and goals of the Proposed Plan for meeting growth consistent with the Framework Element and the SCS. The Redevelopment Plan includes a requirement for the CRA to submit a report that analyzes the cumulative impact of development upon the transportation and circulation system once the total floor area of the Regional Center Commercial land use designation reaches 2.0:1. In addition, the CRA must ensure that the overall floor area ratio for the Regional Center stays below 4.5:1 but individual projects are allowed to have 6:1 FAR, and provide reports on larger projects in the Regional Center. The Redevelopment Plan's requirements related to FAR programs and

reporting, are inconsistent with the project objectives, goals, and policies of the Proposed Plan and updated implementation programs (see Appendix D Draft Plan-Ch. 7 Implementation). There are many implementation programs listed, some of the implementation tools are the Community Plan Implementation Overlay (CPIO-(see Appendix E Draft Hollywood CPIO) to address pedestrian orientation, historic preservation, and ground floor open space; and a follow up implementation program to address a possible Transportation Improvement Assessment Fee. The Proposed Plan includes modernized and improved zoning tools to address scale and design in multiple formats that include transitional height, ground floor ceiling height, transparency, open space, parking, and vehicular access. As such, the Proposed Plan includes requirements and programs that the City finds are better able to meet the goals and policies of the Framework Element and the SCS and the underlying purpose of this project than those in the Redevelopment Plan. The Redevelopment Plan regulations and caps that would conflict with the policies, objectives, goals, and express allowed zoning in the Proposed Plans are in conflict with the Proposed Plan.

2) Project Review and Approval Procedures

Both the Redevelopment Plan and the Los Angeles Municipal Code have procedures for development review and approval. But, the Redevelopment Plan generally has additional project review and approval procedures that would not be needed with the implementation of the Proposed Plan and the extra process involved may hinder the creation of additional housing units and jobs needed to meet existing demand and anticipated growth. In several instances, the Redevelopment Plan requires the CRA to approve a development or participation agreement for uses that the Proposed Plan would allow through the proposed zoning or other existing zoning regulations, which could cause unnecessary hardships inconsistent with the purpose and intent of the Proposed Plan. For example, the Proposed Plan encourages and incentivizes mixed-used projects (residential and commercial) on selected lots with commercial zones; LAMC also permits housing units on lots with commercial zones. Although the Redevelopment Plan also allows residential uses within commercial areas, the project applicant must first secure a development or participation agreement from the CRA. Another example is that the Proposed Plan would allow ground floor restaurants and retail of a certain size in selected industrial areas to generally support entertainment industry employees who work in the area; the Redevelopment Plan could permit commercial uses in industrial areas but not without a development or participation agreement approved by the CRA. Such Redevelopment Plan requirements could delay or present obstacles for the implementation of the Proposed Plan, which would explicitly permit such uses through the zoning. In addition, the dissolution of the CRA/LA has hampered the CRA's authorities to enter agreements and significantly reduced its administrative resources. As such, the Redevelopment Plan is in conflict with the goals and policies of the Proposed Plan.

The Proposed Plan does not support carrying forward the Redevelopment Plan's requirements that are in conflict with the Proposed Plan. For example, the Proposed Plan will utilize the City's zoning (LAMC) for residential land use designations and/or the Proposed Plan's "Qs" Qualified Conditions or "Ds" Development Limitations instead of the Redevelopment Plan's caps. This may arguably result in the Proposed Plan conflicting with the Redevelopment Plan, with the Proposed Plan allowing more residential units than contemplated by the Redevelopment Plan. However, under the terms of the Redevelopment Plan, the City's plans and zoning are intended to control in any conflict between the two, and as such, as a legal matter there cannot be a conflict between the CRA plan and the Proposed Plan in relation to land use plans or zoning requirements. (See Section 502 of the Hollywood Redevelopment Plan).

With that said, even if the Proposed Plan were found to conflict with any substantive or procedural land use requirements of the Hollywood Redevelopment Plan and those requirements were intended to avoid or mitigate environmental effects, there would be no new significant impact from that conflict.

Some of the Redevelopment requirements, including density caps and requirements for CRA agreements to exceed certain FAR requirements may have been imposed to avoid or mitigate environmental impacts under prior CRA environmental documents, including without limitation the CRA EIRs to adopt the Redevelopment Plan in 1986, and update the Plan in 2003. This EIR analyzes all of the environmental impacts of the reasonably foreseeable development of the Proposed Plan, including in the CRA Plan area, without CRA limitations. The City does not find that the elimination of any of these conflicting Redevelopment Plan land use policies or requirements would result in a new or different impact from those already analyzed in this EIR. Based on this, there is no basis to find any new or different significant impact under this threshold based on a conflict with the Redevelopment Plan.

Hollywood Redevelopment Plan - Mitigation Measures. Some of the policies in the Redevelopment Plan that will be in conflict with the Proposed Plan are those that may have been incorporated into the Redevelopment Plan from mitigation measures. To the extent that they were mitigation measures from the original CEQA Clearance prepared for the adoption of the Redevelopment Plan in 1986, or the amendment in 2003, the City finds they are infeasible or not necessary. Mitigation measures from prior EIRs or MNDs may be deleted or modified provided the lead or responsible agency prepares a new environmental clearance, which demonstrates the agency considered the continuing need for the mitigation measure, states the reason for the change to the mitigation measure, and supports the decision to remove or modify the mitigation measure with substantial evidence, and analyzes any significant impacts resulting from deletion or modification of the mitigation measure. The City is not responsible for implementing the mitigation measures in the Hollywood Redevelopment Plan EIRs. To the extent the City is responsible or may become responsible over the life of the Proposed Plan, the City's rationale and evidence for deleting or modifying the mitigation measures in the 1986 and 2003 CEQA Clearances for the Hollywood Redevelopment Plan, including those related to the inconsistencies discussed above, as well as all other mitigation measures, and the analysis of impact resulting from deleting or modifying those mitigation measures, are provided in Appendix M.

Historic Preservation Overlay Zones (HPOZs). The Hollywood CPA contains six HPOZs (Spaulding Square, Sunset Square, Whitley Heights, Melrose Hill, Hollywood Grove, and Hancock Park) that provide for review of proposed exterior alterations and additions to historic properties within designated districts. As discussed in Section 4.5, Cultural Resources, one of the primary objectives of the Proposed Plan is to protect historical resources, and the Proposed Plan includes a series of policies and programs intended to provide protections for historical resources in the Project Area (Table 4.5-3). The Proposed Plan does not introduce any features that would preclude implementation of, or alter the regulatory control ordinances that designated historical resources are subject to in the HPOZ Ordinance and the Cultural Heritage Ordinance regulations. Therefore, the Proposed Plan would be consistent with the HPOZs in the Hollywood CPA.

Other Plans/Ordinances. See also Sections 4.1, Aesthetics, 4.2 Air Quality, 4.8 Hazards, 4.9 Hydrology and Water Quality, 4.12 Noise and 4.15 Transportation and Traffic for discussions of other elements of the City's General Plan and relevant regional plans, including MP 2035, the Congestion Management Plan, the Noise Element, and the South Coast Air Quality Management District (SCAQMD) plan, and other City ordinances, including the noise ordinance, including consistency analysis as appropriate.

Conclusion

Based on all of the above, impacts related to consistency with applicable land use plans, policies, and regulations under the Proposed Plan would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

IMPACT 4.10-3 Would implementation of the Proposed Plan conflict with any applicable habitat conservation plan or natural community conservation plan? **No impact.**

As discussed in Section 4.4, Biological Resources, no Habitat Conservation Clans (HCPs) are located within or near the Project Area. Likewise, there are no Natural Community Conservation Plans (NCCPs) within or near the Project Area. Accordingly, future development occurring over the lifetime of the Proposed Plan does not have the potential to conflict with any applicable HCPs or NCCPs as the Project Area is not subject to any such plans. ***No impact*** would occur.

Mitigation Measures

No mitigation measures are required.

Significance of Impact after Mitigation

No impact.

CUMULATIVE IMPACTS

The cumulative analysis for land use and planning addresses the City of Los Angeles and surrounding jurisdictions. As discussed above, the Proposed Plan would not provide for any physical barriers that could divide a community and be consistent with local and regional plans, policies, and regulations that seek to reduce environmental impacts. The Proposed Plan would not intensify development in single-family residential areas, and instead focuses future development in and along established commercial and transit corridors and a few opportunity multi-family residential areas consistent with regional and local plans that seek to strategically intermingle land use development patterns with transit, improve mobility and accessibility, and enhance economic development at the local and regional levels. The Proposed Plan would not conflict with any applicable plans or policies such that significant environmental effects could be anticipated. Therefore, no significant land use and planning impacts are expected to result from implementation of the Proposed Plan. Cumulative impacts related to land use and planning would be less than significant and would not be cumulatively considerable.

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4.11 MINERAL RESOURCES

This section provides an overview of mineral resources in the Project Area and evaluates impacts associated with the Proposed Plan. The analysis of impacts is based upon information from a variety of sources, including the City of Los Angeles General Plan Conservation Element and the State of California Department of Conservation. Topics addressed include sand, gravel, and oil.

REGULATORY FRAMEWORK

STATE

Surface Mining and Reclamation Act of 1975 (SMARA). SMARA, Public Resources Code (PRC) Sections 2710, *et seq*., provides a comprehensive surface mining and reclamation policy with the regulation of surface mining operations to ensure that adverse environmental impacts are minimized and mined lands are reclaimed to a usable condition. SMARA directs the State Mining and Geology Board (SMGB) to adopt a State policy for the reclamation of mined lands and the conservation of mineral resources. SMARA also directs the State Geologist to classify (identify and map) the non-fuel mineral resources of the State to show where economically significant mineral deposits occur and where they are likely to occur based upon the best available scientific data. Regionally significant mineral resources are identified as Mineral Resources Zones (MRZs). Construction aggregate resources (i.e., sand and gravel) deposits were the first commodity selected for classification by the SMGB. Once mapped, the SMGB is required to designate those areas that contain aggregate deposits that are of prime importance in meeting the region's future need for construction-quality aggregates.

SMARA requires that jurisdictions develop policies that will conserve important mineral resources, where feasible, that might otherwise be unavailable when needed. Once these policies are adopted, land use decisions by the local agency must be in accordance with its mineral resource management policies. These decisions must also balance the mineral value of the resource to the market region as a whole, not just their importance to the local jurisdiction.

The Mineral Land Classification Maps for aggregate resources prepared by the SMGB designate four MRZ resource sensitivities, according to the presence or absence of significant deposits, described below:

- **MRZ-1**: Areas where geologic information indicates there is little likelihood for the presence of significant mineral resources.
- **MRZ-2**: Areas underlain by mineral deposits where geologic data indicate that significant measured or indicated resources are present.
- **MRZ-3**: Areas containing known mineral occurrences of undetermined mineral resources significance.
- **MRZ-4**: Areas of no known mineral occurrences where geologic information does not rule out the presence or absence of significant mineral resources.

Government Code Section 65302(d). Government Code Section 65302(d) states that a conservation element of the general plan shall address water and its hydraulic force, forests, soils, rivers and other waters, harbors, fisheries, wildlife, minerals, and other natural resources. The conservation element shall also consider the effect of development within the jurisdiction, as described in the land use element, on natural resources located on public lands, including military installations.

Division of Oil, Gas, and Geothermal Resources (DOGGR). As part of the State Department of Conservation, DOGGR supervises the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells to protect the environment, and encourage good conservation practices. DOGGR collects data on the location of groundwater, oil, gas, and geothermal resources, and records the location of all drilled and abandoned wells. Existing law requires an operator of a well to obtain approval from the State Oil and Gas Supervisor or district deputy before beginning the work of drilling a well. DOGGR mandated responsibilities are found in PRC Section 3000 and Title, Chapter 4 of the California Code of Regulations (*California Statues and Regulations for the Division of Oil, Gas, & Geothermal Resources).*

Senate Bill (SB) 4 (Pavley) (California Public Resource Code [PRC] Sections 3015-3161). SB 4, approved by Governor Jerry Brown on September 20, 2013, establishes a regulatory structure for unconventional well stimulation techniques, including fracking and acidization. This Bill directs DOGGR to exercise additional requirements over the existing laws that regulate drilling, operations, maintenance, and abandonment of oil and gas wells, tanks and facilities in order to increase transparency and accountability to the public regarding well stimulation treatments. Further, the legislation directs DOGGR to develop the nation's first-ever, statewide permit system to regulate fracking and related drilling technologies, and to have that system in place as of January 1, 2015. As required by SB 4, DOGGR prepares and submits an annual comprehensive report for the California Legislature on well stimulation treatments in the state. The *Well Stimulation Treatment First Annual Report* (December 2015) provides aggregated information to the Legislature and public regarding well stimulation treatments in California and covers well stimulation and related activities performed in California from January 1, 2014 through September 30, 2015.

LOCAL

South Coast Air Quality Management District (SCAQMD). The SCAQMD provides regulations that govern oil and gas-related activity within the South Coast Air Basin. Rule 1148.2 (Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers), adopted in April 2013 and amended in September 2015, gathers air quality-related data on oil and gas well drilling, well completion and well reworks. Operators of onshore oil and gas wells and chemical suppliers are required to electronically notify, and report activities related to well drilling, well completion, and well reworks to SCAQMD. SCAQMD also regulates production equipment such as flares or gas separation equipment used in oil and gas drilling. These are regulated via standard air quality permits which are pulled by operators or suppliers of equipment and are enforced by SCAQMD inspectors. At present, SCAQMD standard air quality permits or registration permits are independent of city or state permitting processes.

City of Los Angeles General Plan Conservation Element. The City's General Plan is a comprehensive, long-range declaration of purposes, policies and programs for the development of the City of Los Angeles. The Conservation Element of the General Plan identifies existing mineral resources in the City and contains resource management objectives and policies. Relevant Conservation Element objectives and policies related to mineral resources are shown in **Table 4.11-1**.

Oil Drilling District and Rock and Gravel District Procedures. To regulate subsurface extraction activities, the City established Oil Drilling District procedures in 1948 and Rock and Gravel District procedures in 1951. The latter was superseded in 1976 by the Surface Mining District Ordinance which brought the City into compliance with SMARA. The former has been amended several times to improve protective and procedural measures and, in 1971, to include offshore oil drilling. Both contain provisions for monitoring and imposing mitigation measures to prevent significant subsidence relative to oil and gas extraction and mining activities. The districts are established as overlay zones and are administered by the Department of City Planning (DCP) with the assistance of other City agencies. The DCP Office of Zoning Administration reviews oil drilling permit applications for compliance with Los Angeles Municipal Code (LAMC) Section 13.01, and issues determination letters for compliance with the LAMC.

TABLE 4.11-1: RELEVANT GENERAL PLAN MINERAL RESOURCES POLICIES	
Objective/Policy	**Objective/Policy Description**
CONSERVATION ELEMENT - RESOURCE MANAGEMENT: MINERAL RESOURCES (SAND AND GRAVEL)	
Objective	Conserve sand and gravel resources and enable appropriate, environmentally sensitive extraction of sand and gravel deposits.
Policy 1	Continue to implement the provisions of the California Surface Mining and Reclamation Act (Public Resources Code Section 2710 et seq.) so as to establish extraction operations at appropriate sites; to minimize operation impacts on adjacent uses, ecologically important areas (e.g., the Tujunga Wash) and ground water; to protect the public health and safety; and to require appropriate restoration, reclamation and reuse of closed sites.
Policy 2	Continue to encourage the reuse of sand and gravel products, such as concrete, and of alternative materials use in order to reduce the demand for extraction of natural sand and gravel.
CONSERVATION ELEMENT - RESOURCE MANAGEMENT (FOSSIL FUELS): OIL	
Objective	Conserve petroleum resources and enable appropriate, environmentally sensitive extraction of petroleum deposits located within the City's jurisdiction so as to protect the petroleum resources for the use of future generations and to reduce the City's dependency on imported petroleum and petroleum products.
SOURCE: City of Los Angeles, *General Plan Conservation Element,* 2001.	

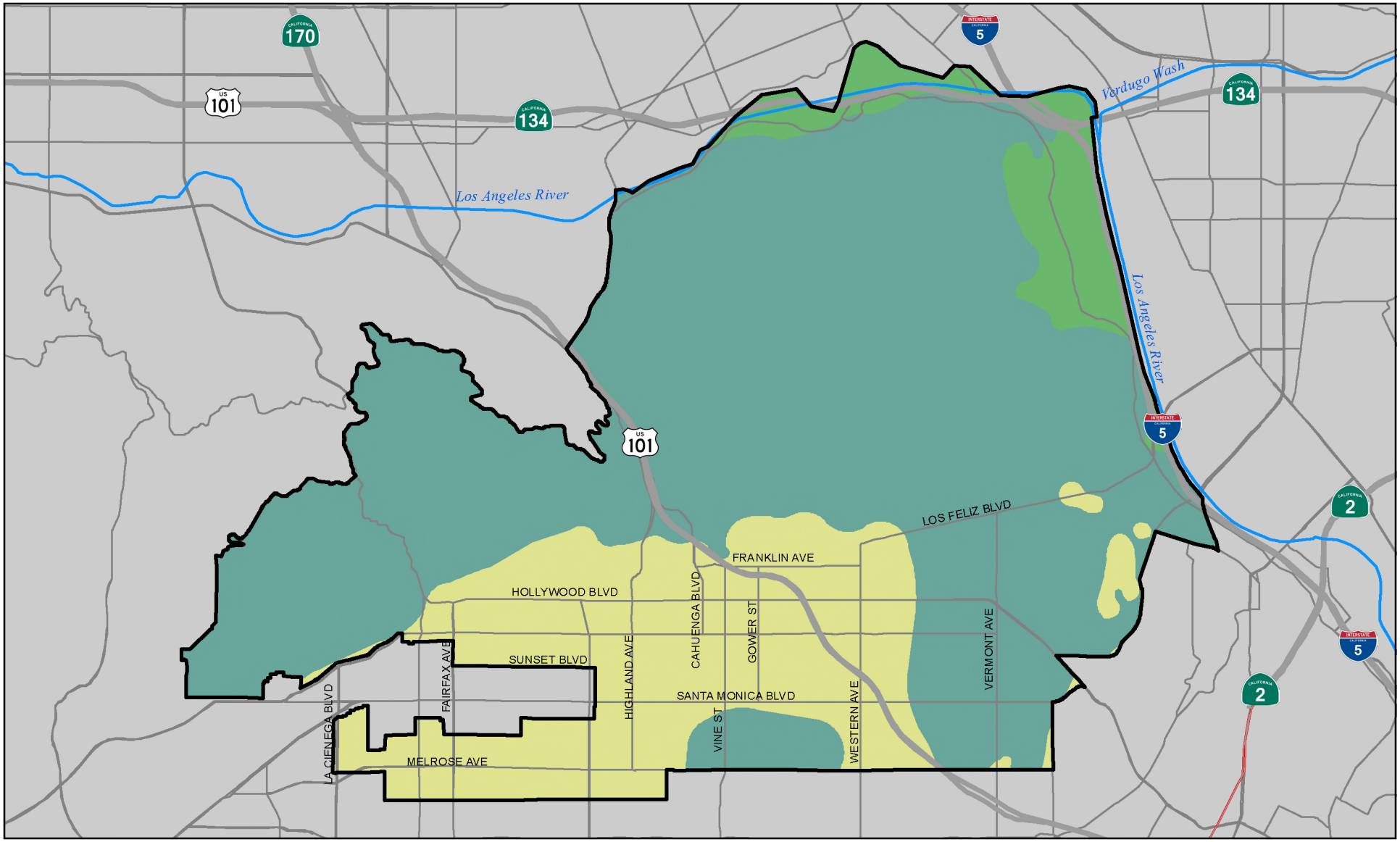
Los Angeles Municipal Code (LAMC). To comply with SMARA, the City adopted the 'G' Surface Mining supplemental use provisions of LAMC Section 13.03 in 1975. Subsequent amendments have brought the City's provisions into consistency with new State requirements. The 'G' (Surface Mining District) provisions are land use, not mineral conservation regulations. They regulate the establishment of sand and gravel districts, extraction operations, mitigation of potential noise, dust, traffic, and other potential impacts, as well as post-extraction site restoration.

EXISTING SETTING

Mineral resources are defined in the City's General Plan Conservation Element as nonrenewable resources that cannot be replaced once depleted. Primary mineral resources identified within the City include rock, gravel and sand deposits that follow the Los Angeles River flood plain, coastal plain, and other water bodies and courses; as well as oil. Mining for sand and gravel in the City began in the early-1900s in the Arroyo Seco and the Big Tujunga Wash when concrete became popular as a building material.

SAND AND GRAVEL

As shown in **Figure 4.11-1**, the Project Area is classified as MRZ-1, MRZ-2, and MRZ-3. In addition, as the Project Area consists of urbanized areas and open space uses, no sand and gravel mines have been identified in the Project Area. The foothills and flatland portions of the Project Area generally west of Normandie Avenue and pockets of areas in the eastern portion of the Project Area are classified as MRZ-1, which indicates that these areas have little or no likelihood for the presence of significant mineral resources. These areas are developed urbanized areas consisting of commercial, residential, industrial, open space, and public facilities areas. The northernmost and northeastern portions of the Project Area, specifically within the Griffith Park area, are classified as MRZ-2, which indicates that these areas are underlain by mineral deposits where geologic data indicates that significant measured or indicated resources are present. The MRZ-2 classified areas within the Project Area are zoned OS or PF and have either an Open Space or Public Facilities land use designation, which may include undeveloped open space, recreational areas, and public roadways. The majority of the Project Area is classified as MRZ-3, which indicate that these areas contain known mineral occurrences of undetermined mineral resources significance. Portions of the Project Area that are within MRZ-3 include a majority of the hillside area in the northern portion of the Project Area, a majority of the area east of Normandie Avenue, and a portion of the Project Area south of Santa Monica Boulevard generally between Hudson Avenue and North Saint Andrews Place.



LEGEND:

Hollywood CPA | MRZ-1 | MRZ-2 | MRZ-3

N W E S

0 2,900 5,800 Feet

SOURCE: CGS Information Warehouse: Mineral Land Classification OFR 94-14, 2014; TAHA, 2018.

taha environmental planners
taha 2010-073

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FIGURE 4.11-1

MINERAL RESOURCE ZONES

OIL

Oil or petroleum extraction began in Los Angeles in 1892 after E.L. Doheny discovered oil near what is now Glendale Boulevard and Second Street. Petroleum extraction and refining continue to be important industries in the City. Petroleum sources in the City stem from the Lower Pliocene (three to five million years old) and from the Upper Miocene (five to 11 million years old) rock formations. Petroleum deposits within the City primarily underlie portions of downtown and west Los Angeles, the harbor area and the Santa Monica and San Pedro bays. The only petroleum sources located within the Project Area is the Salt Lake Field, which is located in the southern portion of the Project Area, as shown in **Figure 4.11-2**. The Salt Lake Field was discovered in the 1890s by Arthur F. Gilmore with oil production activities occurring from the early 1920s until 1935. The Salt Lake Field extends to and underlies the La Brea Tar Pits which continues to produce tar but not oil. Existing uses within the Project Area that are located within the Salt Lake Field include a high school, commercial uses, and residential uses.

Areas of the City in which drilling of oil wells or the production from the wells of oil, gases or other hydrocarbon substances are permitted in the Supplemental Use Oil Drilling District ("O" District).

Figure 4.11-2 identifies 17 oil well sites located within the Project Area. As shown in further detail in **Table 4.11-2**, oil wells located within the Project Area are identified as plugged, idle, or buried and idle. Plugged wells prevent fluid from migrating between underground rock layers. Idle wells are identified as not having produced oil or natural gas for six consecutive months of continuous operation during the last five or more years. Buried-idle wells are characterized the same as idle wells and are also buried. If oil extraction activities were to resume in plugged or idle wells, appropriate approvals from the City's Office of Zoning Administration would need to be obtained in conformance with LAMC Section 13.01. No active oil wells are identified in the Project Area.

TABLE 4.11-2: OIL WELL SITES WITHIN THE PROJECT AREA

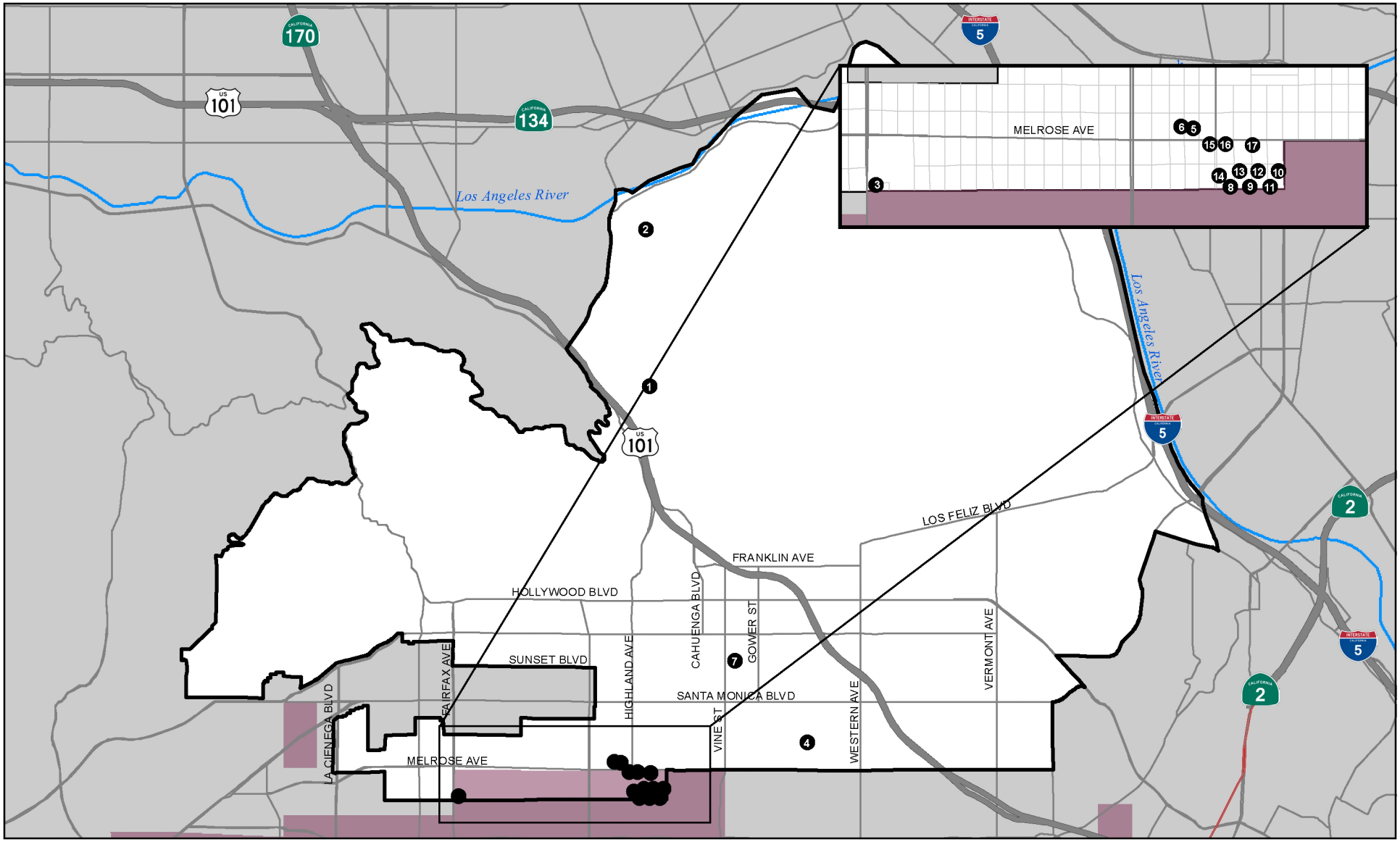
Key to Figure 4.11-2	Operator Name	Oil Well Status/a/
1	Black Wolf Canon Oil Co.	Buried-Idle
2	Gaddie Development Co.	Plugged
3	Chevron U.S.A. Inc.	Plugged
4	Union Oil Company of California	Plugged
5	Chevron U.S.A. Inc.	Plugged
6	Chevron U.S.A. Inc.	Plugged
7	Chevron U.S.A. Inc.	Plugged
8	Rancho La Brea Oil Co.	Plugged
9	Rancho La Brea Oil Co.	Plugged
10	Rancho La Brea Oil Co.	Idle
11	Rancho La Brea Oil Co.	Plugged
12	Rancho La Brea Oil Co.	Plugged
13	Rancho La Brea Oil Co.	Plugged
14	Rancho La Brea Oil Co.	Plugged
15	Rancho La Brea Oil Co.	Plugged
16	Rancho La Brea Oil Co.	Plugged
17	Rancho La Brea Oil Co.	Plugged

/a/**Plugged**: Well is plugged by placing cement in the well-bore or casing at certain intervals as specified in California laws or regulations. The purpose of the cement is to seal the wellbore or casing and prevent fluid from migrating between underground rock layers.

Idle: Any well that has not produced oil or natural gas or has not been used for injection for six consecutive months of continuous operation during the last fi A or more years.

Buried-Idle: Any buried well that has not produced oil or natural gas or has not been used for injection for six consecutive months of continuous operation during the last five or more years.

SOURCE: State of California Department of Conservation, Division of Oil, Gas and Geothermal Resources, November 2016.



LEGEND:

Hollywood CPA

Oil Wells

Oil and Gas Fields

N
W E
S

0 2,900 5,800 Feet

SOURCE: City of Los Angeles, 2016, TAHA, 2018.

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taha 2010-073

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FIGURE 4.11-2
OIL WELLS

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, the Proposed Plan would have a significant impact related to mineral resources if they would:

- Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; and
- Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific land or other land use plan.

METHODOLOGY

Development that includes placement of structures over mineral resource areas, or blocks access to a mineral resource area, is deemed to result in the loss of availability of resources. Impacts are determined based on whether the Proposed Plan would result in a loss of, or loss of access to, identified mineral resources, and whether the loss of access would be permanent. The importance of the mineral resource on a state, regional and local level, in terms of economic value, remaining supply, and feasibility of recovering the resource is also taken into consideration.

The impact analysis for mineral resources was based on several factors, including the policies and land uses of the Proposed Plan, the degree to which existing land uses would change with of the reasonably expected development under the Proposed Plan, the proximity of land use changes to mineral resources, and the thresholds of significance for mineral resources.

IMPACTS

IMPACT 4.11-1 Would implementation of the Proposed Plan result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? **No impact.**

As discussed in the Existing Setting section, the Project Area is classified as MRZ-1, MRZ-2, and MRZ-3. MRZ-1 areas indicate little or no likelihood for the presence of significant mineral resources, and MRZ-3 indicate that such areas contain known mineral occurrences of undetermined mineral resources significance. Thus, based on these classifications, the MRZ-1 and MRZ-3 do not identify the presence of significant resources. Portions of the Project Area that are classified as MRZ-2 have the potential to have important mineral resources. The MRZ-2 classified areas within the Project Area are zoned OS or PF and have either an Open Space or Public Facilities land use designation, which includes uses such as undeveloped open space, recreational areas, and public roadways. Specifically, MRZ-2 classified areas include Griffith Park, Mount Hollywood, Spring Canyon, Fern Canyon, Interstate 5, and State Route 134. Regardless of the MRZ-2 classification, the existing zoning and land use designations do not allow for the extraction of mineral resources, and resource recovery does not occur in the Project Area.

The Project Area is not underlain with active oil fields. The southern portion of the Project Area, is underlain by the Salt Lake Field, as shown in **Figure 4.11-2**. As detailed in **Table 4.11-2**, the existing oil wells located in the Project Area are inactive and designated as buried-idle, plugged or idle. The Proposed Plan does not include provisions that would introduce new oil districts or oil producing uses. While mineral resources are known or are likely to occur in the Project Area, the Proposed Plan does not include provisions to reduce the availability of these resources and does not include plans to extract known mineral resources

in the Project Area. Additionally, the zoning and land use designation in the MRZ-2 areas would remain unchanged under the Proposed Plan. Therefore, implementation of the Proposed Plan would not result in the loss of availability of mineral resources, and ***no impact*** would occur.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

No impact.

IMPACT 4.11-2 Would implementation of the Proposed Plan result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific land or other land use plan? **No impact.**

As discussed under Impact 4.11-1, above, the Proposed Plan does not include provisions to reduce the availability of mineral resources or include policies that would encourage extraction of known mineral resources in the Project Area. Currently, resource recovery does not occur in the Project Area, and the Proposed Plan does not include any policies that would result in the loss of availability or access to such resources. The Proposed Plan would not result in the recovery of resources in the MRZ-2 area and would not preclude the recovery of such resources. The MRZ-2 areas within the Project Area are zoned OS or PF and have land use designations of Open Space or Public Facilities. The existing zoning and land use designations do not allow for the extraction of mineral resources. The zoning and land use designations for this area would remain unchanged under the Proposed Plan. There are no locally important mineral resource recovery sites delineated in the General Plan or any other City or local plan. Therefore, the Proposed Plan would not result in the loss of access to or availability of an important mineral resource recovery site delineated.

The Conservation Element contains policies related to the loss of a known and/or locally important mineral resource. These policies seek to implement the provisions of SMARA so as to establish extraction operations at appropriate sites; to minimize operation impacts on adjacent uses, ecologically important areas and groundwater; to protect the public health and safety; and require appropriate restoration, reclamation and reuse of closed sites. Additionally, the Conservation Element has an objective, policies, and programs to conserve petroleum resources and enable appropriate, environmentally sensitive extraction of petroleum deposits so as to protect the petroleum resources for the use of future generations and to reduce the City's dependency on imported petroleum and petroleum products. The Proposed Plan does not include components that would be inconsistent with the Conservation Element.

The Proposed Plan does not include any policies that would result in the extraction of sand, gravel, or oil resources or further preclude the extraction of such resources and would not introduce new oil districts or oil producing uses. Implementation of the Proposed Plan would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific land or other land use plan. Therefore, there will be ***no impacts*** related to mineral resources.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

No impact.

CUMULATIVE IMPACTS

As previously discussed, no locally important mineral resource recovery sites are delineated in the General Plan or any other City or local plan. The Proposed Plan would not result in the recovery of resources in the MRZ-2 area and would not preclude the recovery of such resources. As the Proposed Plan would not result in impacts to mineral and oil resources, the Proposed Plan would not contribute to a cumulative impact, and impacts related to mineral resources would not be cumulatively considerable.

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4.12 NOISE

This section provides an overview of noise and vibration levels in the CPA and evaluates the construction and operational impacts associated with the Proposed Plan. Supporting data and calculations are included in Appendix H of this Draft EIR. Topics addressed include short-term construction and long-term operational noise and vibration. The following information provides noise and vibration characteristics and effects.

NOISE CHARACTERISTICS AND EFFECTS

Characteristics of Sound. Sound is technically described in terms of the loudness (amplitude) and frequency (pitch) of the sound. The standard unit of measurement for sound is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The "A-weighted scale," abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 0 to 140 dBA.[1] **Figure 4.12-1** provides examples of A-weighted noise levels from common sounds.

Noise Definitions. This noise analysis discusses sound levels in terms of Community Noise Equivalent Level (CNEL), Day-Night Noise Level (L_{dn}), and Equivalent Noise Level (L_{eq}).

Community Noise Equivalent Level (CNEL). CNEL is an average sound level during a 24-hour period. CNEL is a noise measurement scale, which accounts for noise source, distance, single event duration, single event occurrence, frequency, and time of day. Human reaction to sound between 7:00 p.m. and 10:00 p.m. is as if the sound were actually 5 dBA higher than if it occurred from 7:00 a.m. to 7:00 p.m. From 10:00 p.m. to 7:00 a.m., humans perceive sound as if it were 10 dBA higher due to the lower background level. Hence, the CNEL is obtained by adding an additional 5 dBA to sound levels in the evening from 7:00 p.m. to 10:00 p.m. and 10 dBA to sound levels in the night from 10:00 p.m. to 7:00 a.m. Because CNEL accounts for human sensitivity to sound, the CNEL 24-hour figure is always a higher number than the actual 24-hour average.[2]

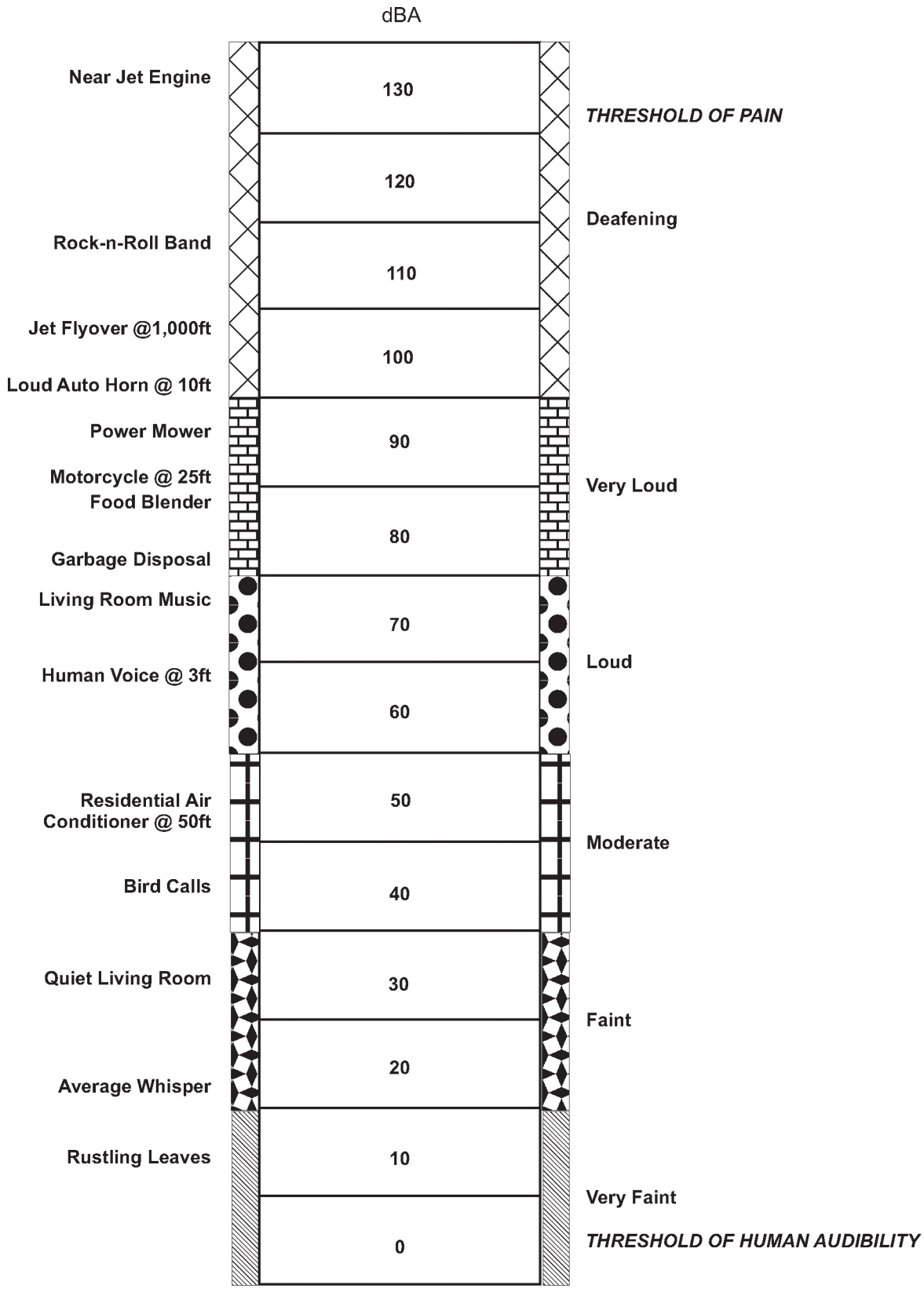
Day-Night Noise Level (L_{dn}). L_{dn} is similar to CNEL except that a 10-dBA penalty is added from 10:00 p.m. to 7:00 a.m. There is no 5-dBA penalty that exists for the CNEL calculation.[3]

Equivalent Noise Level (L_{eq}). L_{eq} is the average noise level on an energy basis for any specific time period. The L_{eq} for one hour is the energy average noise level during the hour. The average noise level is based on the energy content (acoustic energy) of the sound. L_{eq} can be thought of as the level of a continuous noise which has the same energy content as the fluctuating noise level. The equivalent noise level is expressed in units of dBA.[4]

Effects of Noise. Noise is generally defined as unwanted sound. The degree to which noise can impact the human environment ranges from levels that interfere with speech and sleep (annoyance and nuisance) to levels that cause adverse health effects (hearing loss and psychological effects). Human response to noise is subjective and can vary greatly from person to person. Factors that influence individual response include the intensity, frequency, and pattern of noise, the amount of background noise present before the intruding noise, and the nature of work or human activity that is exposed to the noise source.

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[1]California Department of Transportation, *Technical Noise Supplement*, September 2013.
[2]*Ibid.*
[3]*Ibid.*
[4]*Ibid.*



SOURCE: Cowan, James P., Handbook of Environmental Acoustics.

FIGURE 4.12-1

A-WEIGHTED DECIBEL SCALE

Audible Noise Changes. Studies have shown that the smallest perceptible change in sound level for a person with normal hearing sensitivity is approximately 3 dBA. A change of at least 5 dBA is readily perceptible to a person with normal hearing sensitivity. A 10-dBA increase is subjectively heard as a doubling in loudness.[5]

Noise levels decrease as the distance from the noise source to the receiver increases. Noise generated by a stationary noise source, or "point source," will decrease by approximately 6 dBA over hard surfaces (e.g., reflective surfaces such as parking lots or smooth bodies of water) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces such as soft dirt, grass, or scattered bushes and trees) for each doubling of the distance.[6] For example, if a noise source produces a noise level of 89 dBA at a reference distance of 50 feet, then the noise level would be 83 dBA at a distance of 100 feet from the noise source, 77 dBA at a distance of 200 feet, and so on. Noise generated by a mobile source will decrease by approximately 3 dBA over hard surfaces and 4.8 dBA over soft surfaces for each doubling of the distance.

Noise is most audible when there is a direct line-of-sight.[7] Solid barriers, such as walls, berms, or buildings that break the line-of-sight between the source and the receiver greatly reduce noise levels from the source since sound can only reach the receiver by bending over the top of the barrier. However, if a barrier is not solid, high or long enough to break the line-of-sight from the source to the receiver, its effectiveness is greatly reduced.

VIBRATION CHARACTERISTICS AND EFFECTS

Characteristics of Vibration. Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration.[8] Vibration can be a serious concern, causing buildings to shake and rumbling sounds to be heard. In contrast to noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of vibration are trains, buses on rough roads, and construction activities, such as blasting, pile driving, and heavy earth-moving equipment.

Vibration Definitions. There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is most frequently used to describe vibration impacts to buildings and is usually measured in inches per second.[9] The PPV is defined as the maximum instantaneous peak of the vibration signal. The root mean square (RMS) amplitude is most frequently used to describe the effect of vibration on the human body. The RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation (Vdb) is commonly used to measure RMS.

Effects of Vibration. High levels of vibration may cause physical personal injury or damage to buildings. Ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that can affect concentration or disturb sleep. High levels of ground-borne vibration can damage fragile buildings or interfere with equipment that is highly sensitive to ground-borne vibration (e.g., electron microscopes). Although responses to vibration differ, 65 Vdb is the approximate threshold of perception for many people.[10] The approximate dividing line between barely and distinctly perceptible is 75 Vdb and 85 Vdb is typically only acceptable if there are an infrequent number of events per day.

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[5]California Department of Transportation, *Technical Noise Supplement*, September 2013.
[6]*Ibid.*
[7]Line-of-sight is an unobstructed visual path between the noise source and the noise receptor.
[8]Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, 2006.
[9]*Ibid.*
[10]*Ibid.*

REGULATORY FRAMEWORK

Federal, state, and local laws, regulations, plans, and guidelines that are potentially applicable to the Proposed Plan are summarized below:

NOISE

STATE

Department of Health Services. The Department of Health Services, Environmental Health Division, has published the Guidelines for Noise and Land Use Compatibility (the State Guidelines) which recommend guidelines for local governments to use when setting standards for human exposure to noise and preparing noise elements for general plans. The State Guidelines, which is illustrated in **Table 4.12-1**, indicates that residential land use and other noise sensitive receptors generally should be located in areas where outdoor ambient noise levels do not exceed 65 to 70 dBA (CNEL or L_{dn}).

Application of this compatibility matrix to development projects is not mandated by the Department of Health Services; however, each jurisdiction is required to consider the State Guidelines when developing its General Plan Noise Element and when determining acceptable noise levels within its community. According to the State Guidelines, an exterior noise level of 60 dBA CNEL is considered to be a "normally acceptable" noise level for single-family, duplex, and mobile homes involving normal, conventional construction, without any special noise insulation requirements. Exterior noise levels up to 65 dBA CNEL are typically considered "normally acceptable" for multi-family units and transient lodging without any special noise insulation requirements. Between these values and 70 dBA CNEL, exterior noise levels are typically considered "conditionally acceptable," and residential construction should only occur after a detailed analysis of the noise reduction requirements is made and needed noise attenuation features are included in the project design. Exterior noise attenuation features include, but are not limited to, setbacks to place structures outside the conditionally acceptable noise contour and orientation.

California Code of Regulations (CCR). Title 24 of the CCR codifies Sound Transmission Control requirements, which establishes uniform minimum noise insulation performance standards for new hotels, motels, dormitories, apartment houses, and dwellings other than detached single-family dwellings. Specifically, Title 24 states that interior noise levels attributable to exterior sources shall not exceed 45 dBA CNEL in any habitable room of new multi-family dwellings. Dwellings are to be designed so that interior noise levels will meet this standard for at least 10 years from the time of building permit application.

Department of Housing and Community Development. The Department of Housing and Community Development advises that new residential units should not be exposed to outdoor ambient noise levels in excess of 65 dBA (CNEL or L_{dn}), and, if necessary, sufficient noise insulation must be provided to reduce interior ambient noise levels to 45 dBA. Within a 65-dBA exterior noise environment, interior noise levels are typically reduced to acceptable levels (to at least 45 dBA CNEL) through conventional construction, but with closed windows and fresh air supply systems or air conditioning.

LOCAL

The Noise Element of the City of Los Angeles General Plan (General Plan) establishes CNEL guidelines for land use compatibility and includes a number of goals, objectives, and policies for land use planning purposes. The City also has regulations to control unnecessary, excessive, and annoying noise, as cited by the Los Angeles Municipal Code (LAMC) Chapter XI Noise Regulation.

TABLE 4.12-1: GUIDELINES FOR NOISE COMPATIBLE LAND USE

Land Use Category	Community Noise Exposure (dBA, CNEL) 55	60	65	70	75	80
Residential - Low Density Single-Family, Duplex, Mobile Homes						
Residential - Multi-Family						
Transient Lodging - Motels Hotels						
Schools, Libraries, Churches, Hospitals, Nursing Homes						
Auditoriums, Concert Halls, Amphitheaters						
Sports Arena, Outdoor Spectator Sports						
Playgrounds, Neighborhood Parks						
Golf Courses, Riding Stables, Water Recreation, Cemeteries						
Office Buildings, Business Commercial and Professional						
Industrial, Manufacturing, Utilities, Agriculture						

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

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

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

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

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

City of Los Angeles General Plan Noise Element. The City of Los Angeles General Plan Noise Element identifies potentially significant noise sources, addresses vibration issues, identifies historic and current noise management approaches and guides the development of noise regulations. It addresses noise mitigation regulations, strategies and programs and delineates federal, state and City jurisdiction relative to rail, automotive, aircraft and nuisance noise. **Table 4.12-2** identifies the Noise Element goals, objectives, and policies that are relevant to the Proposed Plan. In addition, Exhibit I of the Noise Element includes the noise compatibility guidelines shown in **Table 4.12-1**.

TABLE 4.12-2: RELEVANT GENERAL PLAN NOISE GOALS, OBJECTIVES, AND POLICIES	
Goal/Objective/Policy	**Goal/Objective/Policy Description**
NON-AIRPORT	
P5	Continue to enforce, as applicable, city, state, and federal regulations intended to abate or eliminate disturbances of the peace and other intrusive noise.
P6	When processing building permits, continue to require appropriate project design and/or insulation measures, in accordance with the California Noise Insulation Standards (Building Code Title 24, Section 3501 et seq.), or any amendments thereto or subsequent related regulations, so as to assure that interior noise levels will not exceed the minimum ambient noise levels, as set forth in the City's noise ordinance (LAMC Section 111 et seq., and any other insulation related requirements) for a particular zone or noise sensitive use, as defined by the California Noise Insulation Standards.
LAND USE DEVELOPMENT	
P11	For a proposed development project that is deemed to have a potentially significant noise impact on noise sensitive uses, require mitigation measures, as appropriate, in accordance with California Environmental Quality Act and City procedures.
P12	When issuing discretionary permits for a proposed noise-sensitive use or subdivision of four or more detached single-family units and which use is determined to be potentially significantly impacted by existing or proposed noise sources, require mitigation measures, as appropriate, in accordance with procedures set forth in the California Environmental Quality Act so as to achieve an interior noise level CNEL of 45 dB, or less, in any habitable room as required by LAMC Section 91.
P13	Continue to plan, design and construct or oversee construction of public projects, and projects on City owned properties, so as to minimize potential noise impacts on noise sensitive uses and to maintain or reduce existing ambient noise levels.
P15	Continue to take into consideration, during updating/revision of the City's general plan community plans, noise impacts from freeways, highways, outdoor theaters and other significant noise sources and to incorporate appropriate policies and programs into the plans that will enhance land use compatibility.
P16	Use, as appropriate, the "Guidelines for Noise Compatible Land Use", or other measures that are acceptable to the City, to guide land use and zoning reclassification, subdivision, conditional use and use variance determinations and environmental assessment considerations, especially relative to sensitive uses within a CNEL of 65 dB airport noise exposure areas and within a line-of-sight of freeways, major highways, railroads or truck haul routes.
SOURCE: City of Los Angeles, *Noise Element of the Los Angeles City General Plan*, February 3, 1999.	

Los Angeles Municipal Code (LAMC). The City of Los Angeles has a comprehensive set of regulations concerning the generation and control of noise that could adversely affect people and noise sensitive land uses that are located in four different Chapters of the Code—the Zoning Ordinance (Chapter I), the General Welfare Chapter (Chapter IV), Building Code (Chapter IX), and Noise Regulation Chapter (Chapter XI). There are numerous specific ordinances, many of which do not relate to the impact analysis presented below. This discussion summarizes the general regulations and focuses on the ordinances most relevant to the Proposed Plan.

Regarding construction, Section 41.40 (Noise Due to Construction, Excavation Work – When Prohibited) in Chapter IV (Public Welfare) of the LAMC indicates that no construction or repair work shall be performed between the hours of 9:00 p.m. and 7:00 a.m., since such activities would generate loud noises and disturb persons occupying sleeping quarters in any adjacent dwelling, hotel, apartment or other place of residence. No person, other than an individual home owner engaged in the repair or construction of his/her single-family dwelling, shall perform any construction or repair work of any kind or perform such work within 500 feet of land so occupied before 8:00 a.m. or after 6:00 p.m. on any Saturday or on a federal

holiday, or at any time on Sunday. Under certain conditions, the City may grant a waiver to allow limited construction activities to occur outside of the limits described above.

LAMC Section 91.106.4.8, in the Building Code (LAMC Chapter IX) requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the sites, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public and approved by the City's Department of Building and Safety.

Chapter XI (Noise Regulation) of the LAMC addresses sources of noise other than construction activities. Chapter XI is intended to prohibit unnecessary, excessive and annoying noises from all sources within the City. 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 is considered a violation of the Noise Regulations. The 5-dBA increase above ambient is applicable to City-regulated noise sources (e.g., mechanical equipment – LAMC Section 112.02), and it is applicable any time of the day. The LAMC states that the baseline ambient noise shall be the actual measured ambient noise level or the City's presumed ambient noise level, whichever is greater. The actual ambient noise level is the measured noise levels averaged over a period of at least 15 minutes. The LAMC indicates that in cases where the actual measured ambient conditions are not known, the City's presumed noise levels should be used. The presumed ambient noise levels are in Section 111.03 (Minimum Ambient Noise Level) of the LAMC (**Table 4.12-3**).

TABLE 4.12-3: PRESUMED EXISTING AMBIENT NOISE LEVEL

Type	Zones	dBA	
		Daytime (7:00 a.m. to 10:00 p.m.)	Nighttime (10:00 p.m. to 7:00 a.m.)
Residential	A1, A2, RA, RE, RS, RD, RW1, RW2, R1, R2, R3, R4, and R5	50	40
Commercial	P, PB, CR, C1, C1.5, C2, C4, C5, and CM	60	55
Industrial	M1, MR1, and MR2	60	55
	M2 and M3	65	65

SOURCE: LAMC, Section 111.03.

To account for people's increased tolerance for short-duration noise events, the LAMC provides a 5 dBA allowance for noise sources occurring more than five minutes but less than 15 minutes in any 1-hour period (for a total of 10 dBA above the ambient), and an additional 5 dBA allowance (total of 15 dBA above the ambient) for noise sources occurring five minutes or less in any 1-hour periods. These additional allowances for short-duration noise sources are applicable to noise sources occurring between the hours of 7:00 a.m. and 10:00 p.m. (daytime hours). Furthermore, LAMC provides a reduction of 5 dBA for steady high-pitched noise or repeated impulsive noise. The LAMC defines impulsive sound as sound of short duration, usually less than one second, with an abrupt onset and rapid decay. By way of example in the LAMC, impulsive sound includes explosions, musical base drum beats, or the discharge of firearms.

LAMC Section 112.02 (Radios, Television Sets, and Similar Devices) prohibits any noise level caused by such use or operation which exceeds the ambient noise level on the premises of any other occupied property, or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, by more than 5 dBA. This standard applies to nightclubs.

LAMC Section 112.02 (Air Conditioning, Refrigeration, Heating, Pumping, Filtering Equipment) requires that any heating, ventilation, and air conditioning (HVAC) system within any zone of the City not cause an increase in ambient noise levels on any other occupied property or if a condominium, apartment house, duplex, or attached business, within any adjoining unit to exceed the ambient noise level by more than 5 dBA.

Section 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools) of the LAMC specifies the maximum noise level of powered equipment or powered hand tools. Any powered equipment or hand tool that produces a maximum noise level exceeding 75 dBA at a distance of 50 feet is prohibited. However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means the above noise limitation cannot be met despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of equipment.

Section 112.06 (Places of Public Entertainment) of the LAMC states that is it unlawful for any person to operate, play, or to permit the operation or playing of any radio, television receiver, phonograph, musical instrument, sound amplifying equipment, or similar device which produces, reproduces, or amplifies sound in any place of public entertainment at a sound level greater than 95 dBA at any point that is normally occupied by a customer, unless a conspicuous and legible sign is located outside such place, near each public entrance, stating: "WARNING: SOUND LEVELS WITHIN MAY CAUSE HEARING IMPAIRMENT."

Section 113.01 (Rubbish And Garbage Collection and Disposal) of the LAMC prohibits collecting or disposing of rubbish or garbage, to operate any refuse disposal truck, or to collect, load, pick up, transfer, unload, dump, discard, or dispose of any rubbish or garbage within 200 feet of any residential building between the hours of 9:00 p.m. and 6:00 a.m. of the following day, unless a permit therefore has been duly obtained beforehand from the Board of Police Commissioners.

Section 114.03 (Vehicles - Loading and Unloading) of the LAMC prohibits loading or unloading of any vehicle, or operation of any dollies, carts, forklifts, or other wheeled equipment, which cause any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building between the hours of 10:00 p.m. and 7:00 a.m. of the following day, unless a permit therefore has been duly obtained beforehand from the Board of Police Commissioners. The permit program only applies to boundary areas defined by Section 114.03 (b) of the LAMC.

Article 5 (Amplified Sound) of Chapter XI (Noise Regulation) controls loudspeakers and sound amplifying equipment. Section 115.02 (Prohibition and Regulations) includes multiple provisions, including:

a) In all residential zones and within 500 feet thereof, no sound amplifying equipment shall be installed, operated or used for commercial purposes at any time.

b) The operation or use of sound amplifying equipment for noncommercial purposes in all residential zones and within 500 feet thereof, except when used for regularly scheduled operative functions by any school or for the usual and customary purposes of any church, is prohibited between the hours of 4:30 p.m. and 9:00 a.m. of the following day.

c) In all other zones, except such portions thereof as may be included within 500 feet of any residential zone, the operation or use of sound amplifying equipment for commercial purposes is prohibited between the hours of 9:00 p.m. and 8:00 a.m. of the following day.

d) In all other zones, except such portions thereof as may be included within 500 feet of any residential zone, the operation or use of sound amplifying equipment for noncommercial purposes is prohibited between the hours of 10:00 p.m. and 7:00 a.m. of the following day.

e) The only sounds permitted shall be either music, human speech, or both.

f) Sound emanating from sound amplifying equipment shall be limited in volume, tone and intensity as follows:

   1) The sound shall not be audible at a distance in excess of 200 feet from the sound equipment.
   2) In no event shall the sound be loud and raucous or unreasonably jarring, disturbing, annoying or a nuisance to reasonable persons of normal sensitiveness within the area of audibility.

g) Except as provided in (b) above, no sound amplifying equipment shall be operated upon any property adjacent to and within 200 feet of any hospital grounds or any school or church building while in use.

h) The operation or use of any sound amplifying equipment installed, mounted, attached or carried in or by any sound truck is further prohibited:

   1) Within the Central Traffic district at any time;
   2) Upon Hollywood Boulevard between Vermont Avenue and La Brea Avenue at any time;
   3) Upon Wilshire Boulevard at any time;
   4) Upon Sunset Boulevard at any time;
   5) Upon Vine Street at any time;
   6) Upon any street between the hours of 4:30 p.m. and 9:00 a.m. of the following day; and
   7) Upon any street on any Sunday.

Section 116.01 (Loud, Unnecessary and Unusual Noise) of the LAMC states that it is unlawful for any person to willfully make or continue, or cause to be made or continued, any loud, unnecessary, and unusual noise which disturbs the peace or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area. The standard which may be considered in determining whether a violation of the provisions of this section exists may include, but not be limited to, the following:

a) The level of noise;
b) Whether the nature of the noise is usual or unusual;
c) Whether the origin of the noise is natural or unnatural;
d) The level and intensity of the background noise, if any;
e) The proximity of the noise to residential sleeping facilities;
f) The nature and zoning of the area within which the noise emanates;
g) The density of the inhabitation of the area within which the noise emanates;
h) The time of the day and night the noise occurs;
i) The duration of the noise;
j) Whether the noise is recurrent, intermittent, or constant; and
k) Whether the noise is produced by a commercial or noncommercial activity.

The City of Los Angeles Planning and Zoning Code (LAMC Chapter 1) contains a variety of provisions that directly or indirectly reduce noise impacts on, or impacts that are associated with, different types of land uses. The most basic noise management measure is traditional zoning that separates agricultural, residential, commercial and industrial uses. Another is the front yard setback that serves to distance homes from adjacent street noise. Side and rear yards also serve as noise buffers. Through zone change and subdivision processes, site or use specific conditions can be imposed to assure compatibility of land use and to protect users of a site from impacts from adjacent uses. The commercial (C zones) and manufacturing (M zones) provisions of the code contain use specific requirements intended to reduce noise, odor and other impacts on adjacent uses. These include prohibiting certain commercial and industrial uses within so many feet of residential or less restrictive uses or zones, requiring increased setbacks from residential uses, limiting hours of operation, containing uses wholly within an enclosed building, requiring sound walls, prohibiting openings that face residential uses and prohibiting audibility of noise outside a facility.

Conditional use permits allow the planning commission, zoning administrators and, on appeal, City Council to assess potential inconsistencies and impose conditions to control noise for certain uses that may need special conditions to ensure compatibility with the surrounding land uses. Conditional use permits are required for various land uses in certain zones including, but not limited to, schools, churches, alcohol sales, parks, mixed-use development, and automobile repair facilities. In most cases, the uses are allowed by right in less restrictive zones (e.g., industrial). Some are prohibited entirely in residential zones. The permitting procedures include site investigations, notice to neighbors and hearings to assist decision makers in determining if the use should be permitted and, if permitted, allow imposition of appropriate conditions of approval. Typical conditions include specific site design, setbacks, use limitations on all or parts of the site, walls and hours of operation so as to minimize noise and other impacts.

The City has the authority to revoke, discontinue a use or to impose nuisance abatement conditions on uses that were allowed under the conditional use permit. Conditional use permits may potentially be revoked after a notice and hearing for nuisance (including disturbance of the peace) or noncompliance with the conditions of the conditional use permit. This procedure can be utilized to encourage owners to operate activities on their properties in a manner that is compatible with adjacent uses, particularly residential uses.

Other Planning and Zoning Code provisions allow a zoning administrator to conditionally permit, without public hearing, particular uses allowed in a zone, provided that the uses meet certain criteria, such as provision of additional parking or walls. The additional parking requirements for such uses as health clubs, restaurants, trade schools and auditoriums, in part, would prevent spillover parking on adjacent residential neighborhoods, which would minimize noise impacts, especially in the evening and at night on residential neighborhoods.

City of Los Angeles Building Sound Insulation Regulations. With the development of inexpensive insulation materials, air conditioning and improved noise reduction techniques, it became economically feasible to design buildings that provide effective insulation from outside noise as well as from weather conditions. It has been estimated that standard insulation, window sealing efficiency and other energy conservation measures reduce exterior-to-interior noise by approximately 15 dBA. Such a reduction generally is adequate to reduce interior noise from outside sources, including street noise, to an acceptable level. Building setbacks and orientation also reduce noise impacts.

Sound transmission control requirements are included in the International Building Code (IBC), which are the basis for the 2016 California Building Code (CBC). CBC states noise insulation standards (CBC Title 24, Section 1207.4). The standards require that intrusive noise not exceed 45 dB in any habitable room and has been incorporated into the City of Los Angeles Building Code (LAMC Section 91).

The City of Los Angeles Building Code guides building construction. The insulation provisions are intended to mitigate interior noise from outside sources, as well as sound between structural units. The provisions vary according to the intended use of the building, e.g., residential, commercial, and industrial. The regulations are intended to achieve a maximum interior sound level equal to or less than the ambient noise level standard for a particular zone, as set forth in the City's Noise Ordinance.

VIBRATION

FEDERAL

Federal Transit Administration (FTA). The FTA regulates vibration levels from proposed transit projects. According to the FTA, vibration impacts associated with human annoyance would be significant if vibration caused by new development exceeds 85 VdB, which is the vibration level that is considered to be acceptable only if there are an infrequent number of events per day. In terms of ground-borne vibration impacts on structures, the FTA vibration damage threshold is approximately 90 VdB for buildings

extremely susceptible to building damage (e.g., historic structures) and 98 VdB for engineered concrete and masonry buildings without plaster (e.g., typical urban development).[11]

STATE

There are no adopted state policies or standards for ground-borne vibration. The traditional view has been that common vibrations related to roadway traffic and construction activities pose no threat to buildings or structures. The California Department of Transportation recommends that extreme care be taken when sustained pile driving occurs within 7.5 meters (25 feet) of any building and 15 to 30 meters (50 to 100 feet) of a historic building or a building in poor condition.

LOCAL

There are no adopted City standards for ground-borne vibration.

EXISTING SETTING

NOISE

A series of exterior daytime sound measurements were taken on November 9, 2016 and November 15, 2016 to characterize existing conditions in the CPA. The monitoring occurred between 8:00 a.m. and 4:00 p.m. Sound measurements were taken using a SoundPro DL Sound Level calibrated before and after the measurements. Noise monitoring locations are shown in **Figure 4.12-2**, and the monitor was typically placed on the property line adjacent to the public right-of-way. The locations were selected to represent a wide variety of noise conditions in the CPA, including residential neighborhoods, commercial corridors, schools, and a cemetery. **Table 4.12-4** shows that the existing ambient noise levels within the Project Area range between 53.9 and 74.0 dBA L_{eq}. Existing ambient noise levels by type of land use are shown in **Table 4.12-5**. Sources of noise included automobiles and common urban activities.

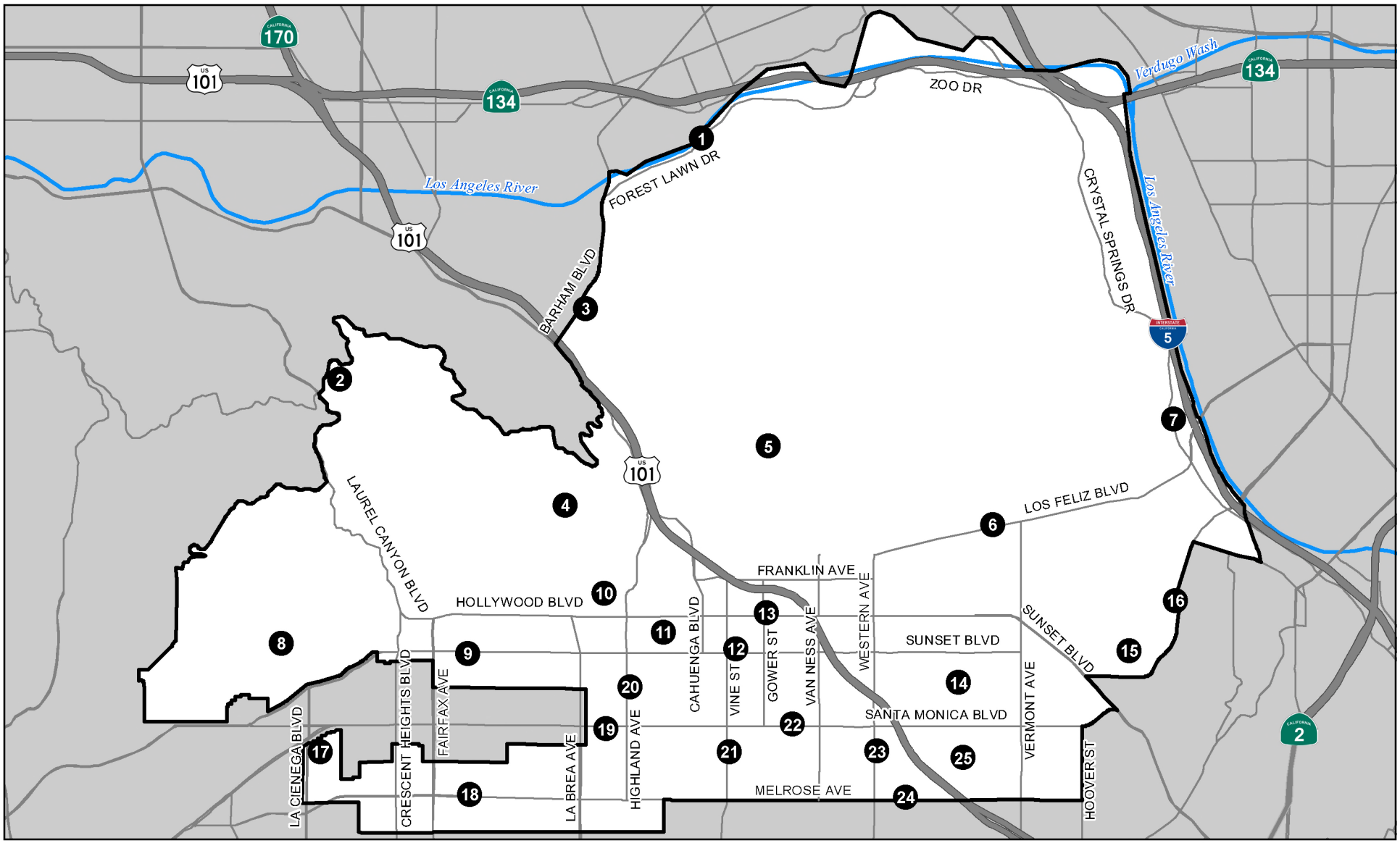
VIBRATION

Common sources of vibration within the Project Area include heavy vehicles on rough roads and construction activities (e.g., earth-moving equipment and pile driving). In addition, commercial or industrial activities may generate vibration (e.g., businesses that recycle construction debris and use heavy equipment). Most of the industrial activities within the Project Area are limited to the entertainment industry and do not involve these kinds of activities. Vibration was not monitored in the CPA for the Draft EIR. The FTA estimates that, at 50 feet, the typical background vibration in urban areas is 52 VdB, the vibration from buses and trucks is 63 VdB, and the vibration from bulldozers is 93 Vdb.[12]

SENSITIVE RECEPTORS

Noise and vibration sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Sensitive uses typically include residences, transient lodgings, schools (both public and private), libraries, churches, hospitals, playgrounds, and parks. Uses that are particularly sensitive to vibration are historic structures. The Hollywood CPA encompasses approximately 13,962 acres of land (21.8 square miles) and is approximately 2.5 miles northwest of downtown Los Angeles. The Hollywood CPA is predominantly residential, which accounts for 6,904 acres or 50 percent of the CPA.

[11]FTA, *Transit Noise and Vibration Impact Assessment*, May 2006.
[12]*Ibid.*



LEGEND:

Hollywood CPA

Noise Monitoring Locations

N
W E
S

0 2,700 5,400 Feet

SOURCE: TAHA, 2018.

taha environmental planners
taha 2010-073

Hollywood Community Plan Update
Draft Environmental Impact Report
CITY OF LOS ANGELES

FIGURE 4.12-2

NOISE MONITORING LOCATIONS

TABLE 4.12-4: EXISTING (TIME-AVERAGED) NOISE LEVELS IN THE HOLLYWOOD CPA

Figure 4.12-2 ID No.	Noise Monitoring Location	General Plan Land Use Designation	Existing Land Use Description	Time-Averaged Sound Level (dBA, L_{eq})
1	6465 Forest Lawn Dr.	Open Space	Cemetery	74.0
2	8035 Briar Summit Dr.	Very Low II Residential	Single-Family Residential	55.1
3	3359 Primera Ave.	Low II Residential	Single-Family Residential	64.1
4	2216 Chelan Dr.	Minimum Residential	Single-Family Residential	69.4
5	2627 N. Beachwood Dr.	Low Medium II Residential	Multi-Family Residential	66.8
6	2208 N. Catalina St.	Very Low II Residential	Single-Family Residential	71.4*
7	4400 Crystal Springs Dr.	Open Space	Park	64.4
8	8750 Hollywood Blvd.	Low II Residential	Single-Family Residential	53.9
9	7700 Sunset Blvd.	Neighborhood Office Commercial	Commercial	71.4
10	1782 N. Orange Dr.	High Medium Residential	Clubhouse	64.7
11	6611 Selma Ave.	Public Facilities / Regional Center Commercial	School	60.4
12	6255 Sunset Blvd.	Regional Center Commercial	Mixed-Use	69.8
13	6051 Hollywood Blvd.	Highway Oriented / Regional Center Commercial	Strip Mall	69.9
14	1262 N. Mariposa Ave.	Medium Residential	Multi-Family Residential	67.0
15	4003 Sunset Dr.	Neighborhood Commercial	Multi-Family Residential	54.7
16	2431 Hyperion Ave.	Neighborhood Office Commercial	Commercial	73.1
17	932 Alfred St.	Medium Residential	Multi-Family Residential	55.4
18	7673 Melrose Ave.	Neighborhood Office Commercial	Automotive	72.3
19	1050 N. Orange Dr.	Limited Manufacturing / Highway Oriented Commercial	Entertainment Production	66.8
20	1300 Highland Ave.	Highway Oriented Commercial	Strip Mall	71.6
21	950 Vine St.	Highway Oriented Commercial / Public Facilities	Strip Mall	69.7
22	5925 Santa Monica Blvd.	Commercial Manufacturing / Highway Oriented Commercial	Commercial	76.9
23	990 N. Western Ave.	Neighborhood Office Commercial	Restaurant	70.3
24	4809 Melrose Ave.	Limited Commercial	Strip Mall	73.8
25	946 N. Mariposa Ave.	Low Medium II Residential	Multi-Family Residential	58.9

Note: Noise measurements taken over a period of 15 minutes. Due to the nature of short term measurements, noise levels are more variable than measurements taken over longer time periods.

* This noise level is taken within a single-family residential neighborhood adjacent to Los Feliz (designated an Avenue I in the Mobility Element).

SOURCE: TAHA, 2017.

TABLE 4.12-5: EXISTING (TIME-AVERAGED) NOISE LEVEL RANGE IN THE HOLLYWOOD CPA BY LAND USE TYPE

Existing Land Use Type	Minimum Recorded Time-Averaged Ambient Sound Level (dBA, L_{eq})	Maximum Recorded Time-Averaged Ambient Sound Level (dBA, L_{eq})
Single-Family Residential	53.9	71.4*
Multi-Family Residential	54.7	67.0
Commercial	64.7	76.9
Public Use	60.4	74.0

Note: Noise measurements taken over a period of 15 minutes. Due to the nature of short term measurements, noise levels are more variable than measurements taken over longer time periods.

* This noise level is taken within a single-family residential neighborhood adjacent to Los Feliz Boulevard (designated an Avenue I in the Mobility Element).

SOURCE: TAHA, 2017.

As described in Section 4.14, Public Services, of this Draft EIR there are approximately 34 LAUSD schools, five libraries, and approximately 18 parks and recreational facilities within the CPA. Also, refer to Section 4.5, Cultural Resources for a discussion of historic properties, which may be sensitive to increases in noise and vibration levels.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, the Proposed Plan would have a significant impact related to noise if it would result in:

- Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels;
- A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;
- A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels; and/or
- For a project located within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels.

METHODOLOGY

The City relies on the Appendix G of the State CEQA Guidelines as the threshold of significance. Below are the methods and criteria used by the City to analyze and answer those questions:

CONSTRUCTION NOISE

Construction noise is assessed in context of the provisions of the LAMC discussed in the Regulatory Framework, including allowable hours of construction and maximum equipment noise levels. Redevelopment in urban infill locations is very common and usual within urban locations, such as the City and the Plan Area, and the associated short-term construction activities and noise created by those activities are typically found in urban environments, such as the Plan Area. Construction noise from typical projects is intermittent throughout the day during the duration of construction activity. Construction noise levels may fluctuate dependent on type of equipment being used, construction phase, or equipment location. Although some individuals may find construction noise of any kind or of any duration very disturbing, as a general matter, typical construction, including with the imposition of the regulatory measures described in the Regulatory Setting, does not result in and would not be considered a significant impact. However, larger projects that require extended construction or heavy-duty equipment could expose sensitive uses and users in the surrounding environment to more continuous and/or louder noise impacts and result in significant short-term noise exposure. When noise-sensitive land uses (e.g., residences, schools, libraries, hospitals) are located within 500 feet of a project site, projects that meet one or more of the characteristics below are considered to have the potential to result in significant impacts.

- Two subterranean levels or more (approximately 20,000 cubic yards of material);
- Construction durations (excluding interior finishing) of 18 months or more;
- Use of large, heavy-duty equipment rated 300 horsepower or greater; or
- The potential for impact pile driving.

OPERATIONAL NOISE

The following thresholds take into account incremental changes in 24-hour noise levels as well as potential regular occurrences of single event, impulsive noise. As noted above, the LAMC defines impulsive sound as sound of short duration, usually less than one second, with an abrupt onset and rapid decay. Such single event noise generating activities could be of short duration but permanently reoccurring depending on the source and associated land use (e.g., movie studios). The Proposed Plan would have significant impact on noise levels from operations if:

- Permanent ambient noise level measured at the property line of affected uses increases by 3 dBA CNEL to or within the "normally unacceptable" or "clearly unacceptable" categories, as shown in **Table 4.12-1**, or any 5 dBA CNEL or more increase in noise level.

The land use and noise compatibility guidelines in the Noise Element are not adopted standards relevant to determining the significance of incremental increased in permanent noise levels. Exhibit I of the Noise Element includes criteria or general guidance associated with incremental increases in noise. Exhibit I is shown in **Table 4.12-1**. This Exhibit was developed in 1990 to help guide determination of appropriate land use and mitigation measures related to existing or anticipated ambient noise levels. This guidance is applicable to assessing if a land use is compatible with the existing noise environment (i.e. impact of the environment on a project) but is not useful alone for assessing if a project would significantly increase existing noise levels. This is particularly true in urban environments like the Plan Area, where existing noise levels often exceed the guidelines shown in **Table 4.12-1**. In addition, sound transmission control requirements are included in the International Building Code, which are the basis for the 2016 CBC and which in turn are incorporated into the City of Los Angeles Building Code (LAMC Section 91). The CBC provides noise insulation standards (CBC Title 24, Section 1207.4). The standards require that intrusive noise not exceed 45 dB in any habitable room. Title 24 legal requirements ensure new sensitive land uses, including residences and schools, are constructed in a manner that ensures acceptable noise levels in interior areas.

CONSTRUCTION AND OPERATIONAL VIBRATION

Consistent with FTA *Transit Noise and Vibration Impact Assessment Manual*, vibration impacts associated with human annoyance would be significant if:

- Vibration caused by new development occurring because of implementation of the Proposed Plan exceeds 85 VdB, which is the vibration level that is considered to be acceptable only if there are an infrequent number of events per day;[13] and/or
- Groundborne vibration caused by new development occurring because of implementation of the Proposed Plan exceeds the FTA vibration damage threshold of approximately 98 VdB for engineering concrete and masonry building, 94 VdB for fragile buildings (i.e., non-engineered timber and masonry buildings) and approximately 90 VdB for extremely fragile historic buildings (i.e., buildings extremely susceptible to vibration damage).[14]

Construction noise levels are based on example equipment levels provided in standard technical references. Construction noise levels are also identified for various phases of construction activity based on the same sources. Construction vibration levels are based on example equipment levels provided in FTA's Transit Noise and Vibration Impact Assessment guidance document.[15]

[13]FTA, *Transit Noise and Vibration Impact Assessment*, May 2006.
[14]*Ibid.*
[15]*Ibid.*

Mobile source noise levels are estimated using methodology that accounts for traffic volumes, roadway width, and vehicle mix. The analysis also discusses operational mechanical equipment noise (e.g., HVAC), land use compatibility, and operational vibration.

This discussion of noise addresses impacts in the Hollywood CPA and any properties bordering the Hollywood CPA. Noise levels are a direct function of both mobile sources (traffic in the CPA), stationary sources (such as HVAC equipment and other similar equipment), other operational sources (such as rooftop entertainment spaces) and construction activity throughout the CPA.

IMPACTS

IMPACT 4.12-1 Would implementation of the Proposed Plan result in the exposure of persons to or generation of noise in levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? **No impact.**

The analysis associated with Impact 4.12-1 assesses if the Proposed Plan would expose people to or generate noise in levels in excess of standards established in the LAMC, noise ordinance and/or Noise Element of the General Plan. This analysis does not assess increases in ambient noise levels. Refer to Impact 4.12-3 for the discussion related to a substantial permanent increase in ambient noise levels and Impact 4.12-4 for the discussion related to a substantial temporary or periodic increase in ambient noise levels.

CONSTRUCTION NOISE

The LAMC regulates construction noise in Section 41.40 (Noise Due to Construction, Excavation Work – When Prohibited) and Section 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools). Persons engaging in construction activities are legally mandated to comply with LAMC requirements. Therefore, based on Section 41.40, it is presumed that construction activities would occur between 7:00 a.m. and 9:00 p.m. on weekdays, and between 8:00 a.m. and 6:00 p.m. when activities would be located within 500 feet of residences on any Saturdays or anytime on Sundays or federal holidays. While the City may grant a waiver to allow limited construction activities to occur outside of the limits described above, such variances are typically granted for short time periods associated with high-rise concrete pouring activities. Granting of a waiver typically requires a detailed noise assessment with measures to control nighttime noise. Waivers comply with the City standards in the LAMC requirements and would not be inconsistent with Impact Statement 4.12-1.

Section 112.05 specifies the maximum noise level of powered equipment or powered hand tools. Any powered equipment or hand tool that produces a maximum noise level exceeding 75 dBA at a distance of 50 feet is prohibited. However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means the above noise limitation cannot be met despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of equipment. The City actively enforces the LAMC and it is presumed that persons engaging in construction activities would follow legal requirements set forth in the LAMC related to technically feasible noise control measures. Therefore, there will be ***no impact*** related to compliance with construction noise standards in the LAMC.

The Noise Element of the General Plan does not include standards that would be applicable to the Proposed Plans.

OPERATIONAL NOISE

The LAMC includes multiple standards associated with long-term and permanent noise sources. Relevant standards are discussed above within Regulatory Framework and include:

- Section 112.01 - Radios, Television Sets, and Similar Devices
- Section 112.02 - Air Conditioning, Refrigeration, Heating, Pumping, Filtering Equipment
- Section 112.04 - Powered Equipment Intended for Repetitive Use in Residential Areas and Other Machinery, Equipment, and Devices
- Section 112.06 - Places of Public Entertainment
- Section 113.01 - Rubbish and Garbage Collection and Disposal
- Section 114.03 - Vehicles – Loading and Unloading
- Section 114.04 - Audible Signaling Devices

The City actively enforces the LAMC and it is presumed that all persons would follow legal requirements set forth in the LAMC related to long-term and permanent source of noise. Therefore, there will be ***no impact*** related to compliance with operational noise standards in the LAMC.

The Noise Element of the General Plan does not include standards that would be applicable to the Proposed Plans.

Mitigation Measures

No mitigation measures are required.

Significance of Impact after Mitigation

No impact.

IMPACT 4.12-2 Would implementation of the Proposed Plan expose people to or generate excessive vibration or groundborne noise levels? **Significant and unavoidable impact for construction and less than significant impact for operation.**

CONSTRUCTION VIBRATION

Vibration is an unavoidable byproduct of construction activity. In an urban environment, vibration from construction equipment is related to the weight and movements of equipment. Construction activity can result in varying degrees of ground vibration depending on the equipment and methods employed. Operation of construction equipment causes vibrations that spread through the ground and diminish in strength with distance. Buildings founded on the soil in the vicinity of the construction site respond to these vibrations with varying results ranging from no perceptible effects at the lowest levels, low rumbling sounds and perceptible vibrations at moderate levels, and slight damage at the highest levels.

Table 4.12-6 shows construction equipment vibration levels based on various reference distances. Construction vibration is a localized event and is typically only perceptible to a receptor that is in close proximity to the vibration source. The type of buildings anticipated to be built under the Proposed Plan would typically be constructed with loaders and bulldozers. Projects such as these and ministerial projects are typically constructed with equipment that has lower power ratings than equipment used to construct high-rise buildings. Lower-powered equipment is less impactful than higher-powered equipment and does not typically generate significant vibration levels.

TABLE 4.12-6: VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment	Approximate Vdb			
	25 Feet	50 Feet	75 Feet	100 Feet
Pile Driver (Impact)	112	106	102	100
Pile Driver (Sonic)	105	96	91	87
Caisson Drilled Piles	87	81	77	75
Large Bulldozer	87	81	77	75
Loaded Trucks	86	80	76	74
Jackhammer	79	73	69	67
Small Bulldozer	58	52	48	46

SOURCE: FTA, *Transit Noise and Vibration Impact Assessment*, May 2006.

Furthermore, these types of projects would generally occur in less dense areas where buildings are generally wood framed and would only result in superficial and not structural damage. High-rise buildings and development on sites with certain geologic conditions may require piles that are often impact driven but usually can also be drilled. Construction equipment would typically generate vibration levels up to 87 Vdb at 25 feet; impact pile driving can generate a vibration level of 112 Vdb at 25 feet. It is possible that heavy equipment could operate within 25 feet of, or adjacent to nearby buildings.

The vibration levels associated with construction equipment could exceed the 90 VdB significance threshold for buildings extremely susceptible to building damage (e.g., historic structures). Refer to Section 4.5, Cultural Resources for a discussion of historic structures located in the CPA. In addition, vibration levels could exceed the 98 VdB significance threshold for engineered concrete and masonry buildings without plaster (e.g., typical urban development), causing building damage and/or substantial human annoyance. Therefore, prior to implementation of mitigation, the Proposed Plan could result in a ***potentially significant impact*** related to construction vibration.

OPERATIONAL VIBRATION

It is not anticipated that new development within the CPA would involve activities that would result in substantial vibration levels (e.g., blasting operations). Although special effects in movie studios could result in some vibration, they would generally be isolated and not perceptible. Operational groundborne vibration in the vicinity of new development associated with the Proposed Plan would be primarily generated by vehicular travel on the local roadways. According to the FTA *Transit Noise and Vibration Impact Assessment* guidance document, rubber tires and suspension systems dampen vibration levels from trucks to a level that is rarely perceptible.[16] Similar to existing conditions, traffic vibration levels even with the expected additional trips from the Proposed Plan would not be perceptible by sensitive receptors. Therefore, impacts related to operational vibration under the Proposed Plan would be ***less than significant***.

Mitigation Measures

Construction

N1 The following Vibration Control Plan shall apply to all projects within the Community Plan Implementation Overlay (CPIO) District Subarea and discretionary projects outside the CPIO subarea that would include operational heavy-duty construction (e.g., large bulldozer or excavator) equipment within 25 feet of a historical resource, including those in a survey that meets the requirements of Public Resources Code 5024.1, unless determined not to be a historical resource by the Director of Planning, in consultation with the Office of Historical Resource. The Vibration

[16]FTA, *Transit Noise and Vibration Impact Assessment*, May 2006.

Control Plan shall also apply to all projects that would utilize pile drivers within 135 feet of historic structures.

- Prepare a Vibration Control Plan. The Vibration Control Plan shall be approved by the City prior to issuance of a building permit.
    - The Vibration Control Plan shall be completed by a qualified structural engineer.
    - The Vibration Control Plan shall include a pre-construction survey letter establishing baseline conditions at potentially affected historical resource structure. The survey letter shall provide a shoring design to protect the historical resource structure from potential damage. The structural engineer may recommend alternative procedures that produce lower vibration levels, such as sonic pile driving or caisson drilling instead of impact pile driving. Development projects shall implement the structural engineer's recommendations.

At the conclusion of vibration causing activities, the qualified structural engineer shall issue a follow-up letter describing damage, if any, to any impacted buildings. The letter shall include recommendations for any repair, as may be necessary, in conformance with the Secretary of the Interior Standards. Repairs shall be undertaken and completed in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24).

N2 Projects within the CPIO subarea and discretionary projects outside the CPIO subarea shall be required to ensure that contractors include best management practices in the contract specifications to reduce damage to vibration-sensitive uses, where appropriate, such as the following:

- Impact pile drivers shall be avoided to eliminate excessive vibration levels. Drilled piles or the use of a sonic vibratory pile driver are alternatives that shall be utilized where geological conditions permit their use.
- Construction activities shall involve rubber-tired equipment rather than metal-tracked equipment.
- The construction contractor shall manage construction phasing (scheduling demolition, earthmoving, and ground-impacting operations so as not to occur in the same time period), use low-impact construction technologies, and shall avoid the use of vibrating equipment when allowed by best engineering practices.

Operational

No mitigation measures are required.

Significance of Impact after Mitigation

Construction Vibration. Development projects occurring within the City of Los Angeles typically do not result in vibration damage even though vibration generating equipment is utilized for all urban infill construction. Although most construction activities located in the Project Area are not anticipated to have significant vibration impacts, it is possible that a small number of development projects in the Project Area could have significant vibration impacts during construction. This would most commonly occur when a development project would be located next to a historical resource constructed of fragile building materials, which is more sensitive to vibration damage, than structures that were built based on more recent building codes. Mitigation Measure **N1** would serve to reduce vibration impacts whenever a development project is located near a historical resource constructed of fragile materials. Although, it is difficult to quantify the vibration reduction associated with Mitigation Measure **N1** without knowing the specifics of a development project, including the distance from the equipment to the historical resource. Implementing caisson drilling instead of impact pile driving would reduce vibration levels from 112 Vdb at 25 feet to approximately 87 Vdb at 25 feet. The unmitigated analysis also concluded that vibration levels could exceed 98 VdB

significance threshold for engineered concrete and masonry buildings without plaster (e.g., typical urban development), causing building damage or substantial human annoyance. Vibration is an unavoidable byproduct of construction activity. In an urban environment, vibration from construction equipment is related to the weight and movements of equipment. In the absence of specific development projects with detailed construction requirements and known adjacent uses, there is no way to determine specific potential for impact and feasible, appropriate mitigation to control equipment weight and movements from construction activity associated with each infill project.

Requiring Mitigation Measures **N1** and/or **N2** for all projects would be infeasible because the City has determined the use of staff resources to apply these mitigation measures to all ministerial projects is not justified. It would require City staff to evaluate each and every ministerial project to determine if that project, because of its unique characteristics, should be subject to this mitigation measure. Additionally, it would require rezoning every property to get authority to review ministerial projects. From an implementation and administrative point of view requiring these procedures or actions would be extremely difficult and require an inordinate amount of staff time and resources to capture the small number of projects that could have significant impacts.

It is anticipated that Mitigation Measure **N1** would substantially reduce/control construction vibration for historical resources of fragile construction. In addition, Mitigation Measure **N2** would limit vibration levels at uses other than historic properties. However, in the absence of construction details associated with specific projects and without knowing the proximity of construction activities to specific receptors, it is anticipated that construction vibration levels at certain particularly fragile adjacent buildings could exceed the thresholds of significance. Therefore, the Proposed Plan could result in a ***significant and unavoidable*** impact related to construction vibration.

Operational Vibration. Impacts related to operational vibration were determined to be ***less than significant without mitigation***.

IMPACT 4.12-3 Would implementation of the Proposed Plan result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? **Significant and unavoidable impact for operational stationary sources and less than significant impact for operational mobile sources.**

OPERATIONAL STATIONARY NOISE

Permanent sources of operational stationary noise can be related to specific equipment that generated noise or a land use known to be noisy. Stationary noise examples include, but are not limited to, HVAC equipment and rooftop bars. Parking noise such as wheel squeal at tight corners in parking structures could also potentially affect sensitive uses. The City's existing development standards and the proposed development standards for the Project Area would reduce the potential for land use inconsistencies. The Proposed Plan would increase housing in certain residentially designated and mixed-use areas. The residential areas where more housing would be allowed under the Proposed Plan are generally located adjacent to commercial areas and transit systems, rather than within single-family and low-density residential neighborhoods. Noise associated with future residential uses would be similar to existing residential uses. Residential uses typically do not involve activities that generate excessive noise levels.

Noise levels are often increased at residential uses adjacent to non-residential zones or in/near mixed-use zones as well as in residential areas adjacent to major thoroughfares. Under the Proposed Plan, the majority of new large development that could potentially cause noise impacts would be located primarily in the Regional Center, along major transit corridors with General Commercial and Neighborhood Commercial

designations, and in a few Limited Commercial areas. The Proposed Plan would generally allow an increased FAR where future proposed mixed-use developments would include residential and/or non-residential uses. Increased intensity and increased housing in commercial areas could result in increases in noise levels in commercial areas due to the increase of truck deliveries and visitor trips, which could affect nearby residences, schools, or other existing sensitive uses along adjacent thoroughfares.

Land uses that commonly generate complaints related to permanent sources of noise include rooftop bars. Many such land uses require conditional use permits that assist in reducing potential impacts to the community. The change in existing noise levels due to new development is highly dependent on specific project characteristics, including the noise level of the particular noise source, the distance to from the receiving land use to the source, and existing noise levels. It is not possible to quantify future noise levels at specific locations within the Proposed Plan when the specific source of noise and location of new development is unknown. It is possible that a land use that has not been planned or developed would result if the ambient noise level measured at the property line of affected uses increases by 3 dBA CNEL to or within the "normally unacceptable" or "clearly unacceptable" categories, as shown in **Table 4.12-1**, or any 5 dBA CNEL or more increase in noise level.

Similarly, the City cannot accurately predict permanent sources of noise that could generate impulsive sound. As discussed above, it is not possible to quantify future noise levels at specific locations within the Proposed Plan Area when the specific sources of noise and location of new development is unknown. It is possible that land uses could generate noise levels that exceed existing noise 20 dBA (L_{eq} 10 minutes) above ambient at the time of day the noise could occur (L_{eq} 10 minutes). Therefore, prior to implementation of mitigation, the Proposed Plan could result in a ***potentially significant impact*** related to operational stationary noise.

OPERATIONAL MOBILE NOISE

The traffic analysis, on which the noise analysis is based, evaluates reasonably expected development that is expected to occur by 2040 as a result of the Proposed Plan. The reasonably expected development is based on the acreage of land designated for each type of land use, allowable densities and intensities for each land use designation, reasonably expected levels of development through the life of the Proposed Plan. Actual noise levels that could result under the Proposed Plan may not be as high as noise levels calculated in this EIR.

Primary objectives of the Proposed Plan include: 1) maximizing development opportunities around existing transit systems to encourage sustainable land use, and 2) directing growth towards transit hubs and corridors. Therefore, while the Proposed Plan would result in higher densities than existing conditions, this increase would be focused in areas around transit that allow for mixed-use development. Concentrating growth in existing urban areas and along transit corridors would reduce the length and number of vehicle trips, which would in turn reduce mobile-source noise levels. As such, noise levels in many areas would be reduced by these policies; not all of these reductions are accounted for in the following analysis.

For mobile sources, an analysis was completed to determine if implementation of the Proposed Plan would significantly increase mobile noise levels in the CPA. The traffic analysis for the Proposed Plan evaluates two treatment options for the transportation system to determine potential impacts associated with the Proposed Plan (see Section 4.15, Transportation and Traffic, for further detail regarding the two options). Treatment Option 1 prioritizes transit and vehicle capacities while Treatment Option 2 prioritizes preservation of on-street parking supply. **Table 4.12-7** shows predicted peak hour mobile source noise levels for Treatment Option 1. **Table 4.12-8** presents peak hour mobile source noise levels for Treatment Option 2.

TABLE 4.12-7: OPERATIONAL MOBILE SOURCE NOISE LEVELS TREAMENT OPTION 1

Roadway Segment	Estimated dBA, CNEL			
	Existing (2016)	Future (2040) No Project/ Existing Plan	Future (2040) with Project	Future (2040) With Project Compared to Existing
Wilton Pl. from Sunset Blvd. to Harold Wy.	63.5	63.7	64.7	1.2
Los Feliz Blvd. from Griffith Park Blvd. to Riverside Dr.	71.1	71.3	70.1	-1.0
Rowena Ave. from Hyperion Ave. to Auburn St.	65.9	66.2	66.6	0.7
Sunset Blvd. from St. Andrew Pl. to Wilton Blvd.	64.7	65.6	66.1	1.4
Melrose Ave. from Fairfax Ave. to Spaulding Ave.	65.6	65.7	65.8	0.2
Hollywood Blvd. from Fairfax Ave. to Genesee Ave.	69.8	69.8	69.8	-0.1
Gower St. from Hollywood Blvd. to Sunset Blvd.	60.4	61.8	63.8	3.5
Vine St. from Fountain Ave. to Delongpre Ave.	67.7	67.9	66.3	-1.3
Sunset Blvd. from Van Ness Ave. to Gower St.	68.9	69.4	70.0	1.1
Laurel Canyon Blvd. from Hollywood Blvd. to Laurelmont Dr.	69.6	69.6	69.6	0.1
Beachwood Dr. form Franklin Ave. to Dearborn Dr.	59.6	59.4	59.1	-0.4
La Brea Ave. from Hawthorne Ave. to Hollywood Blvd.	66.6	66.9	67.1	0.5
Fountain Ave. from Western Ave. to Normandie Ave.	62.0	64.4	62.0	0.0
Highland Ave. from Melrose Ave. to Santa Monica Blvd.	67.0	68.7	68.1	1.1
Gower St. from Hollywood Blvd. to Franklin Ave.	61.9	62.5	63.7	1.7
Cahuenga Blvd. from Fountain Ave. to Lexington Ave.	62.5	63.5	65.6	3.1

SOURCE: TAHA, 2017.

TABLE 4.12-8: OPERATIONAL MOBILE SOURCE NOISE LEVELS TREATMENT OPTION 2

Roadway Segment	Estimated dBA, CNEL			
	Existing (2016)	Future (2040) No Project/ Existing Plan	Future (2040) with Project	Future (2040) With Project Compared to Existing
Wilton Pl. from Sunset Blvd. to Harold Wy.	63.5	63.7	64.3	0.8
Los Feliz Blvd. from Griffith Park Blvd. to Riverside Dr.	71.1	71.3	70.1	-1.0
Rowena Ave. from Hyperion Ave. to Auburn St.	65.9	66.2	66.5	0.6
Sunset Blvd. from St. Andrew Pl. to Wilton Blvd.	64.7	65.6	67.8	3.2
Melrose Ave. from Fairfax Ave. to Spaulding Ave.	65.6	65.7	63.8	-1.8
Hollywood Blvd. from Fairfax Ave. to Genesee Ave.	69.8	69.8	69.8	-0.1
Gower St. from Hollywood Blvd. to Sunset Blvd.	60.4	61.8	63.0	2.6
Vine St. from Fountain Ave. to Delongpre Ave.	67.7	67.9	66.2	-1.5
Sunset Blvd. from Van Ness Ave. to Gower St.	68.9	69.4	70.5	1.6
Laurel Canyon Blvd. from Hollywood Blvd. to Laurelmont Dr.	69.6	69.6	69.6	0.1
Beachwood Dr. form Franklin Ave. to Dearborn Dr.	59.6	59.4	59.1	-0.4
La Brea Ave. from Hawthorne Ave. to Hollywood Blvd.	66.6	66.9	67.1	0.5
Fountain Ave. from Western Ave. to Normandie Ave.	62.0	64.4	62.4	0.4
Highland Ave. from Melrose Ave. to Santa Monica Blvd.	67.0	68.7	67.6	0.6
Gower St. from Hollywood Blvd. to Franklin Ave.	61.9	62.5	63.1	1.2
Cahuenga Blvd. from Fountain Ave. to Lexington Ave.	62.5	63.5	65.1	2.6

SOURCE: TAHA, 2017.

The locations under both treatment options were selected to represent a wide variety of noise conditions in the CPA (e.g., busy roadways and residential neighborhoods). In addition, roadway segments with traffic impacts were also included as these segments are the most likely to have increases in mobile source noise levels.

Conservatively, assuming the entire increase in noise in the future would be attributable to the Proposed Plan, the ambient noise level as a result of the Proposed Plan (Future with Project compared to Existing) would increase. As shown in **Table 4.12-7**, future mobile noise levels would increase by more than 3 dBA CNEL on Cahuenga Boulevard from Fountain Avenue to Lexington Avenue (an increase of 3.1 dBA) and on Gower Street from Hollywood Boulevard to Sunset Boulevard (an increase of 3.5 dBA) under Treatment Option 1. As shown in **Table 4.12-8**, Treatment Option 2 would increase future mobile noise levels by more than 3 dBA CNEL (3.2 dBA) on Sunset Boulevard from Saint Andrew Place to Wilton Boulevard.

Although there are up to three locations where increases above 3 dBA could occur (depending on the Mobility Plan Option), none of the locations would result in increases in noise levels to be within the "normally unacceptable" category for land uses adjacent to these corridors. In two of the three cases adjacent land is commercial. Commercial land uses are typically not considered sensitive for noise and are compatible with a wider acceptable range of noise levels. Under Treatment Option 1, there would also be a 3.1 dBA CNEL increase along Cahuenga Boulevard where multi-family uses are located. This increase would result in future noise levels within the "conditionally unacceptable" category for residential multi-family land uses, but would not result in a significant impact. Therefore, mobile noise impacts would be ***less than significant***.

Mitigation Measures

N3 The following conditions shall apply to all projects within the CPIO subarea and discretionary projects outside the CPIO subarea:

- A Noise Study shall be required for Conditional Use Permits for projects that include sources of exterior noise and are located within 500 feet of noise-sensitive uses. Noise-sensitive uses are residences, transient lodgings, schools, libraries, churches (or other places of assembly), hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. The Noise Study shall characterize the proposed noise sources, quantify noise levels at sensitive uses, and require feasible mitigation measures to reduce noise levels to less than 5 dBA CNEL above the existing noise levels. Feasible mitigation measures include:
  - Installation of sound barriers between noise source and receptor;
  - Use of building design to block line-of-sight between noise source and receptor; and
  - Decibel and time limitations for stationary sources.
- A Noise Study shall be required for projects that include loud source of impulsive sound. The Los Angeles Municipal Code (LAMC) defines impulsive sound as sound of short duration, usually less than one second, with an abrupt onset and rapid decay. By way of example in the LAMC, impulsive sound includes explosions, musical base drum beats, or the discharge of firearms. The Noise Study shall characterize the proposed noise sources, quantify noise levels at sensitive uses, and require feasible mitigation measures to reduce noise levels to less than 20 dBA above the existing noise levels.
- Industrial activity yards that include the operation of heavy equipment shall be shielded by sound barriers that block the line-of-sight to sensitive receptors.

- Parking structures located within 200 feet of any residential use shall be constructed with a solid wall abutting the residences and utilize textured surfaces on garage floors and ramps to minimize tire squeal.

Significance of Impact after Mitigation

Operational Stationary Noise. The change in existing noise levels due to new development is highly dependent on specific project characteristics, including the noise level of the particular noise source, the distance to/from the receiving land use to the source, and existing noise levels. It is not possible to quantify future noise levels at specific locations within the entire Plan Area since the specific sources of noise and location of new development and the sensitivity of adjacent uses are unknown. Mitigation Measure **N3** requires Noise Studies for projects within the CPIO and all discretionary projects within the Plan Area as well as other measures to reduce noise levels on development sites. While difficult to quantify noise reduction associated with Mitigation Measure **N3** in the absence of specific projects, implementing these conditions would reduce noise levels on most development sites to an acceptable level. However, it is anticipated that in limited cases noise levels could still exceed thresholds of significance. Therefore, the Proposed Plan could result in a ***significant and unavoidable*** impact related to operational noise.

Requiring Mitigation Measure **N3** for all projects would be infeasible because the City has determined the use of staff resources to apply these mitigation measures to all ministerial projects is not justified. It would require City staff to evaluate each and every ministerial project to determine if that project, because of its unique characteristics, should be subject to this mitigation measure. Additionally, it would require rezoning every property. From an implementation and administrative point of view requiring these procedures or actions would be extremely difficult and require an inordinate amount of staff time and resources to capture the small number of projects that could have significant impacts.

Operational Mobile Noise. Impacts related to operational mobile noise were determined to be ***less than significant without mitigation***.

IMPACT 4.12-4 Would implementation of the Proposed Plan result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? **Significant and unavoidable impact.**

As discussed above in Impact 4.12-1, land uses sensitive to increased noise levels (e.g., residences) are located throughout the CPA. Construction activity typically involves the operation of multiple pieces of equipment at the same time. **Table 4.12-9** shows noise levels by construction phase at 50 feet. The grading/excavation and finishing phases typically generate the loudest noise levels at 89 dBA L_{eq} without equipment mufflers, and 86 dBA L_{eq} with equipment mufflers.

TABLE 4.12-9: OUTDOOR CONSTRUCTION NOISE LEVELS

Construction Phase	Noise Level at 50 Feet (dBA, L_{eq})	Noise Level at 50 Feet with Mufflers (dBA, L_{eq})
Ground Clearing	84	82
Grading/Excavation	89	86
Foundations	78	77
Structural	85	83
Finishing	89	86

SOURCE: USEPA, *Noise from Construction Equipment and Operations, Building Equipment and Home Appliances*, PB 206717, 1971.

Construction noise is a usual circumstance in urban areas. In particular, as land uses change in response to updated planning efforts that encourage increased density in proximity to transit increased construction activity is occurring and is desirable. In addition, the urban environment within the CPA typically includes areas with varied land uses, such as commercial mixed with residential, that generate higher levels of ambient noise on a daily basis than suburban areas of the City that contain single-family residences.

Projects that are not likely to result in construction noise impacts include projects located on urban infill sites. Construction activities at these sites are inherently limited by the size of the project site. The size of urban infill project sites typically limits the use of the largest (i.e., noisiest) pieces of heavy-duty equipment. The size of a project site also typically limits the size of the development and the related duration of construction activities. Therefore, urban infill projects that meet the following criteria could result in disturbance to residents and employees at adjacent properties, but resulting noise levels are not considered to be potentially significant physical impacts to the overall environment:

- One subterranean level or less (approximately 20,000 cubic yards of material);
- Construction durations of 18 months or less (excluding interior finishing);
- Equipment rated 300 horsepower or less, typically small and medium backhoes, bulldozers, etc.;[17] and
- No potential for impact pile driving.

Projects that could result in significant construction noise impacts include those located on relatively large sites. These projects tend to include relatively lengthy construction durations (longer than 18 months), use heavier equipment, and generally include noisier activities. Such larger projects are not considered usual and could potentially result in significant noise impacts. When noise-sensitive land uses are located within 500 feet of the project site (e.g., residences, schools, hospitals, and parks), projects that meet one of the characteristics below would have the potential to result in disturbing and disruptive impacts to ambient noise levels that would be potentially significant.

- Two subterranean levels or more (approximately 20,000 cubic yards of material);
- Construction durations of 18 months or more (excluding interior finishing);
- Use of large, heavy-duty equipment rated 300 horsepower or greater; and
- The potential for impact pile driving.

It is difficult to determine whether or not construction noise levels at various sensitive land uses would result in significant noise impacts without a detailed noise analysis. The above criteria can serve as guidelines in determining whether or not an impact is anticipated to occur based upon the type and size of project being constructed. Based on the allowed uses in the Proposed Plan, it is reasonably foreseeable that there would be some construction projects that would exceed the criteria above. Therefore, the Proposed Plan could result in a ***potential significant impact*** related to construction activities.

Mitigation Measures

N4 A Noise Study, prepared by a qualified noise expert and reviewed and approved by DCP to meet the requirements herein, shall be required for all projects within the CPIO subarea and discretionary projects outside the CPIO subarea located within 500 feet of noise-sensitive land uses and have one or more of the following characteristics:

- Two or more subterranean levels or 20,000 cubic yards or more of excavated material;
- Construction duration (excluding architectural coatings) of 18 months or more;
- Use of large, heavy-duty equipment rated 300 horsepower or greater; or
- The potential for impact pile driving.

[17]Caterpillar equipment manufacturer identifies 300 horsepower as a rough threshold between medium and large heavy-duty equipment.

Noise-sensitive land uses are residences, transient lodgings, schools, libraries, churches (or other places of assembly), hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. The Noise Study shall characterize sources of construction noise, quantify noise levels at noise-sensitive uses, and identify measures to reduce noise exposure. Specifically, the Noise Study shall identify reasonably available noise reduction devices or techniques to reduce noise levels to acceptable levels and/or durations including through reliance on any relevant federal, state or local standards or guidelines or accepted industry practices, and in compliance with LAMC standards. Noise reduction devices or techniques, shall include but not be limited to: mufflers, shields, sound barriers, and time and place restrictions on equipment and activities. Each measure in the Noise Study shall identify anticipated noise reductions at noise-sensitive land uses.

Project applicants shall be required to comply with all measures identified and recommended by the Noise Study and shall provide proof that notice of, as well as compliance with, the identified measures have been included in contractor agreements.

Significance of Impact after Mitigation

Mitigation Measure **N4** requires a Noise Study to be completed for all projects within the CPIO subarea and discretionary projects outside the CPIO subarea located within 500 feet of noise-sensitive land uses. Mitigation Measure **N4** requires the implementation of mufflers, shields, sound barriers and/or any other available noise reduction device or techniques. However, in the absence of detailed noise analyses associated with specific projects, it is anticipated that construction noise levels at various sensitive land uses could result in significant impacts. Therefore, the Proposed Plan would result in a ***significant and unavoidable*** impact related to temporary and periodic noise after mitigation.

Requiring Mitigation Measure **N4** for all projects would be infeasible because the City has determined the use of staff resources to apply these mitigation measures to all ministerial projects is not justified. It would require City staff to evaluate each and every ministerial project to determine if that project, because of its unique characteristics, should be subject to this mitigation measure. Additionally, it would require rezoning every property. From an implementation and administrative point of view requiring these procedures or actions would be extremely difficult and require an inordinate amount of staff time and resources to capture the small number of projects that could have significant impacts.

IMPACT 4.12-5 For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would implementation of the Proposed Plan expose people residing or working in the project area to excessive noise levels? **No impact.**

The Hollywood CPA is not located within an airport land use plan or within two miles of an airport, thus no impact would occur.[18]

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

No impact.

[18]Los Angeles County Airport Land Use Commission, *Airport Influence Areas*, May 13, 2003.

IMPACT 4.12-6 For a project within the vicinity of a private airstrip, would implementation of the Proposed Plan expose people residing or working in the project area to excessive noise levels? **No impact.**

The CPA is not located within the vicinity of a private airstrip. New development would not expose people residing or working in the Project Area to excessive noise related to airstrip operations. Therefore, the Proposed Plan would have ***no impact*** related to airstrip noise, and no further analysis of this issue is required.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

No impact.

CUMULATIVE IMPACTS

For construction impacts, only the immediate area surrounding a specific development site is included in the cumulative context as the immediate area would be the most affected by construction noise. Typically, if a development site is 500 feet or more away from another site then noise levels would have attenuated to a point that they would not combine to produce a cumulative noise impact. For operational/roadway related impacts, the context is the reasonably foreseeable development of the Proposed Plan, including existing and reasonably foreseeable future development within and outside the CPA. Noise is by definition a localized phenomenon, and is significantly reduced in magnitude as distance from the source increases.

CONSTRUCTION NOISE

Similar to any urban area where new structures are proposed as part of urban development/redevelopment, increases in noise at sensitive receptors would occur as a result of construction of various developments, including those associated with the Proposed Plan. Construction that may occur in the vicinity of the CPA would contribute to noise levels similar to those generated within the CPA. Cumulative growth outside the Plan Area could result in construction noise levels that would combine with construction noise within other areas of the CPA and have a cumulative effect with respect to increases in ambient noise levels and exceedance of City standards. Noise is not strictly additive, and a doubling of noise sources would not cause a doubling of noise levels; however, cumulative construction noise levels would be in excess of the city standards at nearby sensitive receptors. As discussed above, construction noise levels would typically become cumulative if two development sites were to have construction occurring within 500 feet of each other.

Per the LAMC, construction activities would be prohibited between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturdays and national holidays, and on Sundays. However, as discussed above, larger or more unusual projects could result in significant short-term increases in noise levels. These projects could combine together, or combine with smaller projects, to substantially increase noise levels at specific land uses. Therefore, the significant and unavoidable construction noise impacts of the Proposed Plan could add to construction noise impacts associated with cumulative development especially on the periphery of the Plan Area where receptors could be exposed to

noise sources from within and outside the Plan Area. The Proposed Plan would add cumulatively considerable impacts to significant cumulative construction noise impacts.

OPERATIONAL NOISE

Mobile Noise. The traffic analysis presented in the Draft EIR considers the combined effect of project-generated traffic, existing traffic volumes and pass-through future traffic from areas both within and outside the CPA. **Table 4.12-7** presents the cumulative increase in future mobile source noise levels for Treatment Option 1, and **Table 4.12-8** present the cumulative increase for Treatment Option 2. The transportation analysis approach used in this EIR applied established traffic forecasting tools that have been empirically proven and previously accepted under CEQA. However, these forecasting tools may prove to be conservative if some of the recent trends in travel persist. It is not clear what direction the trends will take at this point. VMT per capita has been generally dropping since around 2004, increased for many decades prior, and has now begun to climb again since January 2014. Trends in Los Angeles are also pulling in multiple directions. If the trends toward higher levels of walking, bicycling, and transit use exceed what is forecast in the EIR, this could result in fewer driving related impacts than the Proposed Plan conservatively accounts for in the EIR.

As shown in **Table 4.12-7**, future mobile noise levels including the Project would increase by more than 3 dBA CNEL at up to three locations depending on the Mobility Element Option. However, it would not increase noise levels to be within the "normally unacceptable" category for adjacent land uses. Therefore, the Proposed Plan's increase in mobile source noise levels (including consideration of cumulative development) would not be considered cumulatively considerable.

Stationary Noise. It is not possible to identify all projects that could be developed after implementation of the Proposed Plan. It is possible that operational activities associated with future development within (and outside) the Project Area could exceed the operational significance thresholds for permanent and impulsive sources of noise. Therefore, the significant and unavoidable impacts of the Proposed Plan would add to impacts attributable to cumulative development in the City especially for receptors at the edge of the Plan Area that could be exposed to noise sources from within and outside the Plan Area. The Proposed Plan would add cumulatively considerable impacts to significant cumulative construction noise impacts.

CONSTRUCTION VIBRATION

Regarding vibration, the construction of development projects pursuant to the Proposed Plan would produce temporary vibration levels. Construction vibration impacts associated with the Proposed Plan would be significant and unavoidable. Cumulative development in the CPA is not considered likely to result in the exposure of on-site or off-site sensitive receptors to excessive ground-borne noise and vibration due to the localized nature of vibration impacts, due to the fact that all construction would not occur at the same time and at the same location. Therefore, only sensitive receptors located in close proximity to each construction site would be potentially affected by each activity.

Construction activities associated with development projects pursuant to the Proposed Plan may overlap for some time with construction activities for other development projects, which are adjacent to, or within the CPA. However, for the combined vibration impact from simultaneous construction projects to reach cumulatively significant levels, intense construction from these projects would have to occur simultaneously within 50 feet of any sensitive receptor. As individual development projects under the Proposed Plan as well as projects outside the Plan Area, could be constructed concurrently with each other, it is possible that intense construction from two or more projects would simultaneously occur at distances of 50 feet or less from existing nearby sensitive receptors. Therefore, the significant and unavoidable construction vibration impacts of the Proposed Plan could add to vibration impacts associated with cumulative development especially on the periphery of the Plan Area. Therefore, the Proposed Plan would add cumulatively considerable impacts to significant cumulative construction vibration impacts.

OPERATIONAL VIBRATION

Ground-borne vibration could conceivably be generated by the operation of future development projects within and outside the Plan Area. It is not anticipated that new development within the Plan Area would include substantial sources of operational ground-borne vibration. It is reasonable to assume that other projects outside the Plan Area would have similar characteristics. Therefore, impacts related to operational ground-borne noise and vibration at any sensitive receptor associated with the Proposed Plan would not be cumulatively considerable.

REFERENCES

California Department of Transportation, *Technical Noise Supplement*, September 2013.

City of Los Angeles, *Noise Element of the General Plan*, 1999.

Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

Los Angeles County Airport Land Use Commission, *Airport Influence Areas*, May 13, 2003.

Los Angeles Municipal Code.

PDH Continuing Professional Competency, *Overview of Noise Control and HVAC Acoustics in Buildings*, 2012.

USEPA, *Noise from Construction Equipment and Operations, Building Equipment and Home Appliances*, PB 206717, 1971.

4.13 POPULATION, HOUSING, AND EMPLOYMENT

This section provides an overview of existing population, housing, and employment conditions in the Project Area and evaluates impacts associated with the Proposed Plan. Topics addressed include the anticipated population, housing, and employment growth and the potential displacement of existing residents or housing resulting from implementation of the Proposed Plan. The section utilizes information from a variety of public agencies including, the City of Los Angeles Department of City Planning (DCP), the United States Census Bureau (US Census), the Southern California Association of Governments (SCAG) and the California Department of Finance (DOF).

REGULATORY FRAMEWORK

Federal, state and local laws, regulations, plans, and guidelines that are potentially applicable to the Proposed Plan are summarized below.

FEDERAL

Comprehensive Housing Affordability Study (CHAS). CHAS was enacted by the Cranston-Gonzalez National Affordable Housing Act of 1990 and was run by the U.S. Department of Housing and Urban Development (HUD). The primary purpose of the CHAS data is to demonstrate the number of households in need of housing assistance. This is estimated by the number of households that have certain housing problems and have income low enough to qualify for HUD's programs (primarily 30, 50, and 80 percent of median income). CHAS also considers the prevalence of housing problems among different types of households, such as the elderly, disabled, minorities, and different household types. The CHAS data provide counts of the numbers of households that fit these HUD-specified characteristics in HUD-specified geographic areas.

In addition to estimating low-income housing needs, the CHAS data contribute to a more comprehensive market analysis by documenting issues such as lead paint risks, affordability mismatch, and the interaction of affordability with variables such as age of homes, number of bedrooms, and type of building.

Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Relocation Act). The Uniform Relocation Act (Public Law 91-646) provides important protections and assistance for people affected by federally funded projects. This law was enacted by Congress to ensure that people whose real property is acquired, or who move as a result of projects receiving federal funds, will be treated fairly and equitably and will receive assistance in moving from the property they occupy.

STATE

California Housing Element Law. State Housing Law (Government Code Section 65580) requires local governments to address the existing and projected housing needs of all economic segments of the community through their housing elements. The housing element is one of seven state-mandated elements that every general plan must contain and is required to be updated every eight years and determined legally adequate by the state. The purpose of the housing element is to identify the community's housing needs, states the community's goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs, and define the policies and programs that the community will implement to achieve the stated goals and objectives.

Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375). SB 375 focuses on aligning transportation, housing, and other land uses to achieve regional greenhouse gas (GHG) emission reduction targets established under the California Global Warming Solutions Act (Assembly Bill [AB] 32). SB 375 requires Metropolitan Planning Organizations (MPO) to develop a Sustainable Communities Strategy (SCS) as part of the Regional Transportation Plan (RTP), with the purpose of identifying policies and strategies to reduce per capita passenger vehicle-generated GHG emissions. In application, the SCS must: (1) identify the general location of land uses, residential densities, and building intensities within the region; (2) identify areas within the region sufficient to house all the population of the region; (3) identify areas within the region sufficient to house an eight-year projection of the regional housing need; (4) identify a transportation network to service the regional transportation needs; gather and consider the best practically available scientific information regarding resources areas and farmland in the region; (5) consider the state housing goals; (6) set forth a forecasted development pattern for the region; and (7) allow the regional transportation plan to comply with the federal Clean Air Act (CAA) of 1970 (42 United States Code Section 7401 *et seq.*; Government Code Section 65080, subdivision (b)(F)(2)(B)), which, when integrated with the transportation network and other transportation measures and policies, will reduce the GHG from automobiles and light-duty trucks to achieve, if there is a reasonable way to do so, the GHG emission reduction targets approved by the California Air Resources Board (CARB). If the SCS does not achieve the GHG emission targets set by CARB, an Alternative Planning Strategy (APS) must be developed to demonstrate how the targets could be achieved.

SB 375 also imposes a number of new requirements on the regional housing needs process. Prior to SB 375, the regional transportation plan and regional housing needs processes were not required to be coordinated. SB 375 now synchronizes the schedules of the regional housing needs allocation (RHNA) and RTP processes. The RHNA, which is developed after the RTP, must also allocate housing units within the region consistent with the development pattern included in the SCS. Previously, the RHNA determination was based on population projections produced by DOF. SB 375 requires the determination to be based upon population projections by DOF and regional population forecasts used in preparing the RTP. If the total regional population forecasted and used in the RTP is within a range of three percent of the regional population forecast completed by the DOF for the same planning period, then the population forecast developed by the regional agency and used in the RTP shall be the basis for the determination. If the difference is greater than three percent, then the two agencies shall meet to discuss variances in methodology and seek agreement on a population projection for the region to use as the basis for the RHNA determination. If no agreement is reached, then the basis for the RHNA determination shall be the regional population projection created by DOF.

Existing law requires local governments to adopt a housing element as part of their general plan. Unlike the rest of the general plan, where updates sometimes occur at intervals of 20 years or longer, under previous law the housing element was required to be updated as frequently as needed and no less than every five years. Under SB 375, this time period has been lengthened to eight years and timed so that the housing element period begins no less than 18 months after adoption of the RTP, to encourage closer coordination between housing and transportation planning. SB 375 also changes the implementation schedule required in each housing element. Previous law required the housing element to contain a program, which set forth a five-year schedule to implement the goals and objectives of the housing element. The new law instead requires this schedule of actions to occur during the eight-year housing element planning period, and requires each action have a timetable for implementation.

Fair Employment and Housing Act (FEHA). The FEHA of 1959 (Government Code Section 12900 *et seq.*) prohibits housing discrimination on the basis of race, color, religion, sexual orientation, marital status, national origin, ancestry, familial status, disability, or source of income.

The Unruh Civil Rights Act. The Unruh Civil Rights Act of 1959 (Civil Code Section 51) prohibits discrimination in "all business establishments of every kind whatsoever." The provision has been interpreted to include businesses and persons engaged in the sale or rental of housing accommodations.

California Relocation Assistance Act. The California Relocation Assistance Act (Government Code Section 7260 *et seq.*) establishes uniform policies to provide for the fair and equitable treatment of people displaced from their homes or businesses as a direct result of state and/or local government projects or programs. This Act requires that comparable replacement housing be made available to displaced persons within a reasonable period of time prior to the displacement. Displaced persons or businesses are assured payment for their acquired property at fair market value. Relocation assistance in the form of advisory assistance and financial benefits would be provided at the local level. This includes aid in finding a new home location, payments to help cover moving costs, and additional payments for certain other costs.

Homeowners and Private Property Protection Act (Proposition 99). In 2008, California voters approved Proposition 99, the Homeowners and the Private Property Protection Act, which amended the California Constitution so that local governments are prohibited from using eminent domain authority to acquire an owner-occupied residence for the purposes of conveying it to a private recipient, with limited exceptions. Proposition 99 applies only to owner-occupied residences. Cities may still use eminent domain authority to convey multi-family and non-residential property to other private parties.

Density Bonus Incentives (Government Code Section 65915). The State Density Bonus law (signed in to law in 1979) requires jurisdictions to provide applicants with a density bonus and incentives or concessions for the production of housing development in which affordable housing is also provided. Eligible projects include housing developments with 1) 10 percent housing for lower income households, 2) five percent of the housing for very low-income households, 3) a senior citizen housing development or mobile home park restricted to older persons and 4) 10 percent of the total dwelling units in common interest development for moderate-income families or persons.

Assembly Bill (AB) 2222. On September 27, 2014, Governor Brown signed AB 2222, which amended sections of the State Density Bonus Law (Government Code Section 65915). AB 2222's major provision to the State Density Bonus Law requires that density bonus projects resulting in a loss in existing affordable, and otherwise locally-regulated (i.e., rent-stabilized) housing units, replace those units one-for-one. It also extends the affordability period from 30 to 55 years and expands the use of equity sharing in for-sale units. Several other clarifications of the existing law are also included, but they were not judged to represent a change to current City policy.

REGIONAL

SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Regional Transportation Improvement Plan (RTIP). The 2016-2040 RTP/SCS, adopted in April 2016, is the transportation and overall land use vision for the SCAG region.[1] The State of California requires that cities plan for changes in population, housing demand and employment. If growth is anticipated, each city must accommodate a share of the region's projected growth. Growth projections are developed by each jurisdiction (including the City of Los Angeles) in concert with SCAG. SCAG serves as the MPO for the six-county region that includes Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. SCAG is mandated by federal and state governments to prepare the RTP, a 20-year transportation plan for the region that addresses regional growth, air quality and other issues, based on an analysis of past and future regional trends. The 2016-2040 RTP/SCS includes SCAG's projection of growth for the region. The 2016-2040 RTP/SCS includes population, housing, and employment forecasts that provide advisory information to local jurisdictions for use in planning activities. The 2016-2040 RTP/SCS includes a set of

[1]SCAG, *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*, adopted April 2016.

regional land use strategies that are intended to increase transportation mode choice, guide future land development patterns, and further improve air quality. These land use strategies recognize a higher portion of new households and employment in areas well served by transit and reduce growth in high value habitat areas along with neighborhoods that are adjacent to highways. Like the 2012-2035 RTP/SCS, the proposed land use strategies included in the 2016-2040 RTP/SCS continue to focus new growth in High Quality Transit Areas (HQTAs), existing suburban town centers, and more walkable, mixed-use communities.

SCAG Regional Housing Needs Assessment (RHNA). The RHNA is a key tool for SCAG and its member governments to plan for growth. The fifth cycle Final RHNA Allocation Plan was adopted by the SCAG Regional Council on October 4, 2012 and quantifies the need for housing within each jurisdiction between 2013 and 2021. Communities then plan and determine how they will address this need through the process of completing the housing elements of their general plans. The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment. The RHNA is produced periodically by SCAG, as mandated by state law, to coincide with the region's schedule for preparing housing elements. It consists of two measurements: 1) existing need for housing and 2) future need for housing.[2]

The existing need assessment is based on data from the most recent US Census to measure ways in which the housing market is not meeting the needs of current residents. These variables include the number of low-income households paying more than 30 percent of their income for housing, as well as severe overcrowding.

The future need for housing is determined primarily by the forecasted growth in households in a community, based on historical growth patterns, job creation, household formation rates, and other factors to estimate how many households will be added to each community over the projection period. The need for new households is then adjusted to account for an ideal level of vacancy needed to promote housing choice, maintain price competition, and encourage acceptable levels of housing upkeep and repair. The RHNA also accounts for units expected to be lost due to demolition, natural disaster, or conversion to non-housing uses. The sum of these factors – household growth, vacancy need and replacement need – form the "construction need" assigned to each community. In addition, the RHNA considers how each jurisdiction might grow in ways that will decrease the concentration of low-income households in certain communities. The need for new housing is distributed among income groups so that each community moves closer to the regional average income distribution.

LOCAL

The Housing Authority City of Los Angeles (HACLA) Year 2016 Agency Plan (Agency Plan). The Agency Plan has a goal to preserve the existing affordable housing supply of 79,379 units and will spearhead a collaborative effort to increase the supply of affordable housing in the City of Los Angeles over the next 10 years.[3] HACLA will collaborate with residents, as well as public, non-profit, and private entities to create viable, healthy communities, and to empower residents to achieve financial independence.

City of Los Angeles General Plan. The City of Los Angeles General Plan provides growth and development policies by presenting a comprehensive long-range view of the City as a whole. The General Plan provides a comprehensive strategy for accommodating long-term growth should it occur as projected. Applicable goals and policies that apply to all development within the City of Los Angeles include a

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[2]SCAG, *Regional Housing Needs Assessment (RHNA),* http://www.scag.ca.gov/Documents/scagRHNA2012.pdf, accessed January 9, 2017.

[3]U.S. Department of Housing and Urban Development, Office of Public and Indian Housing. *Housing Authority of the City Los Angeles Year 2016 Agency Plan – Final Version,* October 7, 2015.

balanced distribution of land uses, adequate housing for all income levels, and economic stability. The General Plan Framework Element, Housing Element, and Land Use Element provide guidance specific to population, housing, and employment growth.

- ***Framework Element***. The Framework Element, adopted in December 1996 and amended in August 2001, is intended to guide the City's long-range growth and development through the year 2010. The Framework Element's "smart growth" strategy generally seeks to accommodate growth near transit and other existing infrastructure to assure a sustainable, economically viable future for Los Angeles. Although the horizon year of 2010 has passed, the population which the Framework Element was designed to accommodate has not been reached.
- ***Housing Element***. The 2013-2021 Housing Element of the General Plan identifies the existing and projected housing needs of all economic segments of the City of Los Angeles. The goal of the Housing Element is to encourage the location of housing, jobs, and services in mutual proximity. Policies of the Housing Element include the provision of an adequate and affordable supply of housing to meet the City's RHNA.
- ***Land Use Element***. The 1988 Hollywood Community Plan is one of the 35 community plans that make up the City's Land Use Element. The 35 community plans provide goals, objectives, and policies that are directly and indirectly related to population, housing, and employment and are the current guidelines for development in the Project Area. The Proposed Plan would update these goals and policies to reflect land use patterns, address land use issues, and carry out the community's vision for the Project Area.

Relevant objectives and policies of the Framework and Housing Elements related to population, housing, and employment are listed in **Table 4.13-1**.

TABLE 4.13-1: RELEVANT GENERAL PLAN POPULATION, HOUSING, AND EMPLOYMENT GOALS, OBJECTIVES, AND POLICIES

Goal/Objective/Policy	Goal/Objective/Policy Description
FRAMEWORK ELEMENT – LAND USE	
Objective 3.1	Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.
Objective 3.3	Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.
Objective 3.4	Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridor/boulevards, while at the same time conserving existing neighborhoods and related districts.
Policy 3.4.1	Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.
Objective 3.5	Ensure that the character and scale of stable single-family residential neighborhoods is maintained, allowing for infill development provided that it is compatible with and maintains the scale and character of existing development.

TABLE 4.13-1: RELEVANT GENERAL PLAN POPULATION, HOUSING, AND EMPLOYMENT GOALS, OBJECTIVES, AND POLICIES	
Goal/Objective/Policy	**Goal/Objective/Policy Description**
GENERAL PLAN FRAMEWORK – HOUSING	
Objective 4.1	Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City sub region to meet the projected housing needs by income level of the future population to the year 2010.
Objective 4.2	Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.
Objective 4.3	Conserve scale and character of residential neighborhoods.
Objective 4.4	Reduce regulatory and procedural barriers to increase housing production and capacity in appropriate locations.
GENERAL PLAN FRAMEWORK – ECONOMIC DEVELOPMENT	
Objective 7.2	Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.
Objective 7.3	Maintain and enhance existing businesses in the City.
Objective 7.5	Capture a significant share of regional growth in the "targeted" or emerging industries in the City of Los Angeles.
HOUSING ELEMENT	
Objective 1.1	Produce an adequate supply of rental and ownership housing in order to meet current and projected needs.
Policy 1.1.1	Promote homeownership opportunities and support current homeowners in retaining their homeowner status.
Policy 1.1.2	Promote affordable rental housing for all income groups that need assistance.
Policy 1.1.3	Facilitate new construction of a variety of housing types that address current and projected needs of the city's households.
Policy 1.1.4	Expand location options for residential development, particularly in designated Centers, Transit Oriented Districts and along Mixed-Use Boulevards.
Policy 1.1.7	Strengthen the capacity of the development community to develop affordable housing.
Objective 1.2	Preserve quality rental and ownership housing for households of all income levels and special needs.
Policy 1.2.1	Facilitate the maintenance of existing housing in decent, safe, healthy, and sanitary condition.
Policy 1.2.2	Encourage and incentivize the preservation of affordable housing to ensure that demolitions and conversions do not result in a net loss of the City's stock of decent, safe, healthy, sanitary, or affordable housing. Encourage but not require one-for-one replacement of demolished affordable units, except as mandated by law or ordinance.
Policy 1.2.3	Rehabilitate and/or replace substandard housing with housing that is decent, safe, healthy, sanitary, and affordable and of appropriate size to meet the City's current and future household needs.
Objective 1.3	Forecast and plan for changing housing needs over time in relation to production and preservation needs.
Policy 1.3.1	Monitor the production and preservation of the housing supply.
Policy 1.3.2	Advocate for the production of data necessary for the City's planning purposes, particularly with regard to special needs populations.
Policy 1.3.3	Collect, report and project Citywide and local housing needs on a periodic basis.
Objective 1.4	Reduce regulatory and procedural barriers to the production and preservation of housing at all income levels and needs.
Policy 1.4.1	Provide incentives to include affordable housing in residential development, particularly in mixed-use development, Transit Oriented Districts, and designated Centers.
Policy 1.4.2	Promote the development of new affordable housing units Citywide and within each Community Plan area.

TABLE 4.13-1: RELEVANT GENERAL PLAN POPULATION, HOUSING, AND EMPLOYMENT GOALS, OBJECTIVES, AND POLICIES	
Goal/Objective/Policy	**Goal/Objective/Policy Description**
Objective 2.2	Promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services, and transit.
Policy 2.2.3	Provide incentives and flexibility to generate new housing and to preserve existing housing near transit.
Policy 2.2.4	Promote and facilitate a jobs/housing balance at a Citywide level.
Objective 2.4	Promote livable neighborhoods with a mix of housing types, quality design, and a scale and character that respects unique residential neighborhoods in the City
Policy 2.4.4	Promote residential development that meets the needs of current residents as well as new residents.
Objective 2.5	Promote a more equitable distribution of affordable housing opportunities throughout the City.
Policy 4.1.6	Eliminate zoning and other regulatory barriers to the placement and operation of housing facilities for the homeless and special needs populations in appropriate locations throughout the City.
SOURCE: City of Los Angeles, *The Citywide General Plan Framework, An Element of the City of Los Angeles General Plan*, re-adopted 2001; City of Los Angeles General Plan, *Housing Element 2013-2021*, adopted 2013.	

Los Angeles Municipal Code (LAMC). Zoning regulations provide for the types and densities of commercial, institutional, industrial, and residential uses permitted in each of the City of Los Angeles' zones. Zoning in the City is based on order of restrictiveness. Less intense uses can generally be built within a zone as the zoning increases in intensity, and residential uses are allowed in commercial zones. For instance, R1 (single-family), R2 (such as a duplex), and R3 (medium multi-family) uses are allowed to be built in a R4 (high medium multi-family) residential zone. These residential zones are also generally permitted in most commercial zones. Zoning also includes height districts, which may set restrictions on height or number of stories depending on the zone. For instance, the height district of R3-1 is 1, which sets a height limit of 45 feet. Together, the zones and height districts regulate the uses, floor area ratio (FAR), number of residential units allowed per lot by square footage (density), height, and setbacks. In addition, Qualified Conditions and Development Limitations can further restrict these development factors. See the LAMC for details.

City of Los Angeles Density Bonus Ordinance (Ordinance 176,681). The purpose of the City's Density Bonus Ordinance, codified as LAMC Section 12.22(A)(25), is to establish procedures for implementing Density Bonus requirements, as set forth in California Government Code Sections 65915-65918, and to increase the production of affordable housing, consistent with City policies. Subject to the provisions of LAMC Section 12.22(A)(25), Housing Development Projects that include an affordable housing component and Senior Citizen Housing Development projects may be granted a density bonus, allowing for a density increase over the otherwise maximum allowable residential density under the applicable zoning ordinance and/or specific plan. The density bonus is determined based on the percentage and type of restricted affordable housing units provided and shall not exceed 35 percent. The amount of parking required for these projects may also be reduced. In addition, a Housing Development Project that qualifies for a Density Bonus may be granted incentives set forth in the ordinance that allow for modification to a City development standard or requirement.

Homelessness Reduction and Prevention, Housing, and Facilities Bond (Proposition HHH). Proposition HHH, adopted on June 29, 2016 is a $1.2 billion general obligation bond to finance the construction of supportive and affordable housing for homeless people in the City. The purpose of Proposition HHH, is to provide safe, clean affordable housing for the homeless and for those in danger of becoming homeless, such as battered women and their children, veterans, seniors, foster youth, and the disabled; and provide facilities to increase access to mental health care, drug and alcohol treatment, and other services.

Los Angeles Affordable Housing and Labor Standards Initiative (Proposition JJJ). Proposition JJJ, approved on November 8, 2016, enacts an initiative to impose minimum affordable housing requirements, training standards, and labor and wage regulations on development projects requiring zoning changes, including provisions to require that a certain percentage of labor come from local workers. Key provisions of Proposition JJJ are as follows:

- All development projects that include 10 or more residential units and require changes to the General Plan or other zoning would be required to make a percentage of the units affordable to low-income and working residents or pay a fee to fund affordable housing and enforce laws that protect renters.
- Developers of any such residential projects would have to hire contractors who:
  - are licensed according to city and state law;
  - guarantee to offer at least 30 percent of work-hours to city residents, with 10 percent coming from those living within five miles of the project;
  - pay standard wages for the area; and
  - employ members of apprenticeship training programs and workers with real-world experience.
- Amendments to community plans requires an assessment to consider whether the amendment will "reduce the capacity for creation and preservation of affordable housing and access to local jobs."
- Developers would be required to make as much as 20 percent of the units in a project affordable for low-income and working renters. That number can be as high as 40 percent for homes that are for sale.
- Moreover, projects planned around public transit within a half mile of significant public transit stops would be encouraged through an incentive program that would apply only to projects that include affordable housing and require contractors to comply with the restrictions laid out in the second bullet above.
- No tax dollars to be used.

Transit Oriented Communities Affordable Housing Incentive Program Guidelines (TOC Guidelines). Pursuant to the voter-approved Measure JJJ, LAMC Section 12.22 A.31 was added to create the Transit Oriented Communities (TOC) Affordable Housing Incentive Program (TOC Program). The Measure requires the Department of City Planning to create TOC Guidelines for all Housing Developments located within a one-half mile radius of a Major Transit Stop.[4,5] These Guidelines provide the eligibility standards, incentives, and other necessary components of the TOC Program consistent with LAMC Section 12.22 A.31. In cases where Base or Additional Incentives are permitted, they shall be based off the otherwise allowable development standards for the property found in a zoning ordinance, Specific Plan, Community Plan Implementation Overlay (CPIO), overlay district, or other local condition, law, policy, resolution, or regulation (unless the TOC incentives have been amended per Section III.3). The Guidelines may be modified by the Director with recommendation by the City Planning Commission. To be eligible for TOC incentives, projects must include specified levels of Extremely Low Income, Very Low income or Lower Income units. The TOC Guidelines, adopted by the Director effective September 22, 2017, identify four tiers of incentives depending on distance from a Major Transit Stop. Each tier has different requirements for income levels. Eligible Housing Developments are then allowed to increase the allowable number of units by 50 percent in Tier 1, 60 percent in Tier 2, 70 percent in Tier 3 and 80 percent in Tier 4, except in the RD zone where the maximum increases are 35 percent in Tier 1 and 2, 40 percent in Tier 3 and 45 percent in Tier 4. Similarly, FAR may be increased in each Tier, by up to 55 percent in Tier 4 resulting in at least a 4.25:1 FAR (allowable increases are again less in the RD zone). The TOC Guidelines

[4]Housing Development is defined as the construction of five or more new residential dwelling units, the addition of five or more residential dwelling units to an existing building or buildings, the remodeling of a building or buildings containing five or more residential dwelling units, including a mixed-use development containing residential dwelling units.

[5]Major Transit Stop is a site containing a rail station or the intersection of two or more bus routes with a service interval of 15 minutes or less during the morning and afternoon peak commute periods. The stations or bus routes may be existing, under construction or included in the most recent Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP).

also provide for reduced parking requirements in each tier, with no parking required for eligible Housing Development projects in Tier 4. In addition to Base incentives for density and FAR, the TOC Guidelines provide a menu of Additional Incentives including reductions for yards/setbacks, open space, minimum required lot widths, lot coverage and building heights (including transitional heights). The TOC Guidelines are in place for 10 years but may be extended for five additional years.

City of Los Angeles Affordable Housing Trust Fund (Fund). Contained within the LAMC, the City created and administers the Fund. The Fund establishes a special fund for the purposes of receiving and disbursing monies to address the affordable housing needs of the City. The Fund requires 25 percent of the received initial and continuing net revenue of the 2001 business tax and payroll expense tax amnesty program and the revenue program of the Revenue and Taxation Code Section 1955.1 (Assembly Bill 63) be allocated to the Fund.

City of Los Angeles Rent Stabilization Ordinance (RSO). The City's RSO was established in response to the shortage of affordable housing in the City of Los Angeles and went into effect May 1, 1979. The RSO's stated purpose is to regulate rents so as to safeguard tenants from excessive rent increases, while at the same time providing landlords with just and reasonable returns from their rental units.[6] The RSO addresses allowable rent increases, the registration of rental units, legal reasons for eviction, and the causes for eviction requiring relocation assistance payment to the tenant. Properties subject to the RSO are those that are within the City limits, contain two or more units, and have a Certificate of Occupancy prior to October 1, 1978, as well as replacement units under LAMC Section 151.28. A complaint can be filed by any tenant who believes that an owner, manager, or agent has committed a violation of the RSO. The City's Housing and Community Investment Department oversees and enforces the RSO. Effective June 4, 2017, the City Council amended the RSO requirements for demolition or permanent withdrawal of RSO units from the rental market (Ordinance No. 184873). The amendment strengthened the criteria for an exemption from the RSO for replacement units. Landlords may qualify for an exemption on the newly constructed units where RSO units are demolished by providing affordable units in a number which is at least the number of units demolished or 20 percent of the newly constructed rental units, whichever is greater.[7]

EXISTING SETTING

2016 BASELINE CONDITIONS

CEQA requires an EIR to compare existing physical conditions (baseline) to the physical conditions after implementation of a project. For purposes of the Proposed Plan, which plans for growth and development, there is no expected direct effect from the Proposed Plan (such as for a construction project), but there are expected indirect effects from the reasonably expected development that is anticipated to occur. To assess the impacts of the Proposed Plan requires determining reasonably expected development and identifying the current conditions. Both of these determinations rely in part on estimates of the current population, housing and employment, and the forecasted growth in population, housing and employment.

CEQA Guidelines Section 15125(a) requires that an EIR include a description of the physical environmental conditions in the vicinity of a proposed project as they exist at the time of the Notice of Preparation (NOP) is published. The NOP for this EIR was published on April 29, 2016. Thus, the Draft EIR uses 2016 as the baseline existing conditions.

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[6]Los Angeles Municipal Code, *Chapter XV Rent Stabilization Ordinance*.

[7]Los Angeles Housing & Community Investment Department, *Rent Stabilization Update*, July 2017, http://hcidla.lacity.org/sites/default/files/documents/rent_stabilization_update_-_whats_new.pdf.

Population. Citywide and Project Area population data in 2010 and in 2016 is shown on **Table 4.13-2**. As shown in the table, Citywide population increased from approximately 3,790,000 residents in 2010 to 3,931,000 residents in 2016, resulting in a net population growth of 141,000 residents and a population increase of approximately four percent. The Project Area had approximately 198,000 residents in 2010 and increased to approximately 206,000 residents in 2016, resulting in a net population growth of approximately 8,000 residents or a four percent increase between 2010 and 2016. The change in population growth within the Project Area is similar to the Citywide population growth. Population figures are estimates derived from housing units and are generally more accurate at a jurisdictional level where multiple data sources collect and report such data. It is much harder to ascertain precise numbers for smaller area population data at a CPA level. See Appendix M (Methodology).

TABLE 4.13-2: HISTORICAL POPULATION IN THE PROJECT AREA

Planning Area	2010 Census /a/	2016 (Baseline) /b/	% of Citywide Existing Population	Net Population Growth 2010-2016	% Change in Population /c/
Citywide	3,790,000	3,931,000	100%	141,000	4%
Hollywood	198,000	206,000	5%	8,000	4%

Numbers are rounded to the nearest thousand.
/a/ 2010 Decennial Census.
/b/ SCAG.
/c/ "% Change in Population" is the sum of "Net Population Growth" divided by "2010 Census".
SOURCE: 2010 Census; SCAG 2016-2040 RTP/SCS.

Housing. The Project Area contains approximately 6,900 acres of land designated for residential use, approximately 50 percent of the land area within the Project Area. Single-family neighborhoods comprise approximately 34 percent of the Project Area and multi-family neighborhoods comprise 16 percent of the land area. Nearly half of the acreage of the Project Area historically has been, and continues to be, planned for residential uses. Single-family uses are located primarily in the hills, while multi-family uses are concentrated south of the hills in the flatlands.

The Project Area is an urbanized community consisting of large single-family and multi-family residential neighborhoods, with multiple centers of commercial and industrial activity. The hillside area north of Franklin Avenue (i.e., Santa Monica Mountains) is divided between single-family neighborhoods and two regional parks: Runyon Canyon and Griffith Park. The western half of the hills contains the single-family neighborhoods known as Hollywood Hills and Runyon Canyon. The eastern section of the hills encompasses Griffith Park and the Los Feliz neighborhood. The flatlands consist of a grid of streets lined with commercial centers and corridors and are densely populated with multi-family residential neighborhoods with several low-density residential neighborhoods around the northwestern, southern, and eastern edges of the Project Area. The heart of the Project Area, also known as the Regional Center, is generally located in the center of the Project Area between La Brea Avenue to the west and US-101 to the east, and Franklin Avenue to the north and Sunset Boulevard to the south. This area has a mixture of both historic and modern low-to-high rise buildings ranging from 1-story to more than 20-stories that are occupied by tourist and entertainment-related uses, other commercial uses and multi-family residential development.

Table 4.13-3 presents Citywide and Project Area housing data in 2010 and in 2016. As shown therein, the number of housing units Citywide increased from approximately 1,414,000 housing units in 2010 to 1,453,000 housing units in 2016, resulting in a net growth of approximately 39,000 housing units and an increase of three percent. In comparison, the Project Area had approximately 103,000 housing units in 2010 and 104,000 housing units in 2016, showing a net increase of approximately 1,000 housing units and an increase of one percent. Housing units can be accounted for in different ways by providers of demographic data.

TABLE 4.13-3: HISTORICAL HOUSING UNIT INVENTORY IN THE PROJECT AREA					
Planning Area	2010 Census	2016 (Baseline)	% of Citywide Existing Housing	Net Housing Change 2010-2016	% Change in Housing
Citywide	1,414,000	1,453,000 /a/	100%	39,000	3%
Hollywood	103,000	104,000	7%	1,000	1%

Numbers are rounded to the nearest thousand.
/a/ California Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2016 with 2010 Census Benchmark*
SOURCE: 2010 Census; DOF; and City of Los Angeles, 2016.

SCAG accounts for housing units by providing only an estimate of the number of households, or occupied housing units, meaning that vacant units are excluded. Other demographic data sources, such as the 2010 Census and the DOF, provide the total housing unit number, including both occupied units and vacant units. Historically, the citywide vacancy rate has been approximately five percent. **Table 4.13-3**, below, identifies total housing units (occupied and vacant).

The housing market can be driven by supply and demand and can be influenced by population growth, income, housing unit cost, and housing locations. Age distribution is also a key market characteristic because housing demand within the Project Area can be influenced by the housing preference of certain age groups due to limited income. In many cases the majority of the young adult population (20 to 34 years old) tends to occupy apartments and smaller single-family units. The population in the 35 to 65 years old age bracket occupy a range of housing types, including larger single-family homes, condominiums, and apartments based on income, household sizes and occupancy. Housing demand for the elderly population would also fall into the 35 to 65 years old age category, as well as senior living facilities, assisted living homes and nursing homes. Affordability of housing is increasingly a concern in the Project Area as well as the City as a whole.

Employment. **Table 4.13-4** shows Citywide and Project Area employment trends in 2010 and in 2016. As shown below, Citywide employment increased from approximately 1,605,000 jobs in 2010 to 1,798,000 jobs in 2016, resulting in a net increase of approximately 193,000 jobs and a 12 percent increase in employment. In comparison, Project Area employment slightly decreased from an estimated 103,000 jobs in 2010[8] to approximately 101,000 jobs in 2016, resulting in a two percent reduction in employment. Based on the table below, employment within the Project Area accounts for approximately six percent of the Citywide employment.

TABLE 4.13-4: HISTORICAL EMPLOYMENT TRENDS IN THE PROJECT AREA					
Planning Area	2010	2016 (Baseline)	% of Citywide Employment	Net Employment Change 2010-2016	% Change in Employment
Citywide	1,605,000 /a/	1,798,000 /b/	100%	193,000	12%
Hollywood	103,000 /a/	101,000 /b/	6%	-2,000	-2%

Numbers are rounded to the nearest thousand.
/a/ U.S. Census Bureau, On the Map Application for 2010, https://onthemap.ces.census.gov/, accessed January 2017. The 2010 Census form did not survey people about employment and therefore, a count of jobs is not available from the 2010 Census.
/b/ SCAG.
SOURCE: On the Map (2010); SCAG 2016-2040 RTP/SCS.

[8]The 2010 Census did not survey employment – source is from the U.S. Census Bureau, On the Map Application for 2010, https://onthemap.ces.census.gov/, accessed January 2017.

GROWTH PROJECTIONS

The State of California requires that cities plan for changes in population, housing, and employment. If growth is projected, each city must accommodate a share of anticipated regional growth. SCAG is responsible for producing socio-economic estimates and projections at multiple geographic levels. The socio-economic estimates and projections are used for federal and state mandated long-range planning efforts, such as the 2016-2040 RTP/SCS. In preparing the 2016-2040 RTP/SCS, SCAG prepares population, housing and employment projections in consultation with jurisdictions in the region. These projections are derived from a combination of sources and consider factors such as birth rates; migration rates; historical trends; household size; market and economic projections; existing and planned land uses; and consistency with relevant adopted local, regional and state land use policies and growth strategies. The development of the growth forecast is driven by collaboration between SCAG and local jurisdictions. The integration of the regional and local forecasts is achieved through collaboration among the various contributors.[9] The 2016-2040 RTP/SCS is the most recent adopted regional transportation plan.

DCP allocates population and employment to the City's 35 community plans consistent with the City's General Plan Framework Element and other City policies, which call for directing growth to regional, commercial and transit centers. The City then accommodates for the projected levels of population, housing, and employment through its Community Plan updates. With implementation of the Proposed Plan, the land use designations, intensities, and densities of the Project Area would be revised to accommodate population growth, housing, and employment demand projected by SCAG through the year 2040, as well as to meet the other project objectives, including locating growth in transit centers and along transit corridors. The development growth assumptions for the Proposed Plan are based on the acreage of land designated for each type of land use (by General Plan Land Use designations); allowable densities and intensities in each designation; and anticipated levels of development in the life of the Proposed Plan.

The Proposed Plan would result in increased population, employment, and housing growth in the Hollywood CPA beyond SCAG projections. SCAG provides population forecasts for the City that are generally distributed by the regional planners at SCAG. The Community Plan update process allows DCP city planners to undertake a more detailed review of appropriate locations to direct growth. Community Plan updates aim at a minimum to meet SCAG projections for the City and each CPA, and in some cases may exceed those projections for certain CPAs depending on changed circumstances such as market demand, trends, the introduction of transit or other infrastructure, etc. In the case of Hollywood, the City has envisioned for decades that this community would be a center of employment, commerce and entertainment. Significant transportation infrastructure, including five Metro Red Line stations and various bus lines, has been directed to Hollywood to serve this purpose. Since the past, Hollywood has been a center and is expected to remain a regional center in the future. DCP ultimately determines the distribution of citywide growth through adherence to the General Plan Framework policies and best planning practices, as well as meeting the goals and policies of the SCS/RTP, while at the same time accommodating the citywide projections produced by SCAG.

Population. As shown in **Table 4.13-5**, the 2016-2040 RTP/SCS growth projections for the City of Los Angeles identifies population increasing from approximately 3,931,000 residents in 2016 to approximately 4,609,000 residents by 2040, resulting in a population increase of 17 percent. According to the SCAG growth forecast, the population in the Project Area would increase from approximately 206,000 residents in 2016 to approximately 226,000 residents in 2040, resulting in an approximately 10 percent increase in population.

[9]For more information on SCAG's forecasting methodology and assumptions, see the *Demographics & Growth Forecast Appendix* of the 2016-2040 SCAG RTP/SCS.

TABLE 4.13-5: SCAG POPULATION PROJECTIONS

Planning Area	2016 Baseline	Existing Plan Reasonably Expected Development /a/	SCAG 2040 Forecast /a, b/	Projected Increase (2016 – 2040)	Projected Increase (%)
Citywide	3,931,000	N/A	4,609,000	678,000	17%
Hollywood	206,000	226,000 – 243,000	226,000	20,000	10%

Numbers are rounded to the nearest thousand.
N/A = Not applicable.
/a/ Under the Existing Plan's lower range for Reasonably Expected Development and SCAG's 2040 Forecast, the numbers are similar but the geographic distribution of population in the Community Plan Area would be different.
/b/ The SCAG 2040 Forecast does not factor in potential additional units from the City's TOC Guidelines, which were adopted in 2017 after the adoption of the SCAG 2016/2040 RTP/SCS.
SOURCE: SCAG 2016-2040 RTP/SCS; City of Los Angeles, 2016, 2018.

Housing. As shown in **Table 4.13-6**, the City currently has a housing supply of approximately 1,453,000 housing units that is expected to increase to approximately 1,690,000 occupied housing units by 2040, resulting in an approximately 16 percent increase in the housing supply. The Project Area currently has approximately 104,000 housing units and is expected to increase to approximately 113,000 occupied housing units by 2040, resulting in a nine percent increase in the housing supply. Under the existing Community Plan, housing within the Project Area is expected to increase to approximately 113,000 – 121,000 units, resulting in a nine percent to 16 percent increase in the housing supply.

TABLE 4.13-6: SCAG HOUSING PROJECTIONS

Planning Area	2016 Baseline	SCAG 2040 Forecast /b,c,d/	Projected Increase (2016 – 2040)	Projected Increase (%)
Citywide	1,453,000 /a/	1,690,000	237,000	16%
Hollywood	104,000	113,000	9,000	9%

Numbers are rounded to the nearest thousand.
/a/ California Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2016 with 2010 Census Benchmark.*
/b/ Under the Existing Plan's lower range for Reasonably Expected Development and SCAG's 2040 Forecast, the numbers are similar but the geographic distribution of population in the Community Plan Area would be different.
/c/ The SCAG 2040 Forecast does not factor in potential additional units from the City's TOC Guidelines, which were adopted in 2017 after the adoption of the SCAG 2016/2040 RTP/SCS.
/d/ The SCAG 2040 Forecast is for households, which are occupied housing units, and not for all housing units.
SOURCE: SCAG 2016-2040 RTP/SCS; DOF; City of Los Angeles, 2016, 2018.

Employment. As shown in **Table 4.13-7**, the City currently has approximately 1,798,000 jobs and is expected to increase to approximately 2,169,000 jobs by 2040, representing a 21 percent increase of jobs in the City. The Project Area currently has approximately 101,000 jobs and is expected to increase to approximately 119,000 jobs by 2040, resulting in an 18 percent increase of jobs within the Project Area.

TABLE 4.13-7: SCAG EMPLOYMENT PROJECTIONS

Planning Area	2016 Baseline	SCAG 2040 Forecast /b/	Projected Increase (2016 – 2040)	Projected Increase (%)
Citywide	1,798,000 /a/	2,169,000	371,000	21%
Hollywood	101,000	119,000	18,000	18%

Numbers are rounded to the nearest thousand.
/a/ SCAG.
/b/ Both the Existing Plan and the SCAG 2040 Forecast have similar estimates of future employment but the geographic distribution of jobs in the Community Plan Area would vary.
SOURCE: SCAG 2016-2040 RTP/SCS; City of Los Angeles, 2016.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, the Proposed Plan would have a significant impact if it would:

- Induce substantial population growth in an area either directly (for example by proposing new homes or businesses) or indirectly (for example through extension of new roads or infrastructure);
- Displace substantial numbers of existing housing units necessitating the construction of replacement housing elsewhere; and/or
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

METHODOLOGY

The 2006 L.A. CEQA Thresholds Guide (Thresholds Guide) includes guidance for the determination of impacts under the State CEQA Guidelines Appendix G thresholds for population and housing thresholds of significance related to development projects. The following criteria from the Thresholds Guide are considered relevant to the Proposed Plan:

Inducing Growth

- The degree to which the Proposed Plan would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/build out, and that would result in an adverse physical change in the environment;
- Whether the Proposed Plan would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and
- The extent to which growth would occur without implementation of the Proposed Project.

Displacement of Housing and People

- The total number of residential units to be demolished, converted to market rate, or removed through other means as a result of the Proposed Plan, in terms of net loss of market-rate and affordable units;
- The current and anticipated housing demand and supply of market rate and affordable housing units in the project area;
- The land use and demographic characteristics of the Project Area and the appropriateness of housing in the area; and
- Whether the Proposed Plan would be consistent with adopted City and regional housing policies such as the Framework and Housing Elements, the U.S. Department of Housing and Urban Development (HUD) Consolidated Plan and Comprehensive Housing Affordability Study (CHAS) policies, redevelopment plan, Rent Stabilization Ordinance, and the Regional Comprehensive Plan and Guide.

As to the first impact area, although CEQA requires an EIR to consider its growth-inducing impacts, the EIR "should not assume that growth is necessarily beneficial, detrimental, or of little significance." In relation to the first threshold of significance, based on the nature of the project and its underlying purpose to accommodate growth, growth in the Project Area, even significant growth, is not a significant impact if it accommodates growth projections for the Project Area and the City, can be accommodated by existing or planned facilities and services, and is consistent with the City's Framework Element, as well as state and regional policies and regulations encouraging growth adjacent to transit.

As to the second and third impact areas, the City's CEQA Thresholds Guidelines specify that its criteria should be considered when the project would result in a net loss of housing. Loss of affordable housing and displacement of low-income renters is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact. To the extent that the City's CEQA Guidelines could be interpreted as calling for an analysis of social and economic impacts or create a threshold that is a social and economic impact that does not involve a physical impact to the environment, the CEQA Guidelines would be invalid and are not followed in this EIR. Based on this an impact from loss of affordable housing and displacement in this EIR will be an impact if it results in a physical impact to the environment, such as from construction of new housing elsewhere.

For all impact areas, the analysis in this section considers reasonably expected population, housing unit, and employment growth that would occur with implementation of the Proposed Plan.

As discussed in Appendix M, the reasonably expected development and associated growth in population, housing and employment anticipated to occur with the Proposed Plan is based on assumptions about the level of development that can be reasonably expected to occur during the life of the Proposed Plan (through the horizon year 2040), given the Proposed Plan's land use designations, zoning/height districts, and policies and using best practices and knowledge. Past building data demonstrates that not all sites will be built to the maximum densities permitted by the Proposed Plan for a variety of reasons including economic conditions, market trends, financial lending practices, construction and land acquisition costs, physical site constraints, and other General Plan policies or regulations. For this reason, 100 percent development to maximum allowable densities and intensities is a theoretical scenario that is not analyzed, but rather a more realistic reasonable expected development is used to guide and analyze the potential environmental impacts of those changes.

The DCP uses SCAG RTP/SCS data on population, housing, and employment projections as a benchmark or a reference point to guide the planning process locally. **Table 4.13-8** identifies the reasonably expected population, housing, and employment in the Proposed Plan, and compares this to both the baseline and Existing Plan and SCAG's 2040 projections. Based on proposed changes to General Plan land use designations and zones, implementation of the Proposed Plan would increase the reasonably expected housing, population, and employment compared to the reasonably expected housing, population, and employment under the Existing Plan. Because the Proposed Plan does not prescribe precise development figures, and the TOC incentives and accessory dwelling unit (ADU) provisions are optional programs, an additional percentage was added to the reasonably expected housing units resulting in a range of potential growth. **Table 4.13-8** identifies a range of potential growth for population, housing and employment. For purposes of analysis in this EIR the upper end of the range is analyzed.

TABLE 4.13-8: 2040 REASONABLY EXPECTED DEVELOPMENT OF THE HOLLYWOOD COMMUNITY PLAN

	2016 Baseline	Existing Plan	Proposed Plan	SCAG 2040 Forecast /c/
Population	206,000	226,000 – 243,000	243,000 - 264,000	226,000
Housing /a,b/	104,000	113,000 – 121,000	121,000 - 132,000	113,000
Employment	101,000	119,000	124,000 - 127,000	119,000

Numbers are rounded to the nearest thousand.
/a/ SCAG provides forecasts for households, which is the equivalent of occupied housing units, and does not include all units.
/b/ The Existing Plan and the Proposed Plan factor in additional housing units that can be expected from the City's housing incentives. It assumes all units are occupied.
/c/ The SCAG 2040 Forecast does not factor in potential additional units from the City's TOC Guidelines, which were adopted in 2017 after the adoption of the SCAG 2016/2040 RTP/SCS.
SOURCE: SCAG 2016-2040 RTP/SCS; City of Los Angeles, 2016, 2018.

IMPACTS

IMPACT 4.13-1 Would implementation of the Proposed Plan induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? **Less than significant impact.**

The Proposed Plan does not entitle specific development projects; rather the Proposed Plan's policies, land use designations and zoning establish the basis for where, how, and what type of development can occur. With adoption of the Proposed Plan, land use designations/intensities of the Project Area would be revised to accommodate anticipated population growth and housing and employment demand projected by SCAG through the year 2040. Consistent with sustainable growth policies of the 2016-2040 RTP/SCS and the General Plan Framework Element, the underlying purpose and one of the primary objectives of the Proposed Plan is to accommodate reasonably expected future growth in the Project Area by strategically directing expected development to targeted areas where urban infrastructure is in place. The proposed changes would result in a pattern of land use that directs future growth in the City to already urbanized areas where growth can be supported by existing transportation infrastructure and where different types of land uses can be intermingled to reduce the length and incidence of vehicle trips, in line with state mandates to achieve sustainability targets. Specifically, the Plan Area includes five Metro Red Line stations in Hollywood. Implementation of the Proposed Plan would not introduce unplanned infrastructure in the Project Area. There are no plans for additional Metro stations and the Metro Red Line could accommodate additional riders from the projected growth from the Proposed Plan. As noted in Section 4.16 of this EIR, there are also no plans for new or expanded infrastructure such as water treatment and wastewater treatment facilities, stormwater facilities, or landfills. Some improvements or extensions to utility facilities, including sewer and water lines, may be required for future development. As discussed in Section 4.16 of this EIR, implementation of the Proposed Plan can be supported by the existing storm drain, sewer, and water infrastructure.

Population and Housing Growth. The Proposed Plan allows for increased development in the Project Area within targeted areas to both accommodate housing and population growth projected by SCAG in 2040, and to be consistent with the City's General Plan Framework Element and the policies and goals of the RTP/SCS, which calls for growth to be focused in higher-intensity commercial centers close to transportation and services. Growth is directed away from hillside areas and lower-density neighborhoods and primarily into the Regional Center of the Project Area, which can accommodate jobs and housing as well as entertainment and visitor-serving uses, and other commercial corridors served by transit. The Proposed Plan would accommodate a variety of housing and commercial opportunities near the Metro Red Line rail stations and along major corridors.

The Proposed Plan would allow for population growth in excess of SCAG's 2040 population and housing projections. As described in the methodology section, SCAG growth projections are intended to guide planning at the local level. The City has had a long-standing policy to meet or exceed SCAG projections for a plan area in a manner that is consistent with the General Plan Framework and regional polices while remaining generally consistent with Citywide projections. In some plan areas, particularly in the Central geography of the City, more development potential is accommodated, or planned for, than in other areas. These are areas where infrastructure is in place or anticipated to accommodate that future development. In other words, some CPAs with access to jobs, housing, transit, and cultural and governmental services are expected to accommodate more development than less developed, suburban or semi-rural areas. Therefore, the Proposed Plan is not inducing but rather accommodating anticipated growth.

An increase in reasonably expected housing development and an associated increase in population in the Regional Center and along selected corridors is planned both to accommodate population growth forecasted by SCAG for the City and to be consistent with Framework policies that call for new housing to be located near transit. This targeting of new residential and commercial development in high-quality transit areas is also consistent with state legislation aimed at meeting housing needs, reducing vehicle trips, and improving air quality. Based on the above, the Proposed Plan would better accommodate projected population and housing demand under proposed land use designations and zoning. Although it is possible that the expected housing and population growth in the Hollywood CPA would exceed the SCAG forecasts for this area the Proposed Plan would not induce significant population growth, but rather would serve to accommodate projected citywide growth in a more sustainable manner. Therefore, impacts related to population growth would be ***less than significant***.

Employment Growth. The Proposed Plan accommodates anticipated employment demand projected by SCAG for the Project Area. As described in the Existing Setting, the reasonably expected number of jobs under the Proposed Plan is estimated based on the total amount of non-residential development square-footage that could occur in consideration of the proposed General Plan land uses and employment factors.

The Proposed Plan would accommodate projected job growth. Providing a high number of jobs and housing in an area served by transit options is desirable and generally more sustainable because in areas where jobs and housing are balanced, shorter and fewer vehicle tips are expected as people can live closer to their jobs (provided that wages and housing costs are also balanced).

The potential increase in jobs resulting under the Proposed Plan would support new employment opportunities but would not be considered to include employment-generating uses that would result in unanticipated or unplanned for growth in population. The Project Area is well served by public transportation and is easily accessible by freeway. Travel from one CPA to another would be achieved with easy access to public transit and more intense development along transit corridors. The Plan generally directs growth to areas identified by SCAG as High Quality Transit Areas (HQTA). Therefore, the Proposed Plan is consistent with the 2016-2040 RTP/SCS assumptions that the majority of new housing and commercial development in the region will occur within a half mile of well-serviced transit stops.

Undeveloped open space areas within the Santa Monica Mountains would be expected to remain undeveloped under the Proposed Plan. As such, implementation of the Proposed Plan would not cause growth or accelerate development in an undeveloped area.

Conclusion

The Proposed Plan would not introduce new infrastructure or the extension of roads, but instead would plan for anticipated growth in a sustainable manner by creating additional housing and employment opportunities in close proximity to transit. The Proposed Plan would not induce substantial growth in population through employment-generating uses and would be consistent with state, regional and local policies to locate new development close to transit. While anticipated growth would exceed SCAG's forecasts for the Hollywood CPA, the development reasonably expected to occur under the Proposed Plan would be consistent with SCAG's citywide growth projections, and with City, regional and state policies for housing, economic development, air quality and sustainability, as well as other adopted housing growth policies. Finally, as discussed in 4.14 Public Services and 4.16 Utilities, the projected growth is expected to be accommodated by existing or planned facilities and services. Therefore, impacts related to inducing substantial growth under the Proposed Plan would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

IMPACT 4.13-2 Would implementation of the Proposed Plan displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? **Less than significant.**

The Proposed Plan does not include any direct physical changes that require the removal or demolition of any existing housing units. All existing residential units are allowed to remain in place under the Proposed Plan. The proposed changes to land use designation and/or zoning will affect future development projects, which do not exist yet, once the Proposed Plan is implemented. The number of net new housing units expected under the Proposed Plan is approximately 17,000 to 28,000. This range accounts for recent state and local incentives introduced in 2017 that incentivizes affordable housing in areas well served by transit. The potential increase in housing supply would occur with proposed land use and zoning changes in selected areas of Hollywood.

The existing land use designation and zoning of about 92 percent[10] of the Community Plan Area's total land acreage is maintained under the Proposed Plan; approximately two percent of the total acreage would have administrative corrections or changes; and approximately six percent of the acreage would have active changes that affect land use designation and/or zoning (see Chapter 3.0, Project Description, of this Draft EIR). The two percent group includes changes that will mostly reflect the existing use, which is also the reasonably foreseeable use. For example, most of the existing uses in the two percent group are parks, community gardens, schools, and other public facilities or are portions of these uses and have no housing. These sites are generally government owned, some by the City of Los Angeles, and the foreseeable use of these sites would remain open space or public facilities. Corrections to the erroneous existing land use designation and/or zoning do not remove or demolish any existing housing units on these sites, since there are none, and the Proposed Plan will update the parcel's appropriate use.

The six percent group includes all remaining changes under the Proposed Plan. These changes could increase the development potential of selected areas, such as near the Metro Red Line stations in the Regional Center and along portions of major commercial corridors near transit; preserve or maintain selected areas by implementing new height limits or prohibiting housing on industrial lands reserved for entertainment industry and media-related uses; correcting parcels within the Vermont/Western Station Neighborhood Area Plan (SNAP); and reducing the land use designation and/or zoning of selected areas that are already developed or have historical resources. Within the six percent group, some residential land use designations are proposed to be commercially designated but new 100 percent residential projects and mixed-use projects are allowed in commercial land use designations. Any existing housing would be allowed to remain in these areas and would not be required to redevelop. A few subareas[11] that do not currently allow housing and have no existing housing could introduce housing as an incentive under the Proposed Plan. The Proposed Plan does not require any existing housing in the six percent group to be

[10]The 92 percent includes nomenclature only changes to land use designation that are administrative; older land use designations are being retired and updated under Community Plan updates. Under the Proposed Plan, Limited Manufacturing will become Limited Industrial; Neighborhood Office Commercial will become Neighborhood Commercial; and Highway Oriented Commercial will become General Commercial or Community Commercial. Some existing areas located in the 92% are in the CPIO. The CPIO does not change intensity or density regulations, instead it introduces regulations that address historic preservation and pedestrian-oriented design.

[11]These subareas are identified as 17:1 and 17:3. A project, the Anita May Rosenstein Campus, which will be the new home of the Los Angeles LGBT Center and will have new residential housing, is under construction in subarea 17:1 and is scheduled to open in 2019.

demolished or reduced in order to be consistent with the Proposed Plan's land use designations and zoning. In effect, existing development on the ground would be maintained or grandfathered in. Primarily future development would be subject to the Proposed Plan once it is effective. As a result, existing residential units are not being displaced under the Proposed Plan and would not necessitate the construction of replacement housing elsewhere.

The Proposed Plan would accommodate a potential net increase of approximately 17,000 to 28,000 new housing units, including housing incentive increases. The Proposed Plan would allow for new housing in selected multi-family residential areas near transit and/or job centers by increasing density and/or removing existing restrictions. More housing could also be built in areas of the Proposed Plan, such as along major commercial corridors that use the Proposed Plan's incentive for mixed-use development. The Proposed Plan would create the opportunity for additional housing units than currently exist and supports providing a range of housing opportunities for residents of all income levels, particularly through the use of housing incentive options.

The Proposed Plan aims to add to the inventory of housing stock. In limited instances, however, the Proposed Plan could cause a temporary reduction in housing stock as new buildings are built in place of older ones or as existing buildings are renovated or expanded. Even in areas where the Proposed Plan is not proposing active changes, this could occur, if individual property owners choose to demolish an existing residential building and redevelop to a more intense or dense development than existing currently. For example, an owner could decide to demolish an existing single-family house and build a four-plex on a parcel that allows for low-density multi-family residential housing. The indirect displacement of existing housing is not necessarily a CEQA issue unless it is shown that the displacement will cause an indirect impact to the physical environment. As identified in CEQA Guidelines Appendix G, the physical impacts could be from construction of new housing and the Proposed Plan's construction impacts. Construction impacts from construction of new housing would be similar to construction impacts analyzed in this EIR.

In conclusion, the Proposed Plan is not anticipated to result in the net loss or displacement of housing, necessitating the construction of replacement housing elsewhere. The impact is ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

IMPACT 4.13-3 Would implementation of the Proposed Plan displace substantial numbers of people necessitating the construction of replacement housing elsewhere? **Less than significant impact.**

The Proposed Plan does not include any direct physical changes that require the removal or demolition of any existing housing units. As previously discussed under Impact 4.13-2 above, implementation of the Proposed Plan would primarily increase residential development compared to existing housing, along selected major corridors near transit, and in or near job centers.

Nonetheless, concerns about indirect displacement of people have been raised in Hollywood and citywide, even where no changes to land use designations or zoning are planned. The rising cost of housing is currently a concern throughout the City, reflective of the shortage of housing in the City and the region as

a whole. As population growth continues to outpace the production of housing units, the existing supply of housing is in higher demand which leads to higher rents/prices. Many renters are experiencing financial strain as average rents rise, and would-be homeowners watch as neighborhoods where home prices may have once been within their reach are growing prohibitively expensive. This occurrence may result in displacement of renters and may result in the need for people that live in the Plan Area to move outside the Plan Area or potentially outside of the City. But there is no substantial evidence that there is a reasonable method to predict how many people may potentially be displaced in the Plan Area over the Plan horizon. Additionally, there is no industry standard methodology available to forecast transportation, air, noise or other impacts associated with people who have moved out of the Plan Area. The City is looking at citywide responses to help relieve pressures on the housing supply (e.g., Affordable Housing Linkage Fee, Accessory Dwelling Units Ordinance, Unapproved Dwelling Unit Ordinance, etc.). As properties are redeveloped in the Community Plan Area, there could be temporary displacement of housing units due to the separation of time between removal and replacement of housing. This impact would be temporary, is expected to be spread over the timeframe of the Proposed Plan and would be offset by overall increases in housing development under the Proposed Plan.

Displacement of low-income renters is also a concern but it is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact.[12] To the extent that the CEQA Guidelines could be interpreted as calling for an analysis of social and economic impacts or create a threshold that is a social and economic impact that does not involve a physical impact to the environment, the CEQA Guidelines would be invalid.[13] Based on this, an impact from displacement and/or gentrification is only a CEQA impact if it results in a physical impact to the environment. As identified in Appendix G, those physical impacts could be from construction of new housing. It may also be from transportation or other impacts related to people driving a farther distance. The CEQA Guidelines require a lead agency to consider the reasonably foreseeable indirect environmental consequences of a project's economic or social impacts.[14] To require an analysis of the indirect physical impacts, the social and economic impacts must be supported by substantial evidence. An EIR would be required to analyze reasonably foreseeable, not speculative impacts, resulting from social and economic impacts.[15]

In conclusion, impacts related to displacement would be less than significant, as the adoption of the Proposed Plan would not directly result in physical changes that would cause the displacement of a substantial number of people. The Proposed Plan includes policy for the preservation of Rent Stabilized units and for no net-loss of affordable units. No specific residential units, affordable or market rate, are proposed to be demolished or removed through other means as part of the Proposed Plan. The Proposed Plan may cause a temporary reduction in housing stock as new buildings are built in place of older ones or as existing buildings are renovated. Indirect displacement is occurring in the City due to market forces and indirect displacement would not be solely caused by implementation of the Proposed Plan. Therefore, it is not expected that the Proposed Plan would displace substantial number of people necessitating the

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[12]*Porterville Citizens for Responsible Hillside Dev. v City of Porterville* (2007) 157 CA4th 885, 903 (claimed impact of new homes on existing home values is economic impact).

[13]*Porterville at 903; Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1205; CEQA Guidelines, Section 15131, subd. (a); *Gabric v City of Rancho Palos Verdes* (1977) 73 CA3d 183, 200 (city's refusal to approve negative declaration was abuse of discretion because evidence that construction of residence would affect character of neighborhood is not evidence of environmental impact that would require EIR); *CBIA v. BAAQMD*, 2 Cal. App. 5th 1067, 1083 (2016) ("CEQA cannot be used by a lead agency to require a developer … to obtain an EIR or implement a mitigation measures solely" based on threshold of significance that does not identify a CEQA impact.)

[14]CEQA Guidelines Sections 15064(e); CEB, Practice under the California Environmental Quality Act, Section 6.36.

[15]CEB, Practice under the California Environmental Quality Act, Section 6.36; Public Resources Code Section 21065; *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 1004, 1020 (rejecting an argument that an initial study was required to analyze speculative physical impacts resulting from competition with retail tenant).

construction of replacement housing elsewhere. Additionally, any impact resulting from displacement if it occurs would be speculative. This impact is ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

CUMULATIVE IMPACTS

The cumulative context for population, housing and employment growth is within the City of Los Angeles and surrounding jurisdictions. The City of Los Angeles and Hollywood in particular, is substantially developed (with the exception of some large dedicated open space areas), and most future development in the City is anticipated to occur as infill on vacant or underutilized parcels. Future projects under the Proposed Plan would be developed consistent with the planned growth in the General Plan.

Population, Housing, and Employment Growth. Implementation of the Proposed Plan would be anticipated to result in an increase in population, housing, and employment growth but the expected future share of citywide housing, population, and employment in Hollywood is expected to be generally stable.

Under the Proposed Plan, the share of the City's population in Hollywood in 2040 would be approximately six percent; the housing share would be approximately eight percent and the employment share would be approximately six percent. In 2016, Hollywood had approximately five percent of the citywide population, approximately seven percent of the citywide housing units, and approximately six percent of the citywide employment.

The Proposed Plan is intended to at least accommodate population, housing, and employment growth projected by SCAG for the year 2040 by allowing for more development in certain locations as previously discussed, particularly in proximity to transit, which would increase housing opportunities, resulting in a net gain of housing units in the Project Area as compared to 2016 Existing Conditions and 2040 conditions expected under the Existing Plan. The Proposed Plan would direct growth away from existing low-density residential neighborhoods and towards higher-intensity residential and commercial areas close to transportation and services consistent with the Framework Element's guiding policy to focus growth in higher-intensity commercial and transit centers. The Proposed Plan would also maintain existing light industrial uses associated with the entertainment industry and would promote light industrial land use for media- and studio-related uses by allowing more FAR than what is currently permitted in a few industrial areas.

Displacement of Housing and People. As discussed above, the Proposed Plan does not propose the demolition, conversion to market rate, or removal of any existing residential units. The Proposed Plan is expected to result in a net increase of housing over existing conditions and would allow a variety of new housing types. Therefore, it is not expected to result in permanent displacement of housing and people. The Proposed Plan includes policy for the preservation of Rent Stabilized and covenanted affordable units. The Proposed Project could result in some temporary displacement of housing units and people due to the separation of time between removal and replacement of housing. This temporary displacement would be relatively minor spread over the timeframe for implementation of the Proposed Plan and would be offset

by increases in housing as the Proposed Plan is implemented. Therefore, such temporary impacts would not add to other impacts resulting from redevelopment of sites outside the Project Area.

Based on the information above, the cumulative impact of the Proposed Plan would be less than significant and would not be cumulatively considerable.

REFERENCES

City of Los Angeles, *Housing Element 2013-2021*, adopted 2013.

City of Los Angeles, *The Citywide General Plan Framework, An Element of the City of Los Angeles General Plan*, re-adopted 2001.

Los Angeles Housing & Community Investment Department, *Rent Stabilization Update*, July 2017, http://hcidla.lacity.org/sites/default/files/documents/rent_stabilization_update_-_whats_new.pdf.

Los Angeles Municipal Code, *Chapter XV Rent Stabilization Ordinance*.

Southern California Association of Governments (SCAG), *2012 Regional Housing Needs Assessment (RHNA)*.

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Southern California Association of Governments (SCAG), *Regional Housing Needs Assessment (RHNA)*, http://www.scag.ca.gov/Documents/scagRHNA2012.pdf, accessed January 9, 2017.

Southern California Association of Governments (SCAG), *Sustainability Planning Grant,* http://sustain.scag.ca.gov/Pages/Grants%20and%20Local%20Assistance/GrantsLocalAssistance.aspx, accessed January 17, 2017.

U.S. Census Bureau, *On the Map Application for 2010*, https://onthemap.ces.census.gov/, accessed January 2017.

U.S. Department of Housing and Urban Development, Office of Public and Indian Housing. *Housing Authority of the City Los Angeles Year 2016 Agency Plan – Final Version,* October 7, 2015.

4.14 PUBLIC SERVICES

This section provides an overview of public services provided in the Project Areas and evaluates potential impacts resulting from the Proposed Plan. Topics addressed in this section include fire protection and emergency services, police protection services, public schools, parks and libraries within and in the vicinity of the Project Area.

The impacts of the Proposed Plan to public services are based on the adequacy of existing and planned facilities and personnel to meet additional demand incurred from the Proposed Plan.

FIRE PROTECTION AND EMERGENCY SERVICES

REGULATORY FRAMEWORK

Federal, state and local laws, regulations, plans, and guidelines that are potentially applicable to the Proposed Plan are summarized below.

FEDERAL

Federal Emergency Management Act (FEMA). FEMA was established in 1979 via executive order and is an independent agency of the federal government. In March 2003, FEMA became part of the U.S. Department of Homeland Security with the mission to lead the effort in preparing the nation for all hazards and effectively manage federal response and recovery efforts following any national incident. FEMA also initiates proactive mitigation activities, trains first responders, and manages the National Flood Insurance Program and the U.S. Fire Administration.

Disaster Mitigation Act of 2000. Disaster Mitigation Act (42 United States Code [U.S.C.] §5121) provides the legal basis for FEMA mitigation planning requirements for State, local, and Indian Tribal governments as a condition of mitigation grant assistance. It amends the Robert T. Stafford Disaster Relief Act of 1988 (42 U.S.C. §5121-5207) by repealing the previous mitigation planning provisions and replacing them with a new set of requirements that emphasize the need and creates incentives for state, Tribal, and local agencies to closely coordinate mitigation planning and implementation efforts. This Act reinforces the importance of pre-disaster infrastructure mitigation planning to reduce disaster losses nationwide and the streamlining of the administration of federal disaster relief and programs to promote mitigation activities. Some of the major provisions of this Act include:

- funding pre-disaster mitigation activities;
- developing experimental multi-hazard maps to better understand risk;
- establishing state and local government infrastructure mitigation planning requirements;
- defining how states can assume more responsibility in managing the Hazard Mitigation Grant Program (HMGP); and
- adjusting ways in which management costs for projects are funded.

The mitigation planning provisions outlined in Section 322 of this Act establish performance-based standards for mitigation plans and require states to have a public assistance program (Advance Infrastructure Mitigation [AIM]) to develop county government plans. The consequence for counties that

fail to develop an infrastructure mitigation plan is the chance of a reduced federal share of damage assistance from 75 percent to 25 percent if the damaged facility has been damaged on more than one occasion in the preceding 10-year period by the same type of event.

Federal Fire Safety Act (FFSA). The FFSA of 1992 is different from other laws affecting fire safety as the law applies to federal operations, and there is no requirement for local action unless a private building owner leases space to the federal government. The FFSA requires federal agencies to provide sprinkler protection in any building, whether owned or leased by the federal government that houses at least 25 federal employees during their employment.

STATE

California Constitution Article XIII Section 35. Section 35 of Article III of the California Constitution at subdivision (a)(2) provides: "The protection of the public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50 percent sales tax to be used exclusively for local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 provides that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection, as well as other public safety services. In *City of Hayward v. Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that, Section 35 of Article XIII of the California Constitution requires local agencies to provide fire services and that it is reasonable to conclude that a lead agency will comply with that provision and ensure that public services are provided. (See *City of Hayward v. Trustee of California State University* (2015) 242 Cal. App. 4th 833, 847, stating "the city has a constitutional obligation to provide adequate fire protection services".)

California Fire Code. Title 24, Part 9 of the California Code of Regulations (CCR), also referred to as the California Fire Code, is part of the California Building Code and provides building standard regulations regarding fire protection and notification systems for residential and commercial buildings. It includes fire safety requirements and regulations, including: the implementation of fire protection devices such as fire extinguishers and smoke alarms; installation of sprinklers in all high-rise buildings; establishment of fire resistance standards for fire doors, buildings materials, and types of construction; clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazards areas; and fire suppression training. The California Fire Code is applicable to all occupancies in California except if adopted local regulations are more stringent. Regulations within the California Fire Code have been incorporated by reference with amendments in the Los Angeles Building Code, Fire Safety Regulations.

Title 8 California Code of Regulations (CCR) Sections 1270 and 6773. In accordance with CCR, Title 8 Sections 1270 "Fire Prevention" and 6773 "Fire Protection and Fire Equipment," the California Occupational Safety and Health Administration (Cal-OSHA) has established minimum standards for fire suppression and emergency medical services. The standards include, but are not limited to, guidelines on the handling of highly combustible materials, fire hosing sizing requirements, restrictions on the use of compressed air, access roads, and the testing, maintenance, and use of all firefighting and emergency medical equipment.

California Health and Safety Code Section 13100-13135. California Health Safety Code Section 13100-13135 codifies regulations known as the "Regulations of the State Fire Marshal" and constitutes the Basic Building Design and Construction Standards of the State Fire Marshall. The regulations establish minimum standards for the preservation and protection of life and property against fire, explosion, and panic through

requirements for fire protection and notification systems, fire protection devices, and fire suppression training.

California Governor's Office of Emergency Services (Cal OES). In 2009, the State of California passed legislation creating the Cal OES and authorized it to prepare a Standard Emergency Management System (SEMS) program (Title 19 CCR Section 2401 *et seq.*), which sets forth measures by which a jurisdiction should handle emergency disasters. In California, SEMS provides the mechanism by which local government requests assistance. Non-compliance with SEMS could result in the state withholding disaster relief from the non-complying jurisdiction in the event of an emergency disaster. Cal OES coordinates the state's preparation for, prevention of, and response to major disasters, such as fires, floods, earthquakes and terrorist attacks. During an emergency, Cal OES serves as the lead state agency for emergency management in the state. It also serves as the lead agency for mobilizing the state's resources and obtaining federal resources. Cal OES coordinates the state response to major emergencies in support of local government. The primary responsibility for emergency management resides with local government. Local jurisdictions first use their own resources and, as they are exhausted, obtain more from neighboring cities and special districts, the county in which they are located, and other counties throughout the state through the statewide mutual aid system (see discussion of Mutual Aid Agreements, below). California Emergency Management Agency (Cal-EMA) maintains oversight of the state's mutual aid system.

Mutual Aid Agreements. Cal OES developed the Emergency Managed Mutual Aid (EMMA) System in response to the 1994 Northridge Earthquake. The EMMA System coordinates emergency response and recovery efforts along the coastal, inland, and southern regions of California. The purpose of EMMA is to provide emergency management personnel and technical specialist to afflicted jurisdictions in support of disaster operations during emergency events. Objectives of the EMMA Plan is to provide a system to coordinate and mobilize assigned personnel, formal requests, assignment, training and demobilization of assigned personnel; establish structure to maintain the EMMA Plan and its procedures; provide the coordination of training for EMMA resources, including SEMS training, coursework, exercises, and disaster response procedures; and to promote professionalism in emergency management and response. The EMMA Plan was updated in November 2012 and supersedes the 1997 EMMA Plan and November 2001 EMMA Guidance.

LOCAL

City of Los Angeles General Plan Framework and Safety Elements. The City of Los Angeles General Plan Framework, which is an element of the City of Los Angeles General Plan, was originally adopted in December 1996 and re-adopted in August 2001. The General Plan Framework provides guidance for long-term growth in the City and guides the update of community plans and citywide elements. The General Plan Framework also contains purposes, policies, and programs for City development. Chapter 9 (Infrastructure and Public Services) of the Framework Element addresses fire prevention, fire protection and emergency medical services provided to the City.

The Safety Element of the General Plan identifies existing fire and emergency services, as well as the service needs of the City of Los Angeles in the event of a natural disaster. It was adopted in November 1996. The Safety Element provides goals, objectives, and policies related to the City's response to hazards and natural disasters. The Safety Element goals, objectives, policies, and programs are broadly stated to reflect the comprehensive scope of the Emergency Operations Organization (EOO), which is the program that implements the Safety Element. Goals, objectives, and policies within the General Plan Framework and Safety Element applicable to fire protection and emergency services are provided in **Table 4.14-1**.

TABLE 4.14-1: RELEVANT GENERAL PLAN FIRE PROTECTION GOALS, OBJECTIVES, AND POLICIES	
Goal/Objective/Policy	**Goal/Objective/Policy Description**
FRAMEWORK ELEMENT – CHAPTER 9 INFRASTRUCTURE AND PUBLIC SERVICES	
Goal 9J	Every neighborhood has the necessary level of fire protection service, emergency medical service (EMS) and infrastructure.
Objective 9.16	Monitor and forecast demand for existing and projected fire facilities and service.
Policy 9.16.1	Collect appropriate fire and population development statistics for the purpose of evaluating fire service needs based on existing and future conditions.
Objective 9.17	Assure that all areas of the City have the highest level of fire protection and EMS, at the lowest possible cost, to meet existing and future demand.
Policy 9.17.2	Identify areas of the City with deficient fire facilities and/or service and prioritize the order in which these areas should be upgraded based on established fire protection standards.
Policy 9.17.4	Consider the Fire Department's concerns and, where feasible adhere to them, regarding the quality of the area's fire protection and emergency medical services when developing General Plan amendments and zone changes, or considering discretionary land use permits.
Objective 9.19	Maintain the Los Angeles Fire Department's ability to assure public safety in emergency situations.
Policy 9.19.1	Maintain mutual aid or mutual assistance agreements with local fire departments to ensure an adequate response in the event of a major earthquake, wildfire, urban fire, fire in areas with substandard fire protection, or other fire emergencies.
Policy 9.19.3	Maintain the continued involvement of the Fire Department in the preparation of contingency plans for emergencies and disasters.
SAFETY ELEMENT	
Goal 2	A city that responds with the maximum feasible speed and efficiency to disaster events so as to minimize injury, loss of life, property damage and disruption of the social and economic life of the City and its immediate environs.
Objective 2.1	Develop and implement comprehensive emergency response plans and programs that are integrated with each other and with the City's comprehensive hazard mitigation and recovery plans and programs.
Policy 2.1.5	Response: Develop, implement, and continue to improve the City's ability to respond to emergency events. [All EOO emergency response programs and all hazard mitigation and disaster recovery programs related to protecting and reestablishing communications and other infrastructure, service and governmental operations systems implement this policy.]
Policy 2.1.6	Standards/fire. Continue to maintain, enforce and upgrade requirements, procedures and standards to facilitate more effective fire suppression. [All peak load water and other standards, code requirements (including minimum road widths, access, and clearances around structures) and other requirements or procedures related to fire suppression implement this policy.] The Fire Department and/or appropriate City agencies shall revise regulations or procedures to include the establishment of minimum standards for location and expansion of fire facilities, based upon fire flow requirements, intensity and type of land use, life hazard, occupancy and degree of hazard so as to provide adequate fire and emergency medical event response. At a minimum, site selection criteria should include the following standards which were contained in the 1979 General Plan Fire Protection and Prevention Plan: • Fire stations should be located along improved major or secondary highways. If, in a given service area, the only available site is on a local street, the site must be on a street which leads directly to an improved major or secondary highway. • Fire station properties should be situated so as to provide drive-thru capability for heavy fire apparatus. • If a fire station site is on the side of a street or highway where the flow of traffic is toward a signalized intersection, the site should be at least 200 feet from that intersection in order to avoid blockage during ingress and egress.

TABLE 4.14-1: RELEVANT GENERAL PLAN FIRE PROTECTION GOALS, OBJECTIVES, AND POLICIES

Goal/Objective/Policy	Goal/Objective/Policy Description
	• The total number of companies which would be available for dispatch to first alarms would vary with the required fire flow and distance as follows: (a) less than 2,000 gpm would require not less than 2 engine companies and 1 truck company; (b) 2,000 but less than 4,500 gpm, not less than 2 or 3 engine companies and 1 or 2 truck companies; and (c) 4,500 or more gpm, not less than 3 engine companies and 2 truck companies. These provisions of the 1979 Plan were modified by the Fire Department for purposes of clarification.
Objective 3.1	Develop and implement comprehensive disaster recovery plans which are integrated with each other and with the City's comprehensive hazard mitigation and emergency response plans and programs.
Policy 3.1.1	Coordination: Coordinate with each other, with other jurisdictions and with appropriate private and public entities prior to a disaster and to the greatest extent feasible within the resources available, to plan and establish disaster recovery programs and procedures which will enable cooperative ventures, reduce potential conflicts, minimize duplication and maximize the available funds and resources to the greatest mutual benefit following a disaster.

SOURCE: City of Los Angeles, *The Citywide General Plan Framework, An Element of the City of Los Angeles General Plan*, re-adopted 2001. City of Los Angeles, *Safety Element of the Los Angeles City General Plan*, adopted 1996.

Los Angeles Fire Department (LAFD) Strategic Plan 2015-2017. The LAFD Strategic Plan 2015-2017 focuses on goals and strategic actions to guide the LAFD in the following areas: improving service delivery, implementing advanced technologies, employing sound budgeting practices and enhancing leadership. The plan also addresses the development of an even more professional workforce, promoting a positive work environment, and working to strengthen community relationships to improve preparedness and enhance resiliency during emergency events.

Los Angeles Municipal Code (LAMC) and Charter. The Los Angeles Fire Code is contained within Chapter V, Article 7, Fire Protection and Prevention of the LAMC. As required by the Fire Code, the LAFD Bureau of Fire Prevention and Public Safety is required to administer and enforce basic building regulations as set forth by the state fire marshal. The Los Angeles Fire Code provides regulations for the safeguarding of life and property from fire, explosion, panic, or other hazardous conditions which may arise in the use or occupancy of buildings, structures, or premises. The Los Angeles Fire Code is a combination of the California Fire Code and Los Angeles amendments and was last amended in May 2017 to incorporate by reference portions of the 2016 California Fire Code and 2015 International Fire Code.[1]

LAMC Section 57.503 requires any facility, structure, group of structures, or premises to provide and maintain LAFD access and requires that any structure located more than 150 feet from an approved street provide an approved fire lane.

LAMC Section 57.507.3 contains the fire flow requirements characterized by the type of development. As discussed therein and per Table 57.507.3.1 of LAMC, fire flow requirements require 2,000 gallons per minute (gpm) from three adjacent fire hydrants for low-density residential developments; 4,000 gpm from four adjacent fire hydrants for high density residential and neighborhood commercial developments; 6,000 to 9,000 gpm from four to six fire hydrants for industrial and commercial developments; and to 12,000 gpm available to any block for high-density industrial and commercial developments. As provided in LAMC Section 57.507.3.2 and described in Table 57.507.3.2, each fire hydrant serving industrial and commercial land developments serve 80,000 square feet of land area, be spaced 300 feet from the next fire hydrant on

[1]City of Los Angeles, *Ordinance 184913, Council File No. 16-0852*, June 2017.

roads and fire lands and be a 2.5-inch-by-4-inch double fire hydrant, or 4-inch-by-4-inch double fire hydrant.

LAMC Section 57.507.3.3 requires land uses to include the installation of an automatic fire-sprinkler system should the type of land use exceed the maximum response distances per Table 57.507.3.3 of LAMC Section 57.507.3.3.

City of Los Angeles Proposition F, Q, and J – Facilities Bond. Proposition F, also known as the Fire Facilities Bond, was approved in November 2000 and authorized the issuance of $532.6 million to finance the construction and rehabilitation of fire stations and animal shelters in the City of Los Angeles. Further, $378.6 million was allocated for the construction of 18 new or replacement neighborhood fire/paramedic stations, one regional fire station and training facility, and an emergency air operations/helicopter maintenance facility, for a total of 20 Proposition F projects. Through Proposition F, regional Fire Station 82 (5769 Hollywood Boulevard) was reconstructed and opened in 2012.

Proposition Q, known as the Citywide Public Safety Bond Measure was approved in March 2002 and allocated $600 million to renovate, improve, expand, and construct police, fire, 911, and paramedic facilities. Proposition Q also includes renovations to existing LAFD facilities, totaling 80 LAFD facility renovation projects.

In 2006, Measure J amended Proposition F, providing flexibility in the design of new facilities and setting standards for such facilities. Specifically, Measure J allows the following: the development of new regional fire/paramedic stations to be designed and built on one or more properties that are less than two acres; standard fire/paramedic stations to be designed and built on one acre; components to be built on two or more sites within proximity; or facilities to be designed to fit on a single site of less than two acres.[2]

EXISTING SETTING

Fire prevention, protection, and emergency medical services within the Project Area are provided by the LAFD. LAFD is a full-spectrum life safety agency that provides essential emergency and non-emergency services throughout the 471-square mile jurisdiction within the City. LAFD consists of 3,246 uniformed fire personnel that provide fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service. LAFD also consists of 353 civilian support staff that provides technical and administrative support to the LAFD. A total of 1,018 uniformed firefighters, in addition to 270 firefighter/paramedics are on active duty citywide serving at 106 neighborhood fire stations.[3] In January 2015, the LAFD service areas were re-structured into four geographic bureaus that align with the Los Angeles Police Department (LAPD) geographic boundaries: Central, Valley, West, and South Bureaus. With this updated approach, the LAFD, LAPD, and the City's Emergency Management Department have developed a more unified effort to respond to emergencies. Each designated Bureau Commander is responsible for all LAFD activities in the respective bureaus. In addition, the LAFD has implemented a new emergency medical dispatch card system, known as the Tiered Dispatch System, to reduce call-processing times; and the LAFD Automatic Vehicle Location System, to ensure the nearest emergency resource is dispatched during calls.[4]

[2]City of Los Angeles, Bureau of Engineering, *Fire Facilities Program (Prop F)*, http://eng.lacity.org/fire_paramedic_stations, accessed November 7, 2017.
[3]LAFD, *Our Mission*, http://www.lafd.org/about/about-lafd/our-mission, accessed September 14, 2016.
[4]LAFD, *A Safer City Strategic Plan*, 2015-2017.

The Project Area is located within the LAFD West Bureau service area, which encompasses the western portion of Los Angeles and includes Battalions 4, 5, and 9. The Project Area is located within the Battalion 5 service area and as presented in **Table 4.14-2** and shown in **Figure 4.14-1**, is served by seven fire stations, including Fire Stations 27, 35, 41, 52, 56, 76, and 82. Emergency Medical Services (EMS) is provided to the Project Area through the Bureau of Emergency Medical Services and is dispatched from the same fire stations.

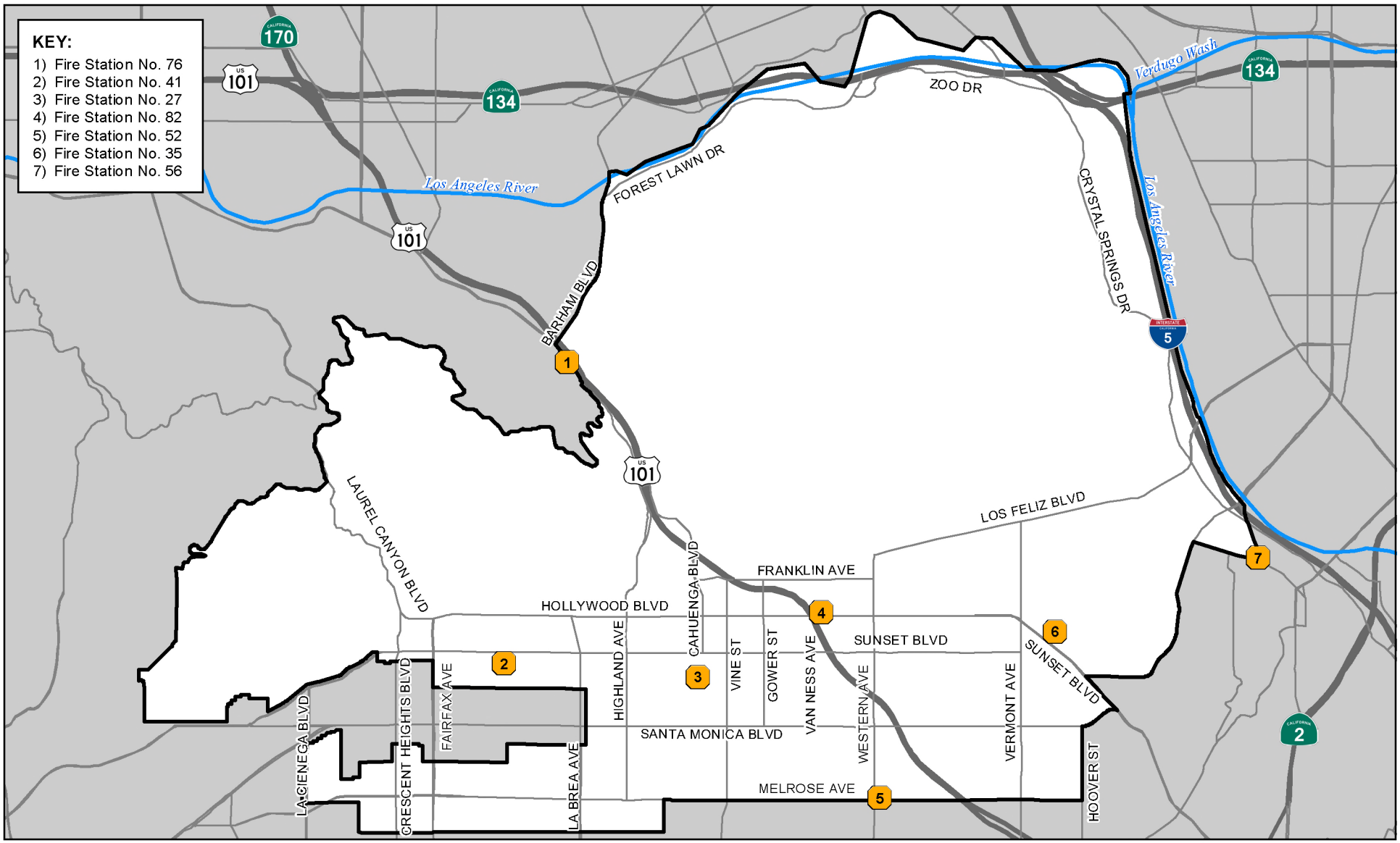
TABLE 4.14-2: LAFD FIRE STATIONS SERVING THE PROJECT AREA

Fire Station	Address	LAFD Community	Average Response Times (mins) /a/		Staffing	Service and Equipment
			Non-EMS	EMS		
27	1327 N. Cole Ave. Los Angeles, CA 90028	Hollywood	3:34	4:07	15	• Task Force Truck • Ambulance Unit • Urban Search & Rescue
35	1601 N. Hillhurst Ave. Los Angeles, CA 90027	Los Feliz	3:48	3:52	12	• Truck Company • Engine Company • Ambulance Unit
41	1439 N. Gardner St. Los Angeles, CA 90046	Hollywood (North Hills & Northwest)	5:24	4:39	8	• Truck Company • Engine Company • Ambulance Unit
52	4957 Melrose Ave. Los Angeles, CA 90029	Hollywood (Southeast)	4:12	4:13	7	• Engine Company • Ambulance Unit
56	2759 Rowena Ave. Los Angeles, CA 90039	Silver Lake	5:30	5:24	4	• Engine Company • Ambulance Unit • Heavy Rescue
76	3111 N. Cahuenga Blvd. Los Angeles, CA 90068	Cahuenga Pass	5:38	5:34	4	• Engine Company • Ambulance Unit
82	5769 Hollywood Blvd. Los Angeles, CA 90028 (West Bureau Headquarters)	Hollywood (Hills & Northeast)	4:25	4:01	6	• Engine Company • Ambulance Unit

Note: Non-EMS = fire and other services; EMS = Emergency Medical Services
/a/ Average response metrics for January-December 2016.
SOURCE: LAFD, *FireStatLA*, www.lafd.org, Navigate LA; TAHA, 2017.

Service Performance Measures. LAFD's services continue to be based on the community's needs, as determined by on-going evaluations, taking into consideration calls for service. These evaluations are used to determine the need for the reallocation of equipment or personnel, or if required, the acquisition of equipment, personnel, and/or new stations. As development occurs, the LAFD reviews development applications for needed facilities. Where appropriate, construction of new facilities is required as a condition of development for individual projects.[5]

[5]Los Angeles Department of City Planning, *The Citywide General Plan Framework: An Element of the City of Los Angeles General Plan, CPC 94-0354 GPF CF 95-2259 CF 01-1162 (adopted August 8, 2001), Chapter 9 (Infrastructure and Public Services), Status of Infrastructure System/Facilities, Fire*.



SOURCE: City of Los Angeles, 2017; TAHA, 2017.

taha environmental planners
taha 2010-073

Hollywood Community Plan Update
Draft Environmental Impact Report
CITY OF LOS ANGELES

FIGURE 4.14-1
FIRE STATIONS

In March 2014, a Third-Party Deployment of Fire Resources Study was prepared for the LAFD to provide for an independent review and analysis of its current deployment of fire and EMS resources and determine the most efficient and cost-effective model that could be implemented by the LAFD.[6] This study focused on three key areas, including the following:

- *Deployment of Resources*. The study reviewed the organization and the performance of the LAFD's current resource deployment, including platoon duty and administrative staffing levels, deployment model, task force configuration, and the use of sworn firefighters to fill non-emergency administrative positions and the feasibility of utilizing non-sworn personnel to staff these positions.
- *Response Times of Fire and EMS*. The study analyzed current LAFD and EMS response times benchmarked against industry goals and comparable agencies.
- *EMS Comparative Analysis*. The study reviewed and analyzed best practices of the LAFD and EMS, including dispatching models and protocols.

Based on the assessment of these key areas, the study made numerous recommendations, including the development of a strategic plan and Standards of Cover. The LAFD prepared *A Safer City: Strategic Plan 2015-2017*, the LAFD's first strategic plan, as discussed above.[7] The LAFD has also initiated a Standards of Response Coverage analysis to assist in the evaluation of specific geographic response areas, specific community risks, deployment methods, response time standards, and the allocation of resources for LAFD.

Fire Flow and Response Distance. The adequacy of fire protection for a given area is based on required fire flow, response distance from existing fire stations, and the LAFD's judgment for needs in the area. Personnel and equipment needs for individual fire stations are determined based on the LAFD's review of the number of incidents within a station's service area. As the number of incidents increases, the LAFD assigns new staff and equipment as necessary to maintain acceptable service ratios and response times.

The fire flow (measured in gallons per minute from the local water system) necessary to contain a fire depends on the existing land use or combination of land uses and the density of the area being served. Consequently, the amount of water necessary for fire protection depends on various factors, including the type of development, risk of life, occupancy, and the level or intensity of a fire hazard. Response distance relates directly to the linear travel distance (i.e., miles between a station and a site) and the LAFD's ability to successfully navigate through an area's circulation system. The Fire Code specifies maximum response distances allowed between specific locations and engine/truck companies based upon land use and fire flow requirements, as shown in **Table 4.14-3**.

When response distances exceed these requirements, plans for all new commercial and residential structures must be reviewed and various fire suppression equipment (e.g., automatic fire sprinkler systems, fire signaling systems, fire extinguishers, smoke removal systems, and any other fire protection devices) as deemed necessary by the Fire Chief are required to be incorporated in the plans prior to the approval of an occupancy permit. In addition to fire flow requirements, the LAFD requires different types of fire hydrants within a specified distance to deliver the required fire flow, which are shown in **Table 4.14-4**.

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[6]Office of the City Administrative Officer, *Third Party Deployment of Fire Resources Study – Los Angeles Fire Department*, March 3, 2014.

[7]LAFD, *A Safer City, Strategic Plan 2015-2017*, April 2015.

TABLE 4.14-3: FIRE-FLOW AND RESPONSE DISTANCE REQUIREMENTS

Land Use	Required Fire-Flow	Maximum Response Distance to LAFD Fire Station /a/	
		Engine Company /b/	Truck Company /b/
RESIDENTIAL			
Low Density Residential	2,000 gpm from three adjacent hydrants flowing simultaneously	1.5 miles	1.5 miles
High Density Residential and Commercial Neighborhood	4,000 gpm from four adjacent hydrants flowing simultaneously	1.5 miles	1.5 miles
COMMERCIAL AND INDUSTRIAL			
Industrial and Commercial	6,000 to 9,000 gpm from four hydrants flowing simultaneously	1.0 mile	1.5 miles
High Density Industrial and Commercial or Industrial (Principal Business Districts or Centers)	12,000 gpm available to any block (where local conditions indicate that consideration must be given to simultaneous fires, an additional 2,000 to 8,000 gpm will be required)	0.75 miles	1.0 mile

Note: gpm = gallons per minute
/a/ Maximum response distance to LAFD fire stations pertains to areas outside the boundaries covered by the Hillside Ordinance (Ordinance Number 168,159). When a portion of any subdivision (as defined in Section 17.02 of the LAMC), falls outside the 1.5-mile distance requirement, automatic fire sprinklers will not be required in that portion whenever a review by the Chief determines that no unacceptable increase in hazard to the public will result.
/b/ The maximum response distances for both LAFD fire suppression companies (engine and truck) must be satisfied.
SOURCE: Los Angeles Municipal Code, *Chapter V – Public Safety and Protection, Article 7 – Fire Protection and Prevention (Fire Code),* Section 57.09.06, Table 9-C.

TABLE 4.14-4: LAND USE AND REQUIRED FIRE FLOW

Type of Land Development	Net Land Area Served Per Hydrant	Distance Between Hydrants on Roads and Fire Lanes	Type of Hydrant
Low-Density Residential	150,000 sq. ft.	600 ft.	2 ½" x 4" Double Fire Hydrant
High-Density Residential & Neighborhood Commercial	100,000 sq. ft.	300-450 ft.	2 ½" x 4" Double Fire Hydrant
Industrial & Commercial	80,000 sq. ft.	300 ft.	2 ½" x 4" Double Fire Hydrant or 4" x 4" Double Fire Hydrant
High-Density Industrial & Commercial	40,000 sq. ft.	300 ft.	4" x 4" Double Fire Hydrant

/a/ This figure will be systematically reduced where greater fire-flow is required due to restricted access, depth of lots, length of blocks, or additional hazards.
SOURCE: Los Angeles Municipal Code, Chapter V – Public Safety and Protection, Article 7 – Fire Protection and Prevention (Fire Code), Section 57.507.3.2 and described in Table 57.507.3.2.

Response time relates to the physical linear travel distance (i.e., the number of miles between a fire station and a specific location) and the LAFD's ability to successfully navigate the given roadway network. Roadway congestion, intersection level of service (LOS), weather conditions, and construction traffic along the response route can affect the response distance in terms of travel time. Generally, multi-lane arterial roadways allow the emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of the path of the emergency vehicle. Additionally, the LAFD in collaboration with Los Angeles Department of Transportation (LADOT) has developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling on designated streets in the City. Designated emergency routes within the Project Area include the US-101, SR-134, and I-5, Cahuenga Boulevard, Hollywood Boulevard, Sunset Boulevard, Santa Monica Boulevard, Los Feliz Boulevard and

Vine Street.[8] The City of Los Angeles has over 205 miles of major arterial routes that are equipped with FPS.[9]

The Citywide response time goal is five minutes. The average Citywide LAFD response time for 2016 for non-EMS events is 4 minutes and 16 seconds and 4 minute 22 seconds for EMS events, which is within the citywide response time goal.[10] The average response times for non-EMS and EMS events for the fire stations that serve the Project Area are provided in **Table 4.14-5**.

TABLE 4.14-5: LAFD FIRE STATION INCIDENT EMS RESPONSE DATA YEAR 2016 /a/

	Average Response Times /b, c/		Incident Count		
Fire Station No.	Non-EMS	EMS	Non-EMS	EMS	Total Incidents
Citywide /d/	4:16	4:22	65,833	378,954	444,787
27	3:34	4:07	1,359	6,546	7,905
35	3:48	3:52	651	4,872	5,523
41	5:24	4:39	1,003	3,991	4,994
52	4:12	4:13	554	3,747	4,301
56	5:30	5:24	413	1,937	2,350
76	5:38	5:34	261	1,183	1,444
82	4:25	4:01	867	3,659	4,526

/a/ District Response Metrics for January-December 2016.
/b/ Non-EMS = fire and other services; EMS = Emergency Medical Services
/c/ Average Travel Time in District, January – December 2016
/d/ The Citywide incident count is the sum of the incident counts is the sum of the LAFD fire station counts, January – December 2016
SOURCE: Los Angeles Fire Department, *FireStatLA*, www.lafd.org, Navigate LA; TAHA, 2017.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the CEQA Guidelines, the Proposed Plan would have a significant impact if it would:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered fire or emergency service facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times or other performance objectives for fire protection and emergency services.

METHODOLOGY

An impact in this section would occur if the Proposed Plan promotes growth patterns resulting in the need for and/or the provision of new or physically altered fire or emergency response facilities, the construction of which would cause significant environmental impacts in order to maintain service ratios, response times,

[8]LAFD, *A Safer City, Strategic Plan 2015-2017*, April 2015.
[9]LAFD, *Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles, Bulletin No. 133*, October 2008.
[10]For informational purposes, Citywide LAFD response times and standards are less than the average response times of other large jurisdictions, such as the City of Pasadena Fire Department (between 6 minutes and 10 seconds to 8 minutes and 18 seconds) and San Diego Fire Department (between 6 minutes and 46 seconds to 11 minutes and 36 seconds, depending on the station). (Pasadena Fire Department, *FY2016 Information Sheet*, 2016; City of San Diego Fire-Rescue Department, *Standards of Response Cover Review*, February 22, 2017).

or other performance objectives. The need for or deficiency in adequate fire and emergency response services in and of itself is not a CEQA impact, but a social or economic impact. (*City of Hayward v. B'd of Trustees* (2015) 242 Cal.App. 4th 833, 843. To the extent that the Proposed Plan causes a need for additional fire and emergency response services that result in the construction of new facilities or additions to existing facilities and the impact from that construction results in a potential impact to the environment, that is a CEQA impact that needs to be assessed in this EIR. Any discussion in this EIR of social or economic impacts that relates solely to the level of fire and life safety services provided to the residents or users of the Project area and its surrounding community, including any existing or future needs and deficiencies, is not determinant on its own of CEQA impacts, absent those social or economic impacts resulting in physical impacts. The ultimate determination of whether there is a significant impact related to fire and emergency response services is based on whether a significant impact will result from the construction of new or expanded fire and emergency response facilities.

IMPACTS

IMPACT 4.14-1 Would implementation of the Proposed Plan result in substantial adverse physical impacts associated with the provision of new or physically altered fire or emergency facilities, the need for new or physically altered fire or emergency facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection and emergency response? **Less than significant impact.**

There are no current plans to build new fire stations or expanded fire and emergency facilities in or around the Project Area. The Proposed Plan includes General Plan Amendments and Zone changes that would result in reasonably expected development in the Project Area, with the most development expected to occur in the Active Change Areas. The proposed changes to development potential would be expected to increase population, housing and employment numbers in the Project Area. As discussed below, over the 20-year planning horizon of the Proposed Plan, construction activities and increases in population, housing and employment in the Project Area would foreseeably increase the need for fire and emergency services. Thus, it is reasonably expected that there may be a need for new fire and emergency facilities. As there are no existing plans for new or expanded fire or emergency facilities, it is not possible at this time to identify particular impacts that may occur based on a specific project's size, type or location. Therefore, the discussion in this EIR is based on the typical fire and emergency facilities built and the typical locations used. The Proposed Plan contains several policies that would affect fire protection and emergency services. These policies (and a program) include the following:

- **M1.4 Emergency vehicles**. Consider the mobility needs of emergency service vehicles when planning a multi-modal transportation system; and
- **LU11.1 Disaster preparedness**. Improve preparedness for disasters, including those related to climate change. Coordinate with other City departments to access preparedness for increased frequency of extreme weather events, such as heat waves, drought, wildfires, flooding, and sea level rise.
- **P19**. Study and update evacuation routes for hillside areas.

Construction

The Proposed Plan would allow for increased development potential, but would not constitute a commitment to any project-specific construction. Construction related to future development within the Project Area, particularly within the Active Change Areas, could result in the effects described below. Construction activities would have the potential to temporarily increase the existing demand on fire

protection and emergency medical services. Construction activities could potentially expose combustible materials (e.g., wood, plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks, exposed electrical lines, chemical reactions in combustible materials and coatings and lighted cigarettes. However, in compliance with Occupational Safety and Health Administration (OSHA) requirements, construction managers and personnel would be trained in emergency response and fire safety operations. Additionally, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site. Project construction would also comply with requirements and policies relating to fire safety practices.

Generally, road and lane closures due to construction activities related to individual projects have the potential to affect response times of fire and emergency services vehicles. Traffic delays caused by potential closures could impede the ability of emergency vehicles to efficiently move along roadways to their destination. Additionally, temporary road closures may also result in detours that impact response time. Any development project that will cause temporary road closures is required to submit a plan to LADOT for approval to ensure any impacts are minimized and, if necessary, proper signage and flagmen provided to avoid impacts. Additionally, large projects are required to develop a construction staging and traffic management plan, as necessary, to ensure emergency access is maintained, consistent with LAFD requirements.

Operation

Under the Proposed Plan, the Project Area is expected to have approximately 243,000 to 264,000 residents by year 2040, which would be a population increase of approximately 37,000 to 58,000 residents compared to the estimated 2016 population.[11] Under the Proposed Plan, the Project Area would have a reasonable expected growth in housing resulting in between 121,000 to 132,000 housing units and a growth in employment with approximately 124,000-127,000 employees by year 2040. These increases would take place over time, and the totals are not anticipated to be reached until 2040 or beyond. The Proposed Plan does not constitute a commitment to any project-specific construction.

Land uses in the Project Area are not expected to change dramatically, but the intensity and/or density of some land uses is expected to increase, especially in Active Change Areas. An increase in population, by itself, would not necessarily increase demand for fire or emergency protection facilities. Based on information provided in LAFD's Strategic Plan 2015-2017, the ability to provide adequate fire protection services is dependent on numerous factors including staffing levels, mutual aid agreements, deployment strategies, and technological advances in equipment. LAFD's primary determinant for assessing future service needs is based on their cumulative review and analysis of past incidents. Options available to LAFD include expanding fire prevention services, increasing staffing levels, and adding new fire stations(s) to underserved areas.

The projected number of residents, employees, and overall anticipated development levels is routinely reviewed by LAFD to assist in determining the future need for emergency services. LAFD determines the need for new fire stations based on a needs assessment that takes in to account the complex set of factors discussed above, as well as the geographic distribution of physical structures; access to trucks, ambulances, and other equipment; the location of new structures; and anticipated response times.[12]

LAFD also evaluates the potential for impacts to their services and, thus, demand for new facilities on a project-by project basis. During the building permit project-level review process, the LAFD reviews the individual development project plans to determine the development project's effect on fire protection and emergency medical services. A development project's land use, fire-related needs, and whether the project site meets the

[11]For informational purposes, and not for impact analysis, the Proposed Plan would have an increase of approximately 17,000 to 21,000 residents compared to future conditions (2040) under the current plan.

[12]LAFD, *A Safer City, Strategic Plan 2015-2017*, April 2015.

recommended response distance and fire safety requirements, as well as project design features that could reduce or increase the demand for fire protection services are also taken into consideration during review of the building permit. Beyond the standards set forth in the Los Angeles Fire Code, consideration is given to the project size and components, required fire-flow, response time, and response distance for engine and truck companies, fire hydrant sizing and placement standards, access, and potential to use or store hazardous materials. On a yearly basis, LAFD assesses its resources, including staffing levels and equipment/vehicles, and reallocates them based on Citywide demand and need.

As discussed in Section 4.15, Transportation and Traffic, of this Draft EIR, the 2040 With Project scenario assumes land use intensification and an organized and coordinated development pattern that increases accessibility of destinations while minimizing the related growth in vehicle trips and VMT per capita. Additionally, designated emergency evacuation and disaster routes within the Project Area would be maintained.[13] The above notwithstanding, the Project is expected to impact roadway segment-level LOS. See Table 4.15-8 and Table 4.15-9 in Section 4.15. There is not a direct relationship between predicted travel delay and emergency response times as California State law requires that drivers yield the right-of-way to emergency vehicles and remain stopped until the emergency vehicles have passed. While increased traffic on local roadways would increase congestion, the impact on response times and overall fire service is not proportional to increasing traffic (see Section 4.15, Transportation and Traffic, of this Draft EIR, for additional discussion about this topic). Generally, multi-lane arterial roadways allow emergency vehicles to travel at higher speeds and permit other traffic to maneuver out of the path of the emergency vehicle. On congested roadways, multi-lane arterial roadways with continuous center left-turn lanes facilitate emergency access when the thru lanes experience delays. Additionally, as previously mentioned under Existing Setting, various roadways within the Project Area are equipped with FPS, a system that automatically turns traffic lights to green for emergency vehicles traveling on designated streets. The Proposed Plan would not introduce new streets or otherwise alter the overall land use pattern within the Project Area in a way that would affect emergency response routes. The Proposed Plan would not encourage growth within hillside areas. The Project Area is generally in an urbanized environment where there is sufficient street access for emergency response.

LAFD has a mandate to protect public safety and must respond to changing circumstances and, therefore, would act to maintain response times. Such actions may include the need to add new facilities or expand existing facilities.

The Project Area is currently served by seven fire stations. These fire stations are located within the Project Area boundaries. As development occurs over the lifetime of the Proposed Plan, it is expected that fire protection service levels will be evaluated and maintained by LAFD. In conformance with California Constitution Article XIII, Section 35, (a)(2), existing policies, procedures and practices related to fire protection and emergency services, LAFD would maintain acceptable emergency response times through the provision of additional personnel and equipment as needed, as well as potentially constructing new or expanding existing fire and emergency response facilities. For example, as previously discussed above, Fire Station 82 was upgraded to a regional facility and reopened in 2012.

As discussed above, LAFD considers the City's growth projections when planning new facilities and reviews projects on a case-by-case basis to either require new facilities, if needed, or condition projects to reduce the demand on services (such as requiring fire sprinklers). No new fire stations are planned or proposed in the Proposed Plan. It is assumed that if new facilities are determined to be necessary at some point in the future, such facilities would occur where allowed under the designated land use. Many of the environmental impacts of the construction and operation of any new facilities, as an allowed land use, have been evaluated throughout this EIR. Specifically, the EIR analyzes anticipated effects of citywide growth

[13]City of Los Angeles, General Plan, *Safety Element*, Exhibit H, 1996.

related to air quality, noise, traffic, utilities, and other environmental impact areas. Construction impacts to air, noise, traffic, as well as other impact areas, are discussed throughout the impact sections and would not be different for the construction of a fire/paramedic station/facility. Noise impacts of emergency service provider facilities, which are unique to this type of operation, can affect nearby sensitive receptors but such impacts are not foreseeable at this time. In addition, should new facilities be needed, such facilities would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size. The Project Area is an urbanized area and new facilities would not involve expansion of the urban sphere beyond current boundaries and, thus, there would be no need for new or expanded infrastructure. According to the Los Angeles Bureau of Engineering (BOE), there are four basic configurations for fire stations, but the typical standard fire/paramedic station would consist of a 15,250-square foot building on a parcel that is approximately one acre. Based on the urban location and the relatively small size of typical facilities, the construction of a new fire facility or expansion of an existing facility would likely qualify for an infill exemption or result in less–than-significant impacts with standard regulatory compliance measures and design features. To the extent that any significant impacts could result from the unique characteristics of a specific site, those impacts would be speculative at this time. Therefore, impacts related to fire protection and emergency services would be less than significant.

Based on the above, impacts related to fire protection and emergency services would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

CUMULATIVE IMPACTS

The Proposed Plan along with cumulative development from other plans (such as surrounding community plans, the Los Angeles County General Plan and the 2016-2040 RTP/SCS) could result in a significant impact to fire services and facilities if the Proposed Plan along with other projects would result in the need for new fire or emergency response facilities or expanded facilities. The cumulative context for fire protection and emergency services is the City since the City is served by LAFD.

As discussed above, the Proposed Plan over the planning horizon of 20 plus years may result in the need for new or expanded fire and emergency response facilities. It is not foreseeable that the construction of such facilities combined with other fire and emergency response facilities would result in any significant impacts as such facilities would not be located near other new fire and emergency response facilities. It would also be speculative to assume construction of facilities along with other nearby construction would result in significant impacts. But to the extent they would occur, they would foreseeably be the same as other cumulative impacts identified in the EIR. It is also not foreseeable at this time that growth as a result of other plans (including surrounding community plans, the Los Angeles County General Plan and/or the 2016-2040 RTP/SCS) along with reasonably expected growth anticipated to result from the Proposed Plan would result in the need for new or expanded fire and emergency response facilities because the need for such facilities is based on a complex set of factors. No new facilities or expansions are currently planned. To the extent that they would result, the impacts would be similar to those addressed in the impact section

above and would not be expected to result in new or substantially different impacts from those impacts discussed in this EIR in the other impact section, such as traffic, air, noise.

Past development has occurred in accordance with the growth allowed under the City of Los Angeles General Plan, and all development in the City is required to maintain consistency with City of Los Angeles fire protection regulations. Future development in the Project Area, as well as future development occurring within the entire LAFD service area, would be required to comply with all applicable LAFD fire code requirements associated with adequate fire access, fire flows, and number of hydrants as a condition of project approval. Additionally, any development project that would be located at distances that exceed response distance requirements would be required to undergo plan review by the Fire Chief, who would determine the fire suppression measures that the development project would be required to implement. New development would be required to provide upgrades to the water distribution systems serving the LAFD service area in accordance with LAFD and/or Los Angeles Department of Water and Power (LADWP) requirements. As with the code requirements for fire access, fire flows, number of hydrants, and fire suppression measures, these upgrades would be addressed for new development in conjunction with individual project approvals.

As discussed in Section 4.15, Transportation and Traffic, of this Draft EIR, a project would have a significant impact on emergency services if it would require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service and if such construction or expansion would result in a significant impact. LAFD has a mandate to protect public safety and must respond to changing circumstances and, therefore, would act to maintain response times. As discussed above, this may result in the need for new fire stations. Based on information provided in LAFD's Strategic Plan 2015-2017, the ability to provide adequate fire protection services is dependent on numerous factors including staffing levels, mutual aid agreements, deployment strategies, and technological advances in equipment. Moreover, LAFD's primary determinant for assessing future service needs is based on their cumulative review and analysis of past incidents. Options available to LAFD include expanding the FPS, increasing staffing levels, and adding new fire stations(s) to underserved areas. Depending on the location of new fire protection facilities, if they are determined to be needed, operational impacts (primarily noise) could occur; however, such impacts are not foreseeable at this time. Therefore, the Proposed Plan would not have cumulative considerable impacts related to fire facilities.

POLICE PROTECTION SERVICES

Federal, state and local laws, regulations, plans, and guidelines that are potentially applicable to the Proposed Plan are summarized below.

REGULATORY FRAMEWORK

FEDERAL

There are no federal police protection services regulations applicable to the Proposed Plan.

STATE

California Constitution, Article XIII, Section 35. Section 35 of Article III of the California Constitution at subdivision (a)(2) provides: "The protection of the public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50 percent sales tax to be used exclusively for local public safety services, including police. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Section 30056 provides that a city is not allowed to spend less of its own financial resources on its combined public safety services (including polices services) in any given year compared to its 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on police protection, as well as other public safety services. In *City of Hayward v. Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that, Section 35 of Article XIII of the California Constitution requires local agencies to provide fire services and that it is reasonable to conclude that a lead agency will comply with that provision and ensure that public services are provided. (See *City of Hayward v. Trustee of California State University* (2015) 242 Cal. App. 4th 833, 847 stating "the city has a constitutional obligation to provide adequate fire protection services".) It is reasonable to analogize that a similar analysis would apply to police services as Section 35 of Article XIII includes a responsibility for cities to give priority to public safety services, which includes police services.

California Penal Code. All law enforcement agencies within the State of California are organized and operated in accordance with the applicable provisions of the California Penal Code. This code sets forth the authority, rules of conduct, and training for peace officers. Under state law, all sworn municipal and county officers are state peace officers.

Title 13 California Code Regulations (CCR) Division 2. Division 2 of Title 13 of the CCR governs the operations of the California Highway Patrol.

LOCAL

Los Angeles Citywide General Plan Framework and Safety Element. The Citywide General Plan Framework is discussed above under "Regulatory Framework" for Fire Protection and Emergency Services. The General Plan Framework Element addresses police services within the City. Goals, objectives, and policies within the General Plan Framework applicable to police services are provided in **Table 4.14-6**.

The Safety Element of the General Plan identifies existing police services and the service needs of the City of Los Angeles in the event of a natural disaster. Goal 2; Objectives 2.1 and 3.1; and Policies 2.15 and 3.1.1 within the Safety Element are applicable to police services. These goal, objectives, and policies are identified in **Table 4.14-1**, above.

City of Los Angeles Charter, Administrative and Municipal Codes. The law enforcement regulations, as well as the powers and duties of the LAPD, are outlined in the City of Los Angeles' Charter, Administrative Code, and the LAMC. Article V, Section 570 of the City of Los Angeles Charter gives power and duty to the LAPD to enforce the penal provisions of the Charter, city ordinances, and state and federal law. The Charter gives responsibility to LAPD officers to act as peace officers and to protect lives and property in case of disaster or public calamity. Division 22, Chapter 11, Article 5, Section 22.240 of the Los Angeles Administrative Code requires the LAPD to adhere to the State of California standards described in Section 13522 of the California Penal Code. Section 13522 charges the LAPD with the responsibility of enforcing all LAMC Chapter 5 regulations related to fire arms, illegal hazardous waste disposal, and nuisances (e.g., excessive noise), and with providing support to the Department of Building and Safety Code Enforcement inspectors and the LAFD in the enforcement of the City's Fire, Building, and Health Codes. The LAPD is also given the power and the duty to protect residents and property and to review and enforce specific security-related mitigation measures in regards to new development.

TABLE 4.14-6: RELEVANT GENERAL PLAN POLICE PROTECTION GOALS, OBJECTIVES, AND POLICIES

Goal/Objective/Policy	Goal/Objective/Policy Description
FRAMEWORK ELEMENT – CHAPTER 9 INFRASTRUCTURE AND PUBLIC SERVICES	
Goal 9I	Every neighborhood in the City has the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood.
Objective 9.13	Monitor and forecast demand for existing and projected police service and facilities.
Policy 9.13.1	Monitor and report police statistics, as appropriate, and population projections for the purpose of evaluating police service based on existing and future needs.
Objective 9.14	Protect the public and provide adequate police services, facilities, equipment and personnel to meet existing and future needs.
Policy 9.14.1	Work with the Police Department to maintain standards for the appropriate number of sworn police officers to serve the needs of residents, businesses, and industries.
Policy 9.14.2	Support the provision of additional sworn police officers to meet the safety needs of the City.
Policy 9.14.3	Pursue state, federal, and other non-conventional funding sources to expand the number of sworn police officers.
Policy 9.14.4	Complete all funded capital facilities in as short a time as possible.
Policy 9.14.5	Identify neighborhoods in Los Angeles where facilities are needed to provide adequate police protection.
Policy 9.14.6	Minimize the processing required to establish needed facilities and, if necessary, modify facility standards to utilize existing available structures for this purpose.
Policy 9.14.7	Participate fully in the planning of activities that assist in defensible space design and utilize the most current law enforcement technology affecting physical development.
Objective 9.15	Provide for adequate public safety in emergency situations.
Policy 9.15.1	Maintain mutual assistance agreements with local law enforcement agencies, state law enforcement agencies, and the National Guard to provide for public safety in the event of emergency situations.

SOURCE: City of Los Angeles, *The Citywide General Plan Framework, An Element of the City of Los Angeles General Plan*, re-adopted 2001.

Los Angeles Police Department (LAPD) Computer Statistics Unit (COMPSTAT) Program. The LAPD COMPSTAT was created in 1994 and implements the General Plan Framework goal of assembling statistical population and crime data to determine necessary crime prevention actions. This system implements a multi-layer approach to police protection services through statistical and geographical information system (GIS) analysis of growing trends in crime through its specialized crime control model. COMPSTAT has effectively and significantly reduced the occurrence of crime in Los Angeles communities through accurate and timely intelligence regarding emerging crime trends or patterns.[14]

Design Out Crime/Crime Prevention Through Environmental Design (CPTED). The Design Out Crime initiative implements the techniques of CPTED, which introduces ways to deter crime by changing the design of buildings and public spaces. The City of Los Angles Design Out Crime Guidelines was developed by the City of Los Angeles CPTED Task Force. The purpose of the guidelines is to inform developers, architects, urban planners, and others involved in the design of building projects to improve safety and reduce crime by providing visual connection/natural surveillance and discouraging criminal

[14]LAPD, *COMPSTAT,* http://www.lapdonline.org/crime_mapping_and_compstat/content_basic_view/6363, accessed September 14, 2016.

activity.[15] Examples of recommended CPTED practices include the use of paths, lighting, entryways, and security features (locks/gates/signs) to enhance site safety.[16]

EXISTING SETTING

The LAPD provides police protection services in the City, including the Project Area. The LAPD also contains specialized units, including Special Operations, Special Weapons and Tactics (SWAT), Gangs and Narcotics, K-9 Units, and Mounted Units. The LAPD is divided into four geographic bureaus: Central, South, West, and Valley Bureaus, which are divided into 21 community police divisions, and into reporting districts. The Project Area is located within several LAPD bureaus, including the Central, Valley, and West Bureaus. LAPD divisions within these geographic bureaus that serve the Project Area are shown in **Figure 4.14-2**. As of September 2016, the LAPD has a total of 9,811 sworn officers.

The Central Bureau encompasses a 65-square mile service area with a population of approximately 900,000 residents. The Central Bureau service boundaries include the Los Angeles City limits on the north and east, Florence Avenue to the south, and Griffith Park Boundary/Western Avenue to the west. The Central Bureau overseas operations in the following area divisions: Central, Hollenbeck, Newton, Northeast, and Rampart, as well as the Central Traffic Division. Communities served by the Central Bureau include the downtown business district, Eagle Rock, Garment District, MacArthur Park, Dodger Stadium and Griffith Park. The eastern portion of the Project Area is located within the Central Bureau jurisdiction.

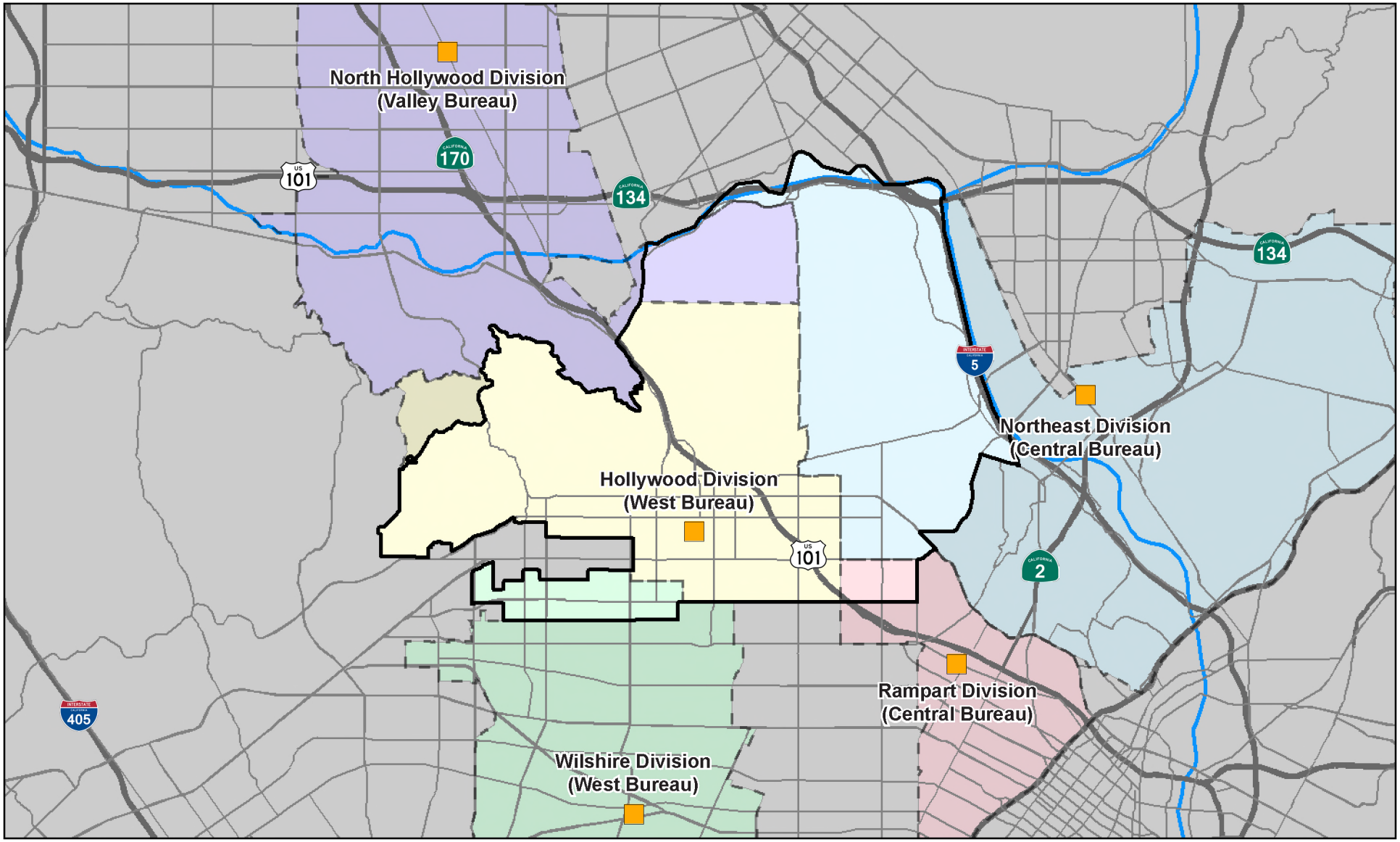
The Valley Bureau encompasses approximately 226.5-square miles serving a population of approximately 1.4 million residents. The Valley Bureau oversees operations in the following areas: Devonshire, Foothill, Mission, North Hollywood, Topanga, Van Nuys, and West Valley, as well as Valley Traffic Division. The northern portion of the Project Area abutting North Hollywood is located within the Valley Bureau jurisdiction.

The West Bureau comprises a 124-square mile service area with a population of approximately 840,000 residents. The West Bureau geographical boundaries are bounded by Forest Lawn Drive to the north, Normandie Boulevard to the east, El Segundo Boulevard to the south, and the Pacific Ocean to the west. The West Bureau includes the following LAPD Divisions: Hollywood, Wilshire, Pacific and West Los Angeles, as well as the West Traffic Division, which includes the neighborhoods of Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and the Miracle Mile. The western portion of the Project Area is located within the West Bureau jurisdiction.

The Project Area would be served by several community police stations, including the Northeast, Rampart, North Hollywood, Hollywood, Olympic and Wilshire Community Police Stations. The Project Area is predominantly located within the Hollywood Community Police Station service area. **Table 4.14-7** provides details of each police station serving the Project Area and is further discussed below.

[15]City of Los Angeles, *Design Out Crime Guidelines: Crime Prevention through Environmental Design*, https://planning.lacity.org/policyinitiatives/CPTED/CPTED_Guidelines.pdf, accessed November 7, 2017.

[16]LAPD, *Design Out Crime*, http://www.lapdonline.org/crime_prevention/content_basic_view/8852#1, accessed September 14, 2016.



SOURCE: City of Los Angeles, 2017; TAHA, 2017.

taha environmental planners
taha 2010-073

Hollywood Community Plan Update
Draft Environmental Impact Report
CITY OF LOS ANGELES

FIGURE 4.14-2
POLICE STATIONS

TABLE 4.14-7: LAPD POLICE STATIONS SERVING THE PROJECT AREA

Bureau	LAPD Community Station	No. of Officers	Service Area (sq. mi)	Population Served
Central	Northeast Division 3353 San Fernando Rd., Los Angeles, CA 90065	150 sworn and civilian (Central Traffic division)	29	250,000
Central	Rampart Division 1401 W. 6th St., Los Angeles, CA 90017	330 sworn and civilian	5.54	164,961
Valley	North Hollywood Division 11640 Burbank Blvd., North Hollywood, CA 91601	300 sworn officers 31 civilian staff 32 reserves 28 citizen volunteers	25	220,000
West	Hollywood Division 1358 N. Wilcox Ave., Los Angeles, CA 90028	365 sworn officers 17 civilian staff	17.2	300,000
West	Olympic Division 1130 S. Vermont Ave., Los Angeles, CA 90006	247 Sworn officers 17 civilian staff	6.2	186,615
West	Wilshire Division 4861 W. Venice Blvd., Los Angeles, CA 90019	337 sworn officers 30 civilian staff	13.97	251,000

SOURCE: LAPD, www.lapd.org; TAHA, 2017.

The Northeast Community Police Station, located within the Central Bureau, encompasses a 29-square mile service area with a population of approximately 250,000 residents. Its service boundaries extend to the Los Angeles City boundaries on the north and east, I-110 to the southeast, Sunset Boulevard to the southeast, and the Griffith Park Boundary/Western Avenue to the west. The Northeast Community Police Station is located at 3353 San Fernando Road and serves the communities of Atwater Village, Cypress Park, Eagle Rock, East Hollywood, Echo Park, Elysian Park, Elysian Valley, Franklin Hills, Garvanza, Glassell Park, Highland Park, Los Feliz, Mount Washington, Silver Lake, and Solano Canyon. Approximately 150 sworn police officers and civilian support staff serve the Northeast Community Police Station service area.

The Rampart Community Police Station, located within the Central Bureau, encompasses a 5.5-square mile service area with a population of approximately 164,961 residents. Its service boundaries extend to Sunset Boulevard to the north, the I-110, I-10 to the south, and Hoover Street and Normandie Avenue to the west. The Rampart Community Police Station is located at 1401 West 6th Street and serves the communities of Angelino Heights, Echo Park, Historic Filipinotown, Koreatown, Lafayette Park, Macarthur Park, Pico-Union, Temple-Beaudry, Virgil Village, and Westlake. Approximately 330 sworn police officers and civilian support staff serve the Rampart Community Police Station service area.

The North Hollywood Community Police Station, located within the Valley Bureau, encompasses a 25-square mile service area with a population of approximately 220,000 residents. The North Hollywood Community Police Station is located at 11640 Burbank Boulevard and serves the community areas of North Hollywood, Studio City, Valley Glen, Valley Village, Toluca Lake, West Toluca Lake, Toluca Woods, Universal City, Cahuenga Pass, and a portion of Sun Valley. Approximately 330 sworn police officers, 31 civilian support staff, in addition to 32 reserve officers and 28 citizen volunteers serve the North Hollywood Community Police Station service area.

The Hollywood Community Police Station, located within the West Bureau, encompasses a 17.2-square mile service area with a population of approximately 300,000 residents. Its service boundaries are Normandie Avenue on the east, City of West Hollywood on the west, Mulholland Drive on the north and Beverly Boulevard on the south. The Hollywood Community Police Station is located at 1358 Wilcox

Avenue and serves the communities of Hollywood, Mount Olympus, Fairfax District (North of Beverly Boulevard), Melrose District, Argyle Avenue and Los Feliz Estates. Approximately 365 sworn police officers and 17 civilian support staff serve the Hollywood Community Police Station service area.

The Olympic Community Police Station, located within the West Bureau, encompasses a 6.2-square mile service area with a population of approximately 186,615 residents. Its service boundaries are Melrose Avenue to the north; Hoover Street to the east; I-10 to the south; and Gower Street, Plymouth Boulevard, and Crenshaw Boulevard to the west. The Olympic Community Police Station is located at 1130 S. Vermont Avenue and serves the communities of the Mid-City region, including Koreatown and Miracle Mile. Approximately 247 sworn officers and 17 civilian support staff serve the Olympic Community Police Station service area.

The Wilshire Community Police Station, located within the West Bureau, encompasses a 13.97 square mile service with a population of 251,000 residents, which can increase to a population of approximately 500,000 people as a result of the business district and educational and professional institutes. The cities of Beverly Hills and West Hollywood and the Police Stations at Hollywood, Rampart, Southwest and West Los Angeles border Wilshire's boundaries. The Wilshire Community Police Station is located at 4861 Venice Boulevard and services the communities of Arlington Heights, Brookside Park, Carthay Circle, Country Club Park, Fairfax, Greater Wilshire, Hancock Park, Larchmont Village, Little Ethiopia, Melrose, Mid-City, Mid-Wilshire, Miracle Mile, Park La Brea, South Carthay, Wellington Square, Wilshire Center, Wilshire Vista, and Windsor Square. Approximately 337 sworn officers and 30 civilian support staff serve the Wilshire Community Police Station service area.

Crime statistics for the year 2016 at the Citywide level and LAPD Community Police station service areas that would serve the Project Area are provided in **Table 4.14-8**. Crimes categorized as Part I crimes are eight "serious offenses" for which the FBI gathers national data and include homicide, rape, robbery, aggravated assault, burglary, motor vehicle theft, burglary theft from vehicle, and personal/other theft. Part II Crimes are "less serious" offenses and include simple assaults, forgery/counterfeiting, embezzlement/fraud, receiving stolen property, weapon violations, prostitution, sex crimes, crimes against family/child, narcotic drug laws, liquor laws, drunkenness, disturbing the peace, disorderly conduct, gambling, dui and moving traffic violations. As shown in **Table 4.14-8**, approximately 125,430 Part I Crimes were committed and approximately 119,955 violent and Part I Crime arrests were made Citywide for the year 2016. Of the LAPD Divisions serving the Project Area, the fewest crimes committed and reported occurred within the Rampart Division with approximately 4,931 Part I Crimes, and the most crimes committed and reported occurred within the North Hollywood Division with approximately 6,747 crimes. Respectively, the Wilshire Division had the least violent and Part I Crime arrests made with 2,723 arrests, compared to 9,994 arrests made in the Hollywood Division.

The crime rate, which represents the number of crimes reported, affects the "needs" projection for staff and equipment for the LAPD. As such, for a conservative analysis, the crime rate in a given area is anticipated to increase as the level of activity and/or population and therefore the opportunities for crime increase. However, due to external factors that contribute to crime rates, such as police presence, crime prevention measures, and ongoing legislation/funding, the potential for increased crime rates may not be directly proportional to the increase in population or land use activity.

Response time is the amount of time between the time an emergency call is made and the time a police unit arrives at the scene. Calls for police assistance are prioritized based on the nature of the call. Police units are often in a mobile state; thus, the number of officers on the street is more directly related to the realized response time than the distance between a police station and a project site. The LAPD has an existing preferred response time of seven minutes for emergency calls.

TABLE 4.14-8: CRIME STATISTICS FOR LAPD STATIONS SERVING THE PROJECT AREAS (YEAR 2016) /a/

Crimes / Arrests	Citywide	Northeast	Rampart	North Hollywood	Hollywood	Olympic	Wilshire
PART I /b/							
Homicide	294	10	22	12	7	8	5
Rape	1,781	69	106	74	130	62	72
Robbery	10,253	306	637	289	552	610	347
Aggravated Assault	15,746	567	801	547	579	672	427
Violent Crime Total	***28,084***	***952***	***1,566***	***922***	***1,268***	***1,352***	***851***
Burglary	15,493	781	416	866	573	645	878
Motor Vehicle Theft	18,678	1,074	640	958	643	752	573
Burglary Theft from Vehicle	31,066	1,818	1,211	2,224	1,549	1,714	1,254
Personal/Other Theft	32,109	1,420	1,098	1,777	1,797	1,319	1,620
Property Crime Total	***97,346***	***5,093***	***3,365***	***5,825***	***4,562***	***4,430***	***4,325***
Part I Crime Total	**125,430**	**6,045**	**4,931**	**6,747**	**5,830**	**5,782**	**5,176**
ARRESTS							
Homicide	342	10	11	11	7	12	3
Rape	360	7	29	11	23	8	14
Robbery	2,836	75	175	66	152	127	108
Aggravated Assault	10,064	345	556	405	495	497	307
Burglary	2,270	108	84	101	110	127	61
Larceny	7,183	327	216	467	311	138	346
Motor Vehicle Theft	3,319	156	145	159	156	138	73
Violent Arrest Total	**13,602**	**437**	**771**	**493**	**677**	**644**	**432**
Part I Crime Arrest Total	**26,374**	**1,028**	**1,216**	**1,220**	**1,254**	**1,047**	**912**
All Arrest Total	**119,955**	**3,836**	**5,465**	**5,219**	**9,994**	**4,414**	**2,723**

/a/ Year 2016 crime statistics are the most up to date provided by the LAPD and are subject to change yearly.
/b/ Part I crimes are eight "serious offenses" for which the FBI gathers national data and includes homicide, rape, robbery, aggravated assault, burglary, motor vehicle theft, burglary theft from vehicle, and personal/other theft.
SOURCE: LAPD, *Compstat Citywide Profile*, *Community Area Profile*, www.lapd.org; TAHA, 2017.

To plan for personnel needs at individual stations, the LAPD uses "Patrol Plan," a field deployment software which takes into account 25 separate factors, including crime data, population density, and traffic speeds, to respond to the need of increased demand associated with new development and/or population growth. The LAPD considers increases in staffing at stations in order to maintain a maximum response time of seven minutes.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the CEQA Guidelines, the Proposed Plan would have a significant impact related to police protection services if it would:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered police protection service facilities, the construction of which could cause significant environmental impacts for police protection in order to maintain acceptable service ratios, response times or other performance objectives.

METHODOLOGY

An impact in this section would occur if the Proposed Plan promotes growth patterns resulting in the need for and/or the provision of new or physically altered police facilities, the construction of which would cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives. The need for or deficiency in adequate police services in and of itself is not a CEQA impact, but a social or economic impact (*City of Hayward v. B'd of Trustees* (2015) 242 Cal.App. 4th 833, 843). To the extent that the Proposed Plan causes a need for additional police services and that results in the construction of new facilities or additions to existing facilities and the impact from that construction results in a potential impact to the environment that is a CEQA impact that needs to be assessed in this EIR. Any discussion in this EIR of social or economic impacts that relates solely to the level of police protection services provided to the residents or users of the Project area and its surrounding community, including any existing or future needs and deficiencies, is not determinant on its own of CEQA impacts, absent those social or economic impacts resulting in physical impacts. The ultimate determination of whether there is a significant impact related to police protection services is based on whether a significant impact will result from the construction of new or expanded police facilities.

Police protection service needs are dependent on the size of the service population and the geographic area served, the number and types of calls for service, and the characteristics of a project and its surrounding community. According to LAPD, impacts on police protection services are considered significant if the demand for services exceeds the capacity of existing facilities, or if a station area is located outside of specified distances from a project area.

The following factors from the City's 2006 Threshold Guide, are useful to consider in determining whether there is an increase demand for police services:

- The population increase resulting from the Proposed Project, based on the net increase of residential units or square footage of non-residential floor area;
- The demand for police services anticipated at the time of project build-out compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and
- Whether the project includes security and/or design features that would reduce the demand for police services.

To the extent that the Proposed Plan results in the need for new police services that will cause the need for new or altered police facilities, the analysis below will evaluate the potential need for new facilities and associated potential impacts from the construction of new police protection facilities or the expansion of existing police protection facilities if they could be required. Police protection impacts are also evaluated for the Proposed Plan within the context of applicable local policies and codes described in the Regulatory Framework.

IMPACTS

IMPACT 4.14-2 Would implementation of the Proposed Plan result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities, need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, and other performance objectives? **Less than significant impact.**

Construction

The Proposed Plan would allow for increased development potential but would not constitute a commitment to any project-specific construction. Construction related to future development within the Project Area, particularly within the change areas, could result in the effects described below. Construction activities would have the potential to temporarily increase the demand on police services. Construction sites can pose an attractive nuisance with respect to vandalism and theft. Road and lane closures due to construction activities related to individual development projects could affect response times of police vehicles. Traffic delays caused by potential closures could impede the ability of police vehicles to efficiently move along roadways to their destination. Additionally, temporary road closures may also result in detours that impact response time. Any development project that will cause temporary road closures is required to submit a plan to LADOT for approval to ensure any impacts are minimized and, if necessary, proper signage and flagmen provided to avoid impacts. Additionally, large projects are required to develop a construction staging and traffic management plan, as necessary, to ensure emergency access is maintained.

Operation

The Proposed Plan would include General Plan Amendments and zone changes that would increase the development potential in the Project Area, as well as expand pedestrian-oriented design standards, promote transit ridership, and encourage a variety of mobility options. The Proposed Plan is expected to result in increases in population, housing, and employment in the Project Area. The population is expected to be approximately 243,000 to 264,000 residents by year 2040, which would be a population increase of approximately 37,000 to 58,000 residents compared to the estimated 2016 population. Although there is no direct proportional relationship between increases in land use activity and increases in demand for police protection services, the number of calls for police response to home and retail burglaries, vehicle burglaries, damage to vehicles, traffic-related incidents, and crimes against persons would be anticipated to increase with the increase in people, commercial and retail land uses, and dwelling units in the Project Area. Such calls are typical of problems experienced in existing developed areas of the City and do not represent unique law enforcement issues that would be created specifically by implementation of the Proposed Plan.

An increase in the number of residents and employees, and amount of developed area within the Project Area would create increased demand for LAPD services. To ensure that necessary police services, facilities, and equipment are provided for the public safety needs of all neighborhoods, demand for existing and projected police services and facilities is monitored and forecasted by LAPD in order to maintain standards. LAPD aims to expedite response in addressing crime in a given area as changes occur; they are able to rapidly staff up in stations as needed to maintain police protection levels. Accordingly, as development occurs over the lifetime of the Proposed Plan, police protection service levels would continue to be evaluated and maintained by LAPD in accordance with existing policies, procedures and practice. All development within the Project Area is subject to LAMC regulations and standards and would be required to be designed in accordance with City standards, which include provisions that address emergency access (e.g., minimum street widths, minimum turning radii, maximum lengths of cul-de-sacs, etc.). Additionally, LAPD would review development project applications to determine the types of design features that the

development project would need to incorporate to deter crime. These design features would be consistent with the techniques of CPTED.

As discussed in Section 4.15, Transportation and Traffic, of this Draft EIR, implementation of the Proposed Plan would result in land use intensification and an organized and coordinated development pattern that would increase accessibility of destinations while minimizing the related growth in vehicle trips and VMT per capita. While implementation of the Proposed Plan could impact segment-level LOS, there is not a direct relationship between predicted travel delay and emergency response times as California State law requires that drivers yield the right-of-way to emergency vehicles and remain stopped until the emergency vehicles have passed. Designated emergency and disaster routes within the Project Area would be maintained. Generally, multi-lane arterial roadways allow emergency vehicles to travel at higher speeds and permit other traffic to maneuver out of the path of the emergency vehicle. On congested roadways, multi-lane arterial roadways with continuous center left-turn lanes facilitate emergency access when the thru lanes experience delays. Additionally, DOT can re-signal timing remotely for police operations during planned events, such as special events.

As development occurs, LAPD would maintain acceptable service levels through the provision of additional personnel and equipment as needed, in conformance with their existing policies, procedures and practices. Nevertheless, it is anticipated that the increase in people and dwelling units in the Project Area would increase the demand for police protection services. While implementation of the Proposed Plan may require increased police protection services over the course of the planning period, existing operational structures, policies, and regulations will help ensure that LAPD can adequately plan for and serve the new growth.

As demand for LAPD services increases, LAPD will act to maintain adequate service levels. The potential for new police station construction is speculative at the present time and is, therefore, not analyzed in this document. It is possible that over the 20-year plan horizon, the reasonably expected development from the Proposed Plan could result in the need for and construction of new or expanded police stations or facilities. No new police stations or facilities are planned or proposed in the Proposed Plan. It is assumed that if new or expanded police facilities are determined to be necessary at some point in the future, such facilities would occur where allowed under the designated land use. The environmental impacts of the construction and operation of new facilities, as an allowed land use, have been evaluated throughout this EIR. Specifically, the EIR analyzes anticipated effects of citywide growth related to air quality, noise, traffic, utilities, and other environmental impact areas. Depending on the location of new police stations, if they are determined to be needed, impacts (primarily noise) could occur, however such impacts are too speculative to assess without information as to design, location and proximity to sensitive receptors. Should new facilities be needed, such facilities are anticipated to be located on parcels that are infill on lots. Based on the urban location and size, the construction of new police facilities or expansion of an existing facility would most likely result in a less-than-significant impact and or possibly qualify for an infill exemption. To the extent that any significant impacts could result from the unique characteristics of a specific project site, those impacts would be speculative at this time.

Impacts to police services are addressed through standard city policies, procedures, and practices. Therefore, impacts related to police protection services, would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

CUMULATIVE

The Proposed Plan along with cumulative development from other plans (such as surrounding community plans, the Los Angeles County General Plan and the 2016-2040 RTP/SCS) could create a significant impact on police services and facilities if the need for additional services and facilities extended beyond existing levels of service. The geographic context for this analysis is the City as served by the LAPD. Future needs for police protection are reviewed regularly, including during the budgeting process. As described above, development projects within the City, including the Project Area, would be subject to review upon project submittal of the development application and may be required to provide security features, such as security cameras, private security services, and/or on-site police drop-in facilities that reduce the demand for police service. Future development would also be required to incorporate design elements relative to security, and semi-public and private spaces such as CPTED. These features may include, but not be limited to, access control to buildings, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, and location of toilet facilities or building entrances in high-foot traffic areas.

Implementation of the Proposed Plan would create increased development opportunities, particularly within Active Change Areas, increasing the overall housing, population, and employment levels of the Project Area, which likely would increase demand for LAPD services. However, as previously discussed, the provision of police protection services in the City is based on the community's existing and projected needs, as determined by LAPD. When an evaluation indicates response times have increased, the acquisition of equipment, personnel, and/or new stations would be considered and procured as needed through the LAPD. As demand for LAPD services increases, LAPD will act to maintain adequate service levels. The potential for new police station construction is speculative at the present time and is, therefore, not analyzed in this document. Depending on the location of new police stations, if they are determined to be needed, impacts (primarily noise) could occur; however, such impacts are too speculative to assess without information as to design, location and proximity to sensitive receptors. Any cumulative impacts related to construction of police facilities would not be expected to be different from other cumulative impacts from development identified in this EIR.

PUBLIC SCHOOLS

This analysis below presents an evaluation of the environmental impacts on public schools under the jurisdiction of the Los Angeles Unified School District (LAUSD) that could result from the implementation of the Proposed Plan. This analysis does not consider impacts on private schools.

REGULATORY FRAMEWORK

State and local laws, regulations, plans, and guidelines that are potentially applicable to the Proposed Plan are summarized below.

STATE

California Government Code Section 65995. California Government Code Section 65995 found in Title 7, Chapter 4.9 of the California Government Code authorizes school districts to collect impact fees from developers of new residential and commercial/industrial building space. Leroy F. Greene School Facilities Act of 1998 (Senate Bill 50 [SB 50]) amended Government Code Section 65995 in 1998, which

allows schools to collect fees to offset costs associated with increasing school capacity as a result of development. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA or other State or local laws. The LAUSD determines the fees in accordance with California Government Code Section 65995, annually, and publishes them in their school fee justification study.

California Education Code. School facilities and services are subject to the rules and regulations of the California Education Code and governance of the State Board of Education (SBE). The SBE is the 11-member governing and policymaking body of the California Department of Education (CDE) that sets kindergarten through 12th Grade education policy in the areas of standards, instructional materials, assessment, and accountability.

California Department of Education (CDE). The CDE is the government agency responsible for public education throughout the state. With the State Superintendent of Public Instruction, the CDE is responsible for enforcing education law and regulations and for continuing to reform and improve public elementary school, secondary school, childcare programs, adult education, and preschool programs. The department oversees funding, and student testing and achievement levels for all state schools. A sector of the CDE, the SBE is the governing and policy making sector responsible for education policies regarding standards, instructional materials, assessment, and accountability. The CDE's mission is to provide leadership, assistance, oversight, and resources so that every Californian has access to an education that meets world-class standards. The core purpose of the CDE is to lead and support the continuous improvement of student achievement, with a specific focus on closing achievement gaps.

Assembly Bill 149 and 2071 – Open Enrollment Policy. The open enrollment policy is a state-mandated policy that enables students located in the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated "open enrollment" seats. Open enrollment seats are granted through an application process that is completed before the school year begins. Under the Open Enrollment Policy, students living in a particular school's attendance area are not displaced by a student requesting an open enrollment transfer to that school.

Class Size Reduction Kindergarten-University Public Education Facilities Bond Act of 1998. Proposition 1A, the Class Size Reduction Kindergarten-University Public Education Facilities Bond Act of 1998 (Education Code §100400–100405) is a school construction funding measure that was approved by the voters on the November 3, 1998 ballot. This Act created the School Facility Program where eligible school districts may obtain state bond funds.

LOCAL

Los Angeles Unified School District (LAUSD). Although the California public school system is under the policy direction of the Legislature, the CDE relies on local control for the management of school districts. In allocating resources among the schools of the district, school district governing boards and district administrators must not only follow the law but also set the educational priorities for their schools.

LAUSD 2016-2019 Strategic Plan. The LAUSD 2016-2019 Strategic Plan outlines LAUSD's fundamental strategy, objectives and key initiatives. The plan is intended to cultivate common understanding and coherence, and to empower all stakeholders to take action toward creating a district of graduates. The Strategic Plan also provides the prioritized framework from which LAUSD will work.[17]

[17]LAUSD, *2016-2019 Strategic Plan: "A District on the Move"- Destination Graduation*, 2016.

LAUSD Choices Program. LAUSD provides education choices including magnet and permits with transportation (PWT) programs to students residing within the LAUSD boundaries. Students interested in enrolling in LAUSD magnet and PWT programs are required to apply through LAUSD eChoices. Magnet schools under the Choice Program include business, communication arts, center for enriched studies, gifted/highly gifted/high ability, liberal arts, magnet schools assistance program, public service, science/technology/engineering/math, and visual and performing arts.[18]

City of Los Angeles General Plan and Framework Element. Chapter 9 Infrastructure and Public Services of the Framework Element includes goals, objectives, and policies applicable to public schools (**Table 4.14-9**).

TABLE 4.14-9: RELEVANT GENERAL PLAN SCHOOL GOALS, OBJECTIVES, AND POLICIES

Goal/Objective/Policy	Goal/Objective/Policy Description
FRAMEWORK ELEMENT – CHAPTER 9 INFRASTRUCTURE AND PUBLIC SERVICES	
Goal 9N	Public schools that provide a quality education for all of the City's children, including those with special needs, and adequate school facilities to serve every neighborhood in the City so that students have an opportunity to attend school in their neighborhoods.
Objective 9.31	Work constructively with the Los Angeles Unified School District to monitor and forecast school service demand based upon actual and predicted growth.
Policy 9.31.1	Participate in the development of, and share demographic information about, population estimates.
Objective 9.32	Work constructively with Los Angeles Unified School District to promote the siting and construction of adequate school facilities phased with growth.
Policy 9.32.1	Work with the Los Angeles Unified School District to ensure that school facilities and programs are expanded commensurate with the City's population growth and development.
Policy 9.32.2	Explore creative alternatives for providing new school sites in the City, where appropriate.
Policy 9.32.3	Work with LAUSD to explore incentives and funding mechanisms to provide school facilities in areas where there is a deficiency in classroom seats.
Objective 9.33	Maximize the use of local schools for community use and local open space and parks for school use.
Policy 9.33.1	Encourage a program of decision-making at the local school level to provide access to school facilities by neighborhood organizations.
Policy 9.33.2	Develop a strategy to site community facilities (libraries, parks, schools, and auditoriums) together.

SOURCE: City of Los Angeles, The Citywide General Plan Framework, An Element of the City of Los Angeles General Plan, re-adopted 2001.

EXISTING SETTING

The LAUSD is the nation's second-largest school district and provides public kindergarten through 12th grade education to students living in the City in addition to all or portions of 26 incorporated cities and unincorporated areas of Los Angeles County. In total, LAUSD provides education services to an area of 710 square miles with a total of 1,302 educational schools and centers, including 451 elementary schools, 83 middle schools, 96 senior high schools, and 277 independent and affiliated charter schools.[19,20] Further, through LAUSD's eChoice program, there are 198 Magnet Programs located throughout LAUSD.

[18]LAUD, *e-Choices LAUSD Choices Program,* http://echoices.lausd.net//GeneralInformation.aspx, accessed September 15, 2016.
[19]LAUSD, *Fingertip Facts 2016-2017*, updated August 2016.
[20]LAUSD, *Charter Schools Division,* https://achieve.lausd.net/Page/1816, accessed November 12, 2017.

LAUSD is divided into six local districts: Central, East, Northeast, Northwest, South, and West. The Project Area is located in the West and Central District.

The West District consists of 146 education centers, including 88 elementary schools, 18 middle schools, 18 high schools, and 6 span schools, 8 early education centers 8 continuation schools, and special education schools.[21,22] The Central District consists of 164 education centers, including 92 elementary schools, 16 middle schools. 27 high schools, 8 span schools and 21 early education centers.[23] A total of 38 LAUSD public schools would serve the Project Area, including 2 primary/early education centers, 22 elementary schools, 5 middle schools, 5 high schools, and 4 charter schools.[24] **Figure 4.14-3** shows the distribution of the LAUSD schools that would serve the Project Area.

For the purposes of analysis, the Proposed Plan anticipates that all the students residing in the Project Area would attend public schools within the Project Area. However, LAUSD students would have the option of attending public schools outside the Project Area through the eChoices program or the option of private schooling.

Based on March 2016 figures, approximately 664,774 students are enrolled in Kindergarten-12th grades in the LAUSD with an additional 69,867 students enrolled in adult education schools, totaling approximately 734,641 students enrolled through LAUSD.[25] **Table 4.14-10** details the LAUSD and Charter schools serving the residents living in the Project Area. **Table 4.14-11** shows the operating capacity and current enrollment of the LAUSD schools serving the Project Area. As shown in **Table 4.14-11**, all the schools currently operate within capacity with the exception of Hollywood Primary Center, Lexington Avenue Primary Center, Alexandria Avenue Elementary, Grant Elementary, Le Conte Middle School, and Virgil Middle School. **Table 4.14-12** presents the projected future enrollment and capacity of the LAUSD schools serving the Project Area for the school year 2020-2021. As shown therein, 12 schools would be operating above capacity.

Charter schools are publicly funded elementary or secondary schools that are usually created or organized by a group of teachers, parents and community leaders, or a community-based organization. These schools are usually sponsored by an existing local public school board or county board of education, and are generally exempt from most laws governing school districts, except where specifically noted in the law. In exchange for this exempt status, charter schools are accountable for producing certain results, which are specifically set forth in a detailed agreement (or "charter") between the sponsoring board and the charter organizers. Charter schools are opened and attended by choice, and, while they provide an alternative to other public schools, they are part of the public education system and may not charge tuition.

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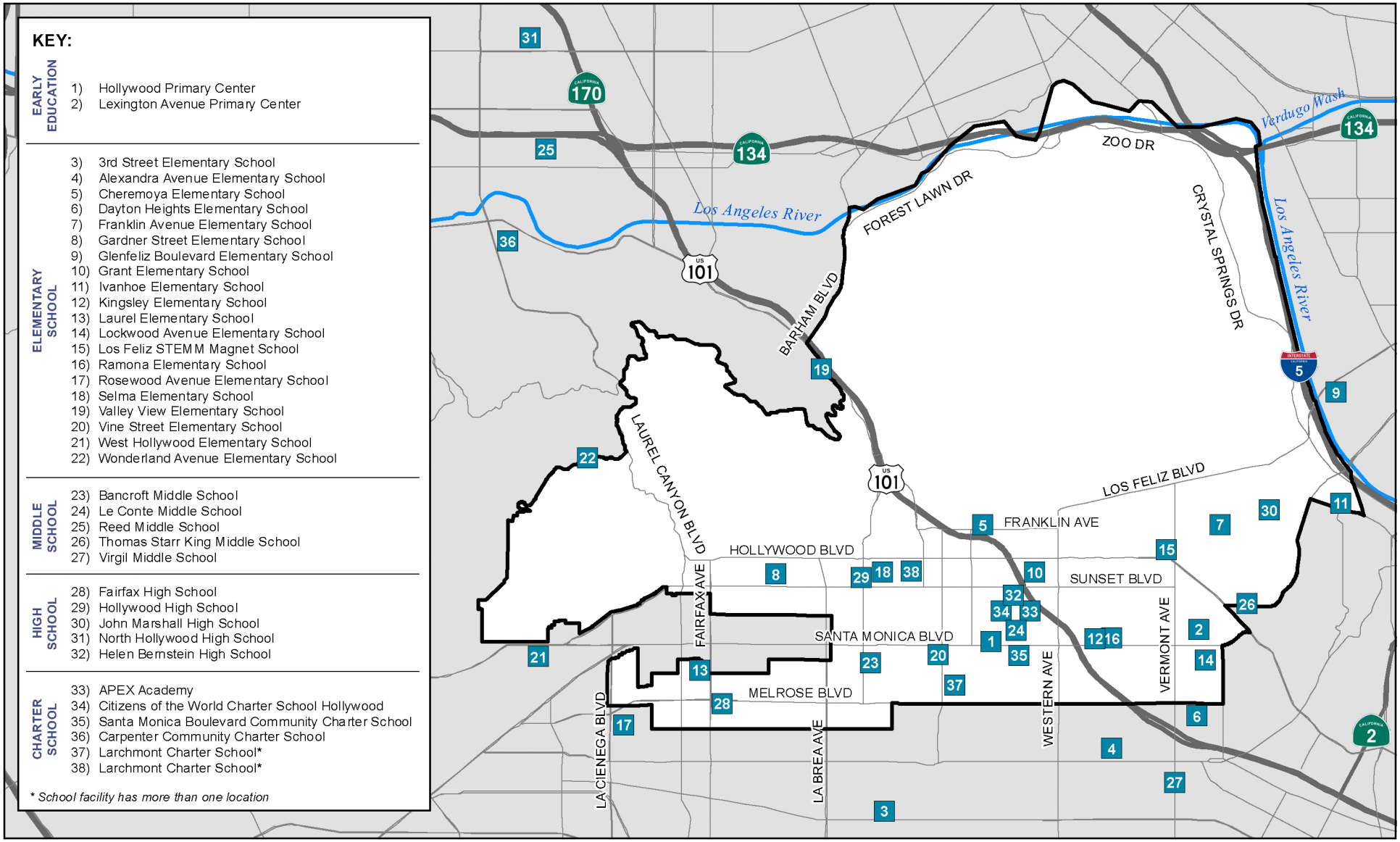
[21]Span schools are defined as schools that span multiple levels (i.e., elementary through middle school, middle through high school, or elementary through high school).

[22]LAUSD, *Local District-West, School Director Network 2016-2017*, http://achieve.lausd.net/cms/lib08/CA01000043/Centricity/Domain/173/LD%20West%202016-17%20Directors%20Network%20%209-16-16.pdf, accessed October 4, 2016.

[23]LAUSD, *Local District Central, Director Assignments, 2016-2017*, http://achieve.lausd.net/Page/2456, accessed October 4, 2016.

[24]LAUSD, Facilities Services Division, *Request for Information for the Hollywood Community Plan Update*, Rena Perez, Director, January 27,2017.

[25]LAUSD, *Fingertip Facts 2016-2017,* updated August 2016.



SOURCE: City of Los Angeles, 2017; TAHA, 2017.

taha environmental planners
taha 2010-073

Hollywood Community Plan Update
Draft Environmental Impact Report
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FIGURE 4.14-3

LAUSD SCHOOLS SERVING THE PROJECT AREA

TABLE 4-14.10: LAUSD SCHOOLS SERVING THE PROJECT AREA /a/

School Name	Address	Grade Served	School Calendar
PRIMARY SCHOOL / EARLY EDUCATION CENTER			
Hollywood Primary Center	1115 Tamarind Ave.	K – 3	Single-Track
Lexington Avenue Primary Center	4564 W. Lexington Ave.	K – 2	Single-Track
ELEMENTARY SCHOOLS			
3rd Street Elementary School	201 S. June St.	K – 5	Single-Track
Alexandria Avenue Elementary School	4211 Oakwood Ave	K – 6	Single-Track
Cheremoya Elementary School	6017 Franklin Ave.	K – 6	Single-Track
Dayton Heights Elementary School	607 N. Westmoreland Ave	K – 5	Single-Track
Franklin Avenue Elementary School	1910 N. Commonwealth Ave.	K – 6	Single-Track
Gardner Street Elementary School	7450 Hawthorn Ave.	K – 5	Single-Track
Glenfeliz Boulevard Elementary School	3955 Glenfeliz Blvd	K – 5	Single-Track
Grant Elementary School	1530 N. Wilton Pl.	K – 6	Single-Track
Ivanhoe Elementary School	2828 Herkimer St.	K – 5	Single-Track
Kingsley Elementary School	5200 W. Virginia Ave.	K – 5	Single-Track
Laurel Elementary School	925 N. Hayworth Ave.	K – 8	Single-Track
Lockwood Avenue Elementary School	4345 Lockwood Ave.	K – 5	Single-Track
Los Feliz STEMM Magnet School	1740 N. New Hampshire Ave.	K – 6	Single-Track
Ramona Elementary School	1133 N. Mariposa Ave.	K – 6	Single-Track
Rosewood Avenue Elementary School	503 N. Croft Ave	K – 5	Single-Track
Selma Elementary School	6611 Selma Ave.	K – 5	Single-Track
Valley View Elementary School	6921 Woodrow Wilson Dr.	K – 6	Single-Track
Vine Street Elementary School	955 N. Vine St.	K – 6	Single-Track
West Hollywood Elementary School	970 Hammond St.	TK – 6	Single-Track
Wonderland Avenue Elementary School (Gifted Magnet)	8510 Wonderland Ave.	K – 5	Single-Track
MIDDLE SCHOOLS			
Bancroft Middle School (PA Magnet, STEAM Magnet)	929 N. Las Palmas Ave.	6 – 8	Single-Track
Thomas Star King Middle School (Film/Media Magnet)	4201 Fountain Ave.	6 – 8	Single-Track
Le Conte Middle School	1316 N. Bronson Ave.	6 – 8	Single-Track
Reed Middle School	4525 Irvine Ave.	6 – 8	Single-Track
Virgil Middle School	152 N. Vermont Ave.	6 – 8	Single-Track
HIGH SCHOOLS			
Fairfax High School	7850 Melrose Ave.	9 – 12	Single-Track
Hollywood High School	1521 N. Highland Ave.	9 – 12	Single-Track
John Marshall High School	3939 Tracy St.	9 – 12	Single-Track
North Hollywood High School	5231 Colfax Ave.	9 – 12	Single-Track
Helen Bernstein High School (STEAM Academy) /b/	1309 N. Wilton Pl.	9 – 12	Single-Track
CHARTER SCHOOLS			
APEX Academy	1309 N. Wilton Pl.	7 – 12	Single-Track
Carpenter Community Charter	3909 Carpenter Ave.	K – 5	Single-Track
Citizens of the World Charter School Hollywood	1316 N. Bronson Ave	K – 5	Single-Track
Larchmont Charter School /c/	815 N. El Centro Ave.	TK – 4	Single-Track
Larchmont Charter School /c/	6611 Selma Ave.	5 – 6	Single-Track
Santa Monica Boulevard Community Charter	1022 N. Van Ness Ave.	K – 6	Single-Track

/a/ LAUSD schools located within the Project Area and in the surrounding area that would serve the Project Area based on LAUSD school district boundaries.
/b/ Part of a "School Choice Area".
/c/ Larchmont Charter School has more than one location.
SOURCE: LAUSD, Facilities Division, http://notebook.lausd.net/pls/ptl/ptl_apps.schoolguide.render, 2016; LAUSD, Facilities Services Division, *Request for Information for the Hollywood Community Plan Update*, Rena Perez, Director, January 27, 2017; TAHA 2017.

TABLE 4-14.11: ENROLLMENT AND CAPACITY OF LAUSD SCHOOLS SERVING THE PROJECT AREA (SCHOOL YEAR 2015-2016)

School Name	Current Capacity /a/	Resident Enrollment /b/	Actual Enrollment /c/	Current Seating Overage / (Shortage) /d/	Overcrowded? /e/
PRIMARY SCHOOL / EARLY EDUCATION CENTER					
Hollywood Primary Center	168	169	142	(1)	**Yes**
Lexington Avenue Primary Center	216	217	181	(1)	**Yes**
ELEMENTARY SCHOOLS					
3rd Street Elementary School	743	533	690	210	No
Alexandria Avenue Elementary School	780	813	747	(33)	**Yes**
Carpenter Community Charter	941	866	946	75	No
Cheremoya Elementary School	384	216	345	168	No
Dayton Heights Elementary School	567	419	540	148	No
Franklin Avenue Elementary School	540	487	509	53	No
Gardner Street Elementary School	513	457	440	56	No
Glenfeliz Boulevard Elementary School	468	313	312	155	No
Grant Elementary School	548	590	540	(42)	**Yes**
Ivanhoe Elementary School	465	410	458	55	No
Kingsley Elementary School	527	390	475	137	No
Laurel Elementary School	393	218	312	175	No
Lockwood Avenue Elementary School	565	498	443	67	No
Los Feliz STEMM Magnet School	529	82	469	447	No
Ramona Elementary School	776	686	616	90	No
Rosewood Avenue Elementary School	380	98	315	282	No
Santa Monica Boulevard Community Charter /f/	—	—	931	—	No
Selma Elementary School	198	153	156	45	No
Valley View Elementary School	290	99	235	191	No
Vine Street Elementary School	607	416	511	191	No
West Hollywood Elementary School	432	200	390	232	No
Wonderland Avenue Elementary School	583	501	547	82	No
MIDDLE SCHOOLS					
Bancroft Middle School	1,222	729	724	493	No
Thomas Star King Middle School	2,096	1,490	1,938	606	No
Le Conte Middle School	514	761	681	(247)	**Yes**
Reed Middle School	1,411	1,378	1,628	33	No
Virgil Middle School	1,309	1,325	705	(16)	**Yes**
HIGH SCHOOLS					
Fairfax High School	2,455	1,807	2,051	648	No
Hollywood High School	1,432	1,029	1,460	403	No
John Marshall High School	2,077	1,990	2,342	87	No
North Hollywood High School	2,713	2,651	2,681	62	No
Helen Bernstein High School /g/	1,357	1,230	1,157	127	No
APEX Academy /f/	—	—	—	—	—
Citizens of the World Charter School Hollywood /f/	—	—	—	—	—
Larchmont Charter School /f/	—	—	—	—	—

"—" indicates information is not available.
/a/ Schools' current operating capacity or the maximum number of students the school can serve while operating on its current calendar. Excludes capacity used by charter co-locations and includes capacity for magnet programs.
/b/ Total number of students living in the schools' attendance area who are eligible to attend the school; also includes magnet students.
/c/ Number of students actually attending the school currently, including magnet students.
/d/ Seating overage or (shortage) based on the difference between the capacity and resident enrollment.
/e/ The schools are considered to be overcrowded or without available capacity if the school operates on a multi-track calendar, there is a seating shortage, or there is a seating overage of less than or equal to a "safety margin" of 30 seats.
/f/ Independent Charter: Capacity and/or enrollment information may not be reported for some independent charters
/g/ Bernstein High School Zone of Choice includes Bernstein High School and Bernstein High School STEM. The individual school and calculated total capacities and reenrollments for school choice areas reports to show current and projected seating overage/shortage and overcrowding.
SOURCE: LAUSD, Facilities Services Division, *Request for Information for the Hollywood Community Plan Update*, Rena Perez, Director, January 27,2017; TAHA 2017.

TABLE 4-14.12: PROJECT FUTURE ENROLLMENT AND CAPACITY OF LAUSD SCHOOLS SERVING THE PROJECT AREA (SCHOOL YEAR 2020-2021)

School Name	Projected Capacity /a/	Projected Enrollment /b/	Projected Seating Overage (Shortage) /c/	Overcrowded in Projected Future? /d/
PRIMARY SCHOOL / EARLY EDUCATION CENTER				
Hollywood Primary Center	168	154	14	No
Lexington Avenue Primary Center	216	226	(10)	**Yes**
ELEMENTARY SCHOOLS				
3rd Street Elementary School	669	568	101	No
Carpenter Community Charter	847	991	(144)	**Yes**
Cheremoya Elementary School	346	302	44	No
Alexandria Avenue Elementary School	702	735	(33)	**Yes**
Dayton Heights Elementary School	510	364	146	No
Franklin Avenue Elementary School	486	610	(214)	**Yes**
Gardner Street Elementary School	462	527	(65)	**Yes**
Glenfeliz Boulevard Elementary School	421	231	190	No
Grant Elementary School	493	535	(42)	**Yes**
Ivanhoe Elementary School	419	419	0	**Yes**
Kingsley Elementary School	474	327	147	No
Laurel Elementary School	365	202	163	No
Lockwood Avenue Elementary School	509	400	109	No
Los Feliz STEMM Magnet School	476	25	451	No
Ramona Elementary School	698	578	120	No
Rosewood Avenue Elementary School	342	109	233	No
Santa Monica Boulevard Community Charter /e/	—	—	—	—
Selma Elementary School	178	130	48	No
Valley View Elementary School	261	138	123	No
Vine Street Elementary School	546	358	188	No
West Hollywood Elementary School	389	244	145	No
Wonderland Avenue Elementary School	525	535	(10)	**Yes**
MIDDLE SCHOOLS				
Bancroft Middle School	1,136	737	399	No
Thomas Star King Middle School	1,886	1,445	441	No
Le Conte Middle School	478	320	158	No
Reed Middle School	1,312	1,416	(104)	**Yes**
Virgil Middle School	1,217	1,343	(126)	**Yes**
HIGH SCHOOLS				
Fairfax High School	2,308	1,717	591	No
Hollywood High School	1,346	905	441	No
John Marshall High School	1,952	2,038	(86)	**Yes**
North Hollywood High School	2,550	2,865	(315)	**Yes**
Helen Bernstein High School /f/	1,275	1,187	88	No
APEX Academy /e/	—	—	—	—
Citizens of the World Charter School Hollywood /e/	—	—	—	—
Larchmont Charter School /e/	—	—	—	—

"—" indicates information is not available.
/a /School planning capacity based on baseline calculation of the number of eligible classrooms after implementing LAUSD operational goals and shifting to a 1-Track Calendar. Includes capacity for magnet programs.
/b/ Project 5-year total number of students living in the school's attendance area and who are eligible to attend the school; includes magnet students
/c/ Projected seating overage or (shortage) based on the difference between the capacity and resident enrollment.
/d/ The schools is considered to be overcrowded or without available capacity if the school operates on a multi-track calendar, there is a seating shortage, or there is a seating overage of less than or equal to a "safety margin" of 30 seats.
/e/ Independent Charter: Capacity and/or enrollment information may not be reported for some independent charters
/f/ Bernstein High School Zone of Choice includes Bernstein High School and Bernstein High School STEM. The individual school and calculated total capacities and reenrollments for school choice areas are reports to show current and projected seating overage/shortage and overcrowding.
SOURCE: LAUSD, Facilities Services Division, *Request for Information for the Hollywood Community Plan Update*, Rena Perez, Director, January 27,2017; TAHA 2017.

Where enrollment in a charter school is oversubscribed, admission is frequently allocated by lottery.[26] Currently, there are 277 charter schools consisting of 52 Affiliated and 224 Independent Charter schools under the jurisdiction of LAUSD, serving more than 138,000 students from kindergarten-12 grades.[27] As shown in **Table 4.14-10**, four charter schools are located within and/or would serve the Project Area.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the CEQA Guidelines, the Proposed Project would have a significant impact related to public schools if it would:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered public school facilities, need for new or physically altered public school facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable capacities or other performance objectives for public schools.

METHODOLOGY

In *Goleta Union Sch. Dist. v Regents of Univ. of Cal.* (1995) 37 CA 4th 1025, the court held that school overcrowding is a social impact and does not require analysis in an EIR and mitigation, unless the overcrowding is linked to physical environmental effects (such as new school construction).

The legal practice guide, "CEB, Practice under the California Environmental Quality Act" provides the following discussion on impacts to schools:

> State and local agencies may not deny either legislative or adjudicative approvals on the basis of a refusal to pay fees in excess of those limits (Government Code Section 65995).
>
> The statutes also significantly limit the application of CEQA to school facilities impact issues. The fees set forth in Government Code Section 65996 constitute the exclusive means of both "considering" and "mitigating" school facilities impacts of projects (Government Code Section 5996(a)).

Because the statute states that the statutory fees are the exclusive means of considering, as well as mitigating, school impacts, it limits not only the mitigation that may be required but also the scope of impact review in the EIR and the findings for school impacts. In *Chawanakee Unified Sch. Dist. v County of Madera* (2011) 196 CA 4th 1016, the court held that because the methods in the statute are the exclusive means of "considering" impacts on schools, an EIR need not describe and analyze a development's impacts on schools (citing this text). Consistent with this view,

- Once the statutory fee is imposed, the impact should be determined to be mitigated because of the provision that the statutory fees constitute full and complete mitigation (Government Code Section 65995(b)); and

[26]California Department of Education, *Charter School General Information*, http://www.cde.ca.gov/sp/cs/re/csabout.asp, accessed September 15, 2016.

[27]LAUSD, Charter Schools Division, *School Directories, Charter Schools Directory 2016-17*, http://achieve.lausd.net/Page/1827, accessed October 4, 2016.

- It should not be necessary to adopt a statement of overriding considerations for school facilities impacts when the statutory fee is assessed, because the impact is deemed as a matter of law to be adequately mitigated (Government Code Section 65995(b)).

The *Chawanakee* court also ruled that the reach of the statute is limited to impacts "on" schools and does not extend to impacts on the non-school physical environment, even though they may be "related" to schools in some way. The implications of this ruling are uncertain, however, because the court did not consider the effect of Government Code Section 65995(b), which states that the statute provides full school facilities mitigation notwithstanding CEQA, or of Government Code Section 65995(c), which defines a school facility as "any school-related consideration relating to a school district's ability to accommodate enrollment."

Based on the above and the uncertainty created by the *Chawanakee* decision related to impacts to non-school property from the construction of school facilities, for purposes of this EIR and conservative analysis, an impact related to schools would occur if the Proposed Plan promotes growth patterns resulting in the need for and/or the provision of new or physically altered public school facilities (including charter schools), the construction of which would cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives. To the extent that the Proposed Plan causes impacts to classroom sizes or school service impacts that results in the construction of new facilities or alterations to existing facilities, and the impact from that construction results in a potential impact to the environment, that is a CEQA impact that needs to be assessed in this EIR. Any discussion in this EIR of social or economic impacts that relates solely to the level of school services provided to the residents or users of the Project area and its surrounding community, including any existing or future needs and deficiencies, is not determinant on its own of CEQA impacts, absent those social or economic impacts resulting in physical impacts. The ultimate determination of whether there is a significant impact related to schools is based on whether a significant impact will result from the construction of new or expanded school facilities to non-school property.

The discussion of impacts to public school addresses impacts for the entire Project Area. Public school service needs are dependent on the size of the service population and the geographic area served. This analysis estimates the number of students that would be generated by reasonably expected development with the Proposed Plan using LAUSD student generation rates and assesses whether existing and planned LAUSD school facilities expected to serve the Project Area would have sufficient available capacity to accommodate the students.[28] If there would not be sufficient available capacity, the EIR will consider whether new school facilities will be needed and if foreseeable, whether the construction of the school facilities will result in a significant impact.

[28]LAUSD, *Student Generation Rate Calculation*, February 2008; LAUSD, *Commercial/Industrial Development School Fee Justification Study*, February 2008.

IMPACTS

IMPACT 4.14-3 Would implementation of the Proposed Plan result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for public schools? **Less than significant impact.**

The reasonably expected development under the Proposed Plan is approximately 243,000 to 264,000 residents and approximately 121,000 to 132,000 housing units by year 2040. This would represent a population increase of approximately 37,000 to 58,000 residents compared to the estimated 2016 population. The Proposed Plan does not contain any specific policies that address public schools and does not constitute a commitment to any project-specific construction.

As shown in **Table 4.14-12**, LAUSD enrollment forecasts are limited to five-year increments extending to 2020-2021, and do not extend out to 2040. Thus, a comparison to LAUSD forecasts for the plan horizon year is not possible. LAUSD may need to expand existing schools and/or provide new facilities in order to accommodate the additional students generated as a result of the Proposed Plan. General Plan Framework Element Policies 9.31.1, 9.32.1 through 9.32.3, 9.33.1, and 9.33.2 require the City to participate and integrate incentives for funding facilities in areas with deficiency in classroom seats; publish demographics and population estimates for school planning; to cooperate with LAUSD to expand school facilities commensurate with population growth; to explore alternatives for new school sites; and to strategize on planning and access for school facilities. LAUSD's Facilities Division monitors growth and school capacity and determines future school needs.

Implementation of the Proposed Plan would increase residential and non-residential development (i.e., commercial, office, industrial, etc.) resulting in an increase in student enrollment in elementary, middle, and high schools. **Table 4.14-13** shows the estimated generation of elementary, middle, and high school students that could be anticipated within the Project Area. As shown therein, existing (2016) land uses are expected to generate approximately 33,539 new students (as shown in **Table 4.14-11**, 26,617 students were enrolled in LAUSD during the 2015–2016 school year), the Future (2040) No Project/Existing Plan could generate approximately 39,089 new students, and the Proposed Plan would generate approximately 42,402 new students. When comparing the reasonably expected development of the Proposed Plan to Existing (2016) land uses, students generated within the Project Area could increase by approximately 26 percent under the Proposed Plan. When comparing the Proposed Plan to the 2015-2016 enrollment, there could be an approximately 59 percent increase of students under the Proposed Plan. (Existing enrollment could be depressed for a number of reasons including students attending private schools and changing demographics in Hollywood.)

As a result of increases in student population, schools already operating above capacity could continue to operate above capacity. However, to help relieve schools that are operating at or above capacity, LAUSD also employs the LAUSD Choices Program that provides education choices including magnet and PWT programs to students residing within the LAUSD boundaries. Magnet schools under the Choice Program include business, communication arts, center for enriched studies, gifted/highly gifted/high ability, liberal arts, magnet schools assistance program, public service, science/technology/engineering/math, and visual and performing arts. In addition, independent Charter Schools that operate through LAUSD also help alleviate schools that are operating at or over capacity.

TABLE 4.14-13: ANTICIPATED STUDENT GENERATION IN THE PROJECT AREA

	Units	Student Generation /a, b/			
		Elementary School (K-5)	Middle School (6-8)	High School (9-12)	Total Students Generated
EXISTING (2016)					
Residential	104,000 du	17,149	4,680	9,391	**31,220**
Non-Residential /c/	47,906,581 sf.	1,092	546	680	**2,319**
Existing (2016) Total		***17,417***	***5,001***	***9,620***	**33,539**
FUTURE (2040) NO PROJECT / EXISTING PLAN					
Residential	121,000 du	19,953	5,445	10,926	**36,324**
Non-Residential /b/	56,480,907 sf.	1,288	644	802	**2,734**
Existing Plan (2040) Total		***21,241***	***6,089***	***11,728***	**39,058**
PROPOSED PLAN (2040)					
Residential	132,000 du	21,767	5,940	11,920	**39,627**
Non-Residential /b/	57,331,263 sf.	1,307	654	814	**2,775**
Proposed Plan (2040) Total		***23,074***	***6,594***	***12,734***	**42,402**

Note: du = dwelling units; sf. = square feet
/a/ Student generation rates are based on the LAUSD School Facilities Needs Analysis, September 2012. Student generation rate for non-residential use is based on the average of office and retail/service student generation rates for a conservative estimate, taken from the LAUSD Commercial/Industrial Development School Fee Justification Study, September 2010.
Residential Generation Rates: Elementary: 0.1649/du, Middle School: 0.0450/du, High School: 0.0903/du
Non-residential Generation Rates: Elementary: 0.0228/1,000 sq. ft., Middle School: 0.0114/1,000 sq. ft., High School: 0.0142/1,000 sq. ft.
/b/ Numbers are rounded to the nearest 100.
/c/ Non-residential uses include commercial, industrial, and public facilities.
SOURCE: TAHA, 2017

Implementation of the Proposed Plan could warrant the need for the expansion or construction of new schools to accommodate new students. A project would have a significant impact on schools if it would require the addition of a new school facility or the expansion, consolidation, or relocation of an existing facility *and* if such construction or expansion would result in a significant impact. In the event LAUSD constructs a new school or physically alters an existing facility, a project-specific environmental analysis would be required to address site-specific environmental concerns. As demand for schools increases, LAUSD will act to maintain adequate school facilities. However, it should be noted that for the 2018-2019 school year, 35 new magnet schools/centers would be available for LAUSD students under the LAUSD Choices program. Of the 35 new magnet schools/centers, three would be located at schools serving the Project Area, including Rosewood Elementary School (Urban Planning/Urban Design), Bernstein High School (Cinematic Arts/Creative Technologies), and Fairfax High School (Police Academy).[29]

It is possible that over the 20-year plan horizon the reasonably expected development from the Proposed Plan could result in the need for and construction of new or expanded schools. No new schools are planned or proposed for the Proposed Plan. It is assumed that if new or expanded schools are determined to be necessary at some point in the future, such facilities would occur where allowed under the designated land use and/or in proximity to residential uses. The environmental impacts of the construction and operation of new facilities, as an allowed land use, have been evaluated throughout this EIR. Specifically, the EIR analyzes anticipated effects of citywide growth related to air quality, noise, traffic, utilities, and other environmental impact areas. Depending on the location of new schools, if they are determined to be needed, impacts related to particular locations could occur, however such impacts are too speculative to assess without information as to design, location and proximity to the population to be served. Should new facilities be needed, such facilities are anticipated to be located on parcels that are infill on lots. Based on

[29]LAUSD, *e-Choices, 2018-2019 New Magnet Schools/Centers*, http://echoices.lausd.net/Magnet/MagnetNewSchool, accessed November 16, 2017.

the urban location and size, the construction of new schools or expansion of an existing facility could result in less than significant impacts and or possibly qualify for an infill exemption. To the extent that any significant impacts could result from the unique characteristics of a specific project site, or specific characteristics of a given school (e.g. night lighting, performance spaces), those impacts would be speculative at this time.

All development in California is subject to California Government Code Section 65995, which allows LAUSD to collect impact fees from developers of new residential and commercial/industrial space. Per SB 50, developer impact fees are the exclusive method for mitigating impacts on school facilities. In addition, SB 50 protects schools from overcrowding as it authorizes schools to collect fees, which would offset costs associated with increasing school capacity, as a result of development projects. Conformance to California Government Code Section 65995 and SB 50 are deemed to provide full and complete mitigation of school facilities impacts. These fees collected on residential and commercial development may be used to pay for all of the following: land (purchased or leased) for school facilities, design of school facilities, permit and plan checking fees, construction or reconstruction of school facilities, testing and inspection of school sites and school buildings, furniture for use in new school facilities, and interim school facilities (purchased or leased) to house students generated by new development while permanent facilities are constructed. Such development would assist in funding efforts necessary to alleviate school overcrowding and would ensure that new development under the Proposed Plan would bear its fair share of the cost of accommodating additional students generated. Nonetheless, with payment of appropriate fees, impacts would ***be less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

CUMULATIVE

The Proposed Plan along with cumulative projects from other plans (such as surrounding community plans, the Los Angeles County General Plan and the 2016-2040 RTP/SCS) would increase student enrollment possibly causing the need for new or expanded facilities, the construction of which could result in significant adverse impacts. However, such impacts would be dependent on site-specific conditions that are too speculative to determine without site-specific information. The geographic context for this cumulative analysis is the City as served by the LAUSD. The payment of school fees in compliance with the California Government Code Section 65995 is considered full mitigation for school impacts; therefore, the cumulative impact of past, present, and future development would be less than significant. Appropriate school fees would be paid for future development. LAUSD's Facilities Division monitors growth and school capacity and determines future school needs. Depending on the location of new schools, if they are determined to be needed, construction and operational impacts (such as traffic, noise, and lighting) could occur and would be generally consistent with other allowed development analyzed in this EIR. However, impacts related to specific locations would be speculative at this time and any cumulative impacts from construction of schools would not be expected to be different from other types of cumulative impacts from development identified in this EIR.

PARKS AND LIBRARY FACILITIES

Federal, state, and local plans, regulations and policies that are potentially applicable to the Proposed Plan are summarized below.

REGULATORY FRAMEWORK

FEDERAL

Parks and Recreation

U.S. Department of Transportation Act of 1966 (US DOT Act). Section 4(f) of the US DOT Act was enacted as a means of protecting publicly owned public parks, recreation areas, and wildlife/waterfowl refuges as well as historic sites of local, state or national significance, from conversion to transportation uses for projects funded in part by the federal government.

Libraries

There are no federal regulations pertaining to libraries that are applicable to the Proposed Project.

STATE

Parks and Recreation

Quimby Act. The Quimby Act was established by the California State Legislature in 1965 and codified as California Government Code Section 66477. The Quimby Act allows the legislative body of a city or county to require, by ordinance, the dedication of land, payment of fees in lieu thereof, or a combination of both for park or recreational purposes as a condition to the approval of a tentative tract map or parcel map. LAMC Sections 12.33 and 17.12 are codified city ordinances that were enacted as a way to implement the Quimby Act. LAMC Sections 12.33 and 17.12 are colloquially referred to as the City's "Quimby Code."[30]

State Public Park Preservation Act of 1971. The primary instrument for protecting and preserving parkland is the State Public Park Preservation Act of 1971 (Public Resources Code Sections 5400–5409). Under the Act, cities and counties may not acquire any real property that is in use as a public park for any non-park use unless compensation or land, or both, are provided to replace the parkland acquired. This provides no net loss of parkland and facilities.

Mitigation Fee Act. The California Mitigation Fee Act, Government Code Sections 66000, *et seq.*, allows cities to establish fees to be imposed on development projects for the purpose of mitigating the impact of development on a city's ability to provide specified public facilities. In order to comply with the Mitigation Fee Act a City must follow the following primary requirements: (1) make certain determinations regarding the purpose and use of a fee and establish a nexus or connection between a development project or class of project and the public improvement being financed with the fee; (2) segregate fee revenue from the General Fund in order to avoid commingling of capital facilities fees and general funds; (3) for fees that have been in the possession of a City for five years or more and for which the dollars have not been spent or committed to a project, the City must make findings each fiscal year.

[30]City of Los Angeles Department of Recreation and Parks, *Quimby/Park Fees*, https://laparks.org/planning/quimby-park-fees, accessed September 15, 2016.

Libraries

There are no state regulations pertaining to libraries that are applicable to the Proposed Project.

LOCAL

Parks and Recreation

Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment. The Parks & Recreation Needs Assessment, adopted May 2016, documents existing parks and recreation facilities in cities and unincorporated communities and to use the data to determine the scope, scale, and location of park needs in Los Angeles County. The Parks & Recreation Needs Assessment also establishes new ways of understanding about parks, recreation, and open space by: considering parks as key infrastructure; using a new series of metrics to determine park needs; supporting a need-based allocation of funding for parks and recreation; and emphasizing community priorities and deferred maintenance projects. As part of the assessment, the Los Angeles County Department of Parks and Recreation collaborated with 86 cities.[31]

County of Los Angeles General Plan Conservation and Open Space Element. The Conservation and Open Space Element of the County General Plan intends to guide the County's long-range preservation of its natural resources and open space and sets policy direction for the open space, natural, and energy-related resources within unincorporated Los Angeles County.[32] The Conservation and Open Space Element establishes a standard of four acres of parkland per 1,000 residents and six acres of parkland per 1,000 County residents to plan for local and regional parkland, respectively.

City of Los Angeles General Plan Framework Element and Service Systems Element – Public Recreation Plan. The City of Los Angeles General Plan is a comprehensive, long range declaration of purposes, policies and programs for the development of the City. The Framework Element has policies that prioritize the implementation of new recreation and park projects in areas of the City with the greatest needs and supports developing non-traditional public park spaces such as community gardens, farmers markets, and public plazas. The Public Recreation Plan of the Service Systems Element of the General Plan identifies existing recreational facilities and parks in the City of Los Angeles. The Public Recreation Plan categorizes parks into three types: neighborhood, community, and regional. Ideally, neighborhood parks have a service radius of approximately 0.5 mile and are pedestrian-accessible without crossing a major arterial street or highway/freeway. Community parks have a service radius of two miles and are easily accessible to the area served. Regional parks in the City provide specialized recreational facilities and/or attractions and have a service radius encompassing the entire Los Angeles region.

The Public Recreation Plan also provides the City's standard long-range ratios for parks to population. The City's standard ratio of parks to population is 2 acres per 1,000 residents for neighborhood parks and two acres per 1,000 residents for community parks, or 4 acres per 1,000 residents of combined neighborhood and community parks, and a minimum of six acres of regional recreational facilities for every 1,000 persons for long-range needs; a minimum of one acre of neighborhood and community parks for every 1,000 persons to meet short- and intermediate-range standards and the overall provision of 1 acres of land per 1,000 persons for total recreational facilities.[33,34] In addition to the park acreage standards, the Public Recreation Plan also states that the types of amenities (e.g., recreation center, gym, basketball courts, etc.)

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[31]County of Los Angeles Department of Parks and Recreation, *Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment*, May 2016.

[32]County of Los Angeles Department of Regional Planning, *Draft General Plan Conservation and Open Space Element*, 2008.

[33]City of Los Angeles, *General Plan Public Recreation Plan*, 1980.

[34]City of Los Angeles, *City of Los Angeles Resolution*, http://clkrep.lacity.org/onlinedocs/2016/16-0529_misc_02_4-15-16.pdf, accessed November 16, 2017.

that are offered on public parks and recreation land should also be considered when determining the adequacy of park space.

2009 Citywide Community Needs Assessment. The Department of Recreation and Parks conducted the Citywide Community Needs Assessment as the first step in the preparation of a Citywide Recreation and Parks Master/Strategic Plan and a Five-Year Capital Improvement Plan. The Needs Assessment identifies, quantifies, and preliminarily prioritizes the tremendous need for recreation and open space in the City. A high-level review was also performed of the Department's facilities in an attempt to address the various facilities needing improvements to meet current and future needs, prevent future maintenance problems, and offer positive alternatives to an increasingly dense and urbanized population.

LAMC Section 12.21(G). LAMC Section 12.21(G) requires new construction of a building, or a group of buildings, to provide a minimum amount of open space, based upon the number of dwelling units of the new construction of more than six dwelling units. Under LAMC Section 12.21(G), 100 square feet of open space for dwelling units with less than three habitable rooms, 125 square feet of open space per dwelling unit with three habitable rooms, and 175 feet of open space per dwelling unit with more than three habitable rooms are required. In addition, LAMC Section 12.21(G) indicates specific provisions with respect to the design and intended use of required open space for new construction.

LAMC Section 12.33. LAMC Section 12.33, which is part of the City's implementation of the Quimby Act, was established by the City in 1985 and establishes a park impact fee, separate from the fees established in LAMC Section 17.12. This section applies to the finalization of zone changes for multi-unit residential projects, including rental projects.

Ordinance 184,505 (Parks Dedication and Fee Update Ordinance). The Parks Dedication and Fee Update Ordinance was passed by City Council in September 2016 and was effective beginning January 2017. The ordinance requires most residential projects that create new dwelling units or joint living and work quarters to dedicate land or to pay a fee for the purpose of developing park and recreational facilities. Residential projects that propose one or more additional dwelling units will be subject to the new Park Fee unless they meet one of the exceptions listed in Los Angeles Municipal Code Section 12.33 C.3 (e.g. certain affordable housing units and secondary dwelling units may be exempt from any requirement to pay a fee).

LAMC Section 17.12. LAMC Section 17.12, which is part of the City's implementation of the Quimby Act, was established by the City in 1971 and states that no final subdivision map shall be approved or recorded, unless land within the subdivision has been dedicated to the City for park or recreational purposes or the park fee has been paid pursuant to LAMC Section 12.33.

LAMC Section 17.58. LAMC Section 17.58 requires land to be dedicated, or fees paid in lieu, or in some other manner set forth in Section 17.12, prior to the final parcel map being approved by the City Council and/or its filing with the Los Angeles County Recorder.

LAMC Section 21.10.3(a)(1). Under LAMC Section 21.10.3(a)(1) (Dwelling Unit Construction Tax), the City imposes a tax of $200 per dwelling unit on all construction of new and modification of existing dwelling units to be paid to the Department of Building and Safety. These Parkland fees are placed into a "Park and Recreational Sites and Facilities Fund" to be used exclusively for the acquisition and development of park and recreational sites or fund capital improvements at existing park facilities, which will serve residents of the residential development that dedicated the land or paid the fees. Park Fees are not permitted to be used to offset park operation and maintenance costs, to purchase materials and supplies, or to replace equipment. If a developer has already paid Quimby fees, as described under Section 17.12, or has dedicated in lieu parkland or recreational facilities, the Parkland fees required may be reduced accordingly.

Libraries

City of Los Angeles General Plan Framework. Chapter 9 (Infrastructure and Public Services) of the Framework Element includes objective, and policies applicable to library services. The objectives applicable to libraries are presented in **Table 4.14-14**.

TABLE 4.14-14: RELEVANT GENERAL PLAN LIBRARY GOALS, OBJECTIVES, AND POLICIES

Goal/Objective/Policy	Goal/Objective/Policy Description
FRAMEWORK ELEMENT – CHAPTER 9 INFRASTRUCTURE AND PUBLIC SERVICES	
Policy 9.23.2	Prioritize the implementation of recreation and park project in areas of the City with the greatest existing deficiencies.
Policy 9.23.5	Re-evaluate the current park standards and develop modified standards which recognize urban parks, including multi-level facilities, smaller sites, more intense use of land, public/private partnerships and so on.
Policy 9.23.7	Establish guidelines for developing non-traditional public park spaces like community gardens, farmer's markets, and public plazas.
Policy 9.24.1	Phase the development of new programs and facilities to accommodate projected growth.
Objective 9.20	Adopt a citywide library service standard by the year 2000.
Objective 9.21	Ensure library services for current and future residents and businesses.

SOURCE: City of Los Angeles, *The Citywide General Plan Framework, An Element of the City of Los Angeles General Plan*, re-adopted 2001.

Los Angeles Public Library (LAPL) Branch Facilities Plan. To guide the construction, maintenance, and operation of libraries within the City, the LAPL Board of Commissioners adopted the Branch Facilities Plan in 1988. The Branch Facilities Plan is comprised of two components. One component sets the size and features of a local branch based upon the population and location it would serve, and the other component is a status list of existing branches and identification of communities that do not have library services. To facilitate and finance the implementation of the Branch Facilities Plan, bond measures were approved in 1989 and 1998. With the anticipated completion of the projects listed in the Branch Facilities Plan of 1988, the LAPL Board of Commissioners approved a revision to the plan in 2007. The Branch Facilities Plan sets the following site selection criteria:

- Branches serving a population above 45,000 persons must have a facility of at least 14,500 square feet on a 40,000-square-foot property. Branches serving a population below 45,000 persons must have a facility of at least 12,500 square feet on a property of at least 32,500 square feet. The size of regional branch facilities must not exceed 20,000 square feet upon a 52,000-square-foot property. When a community reaches a population of 90,000, an additional branch should be considered for the area;
- One-story library buildings with interior layouts must be designed to accommodate the disabled, and to have electronic technology, substantial shelving and seating capacities, and a community meeting room;
- Good visibility and street access;
- Easily accessible by car, by bus and on foot;
- Take into consideration the relative locations of all schools served by the branch; and
- Take into consideration the relative locations of all neighboring branch libraries.

Los Angeles Public Library Strategic Plan 2015-2020. The LAPL Strategic Plan 2015-2020 provides goals, objectives, and key activities highlighting the next steps LAPL will take to provide better access to services, information, and resources to LAPL patrons. The goals and objectives of the Strategic Plan will guide the LAPL in providing services, opportunities, and increase existing collections that will cultivate and inspire young readers; nurture student success; champion literacy and lifelong learning; contribute to the city's economic growth; stimulate the imagination; and strengthen community connections and celebrate the City.[35]

[35]City of Los Angeles Public Library, *Strategic Plan 2015-2020: Creating Opportunity, Building Community, Inspiring Innovation*, June 2015.

EXISTING SETTING

PARKS AND RECREATION

The City of Los Angeles Department of Recreation and Parks (RAP) manage and provide parks and recreational services throughout the City. City park and recreation facilities include over 16,000 acres of parkland with over 444 park sites, including athletic fields, 422 playgrounds, 321 tennis courts, 184 recreation centers, 72 fitness areas, 62 swimming pools and aquatic centers, 30 senior centers, 26 skate parks, 13 golf courses, 12 museums, and 9 dog parks. In addition, the Department of Recreation and Parks also maintain 13 lakes, 92 miles of hiking trails, and operates 187 summer youth camps, and gang reduction and community intervention programs.[36]

According to the City of Los Angeles Public Recreation Plan, parks can be classified as neighborhood, community, or regional. A neighborhood park should be a minimum of five acres in size (ideally 10 acres), with a service radius of a one-half mile. A community park should be a minimum of 15 acres in size (ideally 20 acres), with a service radius of two miles. Regional parks are generally over 50 acres in size and serve the City and region.[37] The Los Angeles County Department of Parks and Recreation manages regional parks, community parks, and golf courses that are available for all county residents to use.

Currently, there are 18 parks and recreational facilities located within the Project Area that immediately serve the residents. These include two regional parks, two community parks, seven neighborhood parks, and seven pocket parks as shown in **Table 4.14-15**.

TABLE 4.14-15: PARKS, OPEN SPACE AND RECREATIONAL FACILITIES IN THE PROJECT AREA

Name	Location	Facility Type	Acres
Griffith Park	4730 Crystal Springs Dr.	Regional Park	4,210
Runyon Canyon Park	2000 N. Fuller Ave.	Regional Park	137
		Regional Park Subtotal	***4,347***
Wattles Garden Park	1824 N. Curson Ave.	Community Park	50
Barnsdall Park	4800 Hollywood Blvd.	Community Park	14.9
		Community Park Subtotal	***64.9***
Poinsettia Recreation Center	7341 Willoughby Ave.	Neighborhood Park	6.2
Lemon Grove Recreation Center	4959 Lemon Grove Ave.	Neighborhood Park	3.8
Hollywood Recreation Center	1122 N. Cole Ave.	Neighborhood Park	3.1
Highland Camrose Park	2101 N. Highland Ave.	Neighborhood Park	2.1
De Longpre Park	1350 N. Cherokee Ave.	Neighborhood Park	1.4
Yucca Community Center	6671 Yucca St.	Neighborhood Park	1.0
Fairfax Senior Recreation Center	7929 Melrose Ave.	Neighborhood Park	0.4
		Neighborhood Park Subtotal	***18.0***
Griffith Park Adult Community Center	3203 Riverside Dr.	Pocket Park	0.7
Lexington Pocket Park	5523 Lexington Ave.	Pocket Park	0.5
Dorothy J. and Benjamin B. Smith Park	7020 Franklin Ave.	Pocket Park	0.5
Carlton Way Park	5927 W. Carlton Way	Pocket Park	0.2
Selma Park	6567 Selma Ave.	Pocket Park	0.2
Seily Rodriguez Park	5707 Lexington Ave.	Pocket Park	0.03
Rosewood Gardens	7811 Rosewood Ave.	Pocket Park	0.03
		Pocket Park Subtotal	***2.2***
		Parks and Recreation Total	**4,432.1**

Note: Pocket Park (less than 1 acre); Neighborhood Park (1-10 acres); Community Park (10-50 acres); Regional Park (over 50 acres)
SOURCE: Los Angeles Department of Recreation and Parks, Los Angeles County GIS Data Portal, zimas.lacity.org and TAHA, 2017.

[36]City of Los Angeles Department of Recreation and Parks, *About Us,* http://www.laparks.org/department/who-we-are, accessed September 16, 2016.

[37]City of Los Angeles, *General Plan Public Recreation Plan*, 1980.

Figure 4.14-4 shows the locations of the parks and recreational facilities within the Hollywood Project Area boundaries.

The City's Public Recreation Plan states that to meet long-range recreational standards, a community should have a minimum of two acres of neighborhood and two acres of community recreational facilities for every 1,000 persons (for a total of four acres), and a minimum of six acres of regional recreational facilities for every 1,000 persons.[38] A minimum of one acre of neighborhood and community parks for every 1,000 persons would be required to meet short- and intermediate-range standards, and the overall provision of 10 acres of land per 1,000 persons for total recreational facilities.[39] Local recreation standards are long-range and may not be reached during the life of a Community Plan. As shown in **Table 4.14-15**, approximately 4,432.1 acres of recreational facilities are located within the Project Area, consisting of approximately 4,347 acres of regional park facilities, 64.9 acres of community parks, 18.0 acres of neighborhood parks, and 2.2 acres of pocket parks.

Using factors from the Public Recreation Plan, there is an existing demand for approximately 2,060 acres of recreational facilities in the Project Area, as detailed in **Table 4.14-16**. Currently, there is sufficient amount of total recreational acreage available in sum of pocket, neighborhood, community, and regional parks/recreational facilities. Based on the City's standards, there is a deficit of 394.35 acres of neighborhood parks and 347.1 acres of community parks, and a surplus of 3,111 acres of regional recreational facilities in the Project Area. The City has a parkland acres-to-population of 4.23 acres per 1,000 residents. The Project Area has a parkland acres-to-population ratio of 21.04 acres per 1,000 residents. However, the Project Area's parkland acres-to-population ratio is skewed due to the location of the Griffith Park. The parkland acres-to-population ratio of neighborhood and community parks is 0.41 acres per 1,000 residents.[40]

TABLE 4.14-16: EXISTING DEMAND FOR PARKS AND RECREATIONAL FACILITIES IN THE PROJECT AREA

Recreational Facility Type	Population (2016)	Demand per 1,000 residents	Demand for Recreational Facilities /a/	Acres of Recreational Space Available	Acres of Surplus /b/	Demand Met
Pocket Parks	206,000	—	—	2.2	—	—
Neighborhood Parks		2 acres	412 acres	17.6	(394.4)	No
Community Parks		2 acres	412 acres	64.9	(347.1)	No
Regional Parks		6 acres	1,236 acres	4,347	3,111	**Yes**
Total		**10 acres**	**2,060 acres**	**4,432.1**	**2,372.1**	**Yes**

"—" indicates information is not available.
/a/ Existing demand is based on open space provisions as provided for each facility type by the City of Los Angeles Public Recreation Plan (i.e., 2 acres for every 1,000 residents for neighborhood facilities; 2 acres for every 1,000 residents for community facilities; 6 acres for every 1,000 residents for regional parks).
/b/ Parenthesis () denotes a deficient acreage.
SOURCE: TAHA, 2017.

As a response to the need for additional park and recreational facilities, the Los Angeles Recreation and Parks has implemented the 50 Parks Initiative which aims to better meet the park and recreational needs of the City's diverse communities by substantially increasing the number of citywide facilities, with a specific focus on densely-populated neighborhoods and communities lacking sufficient park space and recreational facilities.[41]

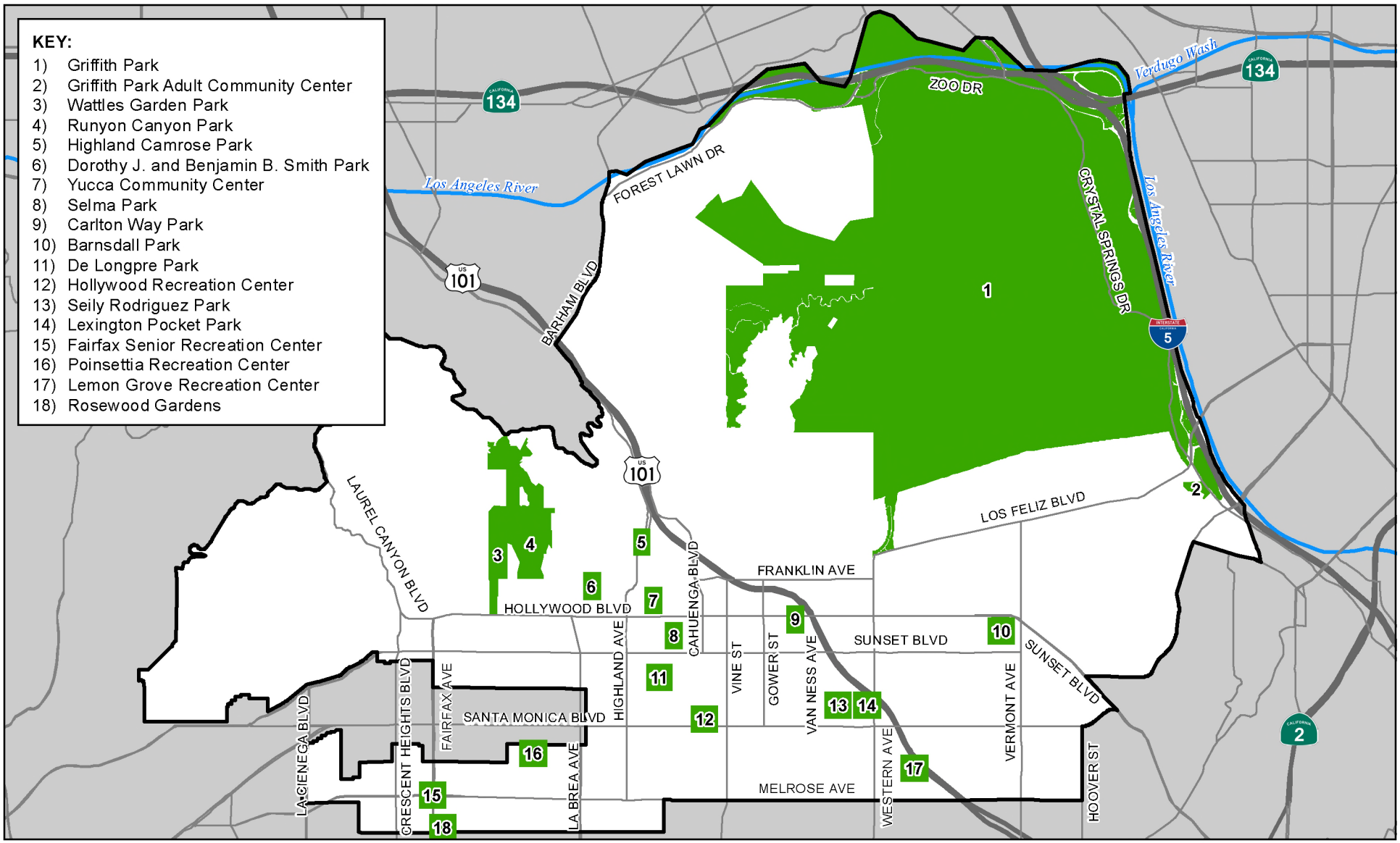
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[38]City of Los Angeles, *City of Los Angeles Resolution*, http://clkrep.lacity.org/onlinedocs/2016/16-0529_misc_02_4-15-16.pdf, accessed November 16, 2017.

[39]City of Los Angeles, *General Plan Public Recreation Plan*, 1980.

[40]City of Los Angeles Department of Recreation and Parks, *Request for Information regarding Recreational and Park Services for the Hollywood Community Plan Update Environmental Impact Report,* Shull, Michael, January 25,2017.

[41]City of Los Angeles Department of Recreation and Parks, *Department of Recreation and Parks New Parks Initiative*, http://www.laparks.org/50parks/index.html, accessed January 25, 2017.



LEGEND:

Hollywood CPA # Parks and Recreational Facilities

N W E S

0 2,750 5,500 Feet

SOURCE: City of Los Angeles, 2017; TAHA, 2017.

taha environmental planners
taha 2010-073

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FIGURE 4.14-4

PARKS AND RECREATION FACILITIES

Los Angeles Recreation and Parks, in conjunction with the Friends of the Hollywood Central Park, is currently evaluating the development of the Hollywood Central Park, which is a proposed deck park that would cap a segment of the Hollywood Freeway.[42] The Los Angeles Department of Water and Power (LADWP) and the U.S. Army Corps of Engineers are in partnership to design and construct the Ecosystem Restoration Project, which is the final phase of the Headworks Ecosystem Restoration Project near Griffith Park's Travel Town, the Los Angeles Equestrian Center, Forest Lawn, Mount Sinai, and across the Los Angeles River from the City of Burbank. The restoration project may include riparian wetlands, open areas with a bike path and improved equestrian and pedestrian access. The proposed date of completion for the project is 2023.[43]

PUBLIC LIBRARIES

The LAPL System provides library services for the City of Los Angeles. The LAPL System includes the Central Library, 8 regional branch libraries, 67 community branches, and 4 bookmobiles. There are approximately six million books and other materials within the LAPL collection. It should also be noted that residents also have access to Los Angeles County library facilities located in adjacent jurisdictions.

All branch libraries also provide free access to computer workstations, which allow patrons to fully access the Internet and the LAPL's electronic resources, including the online catalog, subscription databases, word processing, language learning, and collections of historic documents and photographs. The LAPL website is also specially designed to allow accessibility for children, teens, and Spanish-speakers.

The LAPL operates five libraries within the Project Area, and are listed in detail in **Table 4.14-17**. **Figure 4.14-5** shows the location of these libraries. Combined, these libraries serve a population of approximately 336,354 residents, provide approximately 266,314 total volumes of materials, and have a circulation of 574,175 library materials.

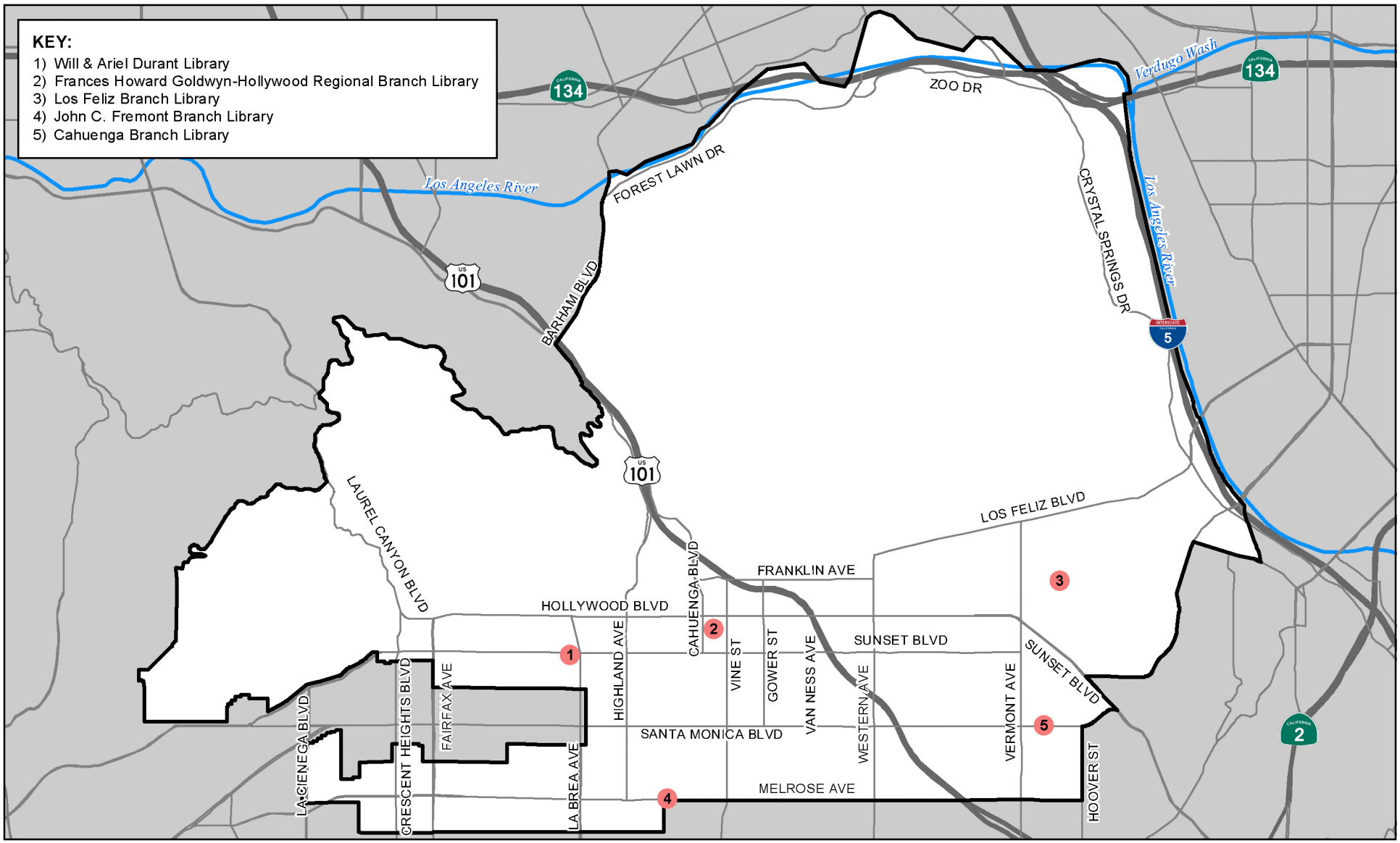
TABLE 4.14-17: PUBLIC LIBRARIES SERVING HOLLYWOOD COMMUNITY PLAN AREA

Library / Address	Building Size (sq. ft)	Collection Size	Circulation Size	Population Served /a/ (Persons)	Square Feet per Person	Volumes per Person
Cahuenga Branch Library 4591 Santa Monica Blvd. Los Angeles, CA 90029	10,942	40,733	116,099	90,947	0.12	0.45
Frances Howard Goldwyn-Hollywood Regional Branch Library 1623 Ivar Ave. Los Angeles, CA 90028	19,000	87,182	123,539	100,086	0.19	0.87
John C. Fremont Branch Library 6121 Melrose Ave. Los Angeles, CA 90038	7,361	40,452	99,181	18,418	0.40	2.20
Los Feliz Branch Library 1874 Hillhurst Ave. Los Angeles, CA 90027	10,500	50,220	185,658	34,052	0.31	1.47
Will & Ariel Durant Branch Library 7140 Sunset Blvd. Los Angeles, CA 90046	12,500	47,727	138,968	92,851	0.13	0.51
TOTAL	**60,303**	**266,314**	**574,175**	**336,354**	**1.15**	**5.50**

/a/ Current service population per the Los Angeles Times Mapping L.A. database. LAPL does not use programmed or targeted service populations.
SOURCE: LAPL, *Library Facilities Division*, 2017; TAHA 2017.

[42]City of Los Angeles, *Notice of Preparation of a Draft Environmental Impact Report (City Document No. NP-14-004-RP)*, http://hollywoodcentralpark.org/sites/default/files/docs/NOP_081314_ENGLISH-US.pdf.

[43]LADWP, *Progress Update for Los Angeles River Revitalization Master Plan - Council Motion 16-0639 Recommendation No. 1*, http://clkrep.lacity.org/onlinedocs/2016/16-0639_rpt_DWP_11-07-2016.pdf.



LEGEND:

Hollywood CPA # Public Libraries

N W E S

0 2,750 5,500 Feet

SOURCE: City of Los Angeles, 2017; TAHA, 2017.

taha environmental planners
taha 2010-073

Hollywood Community Plan Update
Draft Environmental Impact Report
CITY OF LOS ANGELES

FIGURE 4.14-5

PUBLIC LIBRARIES

Based on the existing library facilities and its resources, each library facility serving the Project Area does not meet the standard of 12,500 square feet for a service population of less than 45,000, 14,500 square feet for communities with more than 45,000 population, up to 20,000 square feet for a regional branch, or an additional branch library for communities that reach a population of 90,000.[44]

Cahuenga Branch Library. The Cahuenga Branch Library currently has a building size of 10,942 square feet and serves 90,047 people. This library branch does not meet LAPL's standard of 14,500 square feet for a service population of 45,000 or more, nor does it meet the standard of building another branch library when a community population reaches 90,000 people as no new library facilities are planned.

Frances Howard Goldwyn-Hollywood Regional Branch Library. The Frances Howard Goldwyn-Hollywood Regional Branch Library currently has a building size of 19,000 square feet and serves 100,086 people. This library branch does not meet the standard of building another branch library when a community population reaches 90,000 people and no new library facilities are planned.

John C. Freemont Branch Library. The John C. Freemont Branch Library currently has a building size of 7,361 square feet and serves 18,418 people. This library branch does not meet LAPL's standard of 12,500 square feet for a service population of 45,000 or less.

Los Feliz Branch Library. The Los Feliz Branch Library currently has a building size of 10,449 square feet and serves 34,052 people. This library branch does not meet LAPL's standard of 12,500 square feet for a service population of 45,000 or less.

Will & Ariel Durant Branch Library. The Will & Ariel Durant Branch Library currently has a building size of 12,500 square feet and serves 92,851 people. This library branch does not meet LAPL's standard of 14,500 square feet for a service population of 45,000 or more, nor does it meet the standard of building another branch library when a community population reaches 90,000 people as no new library facilities are planned.

There are no current plans for the construction of new library facilities or expansion of existing library facilities.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the CEQA Guidelines, the Proposed Project would have a significant impact related to parks and other public services if it would:

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios or other performance objectives for parks or libraries.

[44]LAPL, *Request for Information Regarding Library Services for the Hollywood Community Plan Update Environmental Impact Report,* Jung, Thomas, June 15, 2017.

METHODOLOGY

An impact in this section would occur if the Proposed Plan promotes growth patterns resulting in (1) the need for and/or the provision of new or physically altered park or library facilities, the construction of which would cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives, or (2) the increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

The need for or deficiency in adequate park facilities or library facilities to serve the residents or users of the Project Area or the City is not in and of itself a CEQA impact, but a social or economic impact. (*City of Hayward v. B'd of Trustees* (2015) 242 Cal.App. 4th 833, 843). To the extent that the Proposed Plan causes a need for additional recreational or library services and facilities and that results in the construction of new facilities or additions to existing facilities and the impact from that construction results in a potential impact to the environment, that is a CEQA impact that needs to be assessed in this EIR. Additionally, the deterioration of existing recreational facilities and parks caused by the Proposed Plan is a CEQA impact that needs to be assessed in the EIR. Any discussion in this EIR of social or economic impacts that relates solely to the level of library or recreational services provided to the residents or users of the Project area and its surrounding community, including any existing or future needs and deficiencies, is not determinant on its own of CEQA impacts, absent those social or economic impacts resulting in physical impacts. The ultimate determination of whether there is a significant impact related to park/recreational and library services is based on whether a significant impact will result from the construction of new or altered park/recreational or library facilities or where existing park and recreational facilities will be substantially physically deteriorated as a result of the implementation of the Proposed Plan.

This analysis estimates the number of residents that would be generated by implementation of the Proposed Plan and assesses whether existing and planned public parks and libraries expected to serve the Project Area would have sufficient available capacity to accommodate additional users and whether new facilities would need to be constructed, the construction of which would cause significant environmental impacts; and whether the Proposed Plan will result in substantial physical deterioration to park/recreational facilities.

IMPACTS

IMPACT 4.14-4 Would implementation of the Proposed Plan a) increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, and/or b) result in substantial adverse physical impacts associated with the provision of new or physically altered recreational facilities, need for new or physically altered recreational facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios or other performance objectives for parks? **a) significant and unavoidable impact (deterioration of existing facilities); b) less than significant impact (construction of new facilities).**

The Proposed Plan does not contain any specific regulations or policies related to parks and recreational facilities. As discussed above, there are no planned new parks in the Plan Area. Under the Proposed Plan, all existing parks and recreational facilities in the Project Area would remain. The Proposed Plan, reasonably expected development would result in approximately 243,000 to 264,000 residents by year 2040, which would be a population increase of approximately 37,000 to 58,000 residents compared to the estimated 2016 population.

To meet long-range recreational standards identified in the City's Public Recreation Plan, a minimum of two acres of neighborhood and community recreational facilities for every 1,000 persons should be provided to the community.[45] To meet short- and intermediate-range recreational standards, a minimum of one acre of neighborhood and community parks for every 1,000 persons. The population of the Project Area is anticipated to increase to approximately 264,000 people in 2040. Based on the reasonably expected development under the Proposed Plan, the Project Area would need to provide a total of 486 acres of neighborhood parks, 486 acres of community parks and 1,458 acres of regional parks.

As shown in **Table 4.14-18**, reasonably expected development associated with the Proposed Plan would create demand for an additional 580 acres of park space within the Project Area. There is a surplus in total parks and recreational land of 2,369.6 acres that could accommodate this total demand. However, neighborhood parks are in an existing deficit of 394.4 acres with 17.6 acres of neighborhood parks currently available; the demand in year 2040 would be for 116 additional acres. Thus, the demand is anticipated to not be met. Community parks are currently in an existing deficit of 347.1 acres with 64.9 acres of community parks available; the demand in year 2040 would be for an additional 116 acres. Thus, the demand is anticipated to not be met. Regional parks are in a surplus of 3,111 acres and year 2040 demand would be for an additional 348 acres, which would be met by the existing facilities.

TABLE 4.14-18: FUTURE (2040) DEMAND FOR RECREATIONAL FACILITIES IN THE PROJECT AREA

Facility	Reasonably Expected Population	Demand for Recreational Facilities/a/	Acres of Recreational Space Available	Existing Deficit (2016)/b/	Additional Acres of Demand in 2040	Demand Met
Pocket Parks	264,000	--	2.2	--	--	--
Neighborhood Parks		528	17.6	(394.4)	116	No
Community Parks		528	64.9	(347.1)	116	No
Regional Parks		1,584	4,347	3,111	348	Yes
		TOTAL	**4,566.1**	**(2,369.6)**	**580**	

/a/Recommended standard per the City of Los Angeles Public Recreation Plan (Neighborhood and Community Parks = 2 acres/1,000 residents; Regional Parks = 6 acres/1,000 residents).
/b/Parenthesis ( ) denotes a surplus in acreage.
SOURCE: TAHA 2017.

It is anticipated that existing neighborhood and community parks will continue to be used by existing residents as well as the new population. Such additional use of these already over-used parks is likely to result in further substantial physical deterioration of these facilities.

While the surplus in regional park space would provide for ample hiking and other recreational activities, it does not provide for some of the types of recreation typically found in pocket, neighborhood and community parks and, therefore, the deficit in these smaller parks could be significant. The reasonably expected development projected under the Proposed Plan would increase the demand for existing pocket, neighborhood, community, and regional parks, as well as other recreational facilities. In particular, park areas that are already too small to meet existing demand (pocket parks, neighborhood parks and community parks) would experience even greater use in the future, which could accelerate the physical deterioration of these existing facilities. No new recreation facilities are planned or proposed in the Proposed Plan; however, the Los Angeles Recreation and Parks is currently seeking opportunities to expand parkland within the Project Area but has not yet identified specific parcels for acquisition of development. The costs of acquisition of land and the feasibility of assembling parcels of land for recreational facilities are severe

[45]City of Los Angeles, *General Plan Public Recreation Plan*, 1980.

impediments to the provision of parks. Should new parkland be identified, the environmental impacts of construction and operation of new facilities are accounted for throughout this EIR. Specifically, the EIR analyzes anticipated effects of citywide growth related to air quality, noise, traffic, utilities, and other environmental impact areas. The Project Area is urbanized and new parkland facilities would not involve expansion of the urban sphere beyond current boundaries and, thus, there would not be expected to need new or expanded infrastructure.

The Proposed Plan includes policies that say that the City will support development of parkland at the Headworks Reservoir and the Hollywood Central Park (Policies PR3.14 and 3.15).

Future development under the Proposed Plan would be subject to LAMC Sections 12.33 and 17.12, which are part of the City's implementation of the Quimby Act. These ordinances require developers of residential projects (except affordable housing units and second dwelling units) to dedicate land for park and recreation purposes, or pay a fee in lieu thereof, prior to obtaining a permit. The dedication of land for park and recreation purposes or payment of fees would help to offset the demand created by future development under the Proposed Plan. In addition, LAMC Section 12.21 (G) establishes open space requirements for residential projects. However, population growth associated with the reasonably expected increase in housing would create additional demand for parklands that cannot be accommodated in the Project Area.

The following factors are relevant to the provision of new parks: (1) existing citywide open space ratios are suburban in nature and do not reflect the constraints of a dense, urban environment; (2) acquisition of new public land for parks and open space is extremely expensive in the City and Project Area in particular; and (3) vacant or underused land in the Project Area is scarce and purchasing land for the provision of open space would compete with other identified community priorities such as providing housing and non-residential, job-generating uses.

Therefore, it is anticipated that existing pocket, neighborhood and community parks could experience an increase in use that could result in physical deterioration (or accelerated physical deterioration) of existing facilities. If land is identified and the City is able to purchase and develop such land for parks, then construction of new recreation facilities would occur. The Los Angeles Recreation and Parks is responsible for the maintenance of existing parks and recreational facilities and fees collected through the Quimby Act would also be used towards recreation facility improvements.

Given the existing deficits in existing pocket, neighborhood and community parks, the increased demand for such parks and the severe challenges in the provision of new parks it is anticipated that the increased use of the existing parks could result in significant deterioration of these facilities. With the required provision of on-site open spaces, payment of in-lieu fees and limitations on construction of new facilities, it is speculative to determine whether the reasonably expected increase in population could lead to construction of new facilities that could in turn lead to significant impacts. The environmental impacts of the construction and operation of new facilities, as allowed land uses, have been evaluated throughout this EIR. Any unique or peculiar impacts related to specific location or development would be speculative at this time. The Project Area is urbanized and new recreational facilities would not involve expansion of the urban sphere beyond current boundaries and, thus, there would be no need for new or expanded infrastructure.

It is anticipated that impacts related to the project resulting in substantial physical deterioration of parks and recreational facilities would be ***potentially significant;*** impacts related to providing new parks and park facilities would be ***less than significant***.

Mitigation Measures

The Quimby Act requires developers of residential projects (except affordable housing units and second dwelling units) to dedicate land for park and recreation purposes, or pay a fee in lieu thereof, prior to

obtaining a permit. As discussed above, the city collects fees, will require open space under updated fee and Quimby program, but there is not adequate land at reasonable costs. The City has not identified any feasible mitigation.

Significance of Impacts after Mitigation

Significant and unavoidable as to deterioration of existing parks; ***less than significant*** related to providing new recreational and park facilities.

IMPACT 4.14-5 Would implementation of the Proposed Plan result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios or other performance objectives for libraries? **Less than significant impact.**

The Branch Facilities Plan developed for LAPL establishes guidelines related to provision of library services. Library branches serving a population above 45,000 people must have at least 14,500 square feet on a 40,000-square foot property while library branches serving a population below 45,000 people must have a facility of at least 12,500 square feet upon a property of at least 32,500 square feet. The size of regional branch facilities must not exceed 20,000 square feet upon a 52,000-square foot property. When a community reaches a population of 90,000 an additional branch should be considered for the area.[46] The Proposed Plan anticipates approximately 243,000 to 264,000 residents within the Project Area by the year 2040, an increase of 37,000 to 58,000 residents compared to the year 2016.

The increased population is anticipated to increase the demand for library services and resources of the LAPL System. **Table 4.14-17** identifies libraries within the Project Area.

As discussed above, the libraries serving the Project Area do not currently meet LAPL's minimum criteria. Implementation of the Proposed Plan would increase residential population and in turn would increase the library demand. However, long-term demand for library facilities and services as a result of the implementation of the Proposed Plan would be met through the Branch Facilities Plan, which will continue to plan for future demand for adequate library facilities to serve the population of the Project Area. While the increase in population as a result of the implementation of the Proposed Plan may create a demand for library services, internet access to library collections would be available and alleviate some of the need for library services and resources. Based on the above, it is possible that the reasonably expected development from the Proposed Plan could result in the need and construction of new or expanded library facilities. No new library facilities are planned or proposed in the Proposed Plan. It is assumed that if new facilities are determined to be necessary at some point in the future, such facilities would occur where allowed under the designated land use. The environmental impacts of the construction and operation of new facilities, as an allowed land use, have been evaluated throughout this EIR. Specifically, the EIR analyzes anticipated effects of citywide growth related to air quality, noise, traffic, utilities, and other environmental impact areas. Any unique or peculiar impacts related to specific location or development would be speculative at this time. The Project Area is urbanized and new facilities would not involve expansion of the urban sphere beyond current boundaries and, thus, would not be expected to need new or expanded infrastructure. Therefore, impacts related to library services would be ***less than significant***.

[46]City of Los Angeles Public Library, *Los Angeles Public Library Strategic Plan 2007-2010, Appendix VI,* June 2015.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

CUMULATIVE IMPACTS

PARKS

The Proposed Plan along with cumulative projects from other plans (such as surrounding community plans, the Los Angeles County General Plan and the 2016-2040 RTP/SCS) would result in significant impacts related to park facilities if such activities resulted in an increase to the use of existing park and recreational facilities or result in adverse physical impacts to park facilities. The geographic context for this analysis is the City as served by the Los Angeles Recreation and Parks. Past and present development in the City has contributed to a significant deficit in park resources. Currently, there is an insufficient amount of available neighborhood, community, and regional parks/recreational facilities not just in the Project Area, but throughout much of the City. The Proposed Plan anticipates an increase in population, employment and development. Thus, increased use of existing facilities and demand for additional parkland and recreation facilities is reasonably expected. Regional parks are in a surplus in the Project Area and the sum of all parks and recreational facilities would accommodate demand within the Project Area. There could be a deficit of park and recreational land within the City of Los Angeles with the Proposed Plan that could result in the need for acquisition of additional recreational and park facilities, although it is too speculative to identify or analyze such additional facilities at this time. The Quimby Act and Mitigation Fee Act would ameliorate park and recreational demands but likely not enough to meet all the demand. As discussed above, given the existing deficit of neighborhood and community parks, the analysis identifies a significant impact of the Project on the deterioration of existing recreational and park facilities. Therefore, the Proposed Plan would have a cumulatively considerable impact related to the deterioration of recreational and park facilities which would add to cumulative impacts from development in surrounding areas causing a significant cumulative impact related to deterioration of existing parks. The Proposed Plan would not make a cumulatively considerable contribution to impacts related to the provision of new recreational and park facilities different from any other analyzed in this EIR as any environmental impacts of the construction and operation of new facilities, as allowed land uses, have been evaluated throughout this EIR.

LIBRARIES

The Proposed Plan along with cumulative projects from other plans (such as surrounding community plans, the Los Angeles County General Plan and the 2016-2040 RTP/SCS) could result in significant impacts related to library facilities if such activities resulted in an increase to the use of existing library facilities or result in adverse physical impacts to library facilities. However, such impacts would be dependent on site-specific conditions that are too speculative to determine without site-specific information. The geographic context for this cumulative analysis is the City as served by the LAPL. Past and present development in the City has caused a deficit in library services, as evidenced by the LAPL Branch Facilities Plan, which identifies eight new libraries to be constructed in the City. No new library facilities are currently planned within the Project Area. The reasonably expected development growth under the Proposed Plan could cause an increase in demand for libraries services. The Branch Facilities Plan will continue to forecast future demand for library facilities throughout the City and strive to provide adequate facilities and related improvements to serve the existing and future population. In addition, library requirements are changing

with the advent of increasing resources being available on-line. While the increase in population as a result of the Proposed Project and cumulative development may create an increased demand for library services, internet access to library collections would be available and would alleviate some of the need for library services and resources. The potential for new library construction is speculative at the present time and is, therefore, not analyzed in this document. It is assumed that if new facilities are determined to be necessary at some point in the future, such facilities would occur where allowed under the designated land use. It is not expected that any cumulative impacts from the construction of library facilities would be different from others identified in this EIR.

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4.15 TRANSPORTATION AND TRAFFIC

This section provides an overview of transportation and mobility in the Project Area and analyzes the operational impacts associated with the Proposed Plan. Topics addressed in this section include the circulation system; congestion management plan; neighborhood intrusion, emergency access; public transit; bicycle and pedestrian facilities; parking; and safety.

REGULATORY FRAMEWORK

Federal, state, regional, and local laws, regulations, plans, and guidelines that are potentially applicable to the Proposed Plan are summarized below.

FEDERAL

Americans with Disabilities Act (ADA) of 1990. Titles I, II, III, and V of the ADA have been codified in Title 42 of the United States Code, beginning at Section 12101. Title III prohibits discrimination on the basis of disability in "places of public accommodation" (businesses and non-profit agencies that serve the public) and "commercial facilities" (other businesses). The regulation includes Appendix A through Part 36 (Standards for Accessible Design), establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travelway, and a vibration-free zone for pedestrians.

STATE

Complete Streets Act. Assembly Bill (AB) 1358, the Complete Streets Act (Government Code Sections 65040.2 and 65302), was signed into law by Governor Arnold Schwarzenegger in September 2008. As of January 1, 2011, this law requires cities and counties, when updating the part of a local general plan that addresses roadways and traffic flows, to ensure that those plans account for the needs of all roadway users. Specifically, the legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians and transit riders, as well as motorists.

At the same time, the California Department of Transportation (Caltrans), which administers transportation programming for the state, unveiled a revised version of Deputy Directive 64 (DD-64-R1, October 2008), an internal policy document that now explicitly embraces Complete Streets as the policy covering all phases of state highway projects, from planning to construction to maintenance and repair.

Complete Streets Directive. Caltrans enacted Complete Streets: Integrating the Transportation System (Complete Streets Directive) in October 2008, which required cities to plan for a "balanced, multimodal transportation network that meets the needs of all users of streets."[1] A complete street is a transportation facility that is planned, designed, operated, and maintained to provide safe mobility for all users, including bicyclists, pedestrians, transit vehicles, truckers, and motorists, appropriate to the function and context of the facility. Every complete street looks different, according to its context, community preferences, the types of road users, and their needs.

[1]Caltrans, *Implementation Policy of Complete Streets: Integrating the Transportation System*, http://www.dot.ca.gov/hq/tpp/offices/ocp/complete_streets.html, accessed on September 9, 2014.

Statewide Transportation Improvement Program (STIP). Caltrans administers transportation programming for the state. Transportation programming is the public decision-making process that sets priorities and funds projects envisioned in long range transportation plans. It commits expected revenues over a multi-year period to transportation projects. The STIP is a multi-year capital improvement program of transportation projects on and off the State Highway System, funded with revenues from the State Highway Account and other funding sources.

Congestion Management Program (CMP). To address the increasing public concern that traffic congestion is impacting the quality of life and economic vitality of the state, the CMP was enacted by Proposition 111, passed by voters in 1990. The intent of the CMP is to provide the analytical basis for transportation decisions through the STIP process.

Senate Bill (SB) 743. SB 743 directs the Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines by July 1, 2014 to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic Level of Service (LOS). On September 27, 2013, Governor Brown signed SB 743 into law and started a process that could fundamentally change transportation impact analysis as part of CEQA compliance. These changes, which have not yet been fully implemented, will include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts in many parts of California (if not statewide). Further, parking impacts are not considered significant impacts on the environment for particular types of development projects within certain infill areas with nearby frequent transit service. According to the legislative intent contained in SB 743, these changes to current practice were necessary to "…more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

On January 20, 2016, OPR released the *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, which was an update to *Updating Transportation Impacts Analysis in the CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743,* which had been released August 6, 2014. Of particular relevance to this Proposed Plan is the updated text of the proposed new Section 15064.3 that relates to the determination of the significance of transportations impacts, alternatives and mitigation measures. The following key text concerning the analysis of transportation impacts is taken directly from the document:

> *(b) Criteria for Analyzing Transportation Impacts.*
>
> *Lead agencies may use thresholds of significance for vehicle miles traveled recommended by other public agencies or experts provided the threshold is supported by substantial evidence.*
>
> *(1) Vehicle Miles Traveled and Land Use Projects. A development project that results in vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, development projects that locate within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor may be presumed to cause a less than significant transportation impact. Similarly, development projects that decrease vehicle miles traveled in the project area compared to existing conditions may be considered to have a less than significant transportation impact.*
>
> *(2) Induced Vehicle Travel and Transportation Projects. Additional lane miles may induce automobile travel, and vehicle miles traveled, compared to existing conditions. Transportation projects that reduce, or have no impact on, vehicle miles traveled may be presumed to cause a less than significant transportation impact. To the extent that the potential for induced travel has already been adequately analyzed at a programmatic level, a lead agency may incorporate that analysis by reference.*

Parking Cash Out. AB 2109, is a state law requiring employers of 50 or more employees who lease their parking and subsidize any part of their employee parking to offer their employees the opportunity to give up their parking space and rideshare to work instead. In return for giving up their parking space, the employer pays the employee the cost of the parking space.

Assembly Bill (AB) 32 and Senate Bill (SB) 375. With the passage of AB 32, the Global Warming Solutions Act of 2006, the State of California committed itself to reducing statewide greenhouse gas (GHG) emissions to 1990 levels by 2020. The California Air Resources Board (CARB) is coordinating the response to comply with AB 32.

On December 11, 2008, CARB adopted its Proposed Scoping Plan for AB 32. This scoping plan included the approval of SB 375 as the means for achieving regional transportation-related GHG targets. SB 375 provides guidance on how curbing emissions from cars and light trucks can help the state comply with AB 32.

There are five major components to SB 375. First, regional GHG emissions targets. CARB's Regional Targets Advisory Committee guides the adoption of targets to be met by 2020 and 2035 for each Metropolitan Planning Organization (MPO) in the state. These targets, which MPOs may propose themselves, are updated every eight years in conjunction with the revision schedule of housing and transportation elements.

Second, MPOs are required to prepare a Sustainable Communities Strategy (SCS) that provides a plan for meeting regional targets. The SCS and the Regional Transportation Plan (RTP) must be consistent with each other, including action items and financing decisions. If the SCS does not meet the regional target, the MPO must produce an Alternative Planning Strategy that details an alternative plan to meet the target.

Third, SB 375 requires that regional housing elements and transportation plans be synchronized on eight-year schedules. In addition, Regional Housing Needs Assessment (RHNA) allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land as a result of changes in the housing element, rezoning must take place within three years.

Fourth, SB 375 provides California Environmental Quality Act (CEQA) streamlining incentives for preferred development types. Certain residential or mixed-use projects may be eligible to use streamlining if they conform to the SCS if they are (1) at least 50 percent residential, (2) meet density requirements, and (3) are within 0.5 mile of a transit stop.

Finally, MPOs must use transportation and air emissions modeling techniques consistent with guidelines prepared by the California Transportation Commission (CTC). Regional Transportation Planning Agencies, cities, and counties are encouraged, but not required, to use travel demand models consistent with the CTC guidelines.

California Vehicle Code (CVC). The CVC provides requirements for ensuring emergency vehicle access regardless of traffic conditions. Sections 21806(a)(1), 21806(a)(2), and 21806(c) define how motorists and pedestrians are required to yield the right-of-way to emergency vehicles.

REGIONAL

A number of regional improvement plans affect transportation in the City of Los Angeles. They include the Los Angeles County CMP and the Long Range Transportation Plan (LRTP) prepared by Los Angeles County Metropolitan Transportation Authority (Metro), the RTP/SCS, and the Regional Transportation Improvement Plan (RTIP), prepared by Southern California Association of Governments (SCAG), and the City of Los Angeles General Plan, which includes the Mobility Plan (MP) 2035.

Metro Congestion Management Program (CMP). Metro, the local CMP agency, has established an approach to implement the statutory requirements of the CMP. The Metro Board adopted the 2010 CMP in October 2010. The approach includes designating a highway network that includes all state highways and principal arterials within the County and monitoring the network's congestion. The CMP identifies a system of highways and roadways, with minimum levels of service performance measurements designated at LOS E (unless exceeded in base year conditions) for highway segments and key roadway intersections on this system. For all CMP facilities in the study area, a traffic impact analysis is required. The analysis must: investigate measures which will mitigate the significant CMP system impacts; develop cost estimates, including the fair share costs to mitigate impacts of a proposed project; and, indicate the responsible agency. Selection of final mitigation measures is left at the discretion of the local jurisdiction. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the existing mitigation monitoring requirements of CEQA.

Metro 2009 Long Range Transportation Plan (LRTP). The 2009 LRTP includes funding for general categories of improvements, such as Arterial Improvements, Non-motorized Transportation, Rideshare and Other Incentive Programs, Park-and-Ride Lot Expansion, and Intelligent Transportation System (ITS) improvements for which Call for Project Applications can be submitted for projects in Los Angeles County. Metro also has a Short-Range Transportation Plan (SRTP) to define the near-term (through year 2024) transportation priorities in Los Angeles County. In addition to the RTPs, Metro has recently adopted a Complete Streets Policy and a First Last Mile Strategic Plan.

Metro Complete Streets Policy. Metro's recently adopted Complete Streets Policy is reinforcing the California Complete Streets Act (AB 1358) of 2008. Effective January 1, 2017, Metro is requiring that all local jurisdictions within Los Angeles County must adopt a Complete Streets Policy, an adopted city council resolution supporting Complete Streets, or an adopted general plan consistent with the California Complete Streets Act in order to be eligible for Metro capital grant funding programs, starting with the 2017 grant cycles.

Metro Short Range Transportation Plan (SRTP). The 2014 SRTP is a 10-year action plan that guides future Metro programs and projects through 2024 and advances Metro towards the long-term goals identified in the 2009 LRTP. The SRTP identifies the short-term challenges, provides an analysis of our financial resources, proposes action plans for the public transportation and highway modes, and includes other project and program initiatives. In addition, it addresses sustainability, future funding strategies, and lastly, measures the Plan's performance.[2]

Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) and Regional Transportation Improvement Program (RTIP). SCAG adopted the 2016-2040 RTP/SCS in April 2016. The RTP/SCS is a planning document required under state and federal statute that encompasses the SCAG region, including six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The RTP/SCS forecasts long-term transportation demands and identifies policies, actions, and funding sources to accommodate these demands. The RTP/SCS consists of the construction of new transportation facilities, transportation systems management strategies, transportation demand management and land use strategies. The RTIP, also prepared by SCAG based on the RTP/SCS, lists all of the regional funded/programmed improvements over a six-year period.

[2]Metro, *2014 Short Range Transportation Plan, 2014.*

LOCAL

City of Los Angeles General Plan Framework Element (Framework) and Safety Elements. The Framework, an element of the City of Los Angeles General Plan, is a guide for Community Plans to implement growth and development policies by providing a comprehensive long-range view of the City as a whole. It provides a comprehensive strategy for accommodating long-term growth should it occur as predicted. Chapter 9 Infrastructure and Public Services of the Framework addresses fire prevention, fire protection and emergency medical services provided to the City. The Safety Element of the General Plan identifies existing police, fire, and emergency services and the service needs of the City of Los Angeles in the event of a natural disaster. The Safety Element goals, objectives, policies, and programs are broadly stated to reflect the comprehensive scope of the Emergency Operations Organization (EOO), which is the program that implements the Safety Element. The Framework and Safety Elements include goals, objectives, policies, and programs that are applicable to emergency services.

Los Angeles Municipal Code (LAMC). LAMC Section 12.26 contains required Transportation Demand Management (TDM) and Trip Reduction Measures. TDM is defined as the alteration of travel behavior through programs of incentives, services, and policies, including encouraging the use of alternatives to single-occupant vehicles such as public transit, cycling, walking, carpooling/vanpooling and changes in work schedule that move trips out of the peak period or eliminate them altogether (as in the case in telecommuting or compressed work weeks). Trip Reduction Measure is defined as reduction in the number of work-related trips made by single-occupant vehicles. Specific requirements for developments of various sizes are summarized from the code below:

- Development in excess of 25,000 square feet of gross floor area shall provide a bulletin board, display case, or kiosk (displaying transportation information) where the greatest numbers of employees are likely to see it. The transportation information displayed should include, but is not limited to current routes and schedules for public transit serving the site; telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations; ridesharing promotion material supplied by commuter-oriented organizations; regional/local bicycle route and facility information; and a listing of on-site services or facilities that are available for carpoolers, vanpoolers, bicyclists, and transit riders.
- Development in excess of 50,000 square feet of gross floor area shall provide the above plus: (1) designated parking areas for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s); (2) one permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent, clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area; and (3) parking spaces clearly identified (signed and striped) shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles and other amenities.
- Development in excess of 100,000 square feet of gross floor area shall provide the above plus: (1) a safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area; (2) sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development; (3) possible bus stop improvements; and (4) safe and convenient access from the external circulation system to bicycle parking facilities on-site.

City of Los Angeles Mobility Plan (MP) 2035. The City updated the Transportation Element of the City's General Plan, now referred to as MP 2035, to reflect policies and programs that lay the policy foundation for safe, accessible, and enjoyable streets for pedestrians, bicyclists, transit users, and vehicles throughout the City of Los Angeles. The MP 2035 and Final EIR were adopted on August 11, 2015. MP 2035 is compliant with the 2008 Complete Streets Act (AB 1358), which mandates that the circulation element of a city's General Plan be modified to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan.

The goals and objectives of MP 2035 that are relevant to the Proposed Plan are as follows:

- **Safety First**: Focuses on topics related to crashes, speed, protection, security, safety, education, and enforcement.
    - Objective: Vision Zero: Decrease transportation related fatality rate to zero by 2035.
- **World Class Infrastructure**: Focuses on topics related to the Complete Streets Network (walking, bicycling, transit, vehicles, green streets, and goods movement), Great Streets, Bridges, Street Design Manual, and demand management.
    - Objective: Provide 95 percent on-time arrival reliability of buses traveling on the Transit Enhanced Network (TEN) by 2035. Establish an off-peak five-minute bus frequency on 25 percent of the TEN by 2035.
    - Objective: Increase vehicular travel time reliability on all segments of the Vehicle Enhanced Network (VEN) by 2035.
    - Objective: Maintain the Automated Traffic Surveillance and Control (ATSAC) System Communications Network.
- **Access for all Angelenos**: Focuses on topics related to affordability, least cost transportation, land use, operations, reliability, demand management, and community connections.
    - Objective: Ensure that 90 percent of households are within one mile of the TEN by 2035.
    - Objective: Ensure that 90 percent of all households have access within one-half mile of high quality bicycling* facilities by 2035 (*protected bicycle lanes, paths, and neighborhood enhanced streets).
    - Objective: Increase the combined mode split of persons who travel by walking, bicycling or transit to 50 percent by 2035.
- **Collaboration, Communication & Informed Choices**: Focuses on topics related to real-time information, open source data, transparency, monitoring, reporting, emergency response, departmental and agency cooperation and data base management.
    - Objective: Install street parking occupancy-detection capability at 50 percent of on-street parking locations by 2035.
    - Objective: Implement coordinated wayfinding at all major transit stations by 2035.
- **Clean Environment and Healthy Communities**: Focuses on topics related to environment, health, clean air, clean fuels and fleets, and open street events.
    - Objective: Decrease vehicle miles traveled (VMT) per capita by five percent every five years, to 20 percent by 2035.

- Objective: Meet a nine percent per capita GHG reduction for 2020 and a 16 percent per capita reduction for 2035 (SCAG RTP/SCS).

- Objective: Reduce the number of unhealthy air quality days to zero by 2025.

California's Complete Streets Act (AB 1358) was signed into law in 2008 and mandates that complete street policies and standards be incorporated into a City's general plan. The idea behind Complete Streets is to make streets safe, comfortable, and convenient for people using all mode types. MP 2035 also sets forth street designations and related standards in a Complete Street Design Guide. The Guide provides a compilation of design concepts and best practices that promote the major tenets of Complete Streets, safety and accessibility. The Guide is not meant to supersede existing technical standards provided for in other City or national manuals. Rather, it is meant to supplement existing engineering practices and requirements in order to meet the goals of Complete Streets.

Due to specific site and operational characteristics associated with any given street, any proposed street improvement project must still undergo detailed technical analyses by the appropriate city departments. Overall, this Design Guide will indoctrinate the concept of Complete Streets into Los Angeles' present and future street design so that all stakeholders are able to plan for, implement, and maintain safe and accessible streets for everyone.

Great Streets for Los Angeles/Los Angeles Department of Transportation (LADOT) Strategic Plan. In September 2014, the Mayor's Office and LADOT released the Great Streets for Los Angeles, LADOT's first strategic plan to turn the City's essential infrastructure -- its streets and sidewalks -- into safer, more livable 21st century public spaces that accommodate everyone who uses them. The plan builds upon Mayor Garcetti's Great Streets Initiative, which looks at Los Angeles' streets as valuable assets that can help revitalize neighborhoods across the City and make it easier for Angelenos to get around whether they walk, bike, drive, or take transit. The plan also stresses the importance of working closely with other city and regional agencies, such as the Bureau of Street Services and Metro, to improve safe, accessible transportation services and infrastructure.

The plan focuses on Mayor Garcetti's priorities of making the city safe, prosperous, and livable with a well-run government and includes the following key goals:

- **Vision Zero**: Eliminate traffic deaths by 2025 and design streets to increase the safety of pedestrians, including adding 100 new high-visibility continental crosswalks.
- **Great Streets**: Implement changes to the 15 Great Street corridors and launch programs to reduce dangerous speeding in residential neighborhoods. Increase bike infrastructure and launch a regional bikeshare program. Expand bus service and improve its quality and connectivity with surrounding neighborhoods.
- **A 21st Century DOT**: Streamline LADOT's operations to implement needed safety and mobility projects quickly and efficiently. Enhance technologies to manage traffic, meters, and parking operations.
- **World-Class Streets for a World-Class Economy**: Real-time traffic information and more efficient allocation of the street to support local foot traffic and better manage freight traffic. Build Great Streets for vibrant and prosperous neighborhood business districts.

Los Angeles Department of Transportation (LADOT). As part of project review, LADOT determines whether a project requires a traffic study and evaluates project site plans to ensure that they follow standard engineering practice and City design regulations. LADOT's *Transportation Impact Study Guidelines* includes the requirements related to elements such as driveway design, use of off-street parking, and loading facilities. These design related requirements are often imposed through zone changes, conditional use

approvals, division of land or the traffic review process. In many cases it is necessary to clear these traffic requirements (i.e., certify that they have been carried out). This is done by LADOT's representative on the Subdivision Committee, who must approve any plans affected by such requirements.

Los Angeles Fire Department (LAFD) Strategic Plan 2015-2017. The Strategic Plan focuses on nine goals and corresponding strategic actions that guide the LAFD. The primary goals that are applicable to the Proposed Plan include providing exceptional public safety and emergency service and implementing and capitalizing on advanced technologies. Some of the key priorities associated with these goals include:

- Improving response times by utilizing data and metrics to identify gaps in LAFD's response strategies and exploring response time improvements through dialogue, cognitive inquiry, innovation, and follow-up;
- Delivery of emergency medical services by expanding LAFD Emergency Medical Service (EMS) response capabilities for special events and addressing period of high vehicle traffic; and
- Implementing advanced technologies by developing performance metrics, tracking standards, data collection, analysis and reporting procedures (FireStatLA).

The Strategic Plan also focuses on the development of an even more professional workforce, promotion of a positive work environment to address risk management issues and strengthening community relationships to improve preparedness and enhance resiliency during emergency events.

EXISTING SETTING

OVERVIEW

The Project Area is the Hollywood Community Plan Area (CPA), which is located in the City of Los Angeles approximately 2.5 miles northwest of downtown Los Angeles. The analysis evaluates the transportation network within the boundaries of the Project Area as well as the surrounding transportation network that could be potentially impacted by the Project. For the purposes of this EIR transportation impact analysis, Existing Conditions (baseline) is defined as Year 2016, which corresponds to the date of the release of the Notice of Preparation (NOP).

Hollywood, like many other urban areas throughout the country, experiences significant traffic congestion. Despite an extensive street network and transit options, vehicular circulation continues to deteriorate due to historical over-reliance on the car as the primary mode of transportation. The combination of many regional destinations, oversaturated roadways, and unreliable travel times for autos and bus transit underlie the need for creating a transportation network for the Project Area that will better serve all modes of transportation, improve the efficiency of the overall system, and enhance the livability along major boulevards.

The Project Area is served by a network of grid system of arterials, except in areas north of Franklin Avenue, where the road network becomes increasingly curvilinear into the hills. Rapid and local bus transit lines operate on most major and minor arterials. Pedestrian facilities primarily consist of sidewalks adjacent to roadways, and a limited bicycle network is provided. The transportation network in the Project Area is primarily auto- and bus transit-oriented.

Regional access is provided by the Ventura Freeway (US-101 and SR-134) and the Santa Ana Freeway (I-5). There are several key Boulevards and Avenues including Western Avenue, Normandie Avenue, Vermont Avenue, Cahuenga Boulevard, Highland Avenue, La Brea Boulevard, Fairfax Avenue and Crescent Heights Boulevard, which generally run north-south; and Franklin Avenue, Hollywood Boulevard, Sunset Boulevard, Santa Monica Boulevard and Melrose Avenue, which generally run east-west. The Project Area is also served by collector and local streets.

HIGHWAY AND STREET SYSTEM

The roadway network in the Project Area ranges from major freeways, such as US-101, SR-134 and I-5, to neighborhood-serving local roadways. **Figure 4.15-1** displays the roadways within the Project Area and illustrates the classification of roadway facilities. Below is a brief description of the facility types in the City's MP 2035 and Complete Streets Design Guide, including those identified on **Figure 4.15-1** and existing in the CPA.[3]

Boulevard I (Major Highway Class I). Boulevard I streets are generally defined as having three to four lanes in each direction along with a median turn lane. The width of a Class I Boulevard is usually 100 feet, with a typical sidewalk width of 18 feet and a target operating speed of 35 miles per hour (mph).

Boulevard II (Major Highway Class II). Boulevard II streets are generally defined as having two to three lanes in each direction along with a median turn lane. The width of a Class II Boulevard is usually 80 feet, with a typical sidewalk width of 15 feet and a target operating speed of 35 mph.

Avenue I (Secondary Highway). Avenue I streets typically have one to two lanes in each direction, a roadway width of 70 feet, and a normal sidewalk width of 15 feet and a target operating speed of 35 mph. An Avenue I typically includes streets with a high amount of retail uses and local destinations.

Avenue II (Secondary Highway). Avenue II streets usually have one to two lanes in each direction, with a typical roadway width of 56 feet, a typical sidewalk width of 15 feet and a target operating speed of 30 mph. Such streets are typically located in parts of the City with dense active uses, and a busy pedestrian environment.

Avenue III (Secondary Highway). Avenue III streets are defined to have one to two lanes in each direction, with a roadway width of 46 feet, a normal sidewalk width of 15 feet, and a target operating speed of 25 mph. This classification was developed to maintain roadway width in older, more historic parts of the City.

Collector Street. Collector Streets generally have one travel lane in each direction, with a roadway width of 40 feet and a sidewalk width of 13 feet. The target operating speed for Collector Streets is 25 mph. Such streets are typically intended for vehicle trips that start or end in the immediate vicinity of the street.

Industrial Collector Street. Industrial Collector Streets vary from normal collector streets in that larger curb returns are incorporated to allow for the wider turning radii of trucks.

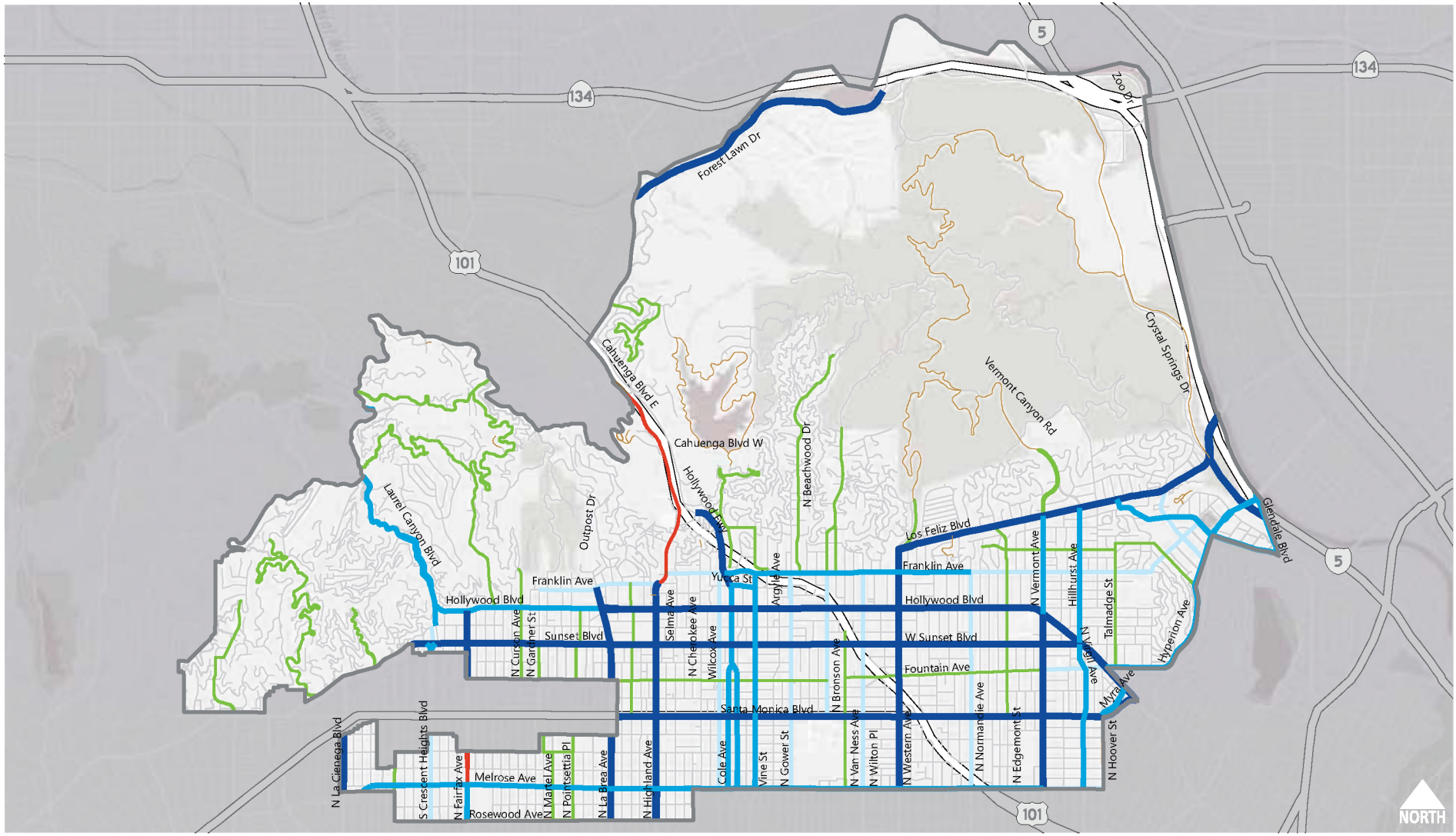
Local Street Standard. Local Street Standard roadways typically have one lane in each direction, and are designed to have a 36-foot width, 12-foot sidewalks, and a target operating speed of 20 mph. Such streets are not designed for through traffic; rather, their focus is to allow access to and from destination points. Unrestricted parking is typically available on both sides of the street.

Local Street Limited. Local Street Limited roadways typically have one lane in each direction, and are designed to have a 30-foot width, 10-foot sidewalks, and a target operating speed of 15 mph.

Industrial Local Street. Although similar to the normal local streets, Industrial Local Streets differ primarily in width for the purpose of providing adequate space for trucks to maneuver. The typical roadway width for an Industrial Local Street is 44 feet, with 10-foot sidewalks and a target operating speed of 20 mph.

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[3]City of Los Angeles, *Complete Streets Design Guide*, adopted August 11, 2015, https://losangeles2b.files.wordpress.com/2015/05/2015_csdg_web-4-22.pdf.



Road Classifications

- Avenue I
- Avenue II
- Avenue III
- Boulevard II
- Collector
- Local Street
- Private

SOURCE: Mobility Plan 2035, 2016; Fehr & Peers, 2018.

taha environmental planners
taha 2010-073

Hollywood Community Plan Update
Draft Environmental Impact Report
CITY OF LOS ANGELES

FIGURE 4.15-1

ROADWAY NETWORK

Signalized Intersections and Traffic Control Devices. The City of Los Angeles' Automated Traffic Surveillance and Control (ATSAC) System is a computer-based traffic signal control system that monitors traffic conditions and system performance to allow ATSAC operations to manage signal timing to improve traffic flow conditions. This system allows monitoring and control of the signal from a central Traffic Operations Center at City Hall. The importance of linking to the ATSAC System is the ability to coordinate the signals in relationship with other signals along a travel corridor. Signal coordination minimizes delay due to stops and enhances vehicle flow. Studies by LADOT and independent third parties have shown that the ATSAC system reduces congestion and increases average travel speeds.[4] The Adaptive Traffic Control System (ATCS) is an enhancement to ATSAC and provides fully traffic-adaptive signal control based on real-time traffic conditions. In addition, LADOT staff can manually adjust traffic signals remotely from the department's command center to respond to collisions, weather, special events, and other emergencies. All signalized intersections in the Project Area are currently operating under the City's ATSAC System and ATCS.

EXISTING TRAFFIC OPERATIONS

This section presents existing traffic volumes, describes the methodology used to assess the traffic operations, and analyzes the resulting operating conditions, indicating volume-to-capacity (V/C) ratios and LOS. LOS is a measure used to describe the condition of traffic flow, ranging from excellent conditions at LOS A to overloaded conditions at LOS F. LOS can be determined by dividing the number of vehicles (i.e., volume [V]) by roadway capacity (C), and the resulting V/C ratio is then used to obtain the corresponding LOS.

The highest 1-hour traffic volume during the AM or PM peak periods on roadways within the Project Area are displayed in **Figure 4.15-2** and **Figure 4.15-3**, AM Peak Period LOS and PM Peak Period LOS, respectively. It should be noted that because traffic volumes are a result of the collective travel choices of thousands of individual drivers, variation in the daily and peak period volumes on any given facility is both expected and observed. The Federal Highway Administration (FHWA) guidelines recommend traffic models are calibrated to within 7 to 15 percent for freeway and arterial volumes to account for this regular variation.[5] This range is based on studies that show that this range represents the average daily fluctuation in traffic for major roadways.[6] Accordingly, the estimates of both existing and future conditions are subject to regular variation due to fluctuations in travel demand (or the travel choices of the thousands of individual drivers using the Project Area roadways).

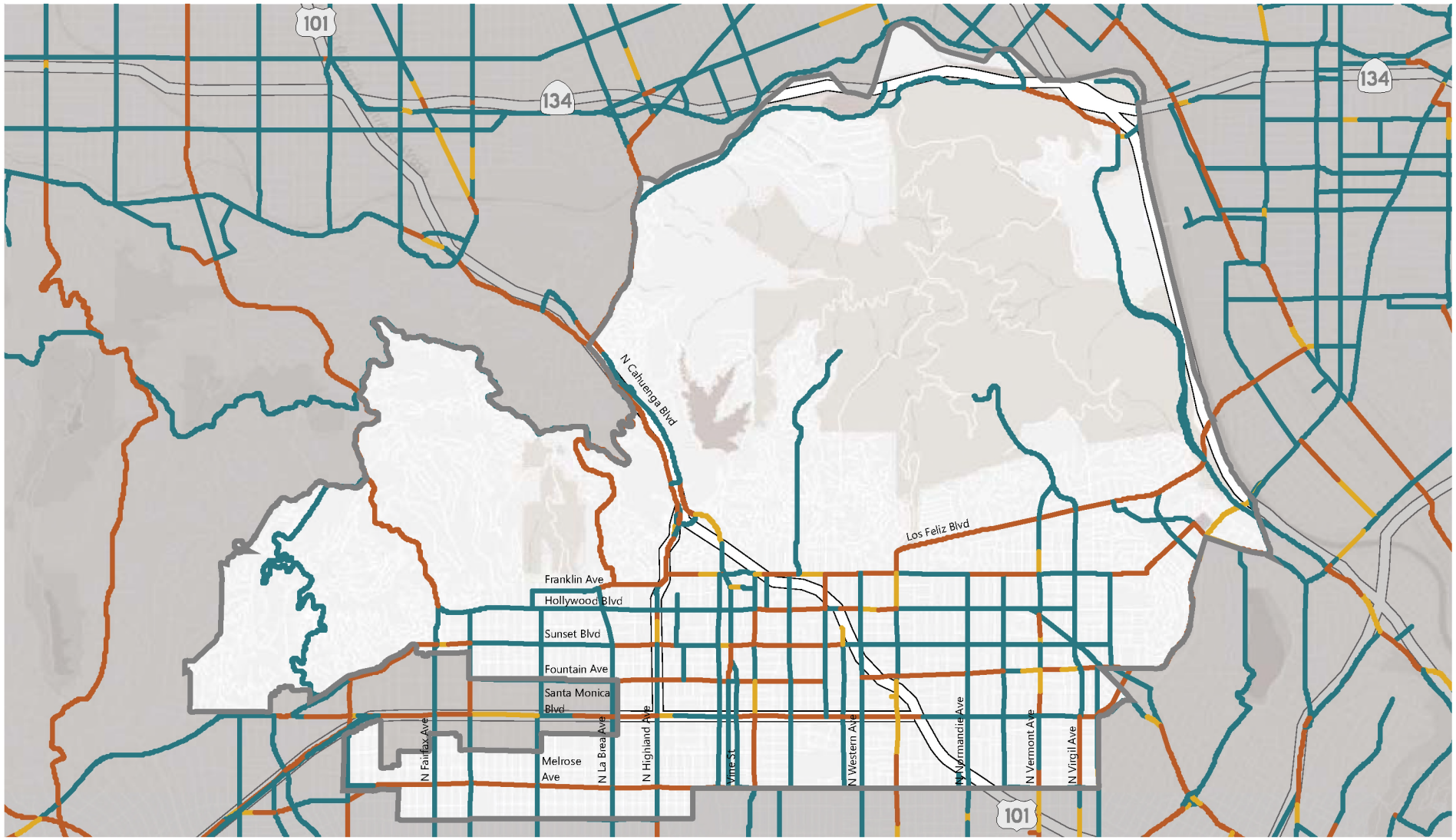
As discussed in additional detail under Special Event Traffic Operations below, special events in Hollywood frequently require partial or full closure of Hollywood Boulevard in the Project Area, including sidewalks and crosswalks, for periods of several hours to several days at a time. The data collection effort for the Existing Conditions assessment included traffic counts recorded by the Regional Integration of ITS Projects (RIITS) during the months of February, March, April and May on a Tuesday, Wednesday and Thursday. These periods represent the most typical traffic conditions, with schools in session and the least likelihood of a holiday or long-weekend related change compared to normal traffic patterns.

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[4]LADOT, *Los Angeles Signal Synchronization Fact Sheet*, February 14, 2016, http://ladot.lacity.org/sites/g/files/wph266/f/LADOT%20ATSAC%20%26%20Signals%20_%20Fact%20Sheet%202-14-2016.pdf, accessed July 27, 2017.

[5]FHWA, *Calibration & Adjustment of System Planning Models*, December 1990.

[6]U.S. Department of Energy, *Variability in Traffic Monitoring Data: Final Summary Report*, August 1997.



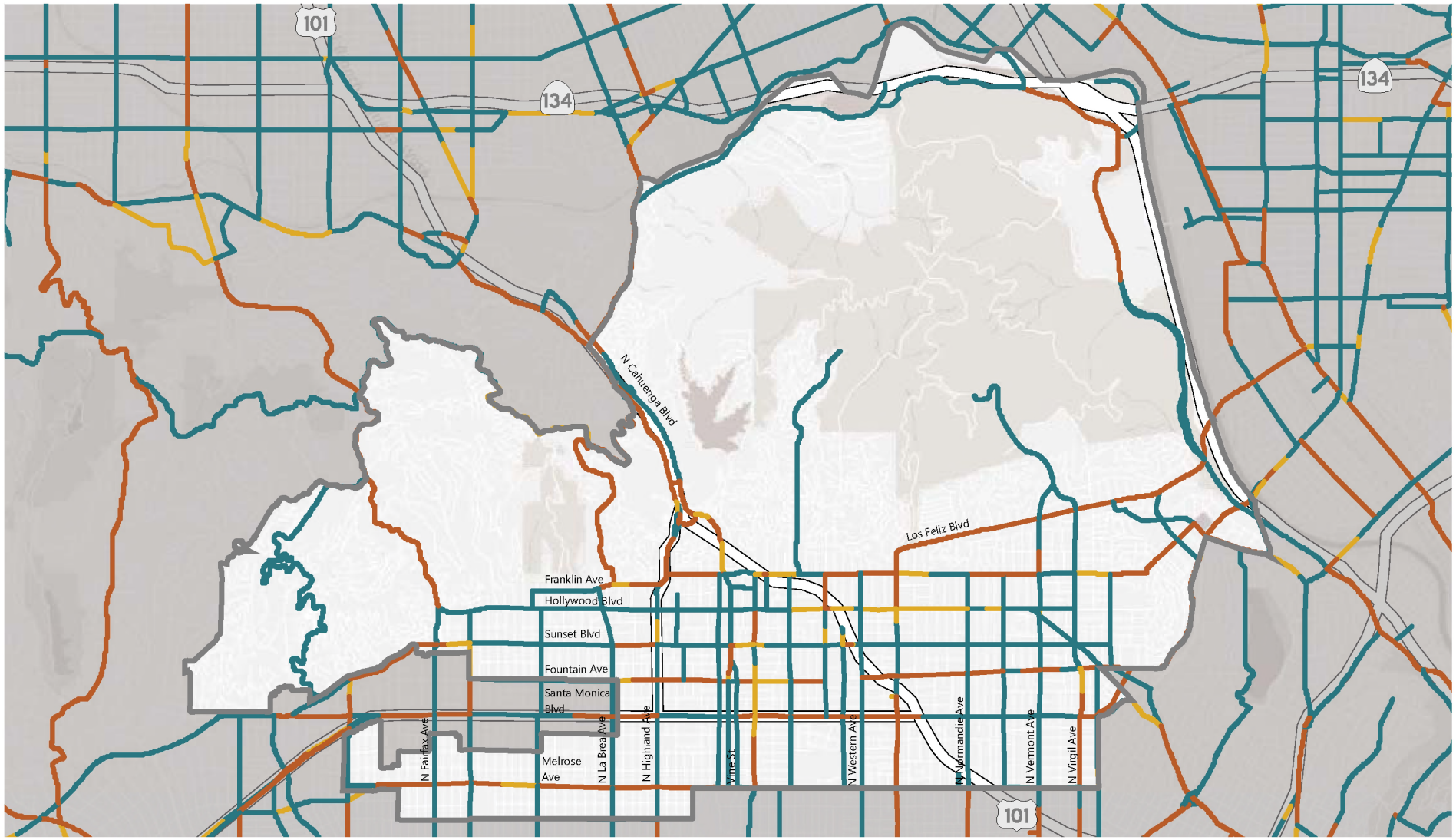
Segment Level of Service

- Acceptable Operations (V/C < 0.90)
- Approaching Capacity (V/C 0.90 - 1.00)
- Over Capacity (V/C > 1.00, LOS F)

SOURCE: Fehr & Peers, 2018.

FIGURE 4.15-2

AM PEAK PERIOD LEVEL OF SERVICE:
2016 EXISTING CONDITIONS



Segment Level of Service

- Acceptable Operations (V/C < 0.90)
- Approaching Capacity (V/C 0.90 - 1.00)
- Over Capacity (V/C > 1.00, LOS F)

SOURCE: Fehr & Peers, 2018.

FIGURE 4.15-3

PM PEAK PERIOD LEVEL OF SERVICE:
2016 EXISTING CONDITIONS

The available traffic count data was post-processed to calculate the average hourly volumes for the Existing Conditions analysis. Time periods with no volume data due to roadway closures were not included in the average hourly volumes. To the extent that event traffic occurred on a weekday (Tuesday, Wednesday or Thursday) between February and May 2016, these travel demands are accounted for when calculating the average hourly volumes within the Plan Area.

To determine the operations of the roadway network during peak commute hours, a LOS analysis was conducted for the roadways in the Project Area. LOS is a qualitative measure used to describe the condition of traffic flows, ranging from excellent conditions at LOS A (free-flow traffic conditions with little or no delay) to LOS F (oversaturated conditions in which traffic flows exceed design capacity) resulting in extensive vehicle queues and delays. See **Table 4.15-4** and accompanying text, in the impact discussion below, for a description of LOS A through F, and discussion for weighted average V/C.

The number of travel lanes on roadways within the Project Area are displayed in **Figure 4.15-4**. The number of travel lanes on several roadways, such as Los Feliz Boulevard, Sunset Boulevard, Santa Monica Boulevard increase by one travel lane in each direction during peak travel periods due to on-street parking restrictions; these street segments are indicated on **Figure 4.15-4**. The peak hour lane capacities were used to determine roadway segment operations during morning and evening commute periods.

The LOS of the study corridors was determined based on the V/C ratio using the Hollywood subarea TDF model.[7] This ratio was calculated by comparing peak hour traffic volumes to the roadway capacity for each facility. The roadway capacities reflect the operating characteristics of the study corridors, such as functional classifications, number of lanes, and travel speeds. Functional classification is a scale that determines the vehicles-per-lane-per-hour capacity; higher classifications generally have more and wider lanes and are designed to facilitate a higher volume of vehicles per hour. **Table 4.15-1** summarizes the typical travel conditions for the roadway network (using a weighted average V/C ratio) and the percentage of roadway segments operating at LOS E or F. The weighted average V/C ratio represents typical travel conditions for the roadway network in the Project Area.

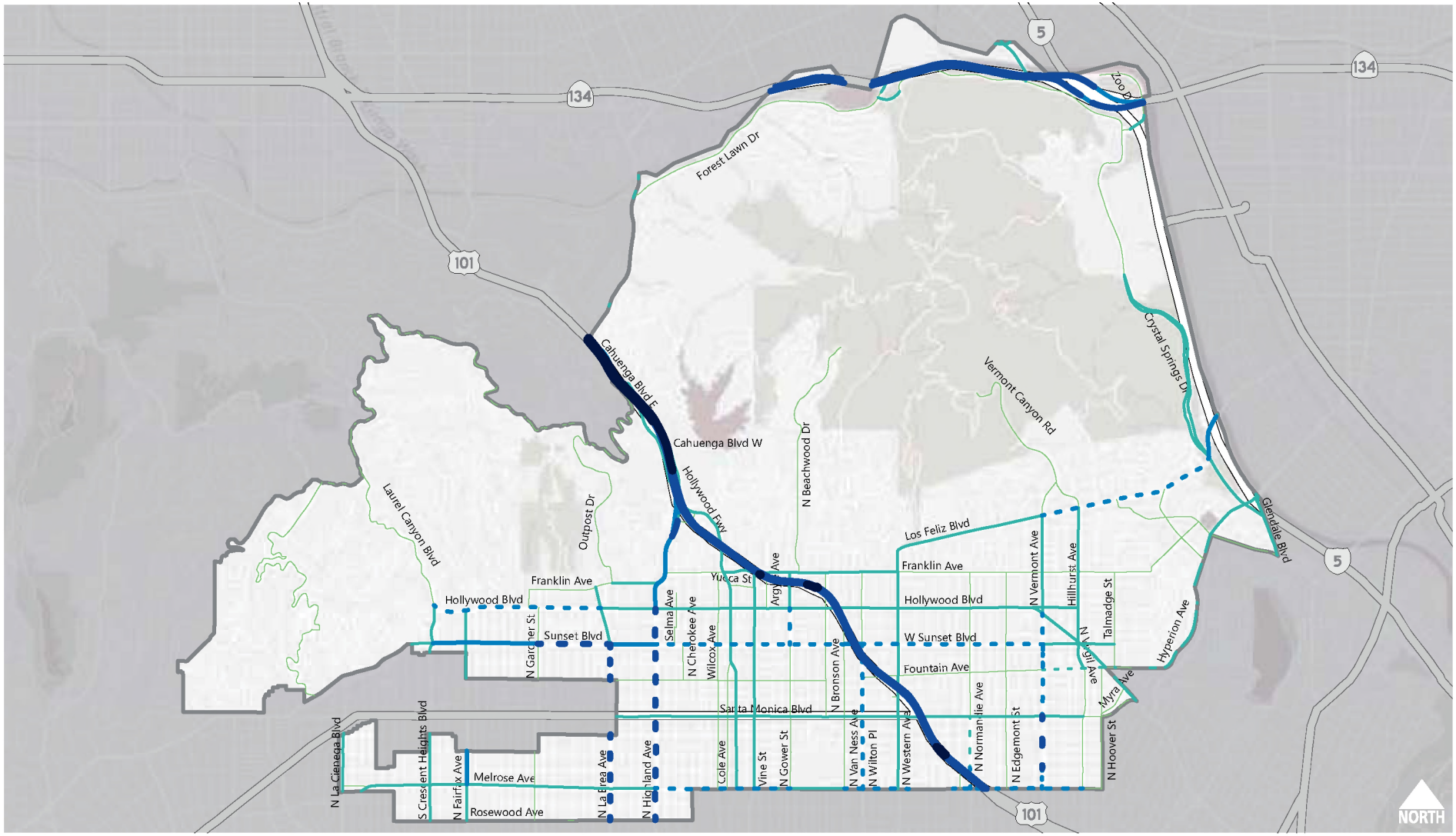
TABLE 4.15-1: EXISTING 2016 ROADWAY SEGMENT LEVEL OF SERVICE (LOS)

Transportation Metrics	Analyzed Time Period	
	AM Peak Period	PM Peak Period
Weighted Average V/C	0.876 (LOS D)	0.890 (LOS D)
Percentage (%) of Street Segments at LOS E or F	37%	37%
WEIGHTED AVERAGE V/C BY FACILITY TYPE		
Avenue	1.165 (LOS F)	1.186 (LOS F)
Boulevard / Parkway	0.862 (LOS D)	0.870 (LOS D)
Local / Collector	0.840 (LOS D)	0.922 (LOS E)

SOURCE: Fehr & Peers, *Hollywood Subarea TDF Model*, 2017.

Approximately 37 percent of the roadways operate at an LOS E or F during either peak period. The weighted average V/C ratio is 0.876 (LOS D) in the AM peak period and 0.890 (LOS D) in the PM peak period. As a general matter, this means a little more than a third of road network (Avenues, Boulevards, and Local/Collector streets) in the Hollywood area experiences substantial delay during the peak period, and overall the network is approaching the limits of its capacity.

[7]Fehr & Peers, *Hollywood Community Plan Model Development Report*, 2016.



Number of Lanes on Road

0 - 1 | 2 | 3 | 4 | 5 - 7

Road segments with a dashed line have peak period parking restrictions in order to accomodate an additional travel lane

SOURCE: Fehr & Peers, 2018.

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FIGURE 4.15-4

EXISTING ROADWAY NETWORK CAPACITY

As discussed above, use of LOS in evaluating significant traffic impacts under CEQA is anticipated to be replaced with other transportation metrics. VMT is a measure of how many miles are being driven. The trip generation estimated by the Travel Demand Forecasting (TDF) model was categorized according to the origin and destination of each trip. Internal-to-internal (II) trips remain within the Project Area. Internal-to-external (IX) trips originate within the Project Area and terminate at an outside destination. External-to-internal (XI) trips originate outside the Project Area and terminate within it. The VMT calculation accounts for all internal (II) trips and trips that begin or end (IX or XI) within the Project Area, as these trips are generated by or attracted to land uses within the Hollywood area. The travel behavior effects of land use changes in Hollywood can be understood by measuring the VMT of trips originating in and/or destined for the Project Area.

An alternative method for measuring VMT is known as the "boundary method", which accounts for all vehicle miles traveled strictly within the border of a defined area. This method would include VMT for trips passing through, but not originating in or destined for, Hollywood. Although a valid method for measuring VMT, it less effectively measures the regional travel effects of Hollywood land uses, and includes travel that passes through Hollywood, which is unrelated to the community plan land uses.

Table 4.15-2 summarizes the Existing Conditions for the Hollywood Community Project Area and presents the model estimates of vehicle mode split for automobiles, transit, bicycles and walk trips. According to model estimates, approximately 23 percent of all trips within the Project Area are made by transit, walking or biking. This is consistent with recent U.S. Census Bureau data, which found that 24 percent of Hollywood area residents use non-automobile methods (transit/bike/walk/other) on their journey to work as compared to approximately 17 percent citywide.

TABLE 4.15-2: 2016 MODE SPLIT

Travel Mode	Percentage (%)
Automobile	77%
Non-Automobile (transit/bike/walk)	23%

Note: U.S. Census Bureau, *2011-2015 American Community Survey 5-Year Estimates Table S0801 Commuting Characteristics by Sex.*
SOURCE: Fehr & Peers, *Hollywood Subarea TDF Model*, 2017.

Table 4.15-3 summarizes the daily vehicle trips (VT) and VMT within the Project Area. The daily VMT generated by uses within the Project Area is approximately 5.6 million miles, which equates to 18.3 VMT per capita. SCAG's estimate of VMT per capita is 21.5 for the greater Los Angeles County area, and 22.8 in the six-county region.

TABLE 4.15-3: 2016 DAILY VEHICLE TRIPS AND VEHICLE MILES TRAVELED

Transportation Metrics	Project Area
Vehicle Trips (VT)	706,000
Total Vehicle Miles Traveled (VMT)	5,624,000
Vehicle Miles Traveled per Capita	18.3

SOURCE: Fehr & Peers, *Hollywood Subarea TDF Model*, 2017.

RELIABILITY

The traffic volume, travel time, and LOS results presented in this section reflect typical weekday (Tuesday through Thursday) conditions within the Project Area without major incidents and under mild weather conditions. Atypical traffic conditions, such as a collision on the US-101, rainy weather or a special event, can impact travelers in the Project Area. The reliability of the roadway network can be impacted by these

occurrences and is a common frustration for drivers. The bus transit system can also be affected by these events.

EMERGENCY ACCESS

California state law requires that drivers yield the right-of-way to emergency vehicles and remain stopped until the emergency vehicles have passed. Generally, multi-lane roadways allow the emergency vehicles to travel at higher speeds and permit other traffic to maneuver out of the path of the emergency vehicle. Within the Project Area, multi-lane roadways running north-south include Western Avenue, Normandie Avenue, Vermont Avenue, Cahuenga Boulevard, Highland Avenue, La Brea Boulevard, Fairfax Avenue and Crescent Heights Boulevard. Roadways running east-west include Franklin Avenue, Hollywood Boulevard, Fountain Avenue, Sunset Boulevard, Santa Monica Boulevard and Melrose Avenue. Additionally, the US-101, SR-134 and I-5 provide emergency access to and from locations within the Project Area. In addition, the LAFD in collaboration with LADOT has developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles travelling on designated streets in the City.[8]

Within the City of Los Angeles, fire prevention and suppression and emergency medical services are provided by the LAFD. Public protection service and law enforcement are provided by LAPD. New development projects in the City may increase the demand for fire protection and emergency medical services, and the LAFD evaluates new project impacts on a project-by-project basis. Consideration is given to project size and components, required fire-flow, response time and distance for engine and truck companies, fire hydrant sizing and placement standards, access, and potential to use or store hazardous materials.[9] The adequacy of emergency service may be influenced by factors such as staffing levels, emergency response times, technology improvements, management strategies, and mutual aid agreements. Every year, LAFD assesses its resources and reallocates them based on demand and need citywide. The provision of new fire stations varies as a function of not only the geographic distribution of physical stations but also due to the availability of fire trucks, ambulances, and other equipment as well as access to reciprocal agreements with neighboring jurisdictions. The City requires that development plans be submitted to the City for review and approval to ensure that new development has adequate access, including driveway access and turning radius in compliance with existing City regulations.[10]

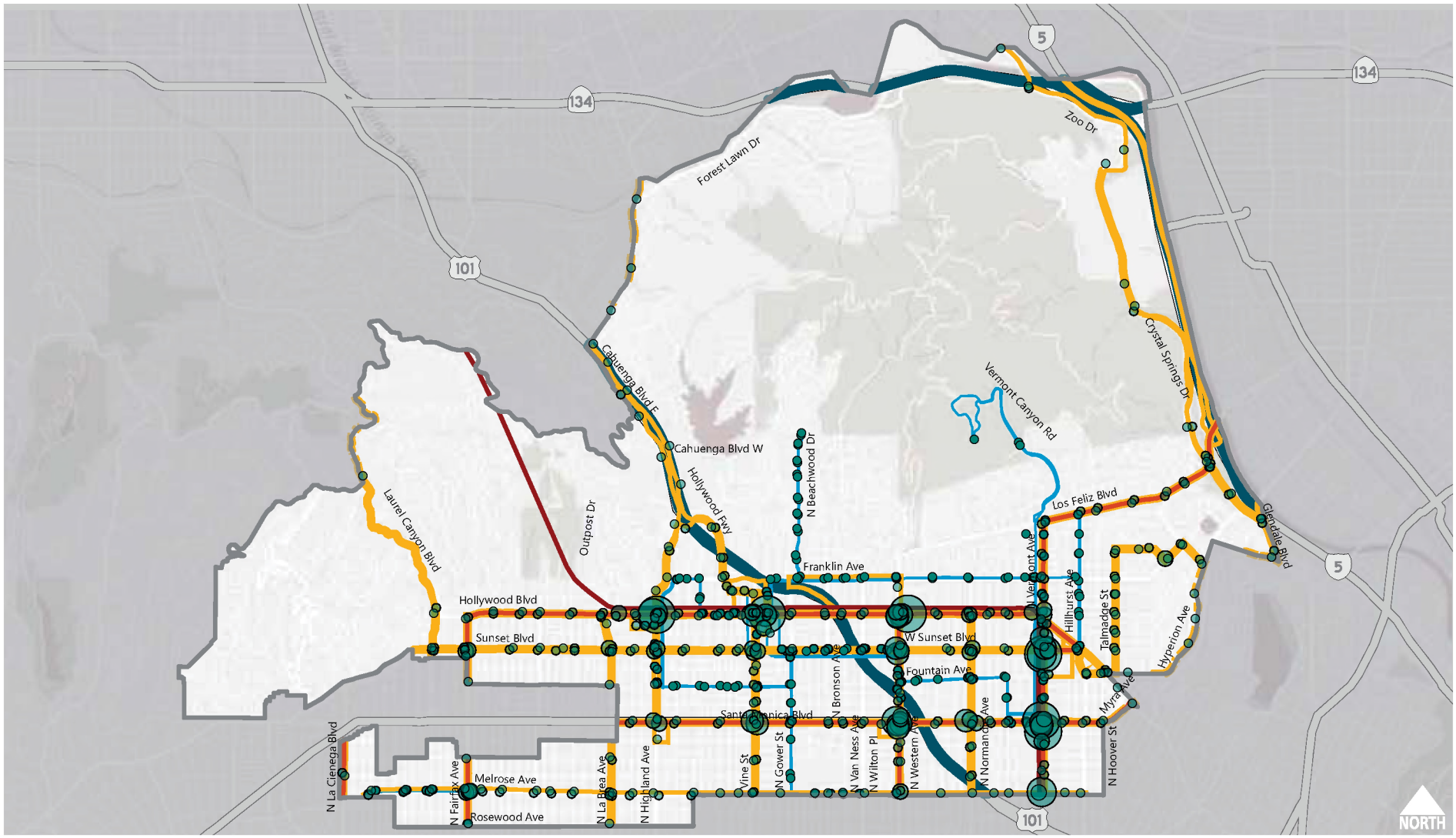
PUBLIC TRANSIT SERVICE

Metro's Red Line subway provides high-speed local and regional transit connections both with the San Fernando Valley and downtown Los Angeles, including a direct connection to Union Station. Other public transit service within the Project Area consists primarily of local bus services linking riders to localized businesses and destinations. A relatively dense network of buses provides local access as well as first/last-mile connections to the Red Line subway stations. Pedestrian access to transit in Hollywood tends to rank near the average for major transit stops/stations in Los Angeles County, with an average rating of 91 out of 100, as reported by WalkScore.com.[11] Bicycle access to major transit stops in the area is less robust, falling well below the countywide average and receiving an average score of 61 out of 100, as reported by WalkScore.com.

Services are provided by multiple transit operators, including Metro and LADOT Downtown Area Short Hop (DASH) and Commuter Express; headways can be as frequent as 15 minutes or less. **Figure 4.15-5** shows transit service coverage in the Hollywood Project Area.

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[8]LADOT, *ATSAC Fact Sheet,* http://ladot.lacity.org/what-we-do/operations/signal-synchronization0
[9]City of Los Angeles, *CEQA Thresholds Guide*, 2006, page K.2.2.
[10]LAMC Section 12.21.A.5 "Design of Parking Facilities".
[11]Fehr & Peers, *Metro Active Transportation Strategic Plan,* April 2016.



Daily Ridership by Stop

- 0 - 250
- 250 - 500
- 500 - 1,000
- 1,000 - 2,000
- 2,000+

Transit Lines

- Metro Red Line
- Metro Rapid Bus
- Metro Local Bus
- LADOT DASH
- LADOT Commuter Express

SOURCE: Metro, 2016; LADOT, 2018; Fehr & Peers, 2018.

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FIGURE 4.15-5

EXISTING TRANSIT SERVICE & RIDERSHIP

Below are brief descriptions of the transit operators that provide service within the Project Area:

Los Angeles County Metropolitan Transportation Authority (Metro). Metro is the primary transit operator in Los Angeles County, providing bus, light rail, and subway services. There are two Metro heavy rail lines (Red and Purple), four Metro light rail lines (Blue, Green, Gold, Expo Phase 1) and two bus rapid transit (BRT) lines (Orange and Silver) operating in exclusive rights-of-way. Bicycles are allowed in designated areas on Metro trains at no extra charge at all times. Metro also operates approximately 180 bus routes in mixed traffic. These bus services vary considerably in speed, frequency and capacity. Buses are equipped with two bicycle racks at the front of the bus, and bicyclists are allowed to load their bicycles on the rack when there is space available at no extra charge. If the rack is full, bicyclists are asked to wait for the next bus.

The following Metro lines currently provide transit service in and through the Project Area:

- Metro Red Line (subway)
- Metro Rapid Lines
  - 704
  - 705
  - 754
  - 757
  - 780
- Metro Local Lines
  - 2
  - 4
  - 10
  - 92
  - 96
  - 105
  - 175
  - 180
  - 201
  - 204
  - 206
  - 207
  - 210
  - 212
  - 217
  - 218
  - 222
  - 237

Los Angeles Department of Transportation (LADOT). LADOT provides local and commuter express bus services in the City of Los Angeles. DASH operates 32 community circulator routes covering downtown Los Angeles and many outlying communities within the City. The Commuter Express operates 14 routes, making a limited number of stops and transporting passengers between downtown Los Angeles and other major centers within the City. Most Commuter Express routes operate during the peak hours only in the peak direction.

LADOT buses are equipped with three bicycle racks at the front of the bus, and bicyclists are allowed to load their bicycles on the rack when there is space available at no extra charge. If the rack is full, bicyclists are asked to wait for the next bus. The following LADOT services operate within and through Hollywood Project Area:

- Commuter Express 422
- DASH Beachwood Canyon
- DASH Fairfax
- DASH Hollywood
- DASH Hollywood/Wilshire
- DASH Los Feliz
- DASH Weekend Observatory Shuttle

West Hollywood CityLine X. The City of West Hollywood operates the "CityLine X" public transit route, a peak-period service connecting West Hollywood with the Metro Red Line station at Hollywood and Highland. Service operates weekdays between 7:00 a.m. and 9:00 a.m. and 5:30 p.m. to 7:00 p.m. every 15-20 minutes. The route includes local stops in West Hollywood along Santa Monica Boulevard.

BICYCLE AND PEDESTRIAN FACILITIES

The Project Area consists of a modest network of bicycle facilities; pedestrian facilities primarily consist of sidewalks adjacent to roadways. Pursuant to the California Vehicle Code, bicycles are allowed on any street within the local street system. Pursuant to Los Angeles City Code, bicycles are also allowed on the sidewalk (LAMC Section 56.15). Most roadways are aligned on a grid system providing multiple route options for traveling throughout the Project Area.

Bicycle facilities are defined as off-street bicycle paths (Class I), on-street signed and striped bicycle lanes (Class II), on-street signed bicycle routes (Class III), and protected bicycle lanes or cycle tracks (Class IV). The design features of the various types of bicycle facilities are summarized below:

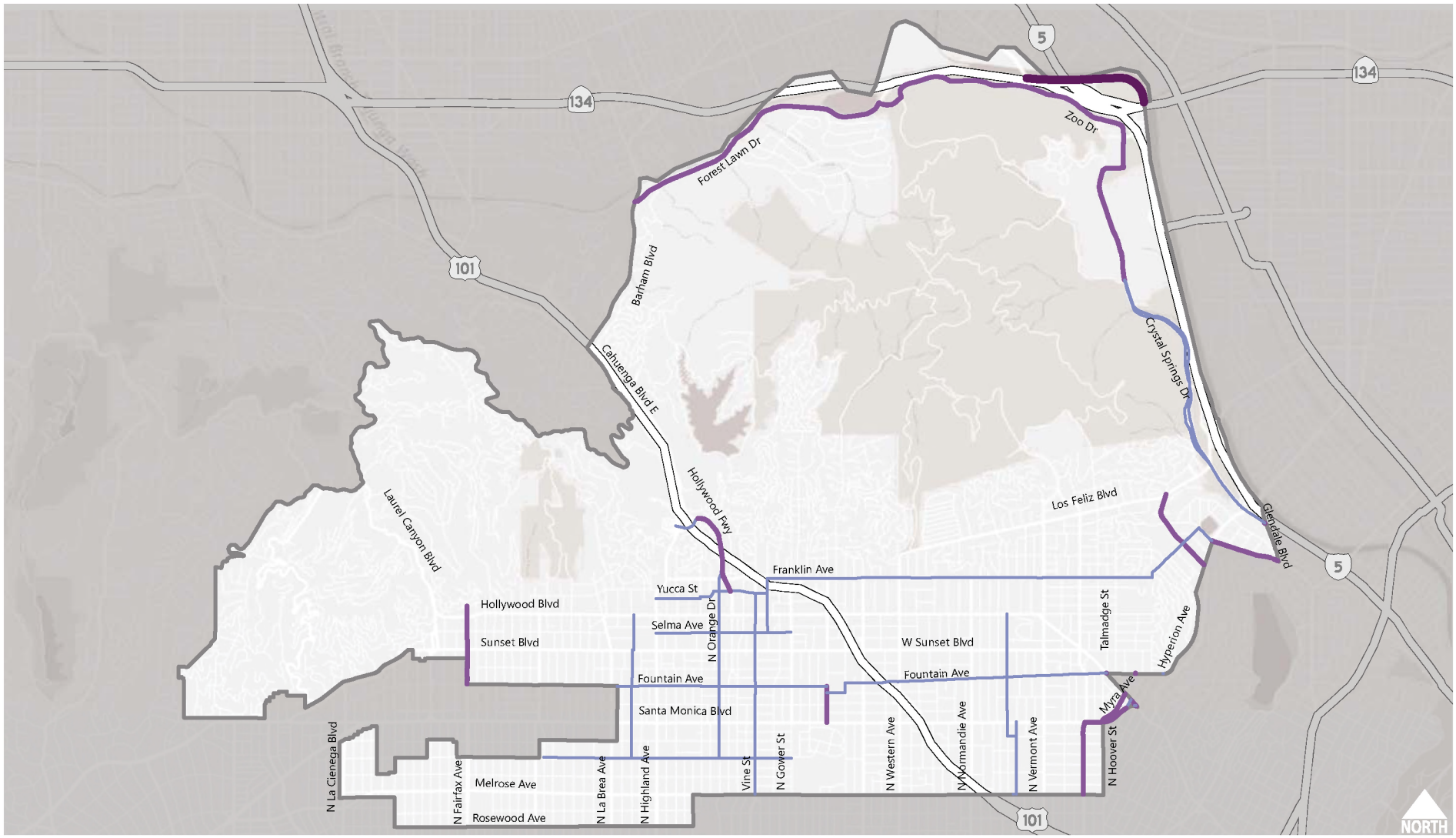
- **Bicycle Path**: A paved pathway separated from motorized vehicular traffic by an open space or barrier and either within the highway rights-of-way or within an independent alignment. Bicycle paths may be used by bicyclists, skaters, wheelchairs users, joggers, and other non-motorized users. Caltrans refers to this facility as Class I Bikeway, which "provides a completely separated right-of-way for the exclusive use of bicycles and pedestrians with cross flow of motorists minimized."
- **Buffered Bike Lanes**: Buffered bicycle lanes provide on-street right-of-way in the form of a painted buffer that directs motorists to travel away from the bike lane and provides room for bicyclists to pass another bicyclist without entering the adjacent motor vehicle travel lane. A buffered bicycle lane is considered a Class II Bikeway.
- **Bicycle Lane**: A striped lane for one-way bicycle travel on a street or highway. Caltrans refers to this facility as a Class II Bikeway.
- **Bicycle Route**: A shared roadway specifically identified for use by bicyclists, providing a superior route based on traffic volumes and speeds, street width, directness, and/or cross-street priority, denoted by signs only. Caltrans refers to this facility as a Class III Bikeway.
- **Protected Bicycle Lane (Cycle Track)**: A bicycle lane that provides further protection from other travel lanes with a physical roadway intervention. This is considered a Class IV Bikeway.

Within the Project Area, there are several existing bicycle facilities in addition to bicycle racks provided at various public and private locations throughout the Project Area. **Figure 4.15-6** shows the locations of the existing bicycle facilities within the Project Area.

The pedestrian network includes sidewalks, crosswalks, and curb ramps, as well as pedestrian amenities such as street trees and benches in some areas. Similar to many areas in the City, the Project Area has an aging network of pedestrian facilities including sidewalks of varying widths and wide crosswalks at most major intersections. Many areas have pedestrian-friendly features such as curb-side parking, and traffic signal modifications to ensure longer pedestrian crossing times, where warranted. Conditions vary widely in terms of sidewalk condition, pavement marking visibility, and obstructions in the sidewalk realm. An estimated 42 percent of the City's 10,750 miles of sidewalks are in disrepair.[12]

In 2015, as part of the Great Streets program, the City reconfigured the Hollywood Boulevard/Highland Avenue intersection to include an exclusive pedestrian signal phase in which all vehicular movement is prohibited. This configuration is also known as a "pedestrian scramble" and improves safety for pedestrians as well as optimizing traffic operations at an intersection with high volumes of pedestrians and turning vehicles.

[12]Los Angeles Times, *A Citizens Sidewalk Brigade for L.A*, September 11, 2012.



Bicycle Facilities

- Class I (Bicycle paths)
- Class II (Bicycle lanes)
- Class III (Bicycle routes/bicycle friendly streets)

SOURCE: LADOT, 2016; Fehr & Peers, 2016.

FIGURE 4.15-6

EXISTING BICYCLE NETWORK

In April 2015, the City of Los Angeles agreed to spend $1.3 billion over the next 30 years to fix sidewalks throughout the City and produce two reports per year to document its progress in repairing substandard sidewalks.

SPECIAL EVENT TRAFFIC OPERATIONS

Special events, such as film premiers, parades, marches, the Los Angeles Marathon, and awards ceremonies frequently require partial or full closure of Hollywood Boulevard in the Project Area, including sidewalks and crosswalks, for periods of several hours to several days at a time. One block of Hollywood Boulevard, between Highland Avenue and Orange Drive, sees frequent closures for special events, for up to 14 days for the Academy Awards ceremony and typically three days for film premiers.

The Hollywood Bowl is a large outdoor music venue located at 2301 North Highland Avenue in the Project Area. With a seating capacity of 17,500 people, the Bowl draws large crowds to evening concerts and other events on the weekends and two or more additional nights per week during the season, June through September. Located in a hilly, residential area, the Bowl is accessible from the Highland Avenue/Hollywood Bowl and Cahuenga Boulevard/Vine Street exits of US-101. Event parking at the Bowl is provided in four lots on either side of Cahuenga Boulevard/Highland Avenue and Odin Street. All parking is stacked with no early exit.

Visitors are encouraged to take advantage of a number of transportation options for events. These include 13 Park & Ride locations throughout Los Angeles County, offering roundtrip bus service to and from the Bowl. The Bowl Shuttle also offers roundtrip service from five locations, including two Metro stations: Hollywood/Highland on the Metro Red Line and Union Station, where Metro Gold, Red, and Purple Lines along with many local and regional bus lines converge.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, the Proposed Plan would have a significant impact related to transportation/traffic if it would:

- Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit;
- Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways;
- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.
- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);
- Result in inadequate emergency access; and/or
- Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

The above thresholds are general in nature and address a broad range of projects. In addition, the OPR has circulated suggested (preliminary discussion draft) changes to these thresholds that would alter the way in which lead agencies have traditionally evaluated traffic impacts to remove automobile delay as a significant impact under CEQA. Mitigation measures used by lead agencies to address increased delay often involve increasing capacity (i.e., the width of a roadway or intersection), which has the potential to induce more

traffic into an area. In addition, most urban areas are built-out and do not have available right-of-way to expand the roadway network by constructing additional vehicle travel lanes. To address this issue, as well as the state's climate change goals (as discussed above under SB 743), the new draft guidelines focus on VMT as a more appropriate metric for measuring transportation impacts. Several of the potential performance metrics that may be implemented as part of these CEQA changes are also provided in this document for informational purposes but are not relied upon for the purposes of determining impact. The determination of significant impacts for each applicable threshold is based on current State and City CEQA thresholds and guidelines.

THRESHOLDS OF SIGNIFICANCE APPLIED TO THE PROPOSED PLAN

This section identifies the thresholds of significance used in this EIR. These thresholds were derived from Appendix G of the CEQA Guidelines and LADOT's *Transportation Impact Study Guidelines*.

Consistency with Plans. In accordance with Appendix G of the CEQA Guidelines, the Proposed Plan would have a significant impact related to transportation if it would:

- Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

Circulation System. The street segment capacity analysis incorporated in the circulation system thresholds below are sufficient and appropriate to characterize the flow of traffic and analyze potential impacts of the Proposed Project. Street segment capacity impacts are generally evaluated in program-level analyses, such as community plans or specific plans, for which details regarding specific land use types, sizes, project access points, etc. are not known. The Thresholds Guide for intersections are not used in this analysis.

The Proposed Plan would have a significant impact to the circulation system if one or more of the following criteria are met:

- The "volume-weighted" average of the volume-to-capacity (V/C) ratio under the Future With Project Conditions for all of the analyzed roadway segments exceeds that of the Existing Conditions; and/or
- The number of roadway links (i.e., street segments) projected to operate at unsatisfactory levels of service (LOS E or F) under the Future With Project Conditions exceeds the number for Existing Conditions.

These criteria have historically been applied in community plan projects. For the purposes of evaluating the significant impacts based on the above criteria, the analyzed roadway segments include avenues, boulevards, and collector streets within the Project Area. Impacts to state highway facilities are based on the CMP as described below.

Neighborhood Intrusion. In accordance with LADOT's *Transportation Impact Study Guidelines*, the Proposed Plan would have a significant impact related to neighborhood intrusion if it increases the average daily traffic (ADT) volume on a local residential street in an amount equal to or greater than the following:

- ADT increase of 120 or more project trips if final ADT $< 1{,}000$
- ADT increase $\geq 12\%$ if final ADT $\geq 1{,}000$ and $< 2{,}000$
- ADT increase $\geq 10\%$ if final ADT $\geq 2{,}000$ and $< 3{,}000$
- ADT increase $\geq 8\%$ if final ADT $\geq 3{,}000$

Final ADT is defined as total projected future daily volume including Proposed Plan, ambient, and related project growth.

The evaluation of potential neighborhood impacts requires details regarding site access of commercial development projects. Therefore, because the routing of traffic to local residential streets included in the

Proposed Plan depends on the locations of site access points for each development site and those access points cannot be known at this time, the Proposed Plan is assessed qualitatively against these thresholds for purposes of this EIR.

Congestion Management Program (CMP). Metro's CMP was implemented to analyze the impacts of local land use decisions on the regional transportation system. Local jurisdictions are responsible for assessing the impacts of new development on the CMP system as part of the development review and entitlement process. For the purposes of showing changes in travel demand on the state highway system within the study area, a CMP analysis was conducted for CMP freeway segments. In accordance with the CMP, the Proposed Plan would have a significant impact on a CMP freeway or arterial monitoring location if it would:

- Increase traffic demand on a CMP facility by two percent of capacity (V/C $\geq$ 0.02), causing LOS F (V/C > 1.00)
- If the facility is already at LOS F, it would increase traffic demand on a CMP facility by two percent of capacity (V/C $\geq$ 0.02)

Air Traffic Patterns. In accordance with Appendix G of the CEQA Guidelines, the Proposed Plan would have a significant impact related to air traffic patterns if it would:

- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

Safety. In accordance with the CEQA Guidelines, the determination of impacts to transportation/traffic should consider whether a proposed project would substantially increase hazards due to a design feature or incompatible uses. According to CEQA Guidelines, the determination of significance shall consider the following factors:

- Increase hazards due to a design feature or incompatible use.
- Design features/physical configurations that affect visibility of cars to pedestrians and bicyclists.
- Changes to physical conditions that would adversely affect transportation safety.

Emergency Access. The CEQA Guidelines states that the Proposed Plan would have a significant impact if it would result in inadequate emergency access.[13,]

Since the Proposed Plan does not include design-level details (such as driveway design and location), project access is not used to evaluate emergency access of the Hollywood Community Plan. As noted earlier in Regulatory Framework, the required City review of site plans addresses adequacy of access.

Within the City of Los Angeles, fire prevention and suppression and emergency medical services are provided by the LAFD. Public protection service and law enforcement are provided by Los Angeles Police Department (LAPD). The relevant CEQA Guidelines for significance for public services is as follows:

> *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: i) Fire Protection and Emergency Medical Services? ii) Police Protection?*[14]

[13]CEQA Guidelines, Appendix G.
[14]Ibid.

The City's screening criteria in the City's 2006 Threshold Guide for whether fire and emergency medical service impacts need more study includes whether there will be an increased number of intersections with LOS E or F. Other screening criteria include: project distance to fire station, brush fire hazards, fire hydrant services, storage of combustible materials. It is important to note that the LOS-related screening criterion is not a threshold of significance. This criterion simply informs whether further study is required, including possibly an EIR. For police protection, the City also refers to the screening criteria specified for fire and emergency medical service.

In accordance with Appendix G and the City's 2006 Threshold Guide, the Proposed Plan would have a significant impact on fire protection and emergency medical services and police protection if it would:

- Require the addition of a new governmental facility or the expansion, consolidation or relocation of an existing facility to maintain service.

The above threshold is used in this EIR for determining the Proposed Plan's emergency access impact.[15]

Public Transit, Bicycle, or Pedestrian Facilities. The Proposed Plan would have a significant impact if it would:

- Disrupt existing public transit, bicycle, or pedestrian facilities or interfere with planned facilities, or create conflicts or inconsistencies with adopted public transit, bicycle, or pedestrian system plans, guidelines, policies, or standards.

No specific LOS methodologies or quantitative thresholds for performance have been identified by the City to evaluate these impacts.

Construction

The CEQA Guidelines do not include criteria for the consideration of transportation-related construction impacts. For this EIR, the Proposed Plan would have a significant transportation-related impact from construction activities if it would:

- Result in a substantial disruption to traffic during construction, which could include temporary street closures; temporary loss of regular vehicular or pedestrian access to existing land uses; temporary loss of an existing bus stop or rerouting of bus lines; or creation of traffic hazards.

Parking

Parking deficits are considered to be socioeconomic effects, rather than impacts on the physical environment as defined by CEQA, but there may be secondary physical environmental impacts, such as increased traffic congestion at intersections, neighborhood intrusion, air quality impacts, safety impacts, noise impacts caused by congestion, or land use impacts. According to SB 743, parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area is not considered a significant impact. A transit priority area is defined as an area within half mile of an existing or planned major transit stop; the majority of the Project Area is within a transit priority area (see **Figure 4.15-1**). The Proposed

[15]The City rejects the use of a threshold of significance for fire and emergency response services in this EIR that is directly tied to response times based on LOS as has been advocated by commentators on other City EIRs. Such a threshold is not supported by substantial evidence. There is no evidence, including substantial evidence, that has been provided to the City or that the City (including its traffic and environmental consultants) is aware of, or has found with reasonable diligence and inquiry, including searching the relevant academic and trade literature and other agency's EIRs prepared across the State that can demonstrate to the City's satisfaction that there is a direct correlation between decreased LOS and decreased response times of fire and emergency response services, or that there is any method to connect LOS and response times for purposes of analyzing a plan adoption or update that covers an area the size of the project area.

Plan would have a significant impact if secondary effects related to parking contribute to other impact topics, such as impacts to the circulation system or neighborhood intrusion.

NEW TRANSPORTATION PERFORMANCE METRICS CURRENTLY UNDER CONSIDERATION

SB 743 directs the OPR to "prepare, develop, and transmit to the Secretary of the Natural Resources Agency for certification and adoption proposed revisions to the guidelines adopted pursuant to Section 21083 establishing criteria for determining the significance of transportation impacts of projects within transit priority areas… Upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion within a transit priority area, shall not support a finding of significance pursuant to this division…"

In January 20, 2016, OPR updated the CEQA Guidelines "Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA," the evaluation of VMT was recognized as "generally the most appropriate measure of transportation impacts." OPR also states that lead agencies may tailor their analysis to include other measures. In order to provide additional information on the transportation benefits and impacts associated with the Community Plan Update, this EIR evaluates vehicle trips and VMT consistent with the intent of SB 743.

In addition to vehicular LOS and the other CEQA significance thresholds described in the aforementioned sections, the following two additional performance metrics are also evaluated in this EIR.

Vehicle Trips (VT). VT are defined as the number of trips undertaken in an automobile, such as in single occupancy vehicles, private automobiles, and vehicles that contain two or more travelers, such as carpools, taxis, or ride-share vehicles. A reduction in VT over time can be used as an indicator of reduced reliance on the automobile as well as an indicator of more travel by carpools.

Vehicle Miles Traveled (VMT). VMT is a measurement of miles traveled (e.g., private automobiles, trucks and buses) by all land uses (e.g., residential, retail, office) in the Project Area. A reduction in VMT overall and in VMT per capita can be used as an indicator of reduced reliance on vehicular travel, primarily by private automobiles.

METHODOLOGY

The transportation analysis for the Hollywood Community Plan has been developed through a process that includes the use of a Hollywood Subarea TDF Model for the analysis of Existing 2016 Conditions compared to Future 2040 With Project Conditions. For some impact areas, a comparison of Future Without Project to Future With Project is also provided for informational purposes only. This section describes the procedures used to assess impacts on the transportation system. It includes an overall discussion of methodology and assumptions, followed by a discussion of how the Proposed Plan is expected to perform for each of the thresholds described above.

STUDY AREA AND REPORTING FRAMEWORK

The Project Area is defined by the boundaries of the Hollywood CPA in the City of Los Angeles. The study area is defined by the potential impacts of the Proposed Plan to transportation and safety. The EIR studied impacts to areas within the Proposed Plan boundaries, adjacent areas in the City of Los Angeles, neighboring jurisdictions and freeways that serve the region. The extent of the study area was determined by comparing traffic volumes under Future With Project and Future Without Project Conditions using the Hollywood subarea model. The study area extends out from the Plan boundaries until the change in traffic

volume related to the Future With Project Conditions was less than two percent, which is generally less than two miles from the Proposed Plan boundary.

ROADWAY SEGMENT AND FREEWAY MAINLINE LEVEL OF SERVICE METHODOLOGY

The impacts from the Proposed Plan to the circulation system, including the Inter- and Intra-state highways, are analyzed using LOS changes on road segments, as described below.

LOS is a qualitative measure used to describe the condition of traffic flow, ranging from excellent conditions at LOS A to overloaded conditions at LOS F. LOS definitions for street segments are summarized in **Table 4.15-4**. LOS can be determined by dividing demand V/C, and the resulting V/C ratio is then used to obtain the corresponding LOS. The capacity values for analyzed roadway segments were obtained from the Hollywood subarea TDF model.

TABLE 4.15-4: ROADWAY SEGMENT LEVEL OF SERVICE (LOS) DEFINITIONS

Level of Service (LOS)	Volume to Capacity Ratio (V/C)	Description
A	0.00 – 0.60	Excellent operation. All approaches to the intersection appear quite open, turning movements are easily made, and nearly all drivers have freedom of operation.
B	>0.60 – 0.70	Very good operation. Many drivers begin to feel somewhat restricted within platoons of vehicles. This represents stable flow. An approach to an intersection may occasionally be fully utilized and traffic queues start to form.
C	>0.70 – 0.80	Good operation. Occasionally drivers may have to wait more than 60 seconds, and back-ups may develop behind turning vehicles. Most drivers feel somewhat restricted.
D	>0.80 – 0.90	Fair operation. Cars are sometimes required to wait more than 60 seconds during short peaks. There are no long standing traffic queues. This level is typically associated with design practice for peak periods.
E	>0.90 – 1.00	Poor operation. Some long-standing vehicular queues develop on critical approaches to intersections. Delays may be up to several minutes.
F	>1.00	Forced flow. Represents jammed conditions. Backups from locations downstream or in the cross street may restrict or prevent movement of vehicles out of the intersection approach lanes; therefore, volumes carried are not predictable. Potential for stop and go type traffic flow.

SOURCE: Transportation Research Board, *Highway Capacity Manual, Special Report 209*, Washington, D.C., 2000.

Plans that involve large areas and are not expected to be fully implemented until Year 2040 or beyond are not analyzed effectively by detailed intersection V/C analyses. In addition, detailed roadway designs for improvements to individual intersections are not yet available. Consequently, roadway segment analysis is commonly used to determine the average service capacity of the roadway network. Street segment capacity impacts are generally evaluated in program-level analyses (such as community plans or long-range development projects) for which details regarding specific land use types, sizes, project access points, etc., are not known.

LOS can be determined by dividing the number of vehicles (i.e., volume (V)) by roadway capacity (C), and the resulting V/C ratio is then used to obtain the corresponding LOS. The volume-weighted V/C ratio is used in order to obtain aggregate statistics regarding the transportation conditions, allowing a comparison of different scenarios and alternatives.

The weighted average V/C ratio represents typical travel conditions for the roadway network in the Project Area. The volume-weighted average V/C ratio is calculated by taking the volume of each street segment and multiplying it by its corresponding V/C ratio. This is divided by the sum of the total volumes, and essentially represents the average V/C ratio for the roadway network in the Project Area.

CMP analysis is typically conducted on all CMP identified freeway facilities within the Project Area. This includes freeway segments where the Proposed Plan will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours. The analysis for the CMP freeway segments used the LOS definitions presented in **Table 4.15-5**.

TABLE 4.15-5: CMP FREEWAY SEGMENT LEVEL OF SERVICE (LOS) DEFINITIONS

Level of Service (LOS)	Demand-to-Capacity Ratio
A	0.00-0.35
B	>0.35-0.54
C	>0.54-0.77
D	>0.77-0.93
E	>0.93-1.00
F(0)	>1.00-1.25
F(1)	>1.25-1.35
F(2)	>1.35-1.45
F(3)	>1.45

SOURCE: Metro, *Congestion Management Program*, 2010.

The required CMP methodology compares the typical lane capacity for a freeway mainline segment to the number of vehicles traveling on the segment during the peak hour. Due to bottlenecks in the freeway network, vehicle demand can often exceed vehicle throughput resulting in significant reductions in travel speeds and extensive vehicle queuing. When this situation occurs, the number of vehicles passing a CMP monitoring location may be substantially lower than the actual vehicle demand for that location. This results in an artificially low traffic count at the CMP monitoring station, that when compared to the typical lane capacity, can show better operations (i.e., a lower V/C) than experienced by drivers.

TRAVEL DEMAND MODEL DEVELOPMENT

The City of Los Angeles Travel Demand Forecasting Model provides the ability to evaluate the transportation system, use performance indicators for land use and transportation alternatives, provide information on regional pass-through traffic versus locally generated trips, and graphically display these results. The model captures planned growth in the Project Area, including special generators, such as airports and universities, and is sensitive to emerging land use trends through improved sensitivity to built environment variables. The model forecasts AM and PM peak period and daily vehicle and transit flows on the transportation network in the City. In essence, the travel demand model serves as a tool to implement, manage and monitor the City of Los Angeles' transportation plans, projects, and programs, providing a suitable starting point for additional refinement as part of a more local application, such as the Proposed Plan.

The potential impacts associated with implementation of the Proposed Plan are evaluated using a refined version of the City of Los Angeles' Travel Demand Model within the Hollywood area. The Hollywood Subregion Travel Demand Forecasting Model (referred to as the Hollywood Model) utilizes the TransCAD Version 5.0 R4 Build 2025 modeling software (consistent with the citywide model) and has been calibrated and validated for 2016 conditions. The Hollywood Model builds on the citywide model update and refines the level of detail within the Plan Area for improved sensitivity in measuring the effect of land use

development and transportation network changes. The model has a future horizon year of 2040 and was designed to produce daily and AM and PM peak hour vehicle and transit flows on roadways within the Project Area based on comprehensive land use and socioeconomic data (SED) and uses a conventional 4-step process of trip generation, trip distribution, modal split and assignment. For modeling purposes, the City of Los Angeles is divided into 2,250 Transportation Analysis Zones (TAZs), each with corresponding SED and connections to the roadway and transit networks. The 46 TAZs that encompass the Hollywood Community Plan in the citywide model were subdivided into 97 TAZs for purposes of this analysis. The subdivided TAZs better reflect how and where traffic enters and exits the street network and is divided along logical transportation boundaries like major streets and topography.

The Hollywood Model is consistent with the most recent 2016-2040 RTP/SCS model's regional transportation network and regional growth forecasts and contains City of Los Angeles SED for both the existing and future conditions within the boundaries of the Hollywood Community Plan. The Hollywood Model was used to generate the Existing Conditions, Future Without Project Conditions, and Future With Project Conditions data for the transportation impact analysis. The Hollywood Community Plan Area Model Development Report is contained in Appendix J.

IMPACT ANALYSIS

The purpose of the transportation analysis is to identify transportation system deficiencies resulting from vehicle trips generated by the employment and population growth anticipated under the Proposed Plan and the proposed transportation network improvements, and to identify feasible mitigation measures. The Proposed Project is a long-term plan that will be implemented over many years in conjunction with already approved development projects in the study area, and regional growth and transportation projects outlined in the 2016-2040 RTP/SCS. Therefore, conducting a project only impact analysis would be misleading because it would not capture the other changes (both land use and transportation network) that will affect travel demands and traffic patterns in the Plan Area and in the adjacent areas. Consequently, traffic and circulation impacts of the Proposed Plan are determined by comparing Future With Project Conditions to Existing Conditions. This provides a conservative analysis of impacts because both regional growth and the Proposed Plan growth are accounted for in the Future With Project Conditions analysis. To provide a comparison of the Proposed Plan to a future scenario that does not include the proposed land use and transportation network changes, a Future Without Project Conditions scenario is provided for informational purposes only.

The Hollywood Subarea Model is built upon and includes the entirety of the City of Los Angeles Travel Demand Forecasting Model, which is consistent with the 2016-2040 SCAG RTP/SCS model and includes all reasonably foreseeable development and regional transportation improvements for the year 2040 in the City of Los Angeles as well as the adjacent Cities, such as West Hollywood, Burbank and Glendale. Thus, the Hollywood Subarea Model includes the regional growth forecast for both inside and outside of the Plan area for the purpose of the Future 2040 Without Project Conditions and for analyzing Future With Project Conditions. The Hollywood Subarea Model refines the level of detail within the Plan Area for improved sensitivity in measuring the effects of land use and transportation network changes.

The analysis tools used to forecast future travel patterns are long-range models of travel demand. Their primary focus is on forecasting driving with some additional sensitivity to other ways of traveling. This is consistent with how most cities forecast traffic and how transportation professionals have operated for decades. However, new trends in how we travel have emerged in recent years. Experts are debating what may be driving these trends and how durable they may or may not be. Many forces are pulling in various directions, including recessionary effects on employment, changes in millennial interest in driving and vehicle ownership, baby boomer retirement choices and their continued participation in the workforce and preferences for urban living, fuel prices, new delivery of goods and services through providers like Amazon,

and greater travel options through autonomous vehicles and shared use mobility (e.g., Lyft, Uber, bikeshare programs).[16]

The transportation analysis approach used in this EIR applies established traffic forecasting tools that have been empirically proven and previously accepted under CEQA Guidelines. However, these may prove to be conservative if some of the recent trends in travel persist. It is not clear what direction the trends will take at this point. VMT per capita has been generally dropping since around 2004 but increased for many decades prior. If the trends toward higher levels of walking, bicycling, and transit use exceed what is forecast in the EIR, this could result in fewer driving-related impacts than the plan conservatively accounts for in the EIR. It is possible, however, that innovations in autonomous and driverless vehicles, transportation network companies (e.g., Lyft and Uber), and same-day delivery will increase future VMT per capita. A variety of factors contribute to VMT, and transportation technologies along with demographic trends will influence future travel behavior. It would be speculative to make assumptions about how these new technologies and changes in transportation may effect travel behavior long-term; therefore, the methodologies and travel forecasts applied in this analysis rely on the state-of-the-practice at this time as previously accepted under CEQA Guidelines.

PROPOSED PLAN MOBILITY NETWORK

MP 2035 provides the framework for future community plan updates, which take a closer look at the transportation system in specific areas of the City and recommend more detailed implementation strategies to realize MP 2035. The MP 2035 reflects policies and programs that lay the foundation for safe, accessible, and enjoyable streets for pedestrians, bicyclists, transit users, and vehicles throughout the City of Los Angeles, including the Hollywood Community Plan. MP 2035 was adopted by the City in August 2015 and is compliant with the 2008 Complete Streets Act (AB 1358), which mandates that the circulation element of a City's General Plan be modified to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan.

As part of the Proposed Plan, a Transportation Impact Assessment (TIA) fee is proposed to fund transportation improvements through collecting fees associated with new development within the Plan Area. The types of transportation improvements envisioned as part of the Proposed Plan are within the framework established in MP 2035. However, the proposed TIA fee program would provide additional funding from new development that would enable transportation improvement projects to be implemented within the Plan Area sooner than they otherwise would be based on currently available funding sources. The Proposed Plan is consistent with the City's multimodal approach to transportation planning and applies such principles to the Plan Area in a more targeted manner. The improvements proposed would provide transportation options and accommodations for multiple modes of travel (i.e., transit, bicycle, pedestrian, and vehicle) as part of the transportation system. In urban areas like Hollywood, congestion often cannot be feasibly mitigated. Therefore, the impact fee would help to fund mitigations that provide alternatives to vehicle travel, as many of the identified improvements in the Proposed Plan do not aim to improve LOS or V/C directly.

Prior to the adoption of the TIA fees, the City would prepare a Nexus Study to show the relationship between the proposed fees and new development in the Plan Area in compliance with the State of California Mitigation Act (AB 1600) (Government Code Sections 66000, *et seq.*). The purpose of a nexus study is to establish the relationship, referred to as the "nexus," between new development expected to occur and the need for new and expanded major public facilities. After establishing the nexus, the TIA fees to be levied for each land use in the area of benefit are calculated based on the proportionate share of the total facility

[16]Fehr & Peers, *Demographic Trends and the Future of Mobility,* February 2014.

use for each type of development. Fee programs require new development to mitigate their project specific impacts and to contribute a fair share to complete regional improvements to mitigate the cumulative impacts. Since the fees contributed by new development only cover a portion of the project costs, LADOT has leveraged developer fees to secure outside transportation grants to help pay for the remaining project costs, primarily by submitting grant applications in the Metro Call for Projects process.

As part of the development of the proposed TIA fees, a list of transportation improvements was developed to provide an overview of the types of projects that could be funded through the collection of TIA fees from new development projects. The transportation improvements identified primarily originated from the MP 2035, the current Hollywood Community Plan, and projects that would support the goals and policies of the Proposed Plan. The enhanced network treatments envisioned through MP 2035 were reviewed and refined to complement the anticipated growth areas as well as the Proposed Plan's goals and policies. Since MP 2035 does not prescribe or mandate how the enhanced network treatments are implemented within each community plan, the refinements to the enhanced network treatments primarily consisted of developing potential implementation options within the Project Area.[17]

The Transportation Project List is presented below in **Table 4.15-6**. The Project List is not exhaustive but is representative of the types of improvements proposed for inclusion in the Community Plan. In addition, the Proposed Plan would not, itself, entitle or otherwise approve any transportation projects. Nevertheless, potential impacts of implementing the transportation improvements contained in the Project Lists were analyzed at a programmatic level as part of the Proposed Plan under Future With Project Conditions.

TABLE 4.15-6: PROPOSED PLAN TRANSPORTATION IMPROVEMENT PROJECT LIST

Primary Mode	Project Name	Project Description
Active Modes	Mobility Hub Amenities	Encourage projects located near transit nodes and Mobility Hubs to provide people-oriented amenities such as shade trees, countdown crosswalk signals, bus shelters, bicycle racks or lockers and enhanced or decorated crosswalks.
	Pedestrian Access to Major Transit Stations	Support the development of coordinated intermodal strategies to implement linkages to future public transit services. Provide enhanced amenities at major transit stops, including widened sidewalks, where possible, pedestrian waiting areas, transit shelters, comfortable seating, enhanced lighting, information kiosks and wayfinding signage (directing pedestrians to transit stops and stations, and from transit facilities to points of interest in the surrounding neighborhood), advanced fare collection mechanisms, shade trees and landscaping, bicycle access, self-cleaning restrooms, and enhanced, ADA compliant street crossing elements adjacent to transit stops and stations (i.e., enhanced crosswalks, crossing signals, and accessible ramps).
	Path Network	Support the construction of pedestrian pathways, bicycle paths and facilities, and the reconnection of Van Ness Ave., as part of any park space built over the US-101.
		Class I Bike Path: the Los Angeles River Bike Path
	Bicycle Enhanced Network & Bike Lanes	Hollywood Blvd.: Virgil Ave. to La Brea Ave. BEN: Protected Bike Lanes
		Melrose Ave.: La Cienega Blvd. to Highland Ave. BEN: Protected Bike Lanes
		Vine St: Franklin Ave. to Melrose Ave. Tier 1 Bike Lanes
		Wilton Pl.: Franklin Ave. to Melrose Ave. Shared Vehicle/Bike Lanes
		Virgil Ave: Melrose Ave. to Los Feliz Blvd. Tier 1 Bike Lanes

[17]MP 2035, page 56 states the following "The Mobility Plan will provide the framework for future community plans and specific plans that will take a closer look at the Plan's Enhanced Networks and PEDs analysis, in specific areas of the City and may recommend more-detailed implementation strategies to realize the MP 2035. More detailed land use planning may reveal the need for changes to the networks, which will be undertaken as needed to reflect these more detailed planning efforts."

TABLE 4.15-6: PROPOSED PLAN TRANSPORTATION IMPROVEMENT PROJECT LIST

Primary Mode	Project Name	Project Description
	Neighborhood Enhanced Network	Amenities and improvements: • Bicycle and pedestrian friendly streets • Share the Road bike icons • Bicycle friendly drainage grates • Directional/wayfinding signage • Bicycle signals and/or push buttons • Bicycle loop detectors • Vehicle speed reduction treatments
	Bikeshare	Provide public bicycle rental in "pods" located throughout the Community Plan Area.
Roadways & ITS	Congestion Monitoring	Implement or enhance "Smart Corridors" to coordinate Caltrans' freeway traffic management system with the Automated Traffic Surveillance and Control (ATSAC)/Adaptive Traffic Control System (ATCS) highway and street traffic signal management system to enhance incident management and motorist information to reduce traffic delays.
	ITS Corridor & Signal Upgrades	Implement ITS and signalization improvements to facilitate traffic flow.
	Intersection Improvements	Identify intersections where congestion related to left turns can be improved, such as intersections along Hollywood Blvd. in East Hollywood, and implement improvements, taking into consideration impacts on pedestrians and bicyclists. Support evaluation and improvement of the complex five-way intersection at Sunset Blvd., Hollywood Blvd., Hillhurst Ave. and Virgil Ave. Study the addition of a second southbound right-turn lane on Highland Ave. at the intersection of Highland Ave. and Franklin Ave., while maintaining sidewalks with a minimum width of 15 feet. Implement a double left-turn lane, eastbound and westbound, on Sunset Blvd. at Western Ave.
	Access Improvements	Support the construction of a new multi-lane roadway to extend from the intersection of Barham Blvd./Forest Lawn Dr. through the NBC/Universal site to Coral Drive adjacent to the US-101. Restripe Cahuenga East south to the US-101 on-ramp near Pilgrim Bridge to provide two lanes on Cahuenga East between the US-101 on-ramp and the US-101 Barham Blvd. off-ramp and from there, three lanes northbound. Restripe Barham Blvd. to allow three southbound lanes and two eastbound lanes within the existing roadway.
	Vehicle Enhanced Network	Highland Ave & Sunset Blvd: Between US-101 Interchanges VEN Corridor/ITS Improvements
	Neighborhood Protection Program	Implement Neighborhood Traffic Management Plans, including possible speed humps, medians, directional signs, and other streetscape improvements along canyon routes and associated streets across the Hollywood Hills, as well as neighborhoods generally located between the following streets: • Franklin Ave. and Hollywood Blvd. • Sunset and Hollywood Blvd. • Sunset and Santa Monica Blvd. • Santa Monica Blvd. and Melrose Ave, including blocks south of Melrose Ave. Franklin Ave and Mulholland Dr. • Highland Ave., La Brea Ave., and Martel Ave. along the Willoughby Corridor
Transit	Transit Enhanced Network	Los Feliz Blvd.: Vermont Ave. to Riverside Dr. TEN: Comprehensive Treatments with Dedicated Bus Lane
		Hollywood Blvd.: Virgil Ave. to La Brea Ave. TEN: Moderate Treatments with Shared Vehicle/Bus Lane
		Santa Monica Blvd.: Madison Ave. to La Brea Ave. TEN: Comprehensive Treatments with Dedicated Bus Lane (cost does not include roadway widening to Modified Ave. I)
		Fairfax Ave.: Rosewood Ave. to Hollywood Blvd. TEN: Moderate Treatments with Shared Vehicle/Bus Lane
		La Brea Ave.: Rosewood Ave. to Sunset Blvd. TEN: Comprehensive Treatments with Dedicated Bus Lane

TABLE 4.15-6: PROPOSED PLAN TRANSPORTATION IMPROVEMENT PROJECT LIST		
Primary Mode	**Project Name**	**Project Description**
		La Brea Ave.: Sunset Blvd. to Hollywood Blvd. TEN: Comprehensive Treatments with Dedicated Bus Lane (cost does not include roadway widening to Modified Avenue I)
		Western Ave.: Melrose Ave. to Hollywood Blvd. TEN: Moderate Plus with Dedicated Bus Lane
		Vermont Ave: Melrose Ave. to Hollywood Blvd. TEN: Comprehensive Treatments with Dedicated Bus Lane
		Vermont Ave: Hollywood Blvd. to Los Feliz Blvd. TEN: Moderate Treatments with Shared Vehicle/Bus Lane
Auto-Trip Reduction	Strategic Parking Program	Implement a parking program and update parking requirements to reflect mixed-use developments, shared parking opportunities, and parking needs at developments adjacent to major transit stations.
	Rideshare Toolkit	Develop an online Transportation Demand Management (TDM) Toolkit with information for transit users, cyclists, and pedestrians as well as ridesharing. The Toolkit would include incentive programs for employers, schools, and residents. Additionally, it would be specific to City businesses, employees, and visitors and would integrate traveler information. It would also include carpooling/vanpooling and alternative work schedules.
	Transportation Demand Management (TDM) Program	This program would provide start-up costs for Transportation Management Organizations/Associations (TMOs/TMAs). It would also provide guidance and implementation of a TDM program.

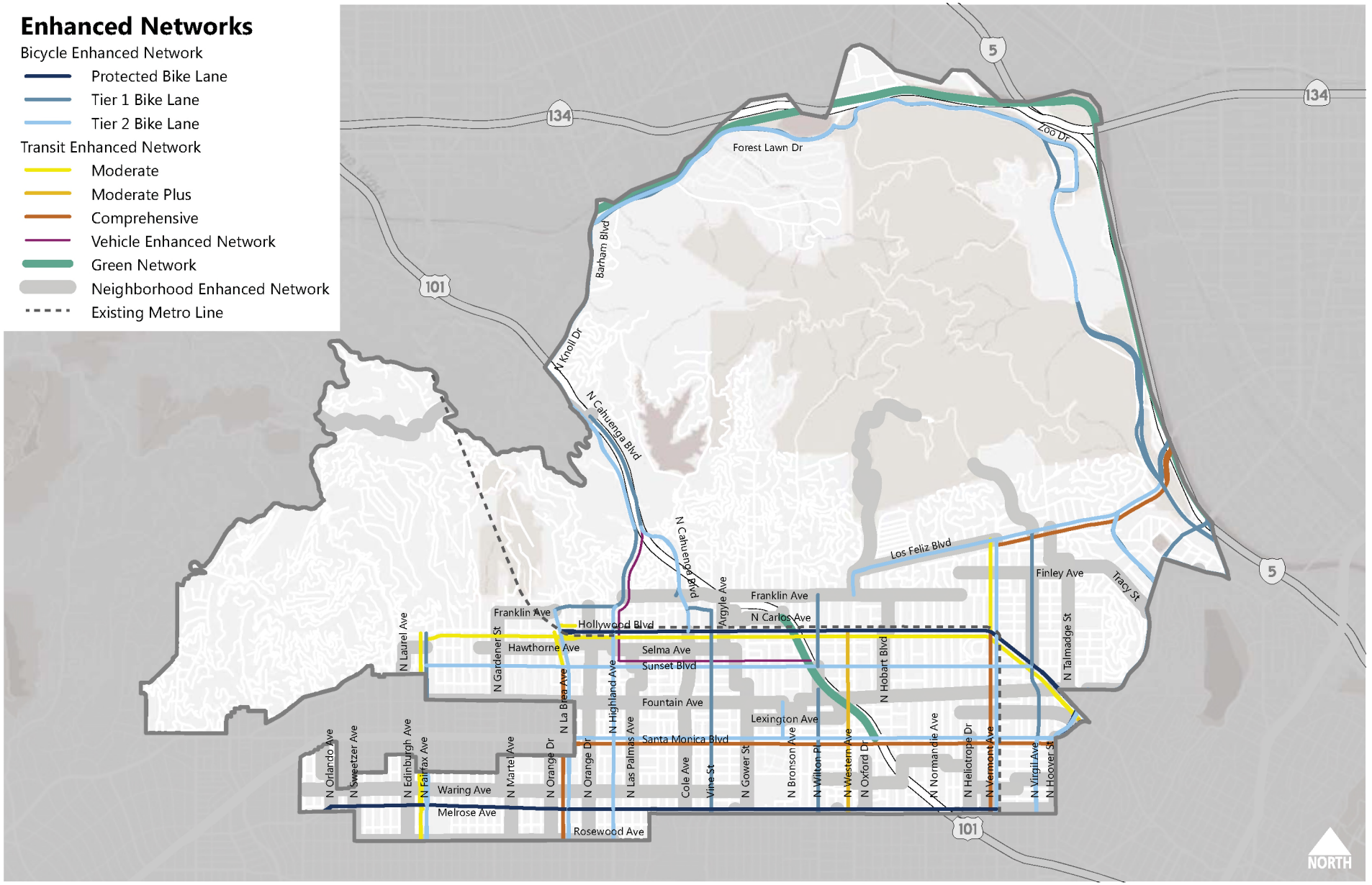
Figure 4.15-7, Future Mobility Network, shows the following enhanced network treatments for roadways in the Hollywood Community Plan:

- Bicycle Enhanced Network (BEN)
- Transit Enhanced Network (TEN)
- Neighborhood Enhanced Network (NEN)
- Vehicle Enhanced Network (VEN)

The future mobility network in the Project Area reflects the following refinements to MP 2035:

- Melrose Avenue between Vermont Avenue and Hoover Street was converted from a BEN to a NEN due to the roadway width and available right-of-way along this portion of the corridor. West of Vermont Avenue and Melrose Avenue would remain as part of the BEN.
- Vermont Avenue between Los Feliz Boulevard and Hollywood Boulevard was converted from a Comprehensive TEN to a Moderate TEN due to the character of the roadway along this portion of the corridor. The Moderate TEN treatment would provide mixed-flow bus and vehicular lanes instead of a bus only lane to preserve on-street parking for the adjacent commercial uses. South of Hollywood Boulevard and Vermont Avenue would remain as part of the Comprehensive TEN.

The Proposed Plan's mobility network is representative of the types of improvements that could be implemented over time. The mobility network improvements would provide transportation options and accommodations for multiple modes of travel (i.e., transit, bicycle, pedestrian, and vehicle) in the Project Area. The Proposed Plan would not, itself, entitle or otherwise approve any transportation projects. However, the proposed TIA fee program would provide additional funding from new development that would enable transportation improvement projects to be implemented within the CPA sooner than they otherwise would be based on currently available funding sources.



SOURCE: Mobility Plan 2035, 2016; Fehr & Peers, 2016.

taha environmental planners
taha 2010-073

Hollywood Community Plan Update
Draft Environmental Impact Report
CITY OF LOS ANGELES

FIGURE 4.15-7

FUTURE MOBILITY NETWORK

To consider the range of potential impacts that could occur from the enhanced network treatments contained in the Project List, two implementation options were developed for the purpose of analyzing potential impacts. Similar to the MP 2035, the Proposed Plan does not prescribe how the enhanced network treatments will be implemented within each community plan. Therefore, the enhanced network treatments in the Plan Area were reviewed in relation to the roadway characteristics, such as roadway width, right-of-way, street designations and adjacent land uses. Treatment Option 1 generally prioritizes vehicle and transit capacity, while Option 2 generally prioritizes the preservation of on-street parking. **Table 4.15-7** presents the enhanced network treatments in the Project Area along with a description of the two implementation options.

IMPACTS

The impacts and mitigation discussion presented below reflects current CEQA requirements as well as the potential future CEQA requirements that would remove automobile delay as a significant impact under CEQA. Mitigations for increased delay often involve increasing vehicular capacity, which has the potential to induce more traffic into an area. In addition, most urban areas, such as Hollywood, are built-out and do not have available right-of-way to expand the roadway network by constructing additional vehicle travel lanes, as has been historically proposed to mitigate traffic impacts. To provide a more comprehensive analysis of potential impacts, both current CEQA requirements and those currently under consideration are provided in this EIR. Determination of impacts are still based on current CEQA Guidelines.

IMPACT 4.15-1 Would implementation of the Proposed Plan conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? **Less than significant.**

The Proposed Plan seeks to enhance access to transit stations and creates new land use and zoning regulations to encourage appropriate mixes and scales of uses as well as site design supportive of transit use. These objectives are consistent with the 2016-2040 RTP/SCS and the MP 2035 goals and policies.

The types of transportation improvements envisioned as part of the Hollywood Community Plan are within the framework established in the MP 2035. The proposed updates to the Plan are consistent with the City's multimodal approach to transportation planning and apply such principles to the Hollywood Community Plan. The proposed mobility improvements would provide transportation options and accommodations for multiple modes of travel (i.e., transit, bicycle, pedestrian, and vehicle) as part of the transportation system.

The Proposed Plan would not conflict with adopted City and state policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Therefore, a ***less than significant impact*** related to consistency with other plans with respect to transit, bicycle or pedestrian policies would occur.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

TABLE 4.15-7: HOLLYWOOD COMMUNITY PLAN MOBILITY TREATMENT OPTIONS

Roadway Segment	Enhanced Network Designation	Current Cross-Section	Hollywood Community Plan Update	
			Treatment Option 1 ***Prioritize Vehicle/Transit Capacity***	**Treatment Option 2** ***Prioritize On-Street Parking***
Los Feliz Blvd.: Vermont Ave. to Riverside Dr.	TEN: Comprehensive Treatments with Dedicated Bus Lane	Three vehicle lanes in each direction with peak period on-street parking restrictions (on-street parking and two vehicle lanes per direction in off-peak travel periods).	All-Day Bus Only Lanes; Two vehicle lanes in each direction	Peak Period Bus Only Lanes; On-Street Parking during off-peak travel periods; Two vehicle lanes in each direction
Hollywood Blvd.: Virgil Ave. to La Brea Ave.	BEN: Protected Bike Lanes TEN: Moderate Treatments with Shared Vehicle/Bus Lane	Two vehicle lanes in each direction with on-street parking	Protected Bike Lanes; Moderate TEN Treatments; Peak period parking restrictions with two vehicle lanes in each direction (on-street parking and one vehicle lane per direction in off-peak travel periods)	Protected Bike Lanes; Moderate TEN Treatments; All-day parking with one vehicle lane in each direction
Highland Ave. & Sunset Blvd.: Between US-101 Interchanges	VEN	Three vehicle lanes in each direction with peak period on-street parking restrictions (on-street parking and two vehicle lanes per direction in off-peak travel periods)	Three vehicle lanes in each direction with parking removal	Three vehicle lanes in each direction with peak period on-street parking restrictions (on-street parking and two vehicle lanes per direction in off-peak travel periods)
Santa Monica Blvd.: Madison Ave. to La Brea Ave.	TEN: Comprehensive Treatments with Dedicated Bus Lane (assumes roadway is widened to Modified Avenue I)	Two vehicle lanes in each direction with on-street parking	All-Day Bus Only Lanes; Two vehicle lanes in each direction	Peak Period Bus Only Lanes; On-Street Parking during off-peak travel periods; Two vehicle lanes in each direction
Melrose Ave.: La Cienega Blvd. to Highland Ave.	BEN: Protected Bike Lanes	Two vehicle lanes in each direction with on-street parking	Protected Bike Lanes; Peak period parking restrictions with two vehicle lanes in each direction (on-street parking and one vehicle lane per direction in off-peak travel periods)	Protected Bike Lanes; All-day parking with one vehicle lane in each direction
Fairfax Ave: Rosewood Ave. to Hollywood Blvd.	TEN: Moderate Treatments with Shared Vehicle/Bus Lane	Two vehicle lanes in each direction with on-street parking	Moderate TEN Treatments; Two vehicle lanes in each direction with on-street parking	*Same as Scenario 1*
La Brea Ave: Rosewood Ave. to Sunset Blvd.	TEN: Comprehensive Treatments with Dedicated Bus Lane	Three vehicle lanes in each direction with peak period on-street parking restrictions (on-street parking and two vehicle lanes per direction in off-peak travel periods)	All-Day Bus Only Lanes; Two vehicle lanes in each direction	Peak Period Bus Only Lanes; On-Street Parking during off-peak travel periods; Two vehicle lanes in each direction

TABLE 4.15-7: HOLLYWOOD COMMUNITY PLAN MOBILITY TREATMENT OPTIONS

Roadway Segment	Enhanced Network Designation	Current Cross-Section	Hollywood Community Plan Update	
			Treatment Option 1 ***Prioritize Vehicle/Transit Capacity***	**Treatment Option 2** ***Prioritize On-Street Parking***
La Brea Ave.: Sunset Blvd. to Hollywood Blvd.	TEN: Comprehensive Treatments with Dedicated Bus Lane (assumes roadway is widened to Modified Avenue I)	Two vehicle lanes in each direction (limited on-street parking on west side).	All-Day Bus Only Lanes; Two vehicle lanes in each direction	Peak Period Bus Only Lanes; On-Street Parking during off-peak travel periods; Two vehicle lanes in each direction
Vine St.: Franklin Ave. to Melrose Ave.	Tier 1 Bike Lanes	Two vehicle lanes in each direction with on-street parking.	On-Street Bike Lanes; One vehicle lane in each direction with on-street parking	*Same as Scenario 1*
Wilton Pl.: Franklin Ave. to Melrose Ave.	Tier 1 Bike Lanes	Two vehicle lanes in each direction with peak period on-street parking restrictions (on-street parking and one vehicle lane per direction in off-peak travel periods)	Shared Vehicle/Bike Lane in each direction; All-Day on-street parking	*Same as Scenario 1*
Western Ave.: Melrose Ave. to Hollywood Blvd.	TEN: Moderate Plus with Dedicated Bus Lane	Two vehicle lanes in each direction with limited on-street parking	Peak Hour Bus Only Lanes and One vehicle lane in each direction (Shared vehicle/bus lanes during off-peak travel periods)	Shared vehicle/bus lanes all-day; Maintain existing on-street parking
Vermont Ave.: Melrose Ave. to Hollywood Blvd.	TEN: Comprehensive Treatments with Dedicated Bus Lane	Three vehicle lanes in each direction with peak period on-street parking restrictions (on-street parking and two vehicle lanes per direction in off-peak travel periods)	All-Day Bus Only Lanes; Two vehicle lanes in each direction	Peak Period Bus Only Lanes; On-Street Parking during off-peak travel periods; Two vehicle lanes in each direction
Vermont Ave.: Hollywood Blvd. to Los Feliz Blvd.	TEN: Moderate Treatments with Shared Vehicle/Bus Lane	Two vehicle lanes in each direction with on-street parking	Moderate TEN Treatments; Two vehicle lanes in each direction with on-street parking	*Same as Scenario 1*
Virgil Ave.: Melrose Ave. to Los Feliz Blvd.	Tier 1 Bike Lanes	One northbound lane and two southbound lanes with on-street parking	On-Street Bike Lanes; One vehicle lane in each direction with on-street parking *(This configuration has already been implemented between Melrose Ave and Santa Monica Blvd)*	*Same as Scenario 1*

IMPACT 4.15-2 Would implementation of the Proposed Plan exceed the City's threshold relating to operation of the vehicular circulation system? **Significant and unavoidable.**

As discussed above, the City's threshold relating to operation of the vehicular circulation system is as follows:

The Proposed Plan would have a significant impact to the circulation system if one or more of the following criteria are met:

- The "volume-weighted" average of the volume-to-capacity (V/C) ratio under the Future With Project Conditions for all of the analyzed roadway segments exceeds that of the Existing Conditions; and/or
- The number of roadway links (i.e., street segments) projected to operate at unsatisfactory levels of service (LOS E or F) under the Future With Project Conditions exceeds the number for Existing Conditions.

As identified in the threshold above, the Proposed Plan's impact on the circulation system is determined using LOS and V/C metrics. Many factors influence the LOS and V/C analysis including, but not limited to, land use patterns, the relationship between land use and transportation, how transportation treatments are designed within the existing roadways, how and where the Proposed Plan directs anticipated growth within the Plan Area, and growth anticipated in the region surrounding the Plan Area.

Land Use Patterns. The Proposed Plan would improve the link between the locations of land use and transportation in a manner that is consistent with the MP 2035 and the General Plan Framework Element. Implementation of the Proposed Plan would create new housing and employment opportunities, mostly in areas around transit identified for mixed-use. This is in accordance with the Framework Element's guiding policy to focus growth in higher-intensity commercial centers close to transportation and services. Under the Proposed Plan, the commercial areas would serve as focal points and activity centers for surrounding neighborhoods by supporting new development that accommodates a variety of uses and encourages pedestrian and multi-modal transportation activity in these commercial centers. The land use changes would also serve to create consistency with future proposed land uses and foster quality development in transition areas. In some cases, the Proposed Plan would allow for increased FARs, density, and height limits. These changes would facilitate mixed-use development in targeted areas, enable opportunities for increased housing and employment, and provide for more compatible uses and development. Where and how the Proposed Plan directs anticipated growth in relation to transportation infrastructure will affect transportation use; therefore, land use patterns are factored into the analysis of the circulation system. The Proposed Plan is consistent with several regionally-adopted land use plans, policies, and regulations that also include transportation strategies. Refer to Section 4.10, Land Use and Planning, of this Draft EIR, for a detailed consistency analysis of the Proposed Plans with respect to SCAG's regional plans, including the RTP/SCS, the RCP, and the CGV.

Regional Background Growth. On a regional level, traffic in the Project Area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future by SCAG. This growth will occur with or without implementation of the Proposed Plan. Project-related traffic impacts (as compared to cumulative impacts) are impacts caused by traffic generated as a result of future developments in the Project Area and not by traffic generated by regional growth. Cumulative impacts are attributable to cumulative traffic growth (including all regional traffic growth) in addition to Project Area traffic that would occur from 2016 to 2040. The background growth influences the transportation analysis by accounting for the increased activity levels under Proposed Plan conditions, although those increases would occur with or without the Plan. Background growth is included in the Hollywood Subarea Model, which is built from the City of Los Angeles Model as described in the Model Development Report included in Appendix J.

Special Events. As discussed previously under Special Event Traffic Operations, special events in Hollywood frequently require partial or full closure of Hollywood Blvd. in the Project Area, including sidewalks and crosswalks, for periods of several hours to several days at a time. To the extent that event traffic occurred on a weekday (Tuesday, Wednesday or Thursday) between the months of February and May, these travel demands are accounted for when calculating the average hourly volumes within the Plan Area under Existing Conditions. This same level of special event traffic is also accounted for in the traffic forecasts and analysis of Year 2040 conditions. The Proposed Plan would not change the number or frequency of special events within the Plan Area under future Year 2040 conditions. Therefore, a separate special events analysis was not conducted for the Proposed Plan.

Level of Analysis. At the aggregate Plan scale, the traffic operation results reflect the impacts related to the Proposed Plan and the number of vehicle travel lanes. However, turn lanes, signal timings, and driveways are not accounted for in the analysis at this scale. Each of these features has the potential to affect operations, delay, VMT, and rerouting of traffic at the neighborhood level. Plans that involve large areas and are not expected to be fully implemented until Year 2040 or beyond are not analyzed effectively by detailed intersection V/C analyses. Consequently, roadway segment analysis is commonly used to determine the average service capacity of the roadway network. The Thresholds Guide states that "street segment capacity impacts are generally evaluated in program-level analyses (such as community plans or long-range development projects) for which details regarding specific land use types, sizes, project access points, etc., are not known."[18]

Circulation System Analysis. As identified above, two criteria (weighted average V/C ratio and the number of street segments at LOS E or F) are used to evaluate the impacts of the Proposed Plan when compared to Existing conditions. The Proposed Plan would have a significant impact to the circulation system if in 2040 with the Project, the V/C ratio worsens compared to Existing Conditions or there are more street segments at LOS E or F then there are in Existing Conditions.

To consider the range of potential impacts that could occur from implementation of the Proposed Plan with future implementation of the enhanced network treatments, two implementation options were developed for the implementation of the enhanced network treatments. Treatment Option 1 generally prioritizes vehicle and transit capacity, while Treatment Option 2 generally prioritizes the preservation of on-street parking. **Table 4.15-7** presents the enhanced network treatments in the Project Area along with a description of the two implementation options. The Proposed Plan with implementation of the enhanced networks under Treatment Option 1 and Treatment Option 2 were analyzed using the Hollywood Subarea Model. In addition, for informational purposes only, weighted average V/C ratios are provided for Future Without Project Conditions (existing plan) for comparison purposes. The Existing V/C for the AM Peak Period is presented in **Figure 4.15-2** and for the PM Peak Period in **Figure 4.15-3**.

Treatment Option 1

Table 4.15-8 presents the volume-weighted V/C ratios and LOS results for the AM peak period. For reference, the Year 2040 without Project V/C is presented, representing anticipated growth in Year 2040 without implementation of the Proposed Plan. Under Year 2040 Without Project Conditions, the weighted V/C ratio worsens from 0.876 (LOS D) to 0.935 (LOS E). The percentage of roadway segments operating at LOS E or F increases from 37 to 42 percent. With the implementation of the Proposed Plan and regional growth anticipated in Year 2040, the weighted V/C ratio worsens from 0.876 (LOS D) to 0.959 (LOS E), and the percentage of roadway segments operating at LOS E or F increases from 37 to 48 percent.

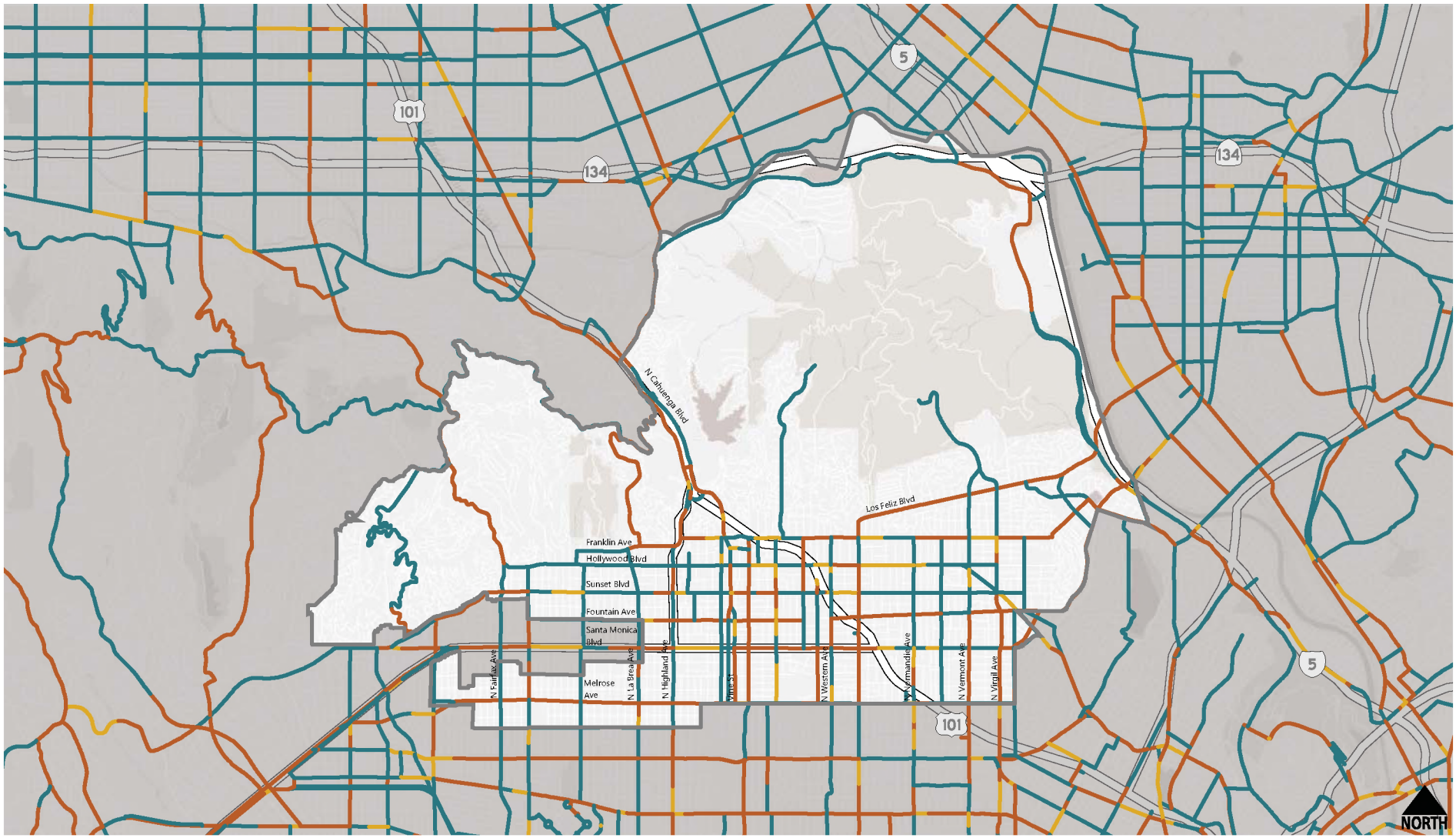
[18]City of Los Angeles, CEQA *Thresholds Guide*, 2006, page L.2-1.

TABLE 4.15-8: AM PEAK PERIOD ROADWAY OPERATIONS				
Transportation Metrics	**Existing 2016 Conditions**	**Future 2040 Without Project**	**Future 2040 With Project Treatment Option 1**	**Future 2040 With Project Treatment Option 2**
Weighted Average V/C	0.876 (LOS D)	0.935 (LOS E)	0.959 (LOS E)	0.972 (LOS E)
Percentage (%) of Street Segments at LOS E or F	37%	42%	48%	49%
Percentage (%) of Center-Line Miles at LOS E or F	35%	40%	45%	45%
WEIGHTED AVERAGE V/C BY FACILITY TYPE				
Boulevard / Parkway	1.165 (LOS F)	1.156 (LOS F)	1.161 (LOS F)	1.161 (LOS F)
Avenue	0.862 (LOS D)	0.924 (LOS E)	0.953 (LOS E)	0.967 (LOS E)
Local / Collector	0.840 (LOS D)	0.931 (LOS E)	0.911 (LOS E)	0.920 (LOS E)
SOURCE: Fehr & Peers, 2018.				

Table 4.15-9 presents the volume-weighted V/C ratios and LOS results for the PM peak period. Under Year 2040 Without Project Conditions, the weighted V/C ratio worsens from 0.890 (LOS D) to 0.955 (LOS E). The percentage of roadway segments operating at LOS E or F increases from 37 to 43 percent. With the implementation of the Proposed Plan and regional growth anticipated in Year 2040, the weighted V/C ratio worsens from 0.890 (LOS D) to 1.002 (LOS F). The percentage of roadway segments operating at LOS E or F also increases from 37 to 50 percent. For reference, the Year 2040 Without Project V/C is presented, representing anticipated growth in Year 2040 Without Project implementation of the Proposed Plan.

TABLE 4.15-9: PM PEAK PERIOD ROADWAY OPERATIONS				
Transportation Metrics	**Existing 2016 Conditions**	**Future 2040 Without Project**	**Future 2040 With Project Treatment Option 1**	**Future 2040 With Project Treatment Option 2**
Weighted Average V/C	0.890 (LOS D)	0.955 (LOS E)	1.002 (LOS F)	1.017 (LOS F)
Percentage (%) of Street Segments at LOS E or F	37%	43%	50%	50%
Percentage (%) of Center-Line Miles at LOS E or F	37%	41%	47%	47%
WEIGHTED AVERAGE V/C BY FACILITY TYPE				
Boulevard / Parkway	1.186 (LOS F)	1.200 (LOS F)	1.198 (LOS F)	1.200 (LOS F)
Avenue	0.870 (LOS D)	0.938 (LOS E)	0.993 (LOS E)	1.010 (LOS F)
Local / Collector	0.922 (LOS E)	0.999 (LOS E)	0.923 (LOS E)	0.937 (LOS E)
Source: Fehr & Peers, 2018.				

The V/C ratios within the study area are presented in **Figure 4.15-8** for the AM Peak Period and in **Figure 4.15-9** for the PM Peak Period.



Segment Level of Service

- Acceptable Operations (V/C < 0.90)
- Approaching Capacity (V/C 0.90 - 1.00)
- Over Capacity (V/C > 1.00, LOS F)

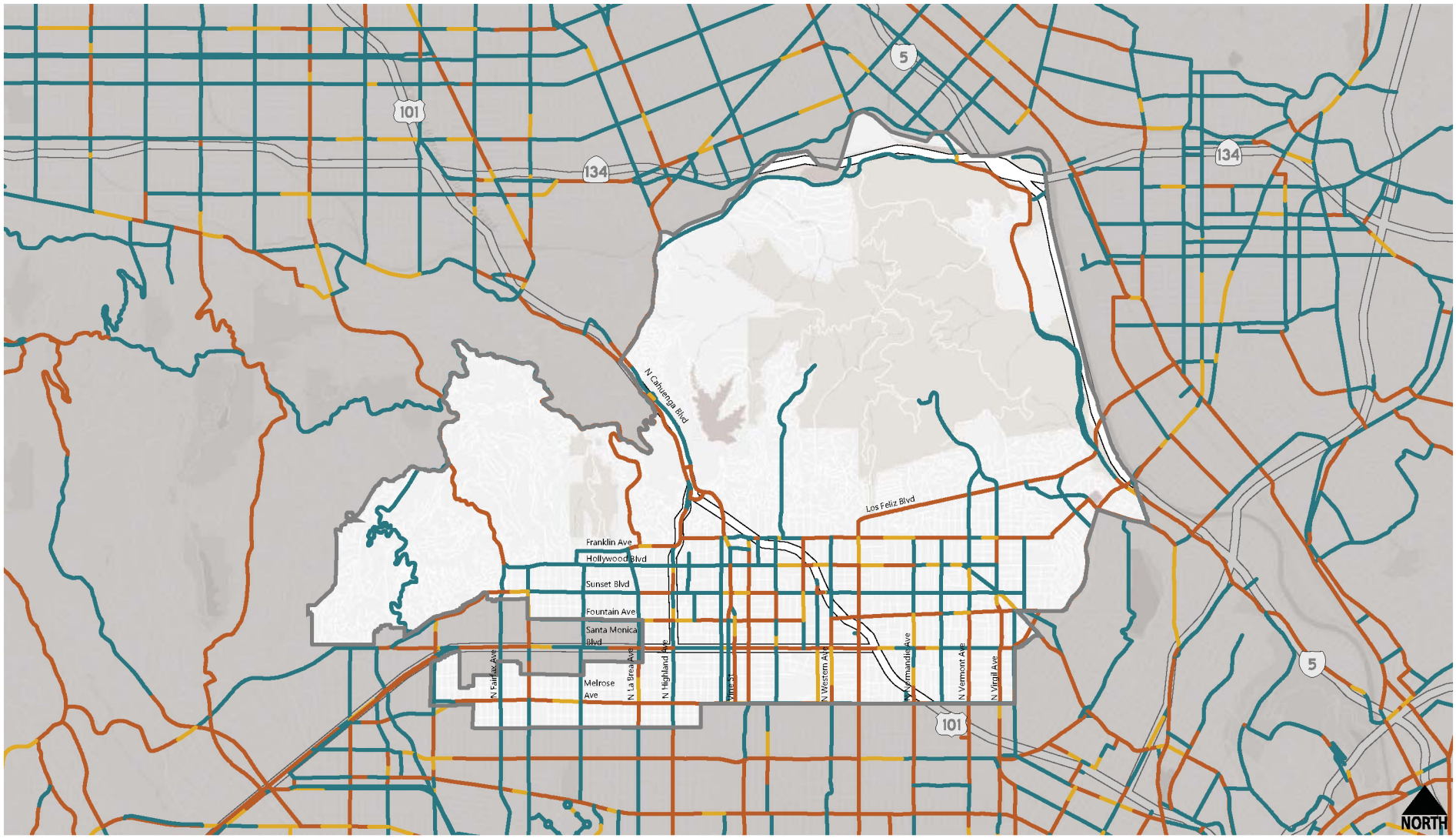
SOURCE: Fehr & Peers, 2018.

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FIGURE 4.15-8

AM PEAK PERIOD LEVEL OF SERVICE:
2040 PROJECT OPTION 1 CONDITIONS



Segment Level of Service

- Acceptable Operations (V/C < 0.90)
- Approaching Capacity (V/C 0.90 - 1.00)
- Over Capacity (V/C > 1.00, LOS F)

SOURCE: Fehr & Peers, 2018.

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FIGURE 4.15-9

PM PEAK PERIOD LEVEL OF SERVICE:
2040 PROJECT OPTION 1 CONDITIONS

Treatment Option 2

Table 4.15-8 presents the volume-weighted V/C ratios and LOS results for the AM peak period for Treatment Option 2. With the implementation of the Proposed Plan and regional growth anticipated in Year 2040, the weighted V/C ratio worsens from 0.876 (LOS D) to 0.972 (LOS E). The percentage of roadway segments operating at LOS E or F also increases from 37 to 49 percent. While the V/C ratios on individual roadway segments vary between the two treatment options considered, Treatment Option 2 results in a higher weighted average V/C and a higher percentage of roadway segments operating at LOS E or F than Treatment Option 1.

Table 4.15-9 presents the volume-weighted V/C ratios and LOS results for the PM peak period. With the implementation of the Proposed Plan and regional growth anticipated in Year 2040, the weighted V/C ratio worsens from 0.890 (LOS D) to 1.017 (LOS F). The percentage of roadway segments operating at LOS E or F also increases from 37 to 50 percent.

The V/C ratios in the study area for the AM Peak Period are presented in **Figure 4.15-10** and for the PM peak period in **Figure 4.15-11**. The resulting weighted average V/C ratio (and corresponding LOS) would worsen with the Proposed Plan under both Treatment Options compared to Existing Conditions, and the number of roadway segments operating at LOS E or F would also increase in comparison to Existing Conditions.

Based on the above, impacts related to traffic operations would be ***potentially significant***.

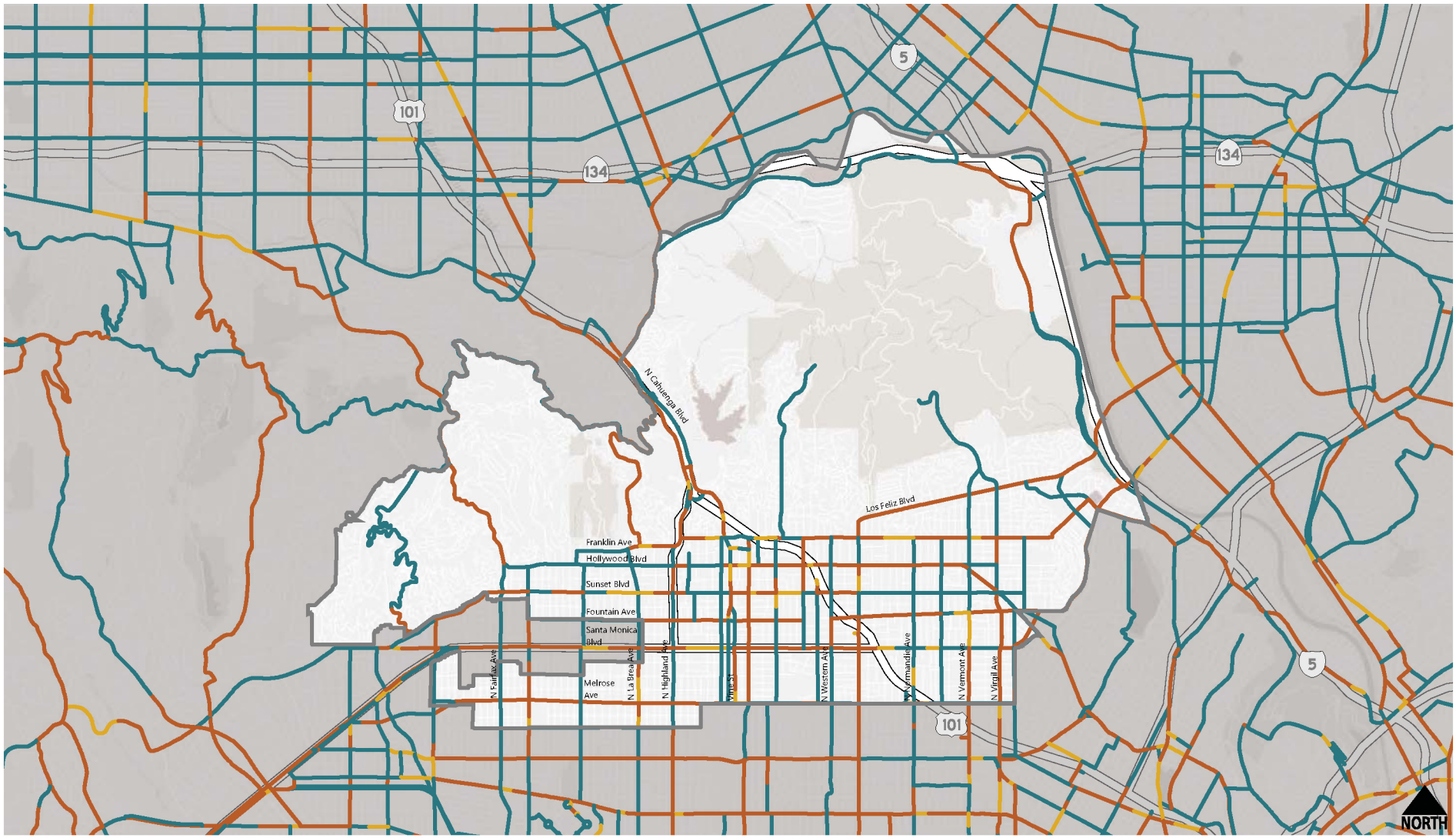
Mitigation Measures

T1 **Technology Upgrades and Intersection Improvements**. As growth occurs within the Proposed Plan Area and transportation improvements contained in the Project List are implemented, Los Angeles Department of Transportation (LADOT) shall implement, as resources permit, Intelligent Transportation System (ITS) signal and corridor upgrades, major intersection improvements such as turn-lane or safety improvements, and/or congestion monitoring technology upgrades both along project routes and parallel roadways if traffic diversions have occurred as a result of the Proposed Plan. Improvements to be implemented shall be determined based on an analysis of project-specific impacts conducted according to LADOT's *Transportation Impact Study Guidelines*.

Significance of Impacts after Mitigation

Mitigation Measure **T1** requires that the roadway improvements that would improve vehicle operations and travel flows included as part of the Project List be implemented if project-specific impacts are identified for land use development or transportation projects in the Plan Area. While the transportation improvements contained in the Project List would eventually be implemented as funding is available, this mitigation measure further defines the timing for the improvements that are needed to mitigate project-specific impacts from individual development sites or transportation projects in the Plan Area. ITS Corridor and Signal Upgrades and CCTV cameras improve LADOT's ability to monitor and respond to real-time traffic conditions. Spot intersection improvements, such as turn-lanes, signal phasing, or safety improvements can also improve vehicle operations. These projects shall be implemented by LADOT to improve traffic flows and safety throughout the project area as determined in further project-specific traffic impact studies based on LADOT's *Transportation Impact Study Guidelines*.

Mitigation Measure **T1** is consistent with the Mayor's Office and LADOT's Great Streets for Los Angeles Strategic Plan. Specifically, the Strategic Plan stresses the importance of creating safe, accessible transportation services and infrastructure while protecting neighborhoods from traffic intrusion and vehicle speeding. It also includes the implementation of real-time traffic information and more efficient allocation of the street to support local foot traffic and better manage freight traffic.



Segment Level of Service

- Acceptable Operations (V/C < 0.90)
- Approaching Capacity (V/C 0.90 - 1.00)
- Over Capacity (V/C > 1.00, LOS F)

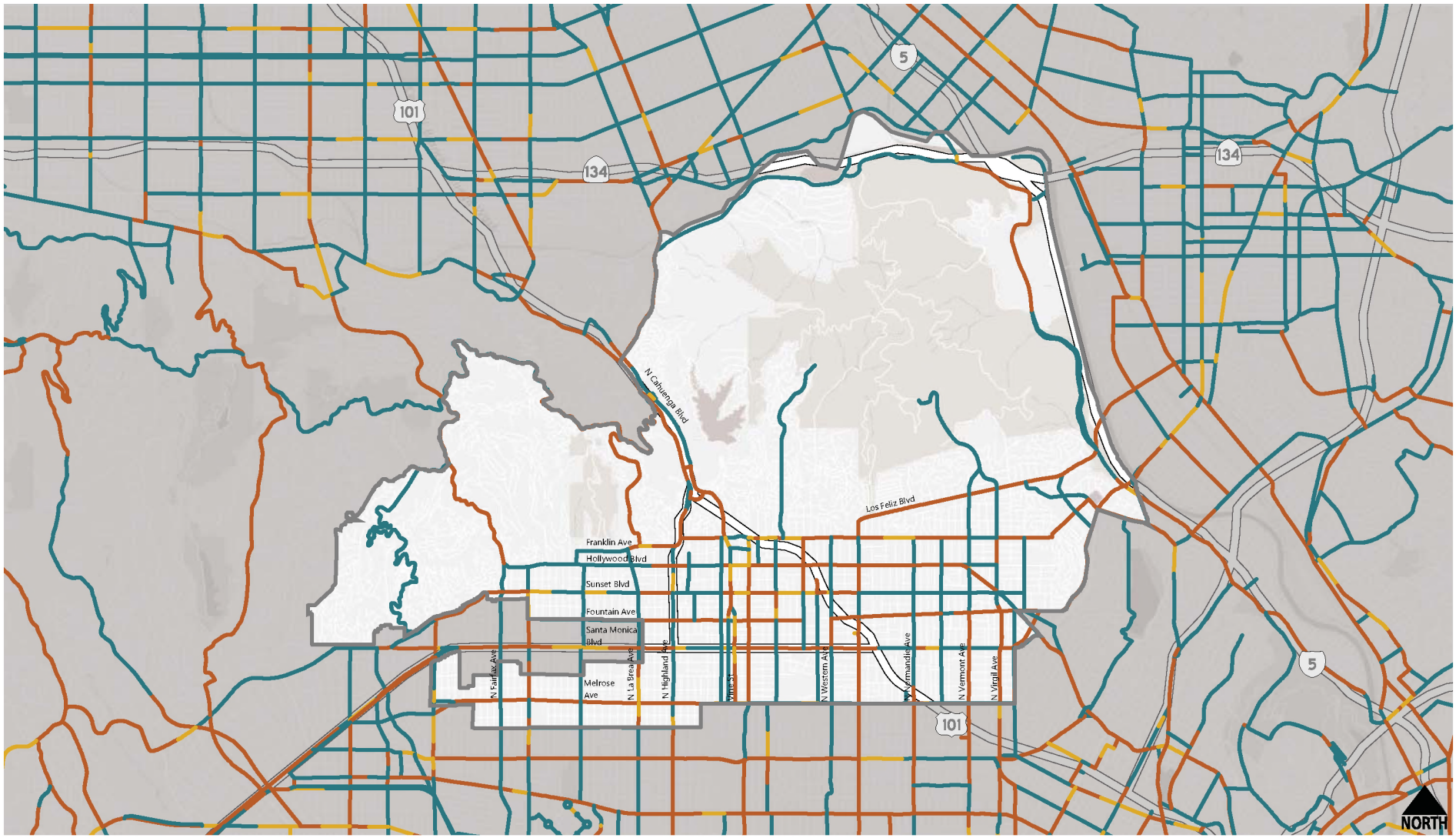
SOURCE: Fehr & Peers, 2018.

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FIGURE 4.15-10

AM PEAK PERIOD LEVEL OF SERVICE:
2040 PROJECT OPTION 2 CONDITIONS



Segment Level of Service

- Acceptable Operations (V/C < 0.90)
- Approaching Capacity (V/C 0.90 - 1.00)
- Over Capacity (V/C > 1.00, LOS F)

SOURCE: Fehr & Peers, 2018.

FIGURE 4.15-11

PM PEAK PERIOD LEVEL OF SERVICE:
2040 PROJECT OPTION 2 CONDITIONS

Impacts related to the vehicular circulation system were determined to be significant without mitigation. Implementation of Mitigation Measure **T1** would ensure that mitigation measures would be completed to reduce the severity of impacts and that detailed analyses would be completed for individual projects that could result in transportation impacts. In urban areas like Hollywood, congestion often cannot be feasibly mitigated. Therefore, while the improvements identified in Mitigation Measure **T1** are expected to reduce the severity of congestion related impacts, the degradation in LOS and V/C ratios may still exceed the applicable significance criteria. Since the implementation of Mitigation Measure **T1** would not reduce the level of impacts to less than significant, the Proposed Plan would, based on current thresholds for roadway LOS, result in a ***significant and unavoidable impact***.

As discussed earlier in this section, it is possible that some or all of the impacts related to vehicular LOS that are considered significant under the current legal and policy framework would no longer be considered significant if analyzed using the new transportation performance metrics under consideration to replace LOS. But as these are no the current thresholds for significance in the City or the state, the impact from the Proposed Plan related to circulation is a ***significant and unavoidable impact***.

IMPACT 4.15-3 Would the implementation of the Proposed Plan exceed the City's thresholds related to neighborhood traffic intrusion? **Significant and unavoidable.**

Per the Thresholds Guide, neighborhood traffic intrusion impacts can be caused by traffic generated by the Proposed Plan, and/or traffic diverted or shifted due to the Proposed Plan onto local streets in residential neighborhoods. Evaluation of potential neighborhood intrusion impacts requires details regarding site access. Therefore, because the routing of traffic to local residential streets depends on the locations of site access points for each development site and those access points cannot be known at this time, the Proposed Plan is assessed qualitatively against these thresholds for purposes of this EIR.

Under Future With Project Conditions, the share of roadway street segments projected to operate at LOS E or F exceeds the share for the Existing conditions in the AM and PM peak periods. Although some of this increase is offset by a reduction in vehicular traffic due to shifts to other modes and routes, congestion could increase on certain roadways in the Project Area. In addition, some drivers may divert from the major corridors in the Project Area to parallel routes.

The EIR modeling analysis accounts for potential redistribution of vehicular traffic from highly congested streets to streets that have more available capacity. The cumulative effect of cut-through traffic is accounted for in the model that includes both arterial and non-arterial roadway street segments. Along roadways where the Proposed Plan would cause significant traffic congestion, diversion of trips could occur onto adjacent parallel routes. It is anticipated that diversion would not occur on streets that operate at LOS D or better during peak periods because the average delay is not substantial. However, for the street segments where the LOS would degrade from D to E or F, some trips could divert to adjacent streets to avoid longer travel times through congested locations. The LOS results with the Proposed Plan are shown in **Figures 4.15-8**, **4.15-9**, **4.15-10**, and **4.15-11**.

Therefore, the Proposed Plan could increase ADT volume on local residential streets in amounts equal to or greater than the following thresholds related to neighborhood traffic intrusion:

- ADT increase of 120 or more project trips if final ADT < 1,000
- ADT increase ≥ 12% if final ADT ≥ 1,000 and < 2,000
- ADT increase ≥ 10% if final ADT ≥ 2,000 and < 3,000
- ADT increase ≥ 8% if final ADT ≥ 3,000

The Proposed Plan and Project List includes programs and policies to address neighborhood traffic intrusion. The Proposed Plan would require future developments to complete the required Traffic Study and Traffic Impact procedures as described in LADOT's *Transportation Impact Study Guidelines*. Per the guidelines, a plan to reduce traffic from traveling through nearby residential areas, referred to as the Residential Neighborhood Traffic Management (NTM) Program, may be required as part of the mitigation program for future development project prior to approval. If NTM measures are required to off-set potential residential street impacts, then, prior to project occupancy, the applicant shall conduct public outreach and develop a NTM plan, in consultation with LADOT, the affected Council District office and the affected neighborhood. The NTM plan shall be prepared in conformance with the guidelines established by LADOT.

While the NTM plan can alleviate neighborhood traffic intrusion from individual developments within the Project Area, regional growth and associated increases in activity levels may still result in vehicles diverting to residential roadways. On a regional level, traffic in the Project Area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future by SCAG. This growth will occur with or without implementation of the Proposed Plan. The background growth influences the transportation analysis by accounting for the increased activity levels under Future With Project Conditions, although many of those increases would occur with or without the project.

Travel route changes on the City's arterial and collector roadways have been captured through the travel model's peak hour forecasts and LOS results. The extent to which trips would divert to adjacent local roadways, and specific roadway segments that may experience an increase in trips due to diversion from parallel routes, cannot be precisely defined at this time given the level of design detail available for the enhanced roadway treatment options and site access locations and designs that may be implemented. Therefore, impacts cannot be precisely determined. However, it is anticipated that increased traffic could occur on local roadways. In addition, regional growth is expected to increase overall activity levels and travel demands in the Project Area.

Since project impacts are based on Future With Project Conditions in comparison to Existing Conditions, under current CEQA Guidelines, this is considered a ***potentially significant*** adverse impact.

Mitigation Measures

T2 **Neighborhood Traffic Management Program.** As growth occurs within the Plan Area and transportation improvements contained in the proposed Project List are implemented, LADOT shall implement, as resources permit, the Neighborhood Traffic Management (NTM) Program on the impacted residential streets based on an analysis of project-specific impacts conducted according to LADOT's *Transportation Impact Study Guidelines*.

Significance of Impacts after Mitigation

Mitigation Measure **T2** requires that the NTM Program included as part of the Project List be implemented if project-specific impacts are identified for land use development or transportation projects in the Plan Area. While the NTM Program contained in the Project List would eventually be implemented as funding is available, this mitigation measure further defines the timing for implementation when the program is needed to mitigate project-specific impacts from individual development sites or transportation projects in the Plan Area as determined through further project-specific traffic impact studies based on LADOT's *Transportation Impact Study Guidelines*. While LADOT's NTM program already requires projects to off-set potential residential street impacts, this mitigation measure ensures that the NTM program will continue to be implemented over the life of the Proposed Plan. Mitigation Measure **T2** is also consistent with the Mayor's Office and LADOT's Great Streets for Los Angeles Strategic Plan that identifies the need to protecting neighborhoods from traffic intrusion and vehicle speeding.

The implementation of the mitigation measure would reduce the level of impact related to neighborhood traffic intrusion but impacts could remain significant since the mitigation measure cannot be guaranteed to reduce residential traffic volumes below the City's current thresholds. In urban areas like Hollywood, traffic diversion resulting from congestion often cannot be fully mitigated. Therefore, while implementing Mitigation Measure **T2** is expected to reduce the severity of neighborhood traffic intrusion, the increase in traffic volumes may still exceed the applicable significance criteria. Therefore, the impact of the Proposed Plan on neighborhood traffic would be ***significant and unavoidable***.

IMPACT 4.15-4 Would implementation of the Proposed Plan exceed Metro's thresholds related to its Congestion Management Plan (CMP)? **Significant and unavoidable.**

The CMP is a state-mandated program administered by Metro that provides a mechanism for coordinating land use and development decisions. CMP requires establishment of LOS standards to measure congestion at specific monitoring locations on the freeway and arterial systems. LOS ranges from LOS A to LOS F, with LOS A representing free-flow conditions and LOS F representing a high level of congestion.

Freeway segment volumes based on Hollywood Subarea model data were used to compare the Future With Project Conditions to Existing Conditions for the CMP freeway monitoring locations within or adjacent to the Project Area. The two treatment options for implementation of the enhanced networks would affect local travel flows but are not anticipated to affect traffic volumes on the regional freeway system. In reviewing the 2040 travel forecasts on the CMP monitoring locations, the AM and PM peak hour traffic volumes between Treatment Option 1 and Treatment Option 2 were nearly identical (within one percent). The highest travel forecast reported between the two treatments were applied to the CMP analysis and are reflected in the analysis results presented below.

Freeway (mainline) operating conditions during peak periods were evaluated using the general procedures established by the CMP. Freeway mainline LOS is estimated with calculation of the V/C ratio. Calculation of LOS based on V/C ratios is a surrogate for the speed-based LOS used by Caltrans for traffic operational analysis. Existing traffic volumes and segment capacity was determined based on the standards in *2010 Congestion Management Program for Los Angeles County.*

As defined by the CMP, a significant impact occurs when a project increases traffic demand on a CMP facility by two percent of capacity ($V/C \geq 0.02$), causing LOS F ($V/C > 1.00$); if the facility is already at LOS F, a significant impact occurs when a project increases traffic demand on a CMP facility by two percent of capacity ($V/C \geq 0.02$). On a regional level, traffic in the Project Area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future by SCAG. This regional growth will occur with or without implementation of the Proposed Plan. Consequently, when comparing traffic operations on the freeway system under Future With Project Conditions to Existing Conditions, peak period congestion increases overtime as a result of background growth and the Proposed Plan.

Table 4.15-10 presents the freeway segment LOS for the CMP Freeway Monitoring Stations within and adjacent to the Project Area for AM and PM peak hours under the Future With Project Conditions in comparison to Future Without Project Conditions for informational purposes.

Table 4.15-11 presents the freeway segment LOS for the CMP Freeway Monitoring Stations within and adjacent to the Project Area for AM and PM peak hours under the Future With Project Conditions in comparison to Existing Conditions for the purpose of identifying potential project impacts.

TABLE 4.15-10: CMP FREEWAY ANALYSIS IMPACT SUMMARY: FUTURE WITHOUT PROJECT AND FUTURE WITH PROJECT PEAK HOUR OPERATIONS

					Future 2040 Without Project			Future 2040 With Project			
CMP Freeway Monitoring Location		Peak Hour	Dir	Capacity	Volume	V/C	LOS	Volume	V/C	LOS	Change in V/C
1004	I-5 at Stadium Way	AM	NB	10000	9,600	0.960	E	9,600	0.960	E	0.000
		AM	SB	10000	14,300	1.430	F(2)	14,500	1.450	F(2)	0.020
		PM	NB	10000	13,000	1.300	F(1)	13,000	1.300	F(1)	0.000
		PM	SB	10000	11,000	1.100	F(0)	10,900	1.090	F(0)	-0.010
1005	I-5 s/o Colorado Blvd. Exit	AM	NB	10000	10,600	1.060	F(0)	10,800	1.080	F(0)	0.020
		AM	SB	10000	14,600	1.460	F(3)	14,700	1.470	F(3)	0.010
		PM	NB	10000	13,700	1.370	F(2)	13,800	1.380	F(2)	0.010
		PM	SB	10000	12,400	1.240	F(0)	12,400	1.240	F(0)	0.000
1006	I-5 at Burbank Blvd.	AM	NB	8000	8,400	1.050	F(0)	8,400	1.050	F(0)	0.000
		AM	SB	8000	9,500	1.188	F(0)	9,500	1.188	F(0)	0.000
		PM	NB	8000	10,600	1.325	F(1)	10,600	1.325	F(1)	0.000
		PM	SB	8000	12,200	1.525	F(3)	12,200	1.525	F(3)	0.000
1036	US 101 n/o Vignes St.	AM	NB	8000	12,100	1.513	F(3)	12,100	1.513	F(3)	0.000
		AM	SB	8000	8,900	1.113	F(0)	8,800	1.100	F(0)	-0.013
		PM	NB	8000	12,400	1.550	F(3)	12,400	1.550	F(3)	0.000
		PM	SB	8000	12,200	1.525	F(3)	12,200	1.525	F(3)	0.000
1037	US-101 s/o Santa Monica Blvd.	AM	NB	8000	7,200	0.900	D	7,200	0.900	D	0.000
		AM	SB	8000	11,300	1.413	F(2)	11,100	1.388	F(2)	-0.025
		PM	NB	8000	11,200	1.400	F(2)	11,200	1.400	F(2)	0.000
		PM	SB	8000	11,900	1.488	F(3)	12,000	1.500	F(3)	0.012
1038	US-101 at Coldwater Canyon Ave.	AM	NB	10000	15,000	1.500	F(3)	15,000	1.500	F(3)	0.000
		AM	SB	10000	15,200	1.520	F(3)	15,200	1.520	F(3)	0.000
		PM	NB	10000	12,900	1.290	F(1)	12,900	1.290	F(1)	0.000
		PM	SB	10000	15,500	1.550	F(3)	15,500	1.550	F(3)	0.000
1048	I-110 s/o US-101	AM	NB	8000	11,800	1.475	F(3)	11,800	1.475	F(3)	0.000
		AM	SB	8000	11,700	1.463	F(3)	11,700	1.463	F(3)	0.000
		PM	NB	8000	11,900	1.488	F(3)	12,000	1.500	F(3)	0.012
		PM	SB	8000	10,700	1.338	F(1)	10,700	1.338	F(1)	0.000
1049	I-110 at Alpine St.	AM	NB	6000	6,300	1.050	F(0)	6,300	1.050	F(0)	0.000
		AM	SB	6000	9,100	1.517	F(3)	9,100	1.517	F(3)	0.000
		PM	NB	6000	9,600	1.600	F(3)	9,800	1.633	F(3)	0.033
		PM	SB	6000	9,300	1.550	F(3)	9,300	1.550	F(3)	0.000
1054	SR-134 at Forman Ave.	AM	EB	10000	8,200	0.820	D	8,100	0.810	D	-0.010
		AM	WB	10000	8,100	0.810	D	8,100	0.810	D	0.000
		PM	EB	10000	12,500	1.250	F(0)	12,500	1.250	F(0)	0.000
		PM	WB	10000	12,500	1.250	F(0)	12,400	1.240	F(0)	-0.010
1055	SR-134 e/o Central Ave.	AM	EB	10000	9,900	0.990	E	10,000	1.000	E	0.010
		AM	WB	10000	9,800	0.980	E	9,900	0.990	E	0.010
		PM	EB	10000	10,700	1.070	F(0)	10,700	1.070	F(0)	0.000
		PM	WB	10000	9,600	0.960	E	9,400	0.940	E	-0.020
1057	SR-170 s/o Sherman Way	AM	NB	10000	6,700	0.670	C	6,700	0.670	C	0.000
		AM	SB	10000	12,400	1.240	F(0)	12,000	1.200	F(0)	-0.040
		PM	NB	10000	9,400	0.940	E	9,200	0.920	D	-0.020
		PM	SB	10000	7,200	0.720	C	7,400	0.740	C	0.020

SOURCE: Fehr & Peers, 2018.

TABLE 4.15-11: CMP FREEWAY ANALYSIS IMPACT SUMMARY: EXISTING AND FUTURE WITH PROJECT PEAK HOUR OPERATIONS

					Existing			Future 2040 with Project				
CMP Freeway Monitoring Location		Peak Hour	Dir	Capacity	Volume	V/C	LOS	Volume	V/C	LOS	Change in V/C	Impact? /a/
1004	I-5 at Stadium Way	AM	NB	10000	9584	0.958	E	9,600	0.960	E	0.002	--
		AM	SB	10000	14274	1.427	F(2)	14,500	1.450	F(2)	0.023	Yes
		PM	NB	10000	12974	1.297	F(1)	13,000	1.300	F(1)	0.003	--
		PM	SB	10000	10808	1.081	F(0)	10,900	1.090	F(0)	0.009	--
1005	I-5 s/o Colorado Blvd. Exit	AM	NB	10000	10400	1.04	F(0)	10,800	1.080	F(0)	0.040	Yes
		AM	SB	10000	14172	1.417	F(2)	14,700	1.470	F(3)	0.053	Yes
		PM	NB	10000	13255	1.326	F(1)	13,800	1.380	F(2)	0.054	Yes
		PM	SB	10000	11725	1.173	F(0)	12,400	1.240	F(0)	0.067	Yes
1006	I-5 at Burbank Blvd.	AM	NB	8000	8372	1.047	F(0)	8,400	1.050	F(0)	0.003	--
		AM	SB	8000	9406	1.176	F(0)	9,500	1.188	F(0)	0.012	--
		PM	NB	8000	10543	1.318	F(1)	10,600	1.325	F(1)	0.007	--
		PM	SB	8000	12196	1.525	F(3)	12,200	1.525	F(3)	0.000	--
1036	US-101 n/o Vignes St.	AM	NB	8000	12014	1.502	F(3)	12,100	1.513	F(3)	0.011	--
		AM	SB	8000	8267	1.033	F(0)	8,800	1.100	F(0)	0.067	Yes
		PM	NB	8000	11904	1.488	F(3)	12,400	1.550	F(3)	0.062	Yes
		PM	SB	8000	12124	1.516	F(3)	12,200	1.525	F(3)	0.009	--
1037	US-101 s/o Santa Monica Blvd.	AM	NB	8000	6867	0.858	D	7,200	0.900	D	0.042	--
		AM	SB	8000	11007	1.376	F(2)	11,100	1.388	F(2)	0.012	--
		PM	NB	8000	11108	1.389	F(2)	11,200	1.400	F(2)	0.011	--
		PM	SB	8000	11613	1.452	F(3)	12,000	1.500	F(3)	0.048	Yes
1038	US-101 at Coldwater Canyon Ave.	AM	NB	10000	14944	1.494	F(3)	15,000	1.500	F(3)	0.006	--
		AM	SB	10000	15152	1.515	F(3)	15,200	1.520	F(3)	0.005	--
		PM	NB	10000	12869	1.287	F(1)	12,900	1.290	F(1)	0.003	--
		PM	SB	10000	15463	1.546	F(3)	15,500	1.550	F(3)	0.004	--
1048	I-110 s/o US-101	AM	NB	8000	11544	1.443	F(2)	11,800	1.475	F(3)	0.032	Yes
		AM	SB	8000	11544	1.443	F(2)	11,700	1.463	F(3)	0.020	Yes
		PM	NB	8000	11746	1.468	F(3)	12,000	1.500	F(3)	0.032	Yes
		PM	SB	8000	10632	1.329	F(1)	10,700	1.338	F(1)	0.009	--
1049	I-110 at Alpine St.	AM	NB	6000	5812	0.969	E	6,300	1.050	F(0)	0.081	Yes
		AM	SB	6000	8972	1.495	F(3)	9,100	1.517	F(3)	0.022	Yes
		PM	NB	6000	9380	1.563	F(3)	9,800	1.633	F(3)	0.070	Yes
		PM	SB	6000	8972	1.495	F(3)	9,300	1.550	F(3)	0.055	Yes
1054	SR-134 at Forman Ave.	AM	EB	10000	8062	0.806	D	8,100	0.810	D	0.004	--
		AM	WB	10000	8062	0.806	D	8,100	0.810	D	0.004	--
		PM	EB	10000	12403	1.24	F(0)	12,500	1.250	F(0)	0.010	--
		PM	WB	10000	12300	1.23	F(0)	12,400	1.240	F(0)	0.010	--
1055	SR-134 e/o Central Ave.	AM	EB	10000	6627	0.663	C	10,000	1.000	E	0.337	--
		AM	WB	10000	9176	0.918	D	9,900	0.990	E	0.072	--
		PM	EB	10000	8667	0.867	D	10,700	1.070	F(0)	0.203	Yes
		PM	WB	10000	6220	0.622	C	9,400	0.940	E	0.318	--
1057	SR-170 s/o Sherman Way	AM	NB	10000	5685	0.569	C	6,700	0.670	C	0.101	--
		AM	SB	10000	10956	1.096	F(0)	12,000	1.200	F(0)	0.104	Yes
		PM	NB	10000	6925	0.693	C	9,200	0.920	D	0.227	--
		PM	SB	10000	5892	0.589	C	7,400	0.740	C	0.151	--

/a/ CMP defines significant freeway impact as change in D/C ratio of 0.02 or more when a freeway segment is at LOS F (D/C ratio > 1.00).
SOURCE: Fehr & Peers, 2018.

Several CMP freeway monitoring locations are operating at LOS E or F under Existing Conditions during both the AM and PM peak hours and are projected to operate at LOS E or F in the future. Many of the resulting V/C ratios on CMP facilities would increase by two percent or more of capacity (V/C $\geq$ 0.02) with the Future With Project Conditions when compared to Existing Conditions. Therefore, impacts related to the CMP would be ***potentially significant***.

The CMP also requires monitoring and analysis at arterial locations. Within the Project Area, there are two monitoring stations on Santa Monica Blvd., at Highland Avenue and Western Avenue. The Future Baseline and Project trips are expected to exceed the threshold of 50 trips required for CMP analysis at arterial locations. Based on Existing Conditions, it is expected these intersections will operate at LOS E or F, and therefore the resulting V/C ratio would increase by two percent or more of capacity.

Mitigation Measures

T3 **Coordination with Other Agencies on Transportation Improvements and Funding.** As development occurs in the Project Area and the City of Los Angeles implements projects that could potentially impact vehicular operations as determined by LADOT on transportation systems managed by other agencies, such as California Department of Transportation (Caltrans), Los Angeles County Metropolitan Transportation Authority (Metro), or neighboring jurisdictions, the City of Los Angeles shall coordinate with these entities to identify transportation improvements and seek opportunities to jointly pursue funding. Mobility solutions shall be focused on safety, enhancing mobility options, improving access to active modes, and implementing Transportation Demand Management (TDM) measures to achieve both local and regional transportation and sustainability goals.

Significance of Impacts after Mitigation

The implementation of Mitigation Measure **T3** would reduce the level of impact related to freeways and the CMP but impacts would foreseeably remain significant since the mitigation measure: 1) cannot be guaranteed to occur prior to certain freeway or roadway segments experiencing increases in traffic volumes in exceedance of the current CMP thresholds and 2) the widening of the freeway mainline segments in the study area is infeasible due to lack of available right-of-way. Therefore, the impact of the Proposed Plan on CMP and state freeway facilities would be ***significant and unavoidable***.

IMPACT 4.15-5 Would implementation of the Proposed Plan result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? **No impact.**

The Hollywood Community Plan does not contain any airports within its boundaries. The closest airport is the Bob Hope Airport in the City of Burbank approximately five miles from the northern boundary. Los Angeles International Airport (LAX) is located approximately 11 miles southwest of the southern boundary. No portion of the Project Area is located within the Airport Land Use Plan (ALUP) for these airports and therefore, air traffic patterns are not anticipated to change. Therefore, there would be ***no impact*** with respect to air traffic patterns.

Mitigation Measures

No mitigation measures are necessary.

Significance of Impacts after Mitigation

No impact.

IMPACT 4.15-6 Would implementation of the Proposed Plan substantially change physical conditions that would adversely affect transportation safety, or increase hazards due to a design feature (e.g., sharp curves, dangerous intersections, or configurations that affect visibility of cars to pedestrians and bicyclists) or incompatible uses (e.g., farm equipment)? **Less than significant.**

The Proposed Plan describes the reasonably expected future development for a portion of the City and does *not* constitute a commitment to any project-specific development, introduce new streets or otherwise change the overall land use pattern within the Project Area. Furthermore, none of the regulations included in the Proposed Plan would promote sharp curves, dangerous intersections, or incompatible uses that could present safety hazards. Rather, numerous policies and programs included in the Proposed Plan emphasize transportation safety for all people using the transportation system, support implementation of transportation treatments that are designed improve roadway safety and help implement other City initiatives (such as Vision Zero or Safe Routes to School) which aim to improve the safety of the City's transportation facilities.

None of the transportation system improvements envisioned in the Proposed Plan or Project List would introduce new safety hazards or incompatible uses at intersections or along roadway segments, as most would be designed to improve safe circulation and access to the transit stations for all users. The multi-modal improvements envisioned in the Proposed Plan are intended to help minimize conflicts between pedestrians and vehicles. Furthermore, design standards in the Proposed Plan are intended to limit the number, width, and location of new driveways along major streets and in areas of high pedestrian activity, thereby improving pedestrian safety.

The implementation of bicycle and pedestrian facilities identified in the Proposed Plan and Project List are anticipated to improve the safety of bicyclists and pedestrians. Automobile speed is a major factor in the severity of collisions with bicyclists and pedestrians, the most vulnerable roadway users. Collisions with a vehicle traveling at 20 miles per hour result in a five percent pedestrian fatality rate, and fatalities increase to 40, 80 and 100 percent when the vehicle speed increases to 30, 40 and 50 mph, respectively.[19] Bicycle lanes, when accompanied by travel lane reductions can help reduce overall vehicle speeds.[20] When modified from four travel lanes to two travel lanes with a two-way left-turn lane, research along 45 corridors throughout the country has found a range of 19 to 47 percent reduction in all roadway crashes. The upgrade to fully protected bicycle lanes or cycle tracks has been shown to reduce the risk of injury by 90 percent.[21]

The bicyclist and pedestrian improvements associated with the Proposed Plan and Project List are also anticipated to increase the number and visibility of bicyclists and pedestrians on the City's transportation network. Of 68 cities across California with highest per capita pedestrian and bicycle collisions, per capita injury rates to pedestrians and bicyclists are shown to fall precipitously as the number of bicyclists increases, revealing a non-linear relationship between bicycle safety and the level of bicycling.[22] This study showed as much as an eight-fold variation of collisions (expressed as a percentage of those that bike or walk to work) in comparing low and high bicycling cities. The underlying reason for this pattern is that motorists drive slower when bicyclists and pedestrians are visible either in number or frequency and drive

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[19]U. S. Department of Transportation National Highway Traffic Safety Administration, *Literature Review on Vehicle Travel Speeds and Pedestrian Injuries. DOT HS 809 021*, 1999.

[20]Federal Highway Administration (FHWA), http://www.fhwa.dot.gov/publications/research/safety/10053/index.cfm, accessed on November 19, 2012

[21]Kay Teschke et al., *Route Infrastructure and the Risk of Injuries to Bicyclists: A Case-Crossover Study. American Journal of Public Health,* 2012.

[22]Jacobsen, P.L., *Safety in Numbers: More Walkers and Bicyclists, Safety Walking and Bicycling. Injury Prevention 9~3!:205–209*, 2003.

faster when few pedestrians and bicyclists are present, resulting in higher overall travel speeds. This effect of modified driving behavior is consistent with other research focused on 24 California cities that shows that higher bicycling rates among the population generally show a much lower risk of fatal crashes for all road users.[23] Comparing these low versus high bicycling communities, there was a ten-fold reduction in fatality rate for motorists, and eleven-fold reduction in fatality rate for pedestrians, and an almost fifty-fold reduction in fatality rate for bicyclists.[24]

Inclusion of protected bicycle lanes further increases the level of safety. New York City implemented the first fully protected bike lanes in the country. Protected bike lanes in New York City on 8th Avenue and 9th Avenue resulted in a 35 percent and 58 percent decrease, respectively, in injuries to all road users.[25] In the same study, implementation of bus/bike lanes on First and Second Avenues led to a 37 percent decrease in injury crashes.[26]

The Proposed Plan is responding to changing demographics, a younger population desirous of safe and accessible active transportation options (bike, walk), a growing number of residents and employees seeking alternatives to the car, and an aging population that may need to rely more and more on transportation alternatives to the automobile. In 2030, senior citizens will make up 1/5 of Los Angeles County's population. This older population (as well as children and the disabled) will benefit from longer pedestrian crossing times, shorter street crossing distances, wider, shaded sidewalks, street benches, increased transit service and separated bicycle facilities. Ultimately, there is nothing in the Proposed Plan expected to significantly reduce pedestrian mobility, including but not limited to the disabled, those with strollers, and bus riders.

Therefore, impacts related to transportation safety as a result of design features or incompatible uses would be ***less than significant***.

Mitigation Measures

No mitigation measures are necessary.

Significance of Impacts after Mitigation

Less than significant.

IMPACT 4.15-7 Would implementation of the Proposed Plan result in inadequate emergency access that could require the addition of a new governmental facility or the expansion, consolidation or relocation of an existing facility to maintain service? **Less than significant.**

Within the City of Los Angeles, fire prevention and suppression and emergency medical services are provided by the LAFD. Public protection service and law enforcement are provided by LAPD. LAFD in collaboration with LADOT has developed a FPS, a system that automatically turns traffic lights to green for emergency vehicles traveling on designated streets in the City.[27] The City of Los Angeles has over 205 miles of routes equipped with FPS.

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[23]Marshall, Wesley E., N. W. Garrick, *Evidence on Why Bike-Friendly Cities Are Safer For All Road Users. Environmental Practice 13 (1),* March 2011.

[24]*Ibid.*

[25]NY DOT, *Measuring the Street: New Metrics for 21st Century Streets*, 2012.

[26]*Ibid.*

[27]Los Angeles Fire Department, Bulletin No. 133, *Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles,* October 2008.

This Draft EIR provides an evaluation of impacts to emergency services. While the Plan would impact segment-level LOS, there is not a direct relationship between predicted travel delay and response times as California state law does require drivers to yield the right-of-way to emergency vehicles and even permits emergency vehicles to use opposing lane of travel, the center turn lanes, or bus-only lanes. In some instances, roadway reconfigurations with the implementation of the transportation improvements as part of the enhanced network treatments could improve emergency access. For example, a roadway reconfiguration could improve emergency access where a bus-only lane or a contiguous center left-turn lane is introduced where it did not exist. Emergency vehicles are permitted to use bus-only lanes for local access to emergency destinations. People traveling by bicycle are required to pull to the side of the road to yield access to emergency providers regardless if they are traveling in a bus-only lane or in a standard travel lane. It is more likely that when in route to an emergency incident, general traffic will be expected to merge into the bus-only lane, permitting the emergency vehicle to pass in the through lane to the left. Emergency responders also routinely use the center left-turn lanes, or even travel in opposing travel lanes if needed. Generally, multi-lane roadways allow the emergency vehicles to travel at higher speeds and permit other traffic to maneuver out of the path of the emergency vehicle.

Knowing exactly how fire and emergency service response times will be affected calls for a great deal of speculation. As explained under Impact 4.15-2, it is not possible to exactly predict the Proposed Plan impacts at the street level. This is one factor as to why it is not possible to forecast response times. The other is that, as explained above, the relationship between emergency access and traffic and potential impacts associated with emergency access is complex and involves factors such as the following:

- The proximity of LAFD and LAPD (and other) facilities to those they serve. There are no current plans to construct new fire or police facilities in the Project Area. LAFD and LAPD are responsible for identifying and implementing capital improvements (such as new Fire or Police Stations) as may be needed to respond to anticipated increased demand. LAFD and LAPD do not have a capital improvement plan that identifies construction of new fire stations in specific locations and therefore it is not possible to forecast or identify any specific impacts associated with any potential new or expanded facilities. Any impacts from building or expanding facilities would be speculative at this point in time.
- The staffing and equipment at fire stations.
- The opportunity for emergency responders to use alternative routes in an area.
- The specific street configuration. LAFD, in cooperation with LADOT and LADCP, actively participates in the design of specific roadway changes in order to ensure adequate fire/emergency access is maintained. LAFD, in reviewing street and right-of-way projects, comments on particular street configuration designs, and will raise concerns if roadways present particular access challenges, and can recommend no changes be done at all or alternative changes be undertaken if fire and emergency access are particularly impacted.
- As identified in the Thresholds Guide, on any given project review, LAFD can implement project specific mitigation requirements, such as requiring fire retardant landscaping, prohibiting construction in fire hazard areas, requiring design features that reduce fire potential and developing emergency response plans.
- The changing demand for service is complex. For example, with increasing populations there may be more density and more construction, though new buildings are constructed in accordance with increasingly stringent building and fire codes making them safer and more resistant to fires, such as requiring fire sprinklers. The population is aging, which may increase demand for service. But it is also feasible that the population may not need additional service, as healthcare and other technologies evolve and are improved.

- Future factors that could increase efficiencies in response, including improvements in technology and management, such as changes in deployment of equipment and staff and mutual aid agreements.

LAFD is responsible for maintaining adequate response times. LAFD published a Strategic Plan in April 2015. The LAFD Strategic Plan focuses on nine goals and corresponding strategic actions that would guide the LAFD for the next three years.[28] The primary goals that are applicable to the Project include providing exceptional public safety and emergency service and implementing and capitalizing on advanced technologies. Some of the key priorities associated with these goals include:

- Improving response times by utilizing data and metrics to identify gaps in LAFD's response strategies and exploring response time improvements through dialogue, cognitive inquiry, innovation, and follow-up;
- Delivery of emergency medical services by expanding LAFD EMS response capabilities for special events and addressing periods of high vehicle traffic; and
- Identifying and implementing advanced technologies to support and improve performance metrics, tracking standards, data collection, analysis and reporting procedures (FireStatLA).

The LAFD Strategic Plan also focuses on the development of an even more professional workforce, promotion of a positive work environment to address risk management issues, and strengthening community relationships to improve preparedness and enhance resiliency during emergency events.

Planning Department staff have discussed the LAFD Strategic Plan and its relationship to growth and traffic with LAFD staff in order to understand how LAFD responds to growth and changes in traffic.[29] LAFD advised that although increasing congestion is a factor in how they address emergency response, their ongoing planning efforts, including the LAFD Strategic Plan take in to account such increases in congestion and LAFD continues to plan for and maintain public safety and emergency service as required. LAFD monitors any impact on-the-ground implementation of the Proposed Plan may have on response times and make adjustments as necessary. These adjustments may or may not include redeploying resources, adding staff or building new fire stations.

Based on the above, LAFD and LAPD may build a new facility or expand an existing facility to provide fire protection, emergency medical service and police protection over the plan horizon for the Proposed Plan that may or may not be in part a result of increased traffic. The location, size, and type of such facility would be speculative at this point in time. (See discussion in Impact 4.14-1). Based on the threshold, an impact would result if construction of a new or expanded facility would result in impact to the environment. Based on the above and as discussed in Impact 4.14-1, the impact of the Proposed Plan on fire protection, emergency medical services and police protection would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

[28]LAFD, *Strategic Plan 2015-2017,* http://www.lafd.org/news/lafd-chief-unveils-departments-strategic-plan.
[29]Meeting between DCP and LAFD staff on September 8, 2015.

IMPACT 4.15-8 Would the implementation of the Proposed Plan substantially disrupt existing public transit, bicycle, or pedestrian facilities or interfere with planned facilities, or create conflicts or inconsistencies with adopted public transit, bicycle, or pedestrian system plans, guidelines, policies, or standards? **Less than significant.**

The types of transportation improvements envisioned as part of the Proposed Plan and Project List are within the framework established in the MP 2035. The policies and programs in the Proposed Plan are consistent with the City's multimodal approach to transportation planning. The transportation improvements supported in the programs and policies of the Proposed Plans and contained in the Project List would provide transportation options and accommodations for multiple modes of travel (i.e., transit, bicycle, pedestrian, and vehicle) as part of the transportation system. The Project List is not exhaustive but is representative of the types of improvements proposed for inclusion in the Community Plan. In addition, the Proposed Plan would not, itself, entitle or otherwise approve any transportation projects. Nevertheless, potential impacts of implementing the transportation improvements contained in the Project Lists were analyzed at a programmatic level as part of the Proposed Plan under Future With Project Conditions. The types of improvements that could be implemented through the Proposed Plan are discussed in further detail below.

Public Transit Facilities

The transit improvements in the Proposed Plan and contained in the Project List include network changes as well as signal timing and technology improvements and stop enhancements that would help to reduce delays for transit vehicles. The changes are intended to provide reliable and frequent transit service that is convenient and safe; increase transit mode share; and reduce single-occupancy vehicle trips.

The Proposed Plan would not disrupt any existing or planned transit facilities or create conflicts or inconsistencies with adopted transit plans, guidelines, policies, or standards. Rather, the Proposed Plan supports existing facilities and adopted plans and polices. Therefore, no impact related to the transit system would occur.

Bicycle Facilities

The bicycle improvements in the Proposed Plan and contained in the Project List reflect the types of bicycle facilities that could be implemented as part of MP 2035 through BEN, Bicycle Lane Network, and NEN treatments. The bicycle facilities are intended to work in conjunction with existing paths and neighborhood facilities to provide a low-stress network of bikeways for all types of riders.

The Proposed Plan would not disrupt any existing or planned bicycle facilities, or create conflicts or inconsistencies with adopted bicycle system plans, guidelines, policies, or standards. Rather, the Proposed Plan supports existing facilities and adopted plans and polices. Therefore, no impact related to the bicycle circulation system would occur.

Pedestrian Facilities

Many of the multi-modal improvements in the Proposed Plan and contained in the Project List are focused on improving accessibility for pedestrians, including improved access to transit. For example, treatments are designed to improve the walking environment around the major transit stations as critical first-/last-mile connections.

The Proposed Plan would not disrupt existing pedestrian facilities or interfere with planned pedestrian facilities, or create conflicts or inconsistencies with adopted pedestrian system plans, guidelines, policies, or standards. Rather, the Proposed Plan supports existing facilities and adopted plans and polices. Therefore, no significant impact related to the pedestrian circulation system would occur.

Therefore, impacts related to public transit, bicycle, and pedestrian facilities would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

IMPACT 4.15-9 Would the Proposed Plan result in a substantial disruption to traffic during construction, which could include temporary street closures; temporary loss of regular vehicular or pedestrian access to existing land uses; temporary loss of an existing bus stop or rerouting of bus lines; or creation of traffic hazards? **Significant and unavoidable.**

Construction-related impacts would generally be temporary. Because the Proposed Plan represents an area relating to the development of multiple parcels, construction-related impacts would depend on the approach to development of each parcel or development site. Although specific impacts related to construction cannot be known at this time, it is likely that construction activities related to site development could necessitate temporary lane, alley, or street closures or result in bus stop relocation or bus rerouting.

The Proposed Plan would not, itself, entitle or otherwise approve any transportation improvements for construction. Implementation of the improvements identified in the Project List would mostly consist of roadway restriping and limited changes to the physical configuration of curbs, and thus, would likely be short in duration while other projects would require longer construction duration. Therefore, temporary construction related impacts could occur from the projects with longer construction durations.

The City implements standard construction techniques to manage construction related traffic impacts. Examples of these include preparation of traffic control plans, requiring flagmen and preparing detours. If unusual circumstances exist (e.g., multiple construction projects going around the same location), there may be ***potentially significant*** impacts.

Mitigation Measures

T4 **Traffic Control Plan.** Construction activities that may result from the Proposed Plan will be evaluated on a project-by-project basis by LADOT for construction-related impacts to traffic. Construction activities will be managed through the implementation of a traffic control plan, approved by LADOT, to reduce the severity and duration of traffic disruption and to ensure the safety of all users of the affected roadway, including, as appropriate, through the use of temporary traffic signals, detours, or the use of flagmen adjacent to construction activities.

Significance of Impacts after Mitigation

Implementation of the mitigation measure would be expected to reduce impacts to transportation related to construction. However, even with implementation of this measure, significant impacts may result. Therefore, construction-related impacts would remain ***significant and unavoidable***.

SECONDARY IMPACTS TO TRANSPORTATION

Parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA. Under CEQA Guidelines, a project's social impacts need not be treated as significant impacts on the environment. Environmental documents must address the secondary physical impacts that

would be triggered by a social impact (CEQA Guidelines Section 15131). The social inconvenience of parking deficits, such as having to hunt for parking spaces, is not an environmental impact, but parking deficits may result in secondary physical environmental impacts, such as increased traffic congestion at intersections; air quality, safety, or noise impacts caused by congestion from drivers seeking parking.

Some of the enhanced network treatments analyzed as part of the Proposed Plan have the potential to remove on-street parking in certain locations. To consider the range of potential impacts that could occur from the implementation of the enhanced network treatments, two implementation options were developed for the purpose of analyzing potential impacts. Treatment Option 1 generally prioritizes vehicle and transit capacity, while Option 2 generally prioritizes the preservation of on-street parking (see **Table 4.15-7**). For example, protected bike lanes are proposed on Hollywood Boulevard (Virgil Avenue to La Brea Avenue) as part of the enhanced network treatments. Under Treatment Option 1, peak period parking restrictions would be implemented on Hollywood Boulevard to accommodate the protected bike lanes and maintain two vehicle lanes in each direction during peak travel hours (on-street parking and one vehicle lane per direction would occur in off-peak travel periods). Under Treatment Option 2, all day parking would be provided along Hollywood Boulevard and the vehicle capacity would be reduced from two to one travel lane in each direction to accommodate the protected bike lanes. Through additional studies, it may be found that on-street parking should be maintained in exchange for a reduction in vehicle capacity (i.e., vehicle travel lane conversions to bike or bus-only lanes) or other off-street parking solutions required in certain locations along the corridors may be proposed. Individual projects would be studied in further detail as the Proposed Plan would not, itself, entitle or otherwise approve any transportation projects.

The Proposed Plan has a variety of policies and programs related to parking. Below is a sample of the proposed policies and programs in the Proposed Plan.

Policy M.6.1: Efficient management. Improve utilization and management of existing public parking supply. Support their use and encourage shared parking, market-driven pricing, and other parking innovations to ensure parking efficiency.

> **Program 93**: Create a parking management district or districts in areas of high parking demand.
>
> **Program 50**: Encourage projects located within the Regional Center to participate in District Valet Programs to mitigate any project-generated parking impacts. Participation in a District Valet Program should be considered as a traffic mitigation measure.
>
> **Program 51**: Consider allowing nightclub and other entertainment venues in the Regional Center to submit a private parking plan certified by the Department of Transportation to utilize underused private commercial parking areas for certification by the Department of Transportation in lieu of providing required on-site parking spaces.

Policy M.6.11: Maximize the use of on-street parking spaces in commercial areas.

> **Program 94**: Work with LADOT to implement Express Park, an intelligent parking management system that provides information on the location and pricing of available parking in current time and adjusts pricing and time limit in response to changes in supply and demand.

Policy M.6.12: New lots and structures. Support construction of new parking lots and structures located in high demand areas that share spaces with multiple uses and adhere to design standards. New parking structures should be built to be adaptive to a future non-parking use.

> **Program 95**: Develop new off-street public parking resources, including parking structures and underground parking, in accordance with design standards.

In addition to the enhanced network treatments analyzed as part the Proposed Plan, the following trip reduction programs would help to reduce the need for vehicular travel and better manage the supply of parking in the project area:

Policy M.1.8: Peak hour parking restrictions. Discourage peak hour parking restrictions on streets with high volumes of bicyclists. Consider peak hour parking restrictions or no on-street parking on designated segments of Boulevards and Avenues in the Vehicle Enhanced Network that facilitate travel for rush hour freeway commuters.

Policy M.2.5: Transportation demand management. Support implementation of transportation demand management strategies to minimize vehicle trips and improve mobility.

Policy M.2.1: Sustainable mobility options. Encourage sustainable mobility options. Support transportation options for persons who do not have cars or want to use their cars less and promote the use of taxis, rental cars, shared cars, shared bicycles, van pools, shuttles, secure bicycle parking, consolidated pick-up and drop-off areas for Transportation Network Companies (TNCs), and other short trip and first/last mile connections to transit. Encourage the location of these services and bus layovers near Metro Rail Stations and major transit nodes.

The Proposed Plan could result in a loss of on-street parking spaces that could increase VMT if people drive farther to find parking or seek an alternate destination with more convenient parking. However, this increased VMT could potentially be off-set by a reduction in vehicle trips resulting from travel options other than driving that would be available as part of the Proposed Plan as discussed under the new transportation performance metrics below, and by implementing the proposed parking policies and programs.

In addition, the City's establishment of Modified Parking Requirement (MPR) Districts (Ordinance No. 182242) allows for the modification of parking requirements within the MPR District to maintain the required number of parking spaces for any permitted use in the District, to allow off-site parking within 1,500 feet of the site, to reduce parking requirements for individual projects, to establish less restrictive parking requirements by use within the District, to establish more restrictive parking requirements by use within the District, to create a commercial parking credit program, or to establish maximum parking requirements within the District.

Based on all of the above, secondary impacts of the Proposed Plan related to loss of parking would be ***less than significant*** and no mitigation is required.

NEW TRANSPORTATION PERFORMANCE METRICS CURRENTLY UNDER CONSIDERATION

SB 743 directs OPR to "prepare, develop, and transmit to the Secretary of the Natural Resources Agency for certification and adoption proposed revisions to the guidelines adopted pursuant to Section 21083 establishing criteria for determining the significance of transportation impacts of projects within transit priority areas. Upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion within a transit priority area, shall not support a finding of significance pursuant to this division…"

The new draft CEQA guidance on transportation impact analysis from OPR focuses on per-capita VMT. Other potential metrics that could be considered include total VMT and vehicle trips. The Proposed Plan's intended benefits can be quantified using these potential metrics. Included below is an overview of the mobility benefits of the Proposed Plan and an analysis using the alternate thresholds identified in this

section. This analysis is provided as additional information and does not affect the impact analysis in this EIR.

This following analysis, as applicable, may be considered in any subsequent environmental analysis that is tiering or relying on or incorporating by reference this EIR should the City adopt a VMT metric threshold/methodology, including to comply with revised CEQA Guidelines.

Overview of Mobility Benefits from Proposed Plan

The Proposed Plan's land use designations and zoning guide future development to areas that are served by existing transit. The Proposed Plan also contains a Project List with transportation improvements in the Plan Area. By improving the link between land use and transportation in a manner that is consistent with the City's MP 2035 and the General Plan Framework Element, the Proposed Plan intends to reduce reliance of vehicular travel, decrease the number of vehicle trips per capita, and reduce VMT per capita in order to provide better access and transportation options to residents, workers and visitors in Hollywood. The potential benefits from each category of projects is presented below. In addition to VMT reductions, many of the enhanced network treatments result in improved accessibility, mode-share, or safety improvements. Where applicable, these benefits are also discussed below.

Potential Transit Improvements

Transit improvements that are part of the Proposed Plan and Project List are intended to facilitate the use of public transit and encourage less use of the single occupant automobile by providing a convenient, accessible and efficient alternative. In addition, many of projects classified as pedestrian and bicycle improvements are intended to provide safe and convenient first-/last-mile connections to transit service.

Potential Pedestrian Improvements

The pedestrian projects in the Proposed Plan and Project List are focused on three categories of improvements: the quality of the pedestrian environment, pedestrian safety, and access to transit. Pedestrian environment improvements include landscaping, shade, shelters, and directional signage. Pedestrian safety improvements include curb extensions, enhanced crosswalks, and upgraded lighting. Transit connection and streetscape projects include many of these same improvements, focused around high-volume transit stations.

Potential Bicycle Improvements

Bicycle projects in the Proposed Plan and Project List primarily fall into three categories of improvement: the presence and quality of bicycle facilities, access to bicycles, and transit connections. Improvements to the presence and quality of bicycle facilities include projects such as bike lanes, which demarcate space for bicyclists, cycle tracks, which provide separated and protected space for bicyclists, and Neighborhood Friendly Streets (identified as the NEN in MP 2035), which include traffic calming measures and route signage for bicyclists. Improvements to transit connections include mobility hubs, which provide information and secure bike parking at transit stations, intended to bridge the first and last mile of a rider's commute.

Potential Roadway & ITS Improvements

Projects related to roadway improvements and ITS in the Proposed Plan and Project List focus on maximizing the efficiency of the road for vehicle use. These projects improve traffic flow by providing select intersection improvements, signal timing and coordination upgrades, signal detectors, and monitoring and response technology.

While there are often emissions reductions associated with these types of projects as travel time per mile decreases, there are no associated VMT reductions. The Neighborhood Protection Program, however, may reallocate VMT away from local streets and onto arterial streets. In addition, these improvements would increase accessibility by increasing the number of jobs reachable by vehicle within a certain amount of time. The improvements may also reduce certain types of collisions by providing dedicated space and signal phasing for protected turning movements and safety improvements at intersections.

Potential Auto-Trip Reduction Improvements

Projects in the Proposed Plan and Project List that directly reduce auto trips generally use either a direct financial incentive or disincentive to influence travel behavior. Some projects within this category focus on providing more information about transportation options, and others focus on connecting program participants to the resources they need to change behavior, such as linking up with a carpool.

While these improvements may not directly expand accessibility, the associated programs may incentivize the creation of new modes of travel, such as carpooling, car sharing, vanpooling, or bikesharing, which would, in turn, improve the mode split between single occupancy vehicles and other transportation options.

Impact Analysis using New Potential Metrics

Vehicle Trips

Vehicle Trips are defined as the number of trips undertaken in an automobile, such as in single-occupancy private automobiles, and vehicles that contain two or more travelers, such as carpools, taxis, or ride-share vehicles. While the total number of vehicle trips is expected to increase as growth occurs in the Project Area and in the region, a reduction in vehicle trips per capita over time can be used as an indicator of reduced reliance on the automobile as well as an indicator of more travel by carpools. A reduction in the number of vehicle trips per capita also helps meet the State's goals of reducing GHG emissions, as mandated by AB 32 and SB 375. Any increase in the number of daily vehicle trips per capita would be an undesirable outcome of the Proposed Plan.

The number of vehicle trips with an origin and/or destination in the project area was forecasted with the TDF model. **Table 4.15-12** summarizes changes in vehicle trips under Existing Conditions and Future With Project Conditions with Treatment Options 1 and 2. The table includes all vehicle trips that originate in the project area, are destined for the project area, or both, but excludes trips that both start and end outside the CPA boundaries.

TABLE 4.15-12: VEHICLE TRIPS PRODUCED BY THE PLAN AREA

Metric	Existing 2016 Conditions	Future 2040 without Project	Percent Change	Future 2040 with Project Treatment Option 1	Percent Change	Future 2040 with Project Treatment Option 2	Percent Change
Daily Vehicle Trips	706,000	752,000	+7%	785,000	+11%	785,000	+11%
Daily Vehicle Trips per Capita	2.3	2.2	-5%	2.0	-12%	2.0	-12%

SOURCE: Fehr & Peers, 2018.

Under Existing conditions, there are approximately 706,000 daily vehicle trips generated by the uses in the Plan Area. Under Future With Project Conditions, daily vehicle trips increase by 11 percent (under both Treatment Options) to over 785,000 trips, reflecting increases in the number of residents, employees and visitors in the Plan Area. Despite the increase in total vehicle trips, vehicle trips per capita declines by

12 percent compared to Existing Conditions, suggesting that more people are choosing to make more trips by walking, biking, transit and/or carpools.

As discussed throughout the EIR, the model-estimated changes in vehicle trips are conservative. Therefore, it is possible that the Hollywood Subarea TDF model and this analysis underestimate the magnitude of vehicle trip per capita reduction in the Future With Project Conditions.

The number of vehicle trips per capita is one potential metric for evaluating transportation impacts that may be included in revisions to the Thresholds Guide. While the City has not yet developed a threshold for this metric, the Proposed Plan would result in an overall decrease in vehicle trips per capita relative to Future Without Project Conditions. Given this conclusion, the Proposed Plan would not result in a significant adverse transportation impact under this potential new CEQA metric.

Vehicle Miles Traveled (VMT)

VMT is a measurement of miles traveled (e.g., private automobiles, trucks and buses) generated by all land uses (e.g., residential, retail, office). While the total VMT is expected to increase as growth occurs in the Project Area and in the region, a reduction in VMT per capita over time can be used as an indicator of reduced reliance on the automobile. Reducing VMT helps meet the State's goals of reducing GHG emissions, as mandated by AB 32 and SB 375. Any increase in the total number of VMT per capita would be an undesirable outcome of the Proposed Plan. VMT was forecasted with the Hollywood Subarea TDF model. **Table 4.15-13** summarizes changes in VMT in Existing Conditions and Future With Project Conditions (Treatment Options 1 and 2) generated by the Proposed Plan.

TABLE 4.15-13: VMT WITH ORIGINS AND/OR DESTINATIONS IN THE PLAN AREA

Metric	Existing Conditions	Future 2040 without Project	Future 2040 with Project Treatment Option 1	Percent Change	Future 2040 with Project Treatment Option 2	Percent Change
VMT	5,624,000	5,708,000	5,902,000	+5%	5,901,000	+5%
VMT per Capita	18.3	16.5	15.2	-17%	15.2	-17%

SOURCE: Fehr & Peers, 2018.

Under Existing Conditions, motorists traveling to, from or within the Project Area, travel over 5.62 million vehicle miles on an average weekday. Under the Future With Project Treatment Options 1 and 2, daily VMT increases to approximately 5.9 million, a 5 percent increase from Existing Conditions in the Project Area.

Under Existing Conditions, the Project Area produces an average of 18.3 vehicle-miles per capita daily. Under the Future With Project Conditions (with both Treatment Option 1 and 2), daily VMT per capita decreases to 15.2 miles, approximately 17 percent below Existing Condition.

The decrease in VMT per capita with the Proposed Plan is due to the additional land use densities expected with the forecasted changes in socioeconomic data (i.e., housing, population and employment growth) and the mobility improvements that are part of the enhanced network treatments. Additional density in the project area provides more opportunities for residents, workers and visitors to travel locally, resulting in shorter trips (or fewer total trips within mixed-use developments).

VMT per capita is one potential metric for evaluating transportation impacts that may be included in revisions to the Thresholds Guide. While the City of Los Angeles has not yet developed a threshold for this metric, the Proposed Plan would result in an overall decrease in VMT per capita. Given this conclusion,

the Proposed Plan would not result in a significant adverse transportation impact under this potential new CEQA metric.

CUMULATIVE IMPACTS

Cumulative impacts are those environmental effects that, on their own, may not be considered adverse, but when combined with other projects over time, result in substantial adverse effects. Cumulative effects are an important part of the environmental analysis because they allow decision makers to look not only at the impacts of an individual project, but the overall impacts to a specific area over time from many different projects. CEQA requires an analysis of cumulative impacts resulting from the implementation of the Proposed Plan along with other related projects anticipated to occur in the same geography and timeframe.

The analysis of Future With Project Conditions takes into account regional population, housing and employment growth prepared by SCAG and found in the 2016-2040 RTP as well as growth anticipated in the Project Area. The RTP also includes a Sustainable Communities Strategy (SCS) that provides guidance on land use planning and transportation to ensure that the region meets CARBs region-specific GHG reduction goals. The RTP also includes large-scale transportation improvements to show how linking transportation and land use planning can reduce automobile trips and greenhouse gas emissions. The 2016-2040 RTP/SCS identifies transportation corridors and transit routes, High Quality Transit Areas (HQTAs), and a variety of strategies to be employed across the region.

The recently adopted City of Los Angeles Mobility Plan 2035 (MP 2035) could have overlapping impacts with the Proposed Plan. In August 2015, the City of Los Angeles adopted MP 2035. MP 2035 (formerly the Transportation Element of the City's General Plan) is the transportation blueprint for the City of Los Angeles. MP 2035 identifies a number of changes to the City's circulation system, including policies, an Enhanced Complete Street System, an Action Plan, a Complete Streets Design Guide, and a revised Bicycle Plan, all of which will influence the network conditions in the Plan Area and adjacent areas in the City of Los Angeles.

MP 2035 provides the framework for future community plans and specific plans, which take a closer look at the transportation system in specific areas of the City and recommend more detailed implementation strategies to realize MP 2035. MP 2035 was prepared in compliance with the 2008 Complete Streets Act, which mandates that the circulation element of a city's General Plan be modified to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan.

The Proposed Plan contains a Project List that reflects the vision of MP 2035 and the analysis above considers two options for implementing MP 2035 in the Project Area; however, the future transportation impact analysis does not reflect full buildout of MP 2035 in adjacent areas of the City of Los Angeles. The proposed TIA fee program would provide additional funding from new development that would enable transportation improvement projects to be implemented within the Plan Area sooner than they otherwise would be based on currently available funding sources. In the remaining portion of the City of Los Angeles outside the Plan Area, buildout of MP 2035 was not included in the Future With Project analysis because, although MP 2035 has been adopted, the timing of implementation and funding sources have not yet been identified. However, the cumulative impacts analysis evaluates the impacts of the Proposed Plan in conjunction with full buildout of MP 2035 throughout the City of Los Angeles.

The Future With Project scenario includes the growth and transportation improvements proposed within the Plan Area, and currently funded transportation projects and growth projections outside the plan area as

identified in the SCAG 2016-2040 RTP. This Future With Project scenario represents the reasonably foreseeable conditions with the Proposed Project. The cumulative impact analysis adds to this future condition additional projects that may occur but that are either currently not approved or not funded. For this analysis, the additional project that is being accounted for is the MP 2035. Buildout of MP 2035 was not included in the Future Without Project or Future With Project scenarios used in the analysis of the Proposed Project because, although MP 2035 has been adopted, the timing of implementation and funding sources have not yet been identified, and project design at the roadway segment or intersection level of detail has not been developed. However, the cumulative impacts analysis evaluates the impacts of the Proposed Project in conjunction with full buildout of the MP 2035 multi-modal improvements (including the Transit, Bicycle, Neighborhood, Pedestrian, and Vehicle Enhanced Networks) both within the Project Area and throughout the City. The transportation planning efforts being undertaken in MP 2035 would complement the transportation improvements that would be enabled by the Proposed Project.

The Proposed Project would not entitle the transportation improvements identified on the list of projects that could be funded through the adoption of TIA fees. As the individual improvements are not proposed for construction at this time, schedules and phasing plans have not been determined for these improvements and design details have not been developed. Therefore, the cumulative impacts of the Proposed Project, in conjunction with MP 2035, are evaluated at a conceptual level of detail.

CIRCULATION SYSTEM

As described in the impact analysis above, potential impacts to the circulation system associated with the Proposed Project were analyzed. V/C ratios and LOS calculations were prepared for Existing 2016 Conditions, Future 2040 without Project, and Future 2040 with Project Conditions. The analysis of Future With Project Conditions accounts for growth and transportation improvements proposed in the Project Area, and regional population, housing and employment growth prepared by SCAG and found in the 2016-2040 RTP. The volume-weighted average of the V/C ratio under Future With Project Conditions for all of the analyzed roadway segments would exceed that of Existing Conditions (0.876 to 0.951 under Option 1 and 0.965 under Option 2 during the AM peak period, and 0.890 to 0.995 under Option 1 and 1.008 under Option 2 during the PM peak period). The percentage of street segments projected to operate at unsatisfactory levels of service (LOS E or F) under Future With Project Conditions exceeds the number for Existing Conditions (37 to 46 percent under Option 1 and 49 percent under Option 2 during the AM peak period, and 37 to 48 percent under Option 1 and 50 percent under Option 2 in the PM peak period).

Within the implementation of MP 2035, many of the proposed transportation improvements would be extended outside of the Project Area, resulting in a more robust multi-modal network throughout the City of Los Angeles. Full buildout of MP 2035 would also likely require the conversion of additional vehicular lanes into transit only lanes or bicycle facilities. Under current CEQA Guidelines and Thresholds Guide, this is considered a significant adverse impact. The combination of the Proposed Project together with MP 2035 would continue to result in volume-weighted average of the V/C ratio in exceedance of Existing Conditions. The Proposed Project would result in a cumulatively considerable contribution to significant cumulative circulation system impacts.

NEIGHBORHOOD INTRUSION

The EIR modeling analysis conducted for the Proposed Plan accounts for potential redistribution of vehicular traffic from highly congested streets to streets that have more available capacity. Along roadways where the Proposed Plan would cause significant traffic congestion, diversion of trips could occur onto adjacent parallel routes. It is anticipated that diversion would not occur on streets that operate at LOS D or better during peak periods because the average delay is not substantial. However, for the street segments where the LOS would degrade from D to E or F, some trips could divert to adjacent streets to avoid longer travel times through congested locations. While the Residential NTM plans required by LADOT can

alleviate neighborhood traffic intrusion from individual developments within the Project Area, regional growth and associated increases in activity levels may still result in vehicles diverting to residential roadways. On a regional level, traffic in the study area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future by SCAG. This growth will occur with or without implementation of the Proposed Plan and MP 2035. It is possible that diversions evaluated under the Future With Project Conditions could increase with implementation of the MP 2035, as full buildout outside of the plan area would likely require the conversion of additional vehicular lanes into transit only lanes or bicycle facilities. Therefore, the diversion of traffic associated with cumulative conditions would result in a cumulatively considerable contribution to significant cumulative neighborhood intrusion impacts.

CONGESTION MANAGEMENT PLAN

As defined by the CMP, a significant impact occurs when a project increases traffic demand on a CMP facility by two percent of capacity (V/C $\geq$ 0.02), causing LOS F (V/C > 1.00); if the facility is already at LOS F, a significant impact occurs when a project increases traffic demand on a CMP facility by 2% of capacity (V/C $\geq$ 0.02). On a regional level, traffic in the study area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future by SCAG. Consequently, when comparing traffic operations on the CMP network under Future With Project Conditions to Existing Conditions, peak period congestion continues to increase as a result of background and Proposed Plan growth. The combination of the Proposed Plan together with MP 2035 would be expected to result in similar travel demands on the state freeway system as analyzed under Future With Project Conditions. Nevertheless, increases in future traffic demand is expected to exceed the CMP threshold of two percent of capacity with background growth, the Proposed Project, and MP 2035. Therefore, the Proposed Project would result in a cumulatively considerable contribution to significant cumulative CMP impacts.

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4.16 UTILITIES AND SERVICE SYSTEMS

This section provides an overview of the utilities and service systems and evaluates the construction and operational impacts associated with the Project Area. Topics addressed include water, wastewater, solid waste, and energy.

The Project Area is evaluated with respect to the demand that could be placed on water, wastewater, solid waste, and energy service providers, whether this demand can be met without the need for additional infrastructure, and whether the Project Area would be in compliance with regulations governing the provision of this utility. Assessment of impacts on water, wastewater, solid waste, and energy conveyance infrastructure and supply includes the comparison of estimated project-generated demand against existing and anticipated resource supplies and/or conveyance/treatment capacity.

WATER SUPPLY

REGULATORY FRAMEWORK

Federal, state and local laws, regulations, plans, and guidelines that are potentially applicable to the Proposed Plan are summarized below.

FEDERAL

The Clean Water Act (CWA) is discussed below under wastewater.

Safe Drinking Water Act. The Safe Drinking Water Act ensures the quality of Americans' drinking water. The law requires actions to protect drinking water and its sources (e.g., rivers, lakes, reservoirs, springs and groundwater wells) and applies to public water systems serving 25 or more people. It authorizes the U.S. Environmental Protection Agency (USEPA) to set national health-based standards for drinking water to protect against both naturally occurring and manmade contaminants. In addition, it oversees the states, municipalities and water suppliers that implement the standards. USEPA standards are developed as a Maximum Contaminant Level (MCL) for each chemical or microbe. The MCL is the concentration that is not anticipated to produce adverse health effects after a lifetime of exposure, based upon toxicity data and risk assessment principles. USEPA's goal in setting MCLs is to assure that even small violations for a period of time do not pose significant risk to the public's health over the long run. National Primary Drinking Water Regulations (NPDWRs) are legally enforceable standards that limit the levels of contaminants in drinking water supplied by public water systems. Secondary standards are non-enforceable guidelines regulating contaminants that may cause cosmetic effects (such as skin or tooth discoloration) or aesthetic effects (such as taste, odor, or color) in drinking water. USEPA recommends secondary standards to water systems but does not require systems to comply. However, California has adopted secondary water standards in Title 22 of the California Code of Regulations (CCR).

STATE

Governor's Declaration of a State of Emergency. On January 17, 2014, California Governor Jerry Brown proclaimed a state of emergency due to drought conditions. This proclamation directs all local urban water suppliers and municipalities immediately implement their local water shortage contingency plans. In response to the proclamation, the City and the Los Angeles Department of Water and Power (LADWP)

activated the Water Conservation Response Unit to implement the Emergency Water Conservation Plan (EWCP).

On May 9, 2016, Governor Jerry Brown signed Executive Order B-37-16 that established a new water use efficiency framework for California. This Executive Order bolstered the state's drought resilience and preparedness by establishing longer-term water conservation measures that include permanent monthly water use reporting, new urban water use targets, reducing system leaks, eliminating wasteful practices (such as hosing off hardscapes, washing automobiles with hoses not equipped with a shut-off nozzle, using non-recirculated water in a decorative water feature, watering lawns in a manner that causes runoff, and irrigating ornamental turf on public street medians), strengthening urban drought contingency plans, and improving agricultural water management and drought plans. Based on monthly water use reporting, the majority of urban water suppliers reported sufficient supplies to meet demand in three additional dry years and are not subject to state conservation mandates. On February 8, 2017, the State Water Resources Control Board (SWRCB) adopted an emergency water conservation regulation to amend and extend the May 2016 regulation. The amended regulation allows certain suppliers the opportunity to submit or resubmit their water supply reliability assessments by March 15, 2017 and does not require mandatory conservation unless water suppliers determine that they have a shortfall. Prohibitions against home owners associations penalizing homeowners for certain outdoor conservation practices during a declared drought remain and similar requirements are extended to cities and counties. The extension maintains urban water supplier monthly reporting and basic water conservation measures. Accordingly, the SWRCB will separately take action to make reporting and wasteful water practices permanent.[1]

State of Emergency Executive Order B-40-17. On April 7, 2017, this Executive Order ended the drought state of emergency in all California counties except Fresno, Kings, Tulare, and Tuolumne, where emergency drinking water projects will continue to help address diminished groundwater supplies. It maintains water reporting requirements and prohibitions on wasteful practices.

Making Water Conservation a California Way of Life. In May of 2016, Governor Brown signed Executive Order B-37-16 that instructed State agencies to help Californians adopt permanent changes to use water more wisely. This Executive Order laid out a framework for moving the State from temporary, emergency water conservation measures to a more durable approach customized to the unique conditions of each local water agency. This report builds upon the Executive Order and provides recommendations for how to implement long-term improvements to water supply management that support water conservation.

Urban Water Management Planning Act. In 1983, the California Legislature enacted the Urban Water Management Planning Act (Water Code, Section 10610 *et seq.*), which requires urban water suppliers to develop water management plans to actively pursue the efficient use of available supplies. Every five years, water suppliers are required to develop Urban Water Management Plans (UWMPs) to identify short-term and long-term water demand management measures to meet growing water demands. The LADWP, as a water supplier, has prepared and adopted an UWMP, the latest of which was completed in the year 2015. In addition to the UWMP, there are several state regulations which govern water consumption within the City:

- **Title 20, CCR Section 1605.1**. Mandates water conservation by establishing efficiency standards that give the maximum flow rate of all new shower heads, lavatory, sink faucets, and tub spout diverters.
- **Health and Safety Code Section 17921.3**. Requires all buildings to have low-flush toilets and urinals.

[1]SWRCB, *Water Conservation Portal – Emergency Conservation Regulation*, http://www.waterboards.ca.gov/water_issues/programs/conservation_portal/emergency_regulation.shtml, accessed February 15. 2017.

- **Health and Safety Code Section 116785**. Prohibits the installation of residential water softening or conditioning appliances unless certain conditions are met and requires the installation of water conservation devices on fixtures using softened or conditioned water.
- **Water Code Section 10910**. Requires the identification of any public water system that may supply water for proposed projects that are subject to California Environmental Quality Act (CEQA) and provides guidelines to include in a water supply assessment, as further described below.

Water Conservation Act. In 2009, the Water Conservation Act was enacted by the California Legislature, which required water agencies to reduce per capita water use by 20 percent by 2020 (known as 20x2020). This includes increasing recycled water use to offset potable water use. Water suppliers are required to set a water use target for 2020 and an interim target for 2015 using one of four methods stipulated in the Act. Failure to meet adopted targets will result in the ineligibility of a water supplier to receive water grants or loans administered by the state. In compliance with the Water Conservation Act, LADWP calculated its baseline per capita water use for the City, urban use target for 2020, and interim water use target for 2015, which is detailed in **Table 4.16-1**.

TABLE 4.16-1: 20X2020 BASE AND TARGET DATA

20x2020 Required Data	Gallons Per Capita per Day (gpcd)
BASE PER CAPITA DAILY WATER USE	
10-Year Average /a/	154
5-Year Average /b/	152
2020 TARGET USING METHOD 3 /c/	
95% of Hydrologic Region Target (149 gpcd)	142
95% of Base Daily Capita Water Use 5-Year Average (152 gpcd)	144
Actual 2020 Target	142
2015 Interim Target	**148**
2015 Actual Use	**114**

/a/Ten-year average based on fiscal year 1995/96 to 2004/05.
/b/Five-year average based on fiscal year 2003/04 to 2007/08.
/c/Methodology requires smaller of two results to be actual water use target to satisfy minimum water use target.
SOURCE: City of Los Angeles Department of Water and Power, *2015 Urban Water Management Plan, Executive Summary, Exhibit ES-L*, page ES-15, adopted April 2016.

The LADWP has met its 2015 and 2020 target as measured by 2015 use. As of February 2017, the City reached its 20 percent reduction in the City's per capita water use. The 20 percent reduction also meets the 2017 goal of the Sustainable City pLAn.[2]

Water Supply Assessments (WSA). In 2001, the California State Legislature approved Senate Bill (SB) 610, which amended Public Resources Code Section 21151.9 and Water Code Sections 10910 *et seq.* requiring the preparation of a "water supply assessment" for large developments. A WSA would be required under the following circumstances:

- A proposed residential development of more than 500 dwelling units;
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- A proposed hotel or motel, or both, having more than 500 rooms;

[2]Office of the Los Angeles Mayor Eric Garcetti, *Los Angeles Achieves Major Garcetti's Goal of 20 Percent Water Savings*, February 2, 2017, https://www.lamayor.org/los-angeles-achieves-mayor-garcetti%E2%80%99s-goal-20-percent-water-savings, accessed December 4, 2017.

- A mixed-use project that includes one or more of the projects specified in this subdivision; and/or
- A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

These assessments, prepared by "public water systems" responsible for service, address whether adequate existing or projected water supplies are available to serve future development occurring under Proposed Project. State regulations do not specifically require the preparation of a WSA for a general plan. Section 10910(c)(2) states that if the projected water demand associated with a proposed plan was accounted for in the most recently adopted UWMP, the public water system may incorporate the requested information from the UWMP into the analysis.

Water Conservation in Landscaping Act. In 2006, this Act was enacted by the California Legislature to resolve outdoor water waste through improvements in irrigation efficiency and selection of plants requiring less water. This Act required an update to the existing local Model Water Efficiency Landscape Ordinance.

2016 California Green Building Standard Code. The California Green Building Standards Code is Part 11 of 12 parts of the official compilation and publication of the adoption, amendment and repeal of building regulations to the CCR, Title 24, Part 11, also referred to as the California Building Standards Code. The purpose of this code is to improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices. The provisions of this code shall apply to the planning, design, operation, construction, use and occupancy of every newly constructed building or structure, unless otherwise indicated in this code, throughout the State of California.

LOCAL

City of Los Angeles General Plan (Framework). The Framework was adopted in 1996 and amended in August 2001. The Framework is a general, long-term, programmatic document that has goals and policies that are implemented by the various individual elements of the City of Los Angeles General Plan. The goals, objectives, and policies of the Framework that are related to water supply, storage, and delivery infrastructure are listed in **Table 4.16-2**.

Emergency Water Conservation Plan (EWCP). The EWCP is found in Los Angeles Municipal Code (LAMC) Chapter XII, Article I. The purpose of the EWCP is to provide a mandatory water conservation plan to minimize the effect of a water shortage to City water users. The provisions outlined within the EWCP are intended to significantly reduce the consumption of water over an extended period of time, thereby extending the available water required for the City water users while reducing the hardship of the City and the general public to the greatest extent possible. The EWCP contains six water conservation phases, which correspond with the severity of water shortage. Each increase in phase corresponds with more stringent water conservation measures.[3] Phase I of the EWCP requires a number of water-saving measures including prohibiting hose watering of driveway and associated walkways; requiring decorative fountains to use recycled water and repairing water leaks in a timely manner. The City imposes additional mandatory water use restrictions as a result of drought conditions. As of April 2016, Mayor Eric Garcetti approved an amendment to the EWCP that would increase fines for water wasters during periods of severe drought and will encourage conservation by the City's largest residential users.[4]

[3]LADWP, *Fact Sheet: Revised Water Conservation Ordinance*, 2010.
[4]LADWP, *LADWP Newsroom Mayor Garcetti Signs New Water Saving Measures*, April 27, 2016, http://www.ladwpnews.com/go/doc/1475/2814194/Mayor-Garcetti-Signs-New-Water-Saving-Measures, accessed February 15, 2017.

TABLE 4.16-2: RELEVANT GENERAL PLAN WATER SUPPLY GOALS, OBJECTIVES, AND POLICIES

Goal/Objective/Policy	Goal/Objective/Policy Descriptions
Goal 9C	Adequate water supply, storage facilities, and delivery system to serve the needs of existing and future residents and businesses.
Objective 9.8	Monitor and forecast water demand based upon actual and predicted growth.
Policy 9.8.1	Monitor water usage and population and job forecast to project future water needs.
Objective 9.9	Manage and expand the City's water resources, storage facilities, and water lines to accommodate projected population increases and new or expanded industries and businesses.
Policy 9.9.1	Pursue all economically efficient water conservation measures at the local and statewide level.
Policy 9.9.2	Develop reliable and cost-effective sources of alternative water supplies, including water reclamation and exchanges and transfers.
Policy 9.9.3	Protect existing water supplies from contamination, and clean up groundwater supplies so those resources can be more fully utilized.
Policy 9.9.4	Work to improve water quality and reliability of supply from the State Water Project and other sources.
Policy 9.9.5	Maintain existing rights to groundwater and ensure continued groundwater pumping availability.
Policy 9.9.6	Identify the needs for land and facilities necessary to provide an adequate and reliable water supply and develop those facilities in an environmentally and socially sensitive way.
Policy 9.9.7	Incorporate water conservation practices in the design of new projects so as not to impede the City's ability to supply water to its other users or overdraft its groundwater basins.
Policy 9.9.9	Clean or replace where necessary, deficient water distribution lines in the City.
Objective 9.10	Ensure that water supply, storage, and delivery systems are adequate to support planned development.
Policy 9.10.1	Evaluate the water system's capability to meet water demand resulting from the Framework Element's land use patterns.
Policy 9.10.2	Solicit public involvement, when appropriate, in evaluating options for the construction of new and/or expansion of existing water facilities.
Objective 9.11	Ensure, to the extent possible, the continued provision of water capacity, quality and delivery after an earthquake or other emergency.
Policy 9.11.1	Provide for the prompt resumption of water service with adequate quantity and quality of water after an emergency.

SOURCE: City of Los Angeles, *The Citywide General Plan Framework, An Element of the City of Los Angeles General Plan*, re-adopted 2001.

Model Water Efficient Landscape Ordinance. In 2009, the City adopted the Model Water Efficient Landscape Ordinance in compliance with the State Water Conservation in Landscaping Act. This Ordinance requires development of water budgets for landscaping, reduction of erosion and irrigation related runoff, utilization of recycled water if available, irrigation audits, development of requirements for landscape and irrigation design, and scheduling of irrigation based on localized climate for new construction and redevelopment projects. The City requires automatic sprinkler systems to be installed to irrigate landscaping during morning hours or during the evening to reduce water losses from evaporation. Sprinklers are required to water less often in cooler months and during the rainfall season, so that water is not wasted in excessive landscape irrigation.

Landscape Ordinance No. 170978. In 1996, Landscape Ordinance No. 170978 became effective with an overarching goal to improve the efficient use of outdoor water. This Ordinance was amended in 2009 to comply with the Water Conservation in Landscaping Act of 2006 and the Model Water Efficient Landscape Ordinance.

Water Efficiency Requirements Ordinance. In 2009, the City further increased its water efficiency mandates with the adoption of the Water Efficiency Requirements Ordinance. This Ordinance establishes water efficiency requirements for new developments and renovations of existing buildings by requiring installation of high efficiency plumbing fixtures in all residential and commercial buildings.

Retrofit on Resale Ordinance. In 1988, the City adopted a plumbing retrofit ordinance to mandate the installation of conservation devices in all properties and to require water-efficient landscaping in all new construction. The Ordinance was amended in 1998, requiring the installation of ultra-low-flush toilets and water saving showerheads in single- and multi-family residences prior to resale. LADWP has explored the expansion of the City's Retrofit on Resale Ordinance to include non-residential properties.

Supply Ordinance No. 165004. Adopted in 1989, this Ordinance effectively reduces Citywide water consumption by requiring new buildings to install water conservation fixtures, such as ultra-low-flush toilets, urinals, taps, and showerheads, and plumbing fixtures which reduce water loss from leakage in order to obtain building permits in the City of Los Angeles. In addition, there are provisions requiring xeriscaping – the use of low-maintenance, drought-resistant plants.

Ordinance No. 166080. Adopted in 1991, this Ordinance prohibits the use of hoses to wash sidewalks, walkways, driveways, or paved parking areas.

Low Impact Development (LID) Ordinance. Approved on January 15, 2010, this Ordinance requires a variety of best management practices (BMPs) to manage stormwater and urban runoff and reduce runoff pollution. The LID Ordinance builds on the City's Standard Urban Stormwater Mitigation Plan (SUSMP) process incorporating environmental practices including infiltration, capture and use, groundwater recharge, and biofiltration.

2017 Los Angeles Amendment Green Building Code, No. 184691. The purpose of the Green Building Program is to reduce the use of natural resources, create healthier living environments and minimize the negative impacts of development on local, regional, and global ecosystems. The program consists of a Standard of Sustainability and Standard of Sustainable Excellence. The program addresses five key areas: (1) Site: location, site planning, landscaping, storm water management, construction and demolition recycling; (2) Water Efficiency: efficient fixtures, wastewater reuse, and efficient irrigation; (3) Energy & Atmosphere: energy efficiency, and clean/renewable energy; (4) Materials & Resources: materials reuse, efficient building systems, and use of recycled and rapidly renewable materials; and (5) Indoor Environmental Quality: improved indoor air quality, increased natural lighting, and improved thermal comfort/control. The Green Building Code also requires that water conservation measures be incorporated into the construction and design of new buildings, additions, and alterations valued at over $200,000.[5]

Existing Buildings Energy and Water Efficiency (EBEWE) Ordinance. Effective in 2017, the EBEWE Ordinance makes public the annual energy and water consumption of all buildings over 20,000 square feet in the City. Beginning in 2017, privately owned buildings that are 20,000 square feet or more and buildings owned by the City that are 7,500 or more are required to be benchmarked, and owners must disclose annual energy and water consumption. Privately owned buildings that are 100,000 square feet or more must begin benchmarking reporting by December 1, 2017, and smaller buildings must begin reporting over the following two years. The Ordinance is designed to facilitate the comparison of buildings' energy and water consumption, and reduce building operating costs, lower energy and water consumption.

Los Angeles Department of Water and Power (LADWP) Policies. The City requires that each applicant coordinate with the LADWP in order to ensure that existing and/or planned water conveyance facilities are capable of meeting water demand/pressure requirements. In coordination with the LADWP, each applicant/contractor shall identify specific on- and off-site improvements needed to ensure that impacts related to water supply and conveyance demand/pressure requirements are addressed at the time that a water

[5]LADWP, *LADWP Newsroom Mayor Garcetti Signs New Water Saving Measures*, April 27, 2016, http://www.ladwpnews.com/go/doc/1475/2814194/Mayor-Garcetti-Signs-New-Water-Saving-Measures, accessed February 15, 2017.

connection permit application is submitted. Water supply and conveyance demand/pressure clearance from LADWP shall be required during this time as well.

Los Angeles Fire Department (LAFD) and Building and Safety Department Policies. The City requires each applicant to coordinate with the LAFD and Building and Safety Department in order to ensure that existing and/or planned fire hydrants are capable of meeting fire flow demand/pressure requirements. The issuance of building permits shall be dependent upon submission, review, approval, and testing of fire flow demand and pressure requirements, as established by the LAFD and Building and Safety Department prior to occupancy. In addition, prior to issuance of building permits, applicants are required to pay any appropriate fees imposed by the Building and Safety Department. A percentage of building permit fees is contributed to the fire hydrant fund, which provides for citywide fire protection improvements.

Los Angeles Department of Water and Power (LADWP) 2015 Urban Water Management Plan (UWMP). The 2015 UWMP, the water supply planning document for the City prepared by LADWP, presents the basic policy principles that guide LADWP's decision-making process to secure a sustainable water supply for Los Angeles. The 2015 UWMP forecasts future water demands and water supplies under average and dry year conditions; identifies future water supply projects such as recycled water; provides a summary of water conservation BMPs; and provides a single and multi-dry year management strategy. The 2015 UWMP serves as a master plan for water supply and resources management consistent with the City's goals and policy objectives; and (2) provides full compliance with the requirements of the Urban Water Management Planning Act. Faced with increasing demands for additional water supplies and drought conditions, several sustainability initiatives continue to be implemented to decrease water use by up to 25 percent per capita over the next 20 years, reduce dependence on imported water supplies, and accelerate the development of local supplies.

EXISTING SETTING

Los Angeles Department of Water and Power (LADWP). LADWP manages the water supply for the City of Los Angeles. The LADWP serves about 187 billion gallons of water to 3.9 million residents and businesses and 679,000 service connections each year. Primary sources of water for the LADWP service area include the Los Angeles Aqueduct (LAA), local groundwater, State Water Project (SWP) and the Colorado River Aqueduct (supplied by the Metropolitan Water District [MWD]), and recycled water. Recycled water is beginning to become a larger part of the overall supply portfolio. Water supplies from the LAA, SWP, and Colorado River Aqueduct are considered imported sources because they are obtained outside of LADWP's service area. **Table 4.16-3** shows the LADWP water supplies. In Fiscal Year (FY) 2015/2016, LADWP supplied approximately 486,734 acre-feet (af) of water to the City. As of 2015/2016, of the 486,734 af of water provided by LADWP to the City, approximately 70 percent is from MWD, 12 percent is from the LAA, 16 percent is from local groundwater, and approximately two percent is from recycled water.[6]

[6]An acre-foot of water is equivalent to 325,851 gallons of water.

TABLE 4.16-3: LADWP WATER SUPPLY SERVING THE CITY OF LOS ANGELES (IN ACRE FEET)

Fiscal Year	MWD	LA Aqueduct	Local Groundwater	Recycled Water	Total
2005/2006	208,865	368,878	50,620	1,417	629,780
2006/2007	292,771	277,817	92,899	5,151	668,638
2007/2008	420,266	151,506	73,314	4,181	649,267
2008/2009	434,682	108,503	61,619	7,906	612,710
2000/2010	258,680	199,739	76,982	6,703	542,104
2010/2011	166,352	307,692	49,354	7,894	531,292
2011/2012	209,746	266,634	61,060	6,850	544,290
2012/2013	388,402	113,411	57,246	7,513	566,572
2013/2014	441,871	61,024	79,403	10,054	592,352
2014/2015	362,607	57,535	90,438	10,421	521,001
2015/2016	339,906	57,859	79,056	9,913	486,734

SOURCE: City of Los Angeles, Los Angeles Open Data, *LADWP Water Supply in Acre Feet*, https://data.lacity.org/A-Livable-and-Sustainable-City/LADWP-Water-Supply-in-Acre-Feet/qyvz-diiw/data, accessed December 4, 2017.

Metropolitan Water District of Southern California (MWD). The MWD is a consortium of 26 member agencies, which includes LADWP. The MWD service area encompasses the service areas of its 26 member agencies, approximately 5,200 square miles, and includes portions of Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura Counties. LADWP purchases water from MWD to supplement its water supplies from the LAA and local groundwater basins. MWD is the largest water wholesaler for domestic and municipal uses in Southern California. MWD imports its water supplies from Northern California through the SWP via the California Aqueduct, and the Colorado River through the MWD-owned Colorado River Aqueduct. Per MWD Act Section 135, each of MWD's 26 member agencies has a preferential right to purchase water from the MWD.[7]

Due to effects from dry weather conditions and environmental restrictions on water pumping operations within San Francisco Bay/Sacramento-San Joaquin River Delta (Delta), water supplies have been restricted. To address the possibility that MWD water supplies may not meet member water demand, the MWD and its 26 member agencies have prepared a Water Supply Allocation Plan (WSAP). If the MWD cannot meet member water demand for any given year, it uses a formula within the WSAP to allocate water to member agencies in a fair and efficient manner.

MWD has undertaken efforts to provide additional supply reliability for the entire southern California region. MWD has worked closely with LADWP to ensure the implementation of water resource development plans. To meet member agencies' growing supply and reliability needs, MWD is planning improvements to the WSAP. The MWD Board of Directors voted to not implement a WSAP for 2016/2017 as water supply conditions improved relative to prior years and storage levels in SWP reservoirs increased.[8]

Los Angeles Aqueduct (LAA). Snowmelt runoff from the Eastern Sierra Nevada Mountains and groundwater from the Owens Valley Groundwater Basin are collected and conveyed to the City via the LAA. LAA supplies can fluctuate yearly due to varying hydrologic conditions. In recent years, the LAA supplies have been less than the historical average because of LADWP's obligations to perform environmental restoration in Mono and Inyo Counties. The Runoff Forecast Model and the Los Angeles Aqueduct Simulation Model (LAASM) was used jointly to predict water available from the LAA. Based on the LAASM data, average long-term LAA delivery over the next 25 years is expected to be 278,000

[7]The MWD Act was passed in 1928 to form the MWD and governs how the MWD operates within the state.
[8]MWD, *5/10/2016 Board Meeting, Board of Directors Water Planning and Stewardship Committee,* March 10, 2016.

acre-feet per year (afy) and gradually decline to 267,000 afy due to climate change impacts. LADWP also anticipates conserving 20,000 afy of water usage for dust mitigation on Owens Lake after implementation of the Owens Lake Dust Mitigation Program and Master Project. However, by 2024, with the completion of the Owens Lake Dust Mitigation Program and Master Project, the projected LAA delivery will increase to 286,000 afy due to water conserved at Owens Lake.[9]

Local Groundwater. The LADWP traditionally extracts groundwater from nine well fields on City-owned property in Owens Valley, and three local groundwater basins: San Fernando, Sylmar, and Central. Groundwater pumped from Owens Valley is used in Owens Valley and in the City. A remediation of an environmental condition occurred in the Owens Valley River and Mono Lake as a result of water diversion for the LAA, in which 182,000 af was used to raise the lake water level and mitigate dust issues. The water supply was reduced from 1998 to 2015 for environmental mitigation for the court ordered program.[10] A detailed discussion of these groundwater basins is found in Section 4.9, Hydrology and Water Quality, of this Draft EIR.

Table 4.16-4 presents LADWP's forecast for groundwater production from each basin through fiscal year ending June 30, 2040. The projection accounts for projects that restore capacity of LADWP's existing well fields and the implementation of expanded basin remediation in San Fernando Basin. Although excluded from the figures provided, LADWP anticipates pumping additional volumes in conjunction with enhanced groundwater recharge and replenishment using stormwater and purified recycled water. As detailed in **Table 4.16-4**, over the course of the 2014-2015 water year, LADWP pumped 80,097 af of water from the San Fernando Groundwater Basin and 6,948 af of water from the Central Basin.

TABLE 4.16-4: GROUNDWATER PRODUCTION 2014/15 TO 2039/40

	Acre Feet per Year (AFY)					
Basin	**2014/15 (Actual)**	**2019/20**	**2024/25**	**2029/30**	**2034/35**	**2039/40**
San Fernando /a/	80,097	90,000	88,000	84,000	92,000	92,000
Sylmar /b/	0	4,170	4,170	4,170	4,170	3,570
Central /b/	6,948	18,500	18,500	18,500	18,500	18,500
Total	**87,045**	**112,670**	**110,670**	**106,670**	**114,670**	**114,070**

/a/San Fernando Basin remediation facilities are expected to be in operation in FY 2021/22. Use of groundwater storage credits allows for increased pumping above safe yield.
/b/Use of groundwater storage credits in Sylmar Basin and Central Basin allows for temporary increase in pumping above safe yield until stored water credits have been expended.
SOURCE: LADWP, *2015 Urban Water Management Plan*, page 6-24, 2016.

Recycled Water. Recycled water is produced by the Hyperion Treatment Plant (HTP), Terminal Island Water Reclamation Plant (TIWRP), Donald C. Tillman Water Reclamation Plant (DCTWRP), Edward C. Little Water Recycling Facility (ECLWRF), and the Los Angeles-Glendale Water Reclamation Plant (LAGWRP). Recycled water is provided for landscape irrigation and commercial uses. Currently recycled water provides approximately two percent to the City's water supply. **Table 4.16-5** provides details on these treatment plants services, capacity, and average daily flows.

[9]LADWP, *2015 Urban Water Management Plan, Chapter 5, Los Angeles Aqueduct System*, page 5-15, adopted April 2016.
[10]An acre-foot of water is equivalent to 325,851 gallons of water.

TABLE 4.16-5: WASTEWATER TREATMENT PLANTS SUMMARY			
Treatment Plants	**Treatment Level**	**Capacity (mgd)**	**Average Flows (mgd)**
Donald C. Tillman	Tertiary to Title 22 Standards with Nitrification/Dentrification	80	34
Los Angeles-Glendale	Tertiary to Title 22 Standards with Nitrification/Dentrification	20	14
Terminal Island	Tertiary; Advanced treatment (MF/RO) of 5 mgd	30	16
Hyperion	Full secondary	450	263
Note: mgd = million gallons per day **SOURCE**: LADWP, *2015 Urban Water Management Plan; Exhibit 4C: Sources of Recycled Water Summary*, 2016.			

WATER SUPPLY TREATMENT PROCESS

LADWP supplies water that meets or exceeds all health-related state and federal standards.[11] LADWP accomplishes such standards by: (1) filtration of the LAA supply; (2) security measures safeguarding access to water supply and storage areas; (3) control of algae growth in groundwater and reservoirs; (4) continuous disinfection of water entering mains; and (5) regular water quality testing, inspection, and cross-control prevention.

All water coming from the LAA, the California Aqueduct, and the Colorado River Aqueduct is filtered and treated at the LAA Filtration Plant or the Jenson, Weymouth and Diemer Treatment Plants to ensure a safe drinking water supply.

According to the 2016 Drinking Water Quality Report prepared by LADWP, water flows into the filtration plant by gravity and travels through screens to remove environmental debris such as twigs and dead leaves. Fluoride is adjusted to the optimal level to promote oral health by strengthening tooth enamel. Ozone, a super-charged oxygen molecule and a powerful disinfecting agent is injected into the water to help particles clump together and to improve the water's taste and appearance. Treatment chemicals are quickly dispersed into the water to make fine particles called "floc." A six-foot-deep filter composed of crushed coal over gravel removes the floc and previously added chemicals. In May 2014, LADWP commissioned a new advanced process at the filtration plant, the Dr. Pankaj Parekh Ultraviolet (UV) Disinfection Facility, which replaces ozone as the primary disinfectant for surface water. The water goes through UV purification which has been identified as one of the most effective methods of drinking water treatment by the USEPA. Then chlorine and ammonia are added during the final step to ensure lasting disinfection and to protect the water as it travels through the city's large distribution system to your tap.

The LAA Filtration Plant has a water treatment capacity of up to 600 million gallons per day (mgd). In the mid-2000's, LADWP began a comprehensive modernization of the filtration plant to upgrade and replace equipment. The upgrade program is on-going process and will continue to deliver dependable supply of safe, quality water to its customers in an efficient and publicly responsible manner. Furthermore, LADWP continues to invest in improving drinking water quality through its Capital Improvement Program, in which water quality capital expenditures are approximately $1.4 billion, and 40 percent of the total capital budget.[12]

LADWP pumps and disinfects groundwater with chlorine as a safeguard against microorganisms to comply with state and federal safe drinking water standards. Additionally, LADWP continuously monitors and ensures that all water meets water quality standards and results are far below the maximum contaminant levels permitted by state or federal regulations.

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[11]LADWP, *2016 Drinking Water Quality Report,* 2017.

[12]LADWP, *Water Quality Improvement,* https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-w-rsrvoir-imprv?_afrLoop=100624598640911 6#%40% 3F_afrLoop%3D1006245986409116%26_adf.ctrl-state%3Duq2zhs1ee_25, accessed September 20, 2016.

WATER CONVEYANCE FACILITIES

Water supply to the City is provided by LADWP's water infrastructure system. LADWP's infrastructure and conveyance system includes 6,730 miles of mainline pipelines less than 20 inches in diameter, 550 miles of trunk lines greater than 20 inches in diameter, 123 tanks and reservoirs, 94 pumping stations, 24 chlorination stations, 328 regulator and relief stations, and 60,115 fire hydrants.[13]

WATER CONSERVATION

Los Angeles consistently ranks among the lowest in per person water consumption when compared to California's largest cities.[14] This is accomplished through water metering, water rationing, public awareness and incentives, industrial process water use efficiency, and other policies, programs and ordinances. As a result of water conservation measures, the City has reduced its water usage by 31 percent during FY 2014/2015 compared to FY 2006/2007.[15] Furthermore, state legislation, which postdates several City water conservation ordinances, has only strengthened the City's commitment to water conservation and provides added assurance that the City will continue its leadership role in managing demand for water in the near and distant future.

EXISTING WATER DEMAND

Table 4.16-6 shows the estimated daily water usage of existing land uses within the Project Area. (A discussion of how estimates were determined is provided in the Methodology discussion below). Under Existing (2016) Conditions, the Project Area uses approximately 54.3 mgd (60,867 afy). This demand comprises a residential water demand of approximately 24.0 mgd (26,921 afy) and a non-residential water demand of 30.3 mgd (33,946 afy).

TABLE 4.16-6: EXISTING (2016) WATER USE IN THE PROJECT AREA /a/

Land Use	Dwelling Units or Square Footage in Project Area /b/	Daily Indoor and Outdoor Water Use (gpd)	Daily Indoor & Outdoor Water Use (afy)
RESIDENTIAL			
Residential Units	98,868 du	24,036,835	26,921
	Residential Subtotal	***24,036,835 (24.0 mgd)***	***26,921***
NON-RESIDENTIAL			
Commercial	26,837,005 sf.	17,775,317	19,908
Industrial	8,700,384 sf.	5,512,230	6,174
Public Facilities	12,369,192 sf.	7,020,900	7,864
	Non-Residential Subtotal	***30,308,447 (30.3 mgd)***	***33,946***
	Existing (2016) Total	**54,345,282 (54.3 mgd)**	**60,867**

Note: gpd = gallons per day; du = dwelling units; sf. = square feet; afy = acre feet per year; 1 gpd = 0.00112 afy; 1 mgd = 1,000,000 gpd
/a/ Water demand generation rates utilize CalEEMod water consumption factors for residential and non-residential uses. Non-Residential Uses utilize several water demand generation rates based on specific uses for commercial, industrial and public facilities. Both indoor and outdoor water use rates (accounting for landscaping) are used. See Appendix I of this EIR for detailed calculations of indoor and outdoor water demand.
/b/ For purposes of calculating water demand, data showing number of dwelling units and area of non-residential development are not rounded. In this EIR, numbers are rounded for purposes of presentation. Total 2016 development in the Project Area is 98,868 du and 47,906,581 sf of non-residential uses.
SOURCE: City of Los Angeles, Department of City Planning, 2018; TAHA, 2018.

[13]LADWP, *Water Infrastructure Plan 2016.*
[14]LADWP, *2015 Urban Water Management Plan, Chapter Three: Water Conservation*, adopted April 2016.
[15]*Ibid.*

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the CEQA Guidelines, the Proposed Plan would have a significant impact related to water demand and/or conveyance infrastructure if it would:

- Require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; and/or
- Have insufficient water supplies available to serve the project from existing entitlements and resources, or result in new or expanded entitlements needed.

METHODOLOGY

This guidance is based on CEQA Guidelines Appendix G and provides specific criteria to be considered when making a significance determination.

This analysis utilizes the California Emissions Estimator Model (CalEEMod), which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to estimate air emissions associated with different types of land use. In developing CalEEMod, the California Air Pollution Control Officers Association (CAPCOA) developed a number of factors for activities (including water demand, wastewater generation, and solid waste generation) for different activities associated with different land uses in order to aid in calculating air emissions associated with these activities. By applying the CalEEMod factors to existing development and to the estimated buildable square footages by land use type, an estimate is made as to water consumption for Existing Conditions and for the Reasonably Expected Development under the Proposed Plan. By calculating existing emissions using standardized usage/generation rates, the analysis provides for a common basis to compare land uses now and into the future.

The estimated increase in consumption is compared to the estimated existing water demand in the Project Area to determine the anticipated increase and to help in determining if the anticipated water supply would be able to accommodate the Proposed Plan's net increase in water demand. This analysis does not rely upon, or use, population data but rather uses 2040 forecasted development (dwelling units and square footages of non-residential land use).

To the extent that the analysis shows the need for new infrastructure to meet demands, the impact analysis considers whether the construction of the new infrastructure could result in significant impacts. The need for infrastructure is not an impact under the threshold unless it results in construction activities that could result in a significant impact to the environment.

IMPACTS

IMPACT 4.16-1 Would implementation of the Proposed Plan require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? **Less than significant impact.**

Reasonably Expected Development under the Proposed Plan would increase water demand over time. As shown in **Table 4.16-6**, Existing (2016) Condition has a water demand of 54.3 mgd (60,866 afy). This total includes a residential water demand of 24.0 mgd (26,921 afy) and a non-residential water demand of 30.3 mgd (33,946 afy).

As shown in **Table 4.16-7**, water demand under the Proposed Plan is estimated to be 62.3 mgd (69,728 afy). This total includes a residential water demand of 29.7 mgd (33,273 afy), and a non-residential water demand of 32.5 mgd (36,454 afy).

TABLE 4.16-7: FUTURE (2040) WATER USE WITHIN THE PROJECT AREA /a/

Land Use	Dwelling Units or Square Footage in Project Area /b/	Daily Indoor and Outdoor Water Use (gpd)	Daily Indoor and Outdoor Water Use (afy)
FUTURE (2040) NO PROJECT/EXISTING PLAN			
Residential			
Residential Units	121,277 du	***27,316,387***	***30,598***
	Residential Subtotal	***27,316,387 (27.3 mgd)***	***30,598***
Non-Residential			
Commercial	31,640,296 sf.	17,407,603	19,499
Industrial	10,257,580 sf.	6,498,809	7,280
Public Facilities	14,583,031 sf.	8,344,749	9,347
	Non-Residential Subtotal	***32,251,161 (32.2 mgd)***	***36,126***
	Future (2040) No Project/Existing Plan Total	**59,567,548 (59.6 mgd)**	**66,724**
PROPOSED PLAN (2040)			
Residential			
Residential Units	131,897 du	29,708,436	33,273
	Residential Subtotal	***29,708,436 (29.7 mgd)***	***33,273***
Non-Residential			
Commercial	35,748,672 sf.	19,667,916	22,028
Industrial	8,646,823 sf.	5,478,295	6,136
Public Facilities	12,935,768 sf.	7,402,146	8,290
	Non-Residential Subtotal	***32,548,357 (32.5 mgd)***	***36,454***
	Future Proposed Plan (2040) Total	**62,256,793 (62.3 mgd)**	**69,728**

Note: gpd = gallons per day; du = dwelling units; sf. = square feet; afy = acre feet per year; 1 gpd = 0.00112 afy; 1 mgd = 1,000,000 gpd
/a/ Water demand generation rates utilize CalEEMod water consumption factors for residential and non-residential uses. Non-Residential Uses utilize several water demand generation rates based on specific uses for commercial, industrial and public facilities. Both indoor and outdoor water use rates (accounts for landscaping) are used. See Appendix I of this Draft EIR for detailed calculations of water demand generation.
/b/ For purposes of calculating water demand, data showing number of dwelling units and area of non-residential development are not rounded; in general, in this document, numbers are rounded for purposes of presentation. Future 2040 No Project development in the Project Area is 121,277 du and 57,118,521 sf. of non-residential uses. Proposed Plan development in the Project Area is 131,897 du and 57,331,263 sf. of non-residential uses.
SOURCE: City of Los Angeles, Department of City Planning, 2018; TAHA, 2017.

The Proposed Plan would result in an increase in water demand of 7.9 mgd (8,861 afy) compared to Existing (2016) Conditions. The Proposed Plan would result in an increase in water demand of approximately 15 percent compared to Existing (2016) Conditions.

For informational purposes and not for impact analysis, the Project under the Future (2040) No Project/Existing Plan would have a water demand of 59.6 mgd (66,724 afy), which would include 27.3 mgd (30,598 afy) of residential water demand and 32.2 mgd (36,126 afy) of non-residential water demand. This would represent an approximately 10 percent increase compared to the water demand under Existing (2016) Conditions.

Water conservation measures would apply to new development, but existing uses are also increasingly implementing water conservation measures in response to increased regulations, community pressure, and pricing controls; therefore, this estimated net increase in water demand in the Project Area may represent a conservative estimate. Furthermore, any water usage increases resulting from the Proposed Project are anticipated to occur incrementally through the year 2040. Since the mid-2000s, LADWP has initiated a comprehensive modernization and upgrade program at the LAA Filtration Plant to continue and better serve

its customers. Based on the water treatment capacity of 600 mgd at the LAA Filtration Plant, the anticipated water demand increase of 15 percent as a result of the Proposed Plan would be within the capacity of the Filtration Plant.

LADWP continues to invest in improving drinking water quality through its Capital Improvement Program, where water quality capital expenditures are approximately $1.4 billion, and 40 percent of the total capital budget. Thus, the construction of new water treatment plants is not anticipated to occur as a result of the approval of the Proposed Plan.

Without knowing the location of specific development and location of associated water feeder facilities it is not possible to determine impacts to other specific LADWP facilities. Therefore, it is anticipated that Reasonably Expected Development under the Proposed Plan could exceed the capacity of existing and/or planned water treatment facilities, water conveyance facilities, or the capacity of existing and planned fire hydrants. Local water delivery lines may need to be replaced in certain locations, and it is possible that the construction of new water lines or new water treatment facilities may be necessary to serve new development in the Project Area. The City requires that applicants coordinate with LADWP to ensure that existing and/or planned water conveyance facilities are capable of meeting water demand/pressure requirements. In coordination with the LADWP, project applicants are required to identify specific on- and off-site improvements needed to ensure that impacts related to water supply and conveyance demand/pressure requirements are addressed prior to issuance of a certificate of occupancy. Water supply and conveyance demand/pressure clearance from LADWP are required at the time that a water connection permit application is submitted. In addition, the City requires applicants to coordinate with the LAFD and Building and Safety Department to ensure that existing and/or planned fire hydrants are capable of meeting fire flow demand/pressure requirements. The issuance of building permits is dependent upon submission, review, approval, and testing of fire flow demand and pressure requirements, as established by the LAFD and Building Safety Department prior to occupancy.

LADWP installs and maintains the water distribution system. The 2016-2017 LADWP Water Infrastructure Plan establishes goals and targets for replacing and/or upgrading infrastructure. Through infrastructure projects, the LADWP would replace or upgrade major system components that are outdated or malfunctioning. With approximately 7,200 miles of water pipes citywide, LADWP plans to replace approximately 500 miles in the next 10 years giving the highest priority to pipes with high risk of failure. Implementation of the Proposed Plan could require the construction of new or upgraded water distribution facilities. However, if new facilities are determined to be necessary at some point in the future, the construction of such infrastructure would not be expected to result in significant environmental impacts. Routine infrastructure projects involving replacing or upgrading water distribution facilities, such as trunk lines, generally include the preparation of a mitigated negative declaration (MND) and in some cases may possibly qualify for a Categorical Exemption (e.g., CEQA Guidelines Section 15302). The environmental impacts of the construction and operation of these new or upgraded facilities are consistent with the impacts that have been evaluated throughout this EIR. Specifically, the EIR analyzes anticipated effects of citywide growth related to air quality, noise, traffic, and other environmental impact areas. To the extent that any significant impacts could result from the unique characteristics of a specific project site, those impacts would be speculative at this time. Therefore, impacts related to the construction of new water conveyance infrastructure and water treatment facilities or expansion of existing facilities under the Proposed Plan would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

IMPACT 4.16-2 Would implementation of the Proposed Plan have insufficient water supplies available to serve the Project Area from existing entitlements and resources, or result in new or expanded entitlements needed? **Less than significant impact.**

The calculated water demand does not take into account reductions in water use by sector anticipated for the City as a whole. Therefore, given the long lifespan of the Proposed Plan, it is important to consider the City's commitment to water conservation in conjunction with supply and demand forecasts to fully evaluate the impact of the Proposed Plan on water supplies. Passive conservation includes long-term behavioral changes in customer water use and compliance with codes and ordinances that mandate increased efficiency. As previously discussed and as shown in **Table 4.16-7**, implementation of the Proposed Plan would have a water demand of 62.3 mgd (69,728 afy). Compared to the Existing (2016) Conditions baseline water demand of 54.3 mgd (60,867 afy), this would represent a water demand increase of appropriately 15 percent compared to Existing (2016) Conditions baseline. For informational purposes and not for impact analysis, the Project under the Future (2040) No Project/Existing Plan would have a water demand of 59.6 mgd (66,724 afy) and would represent an approximately 10 percent increase (as a result of increased development) compared to Existing (2016) Condition. The proposed increase in water demand would occur incrementally over the lifespan of the Proposed Project.

MWD and LADWP are planning for the reasonably expected future populations through a variety of programs. Central to water planning is increasing conservation. The LADWP forecasts that citywide water demand with passive water conservation efforts would be approximately 675,685 af in 2040.[16] Based on the estimated amount of water demanded by the Proposed Project (69,728 afy), the Proposed Project would represent approximately 10 percent of citywide water demand in 2040. LADWP is currently completing a comprehensive Water Conservation Potential Study that will identify remaining active and passive conservation opportunities. The results from this study will guide LADWP's future water conservation planning and program development. In addition, state legislation, which postdates several City water conservation ordinances, strengthens the City's commitment to water conservation and provides added assurance that the City will continue its leadership role in managing demand for water in the near and distant future.

Based on City policy, new water demand is to be met by expanding water recycling and conservation. All new development within the Project Area under the Proposed Plan would be required to implement the water conservation measures described in the Regulatory Framework section. New development within the Project Area would be required to comply with the Water Efficiency Requirements Ordinance - City Ordinance No. 180,822, Los Angeles Green Building Code Ordinance - City Ordinance No. 181,480, and the most current California Green Building Standard Code, and all applicable regulations in the future. Existing development within the Project Area may not be required to conform to these measures, although community pressure and pricing controls are anticipated to continue to reduce water demand from existing uses.

Water conservation efforts would attenuate some of the added demand for water resources from new development as the Proposed Plan is implemented. LADWP would continue to work closely with the City of Los Angeles Department of City Planning to develop and update the UWMP every five years to identify short-term and long-term water resources management measures to meet growing water demands over a 20-year horizon. As required by the Urban Water Management Planning Act, water suppliers are required to develop a UWMP every five years; the 2015 UWMP is the most current UWMP prepared by LADWP. The 2015 UWMP utilizes Southern California Association of Governments (SCAG) demographic forecast for its water demand projections. While the Proposed Project would increase the forecast population in the Project

[16]LADWP, *2015 Urban Water Management Plan, Exhibit 2L (Water Demand Forecast with Passive Conservation Savings from Codes, Ordinances and Conservation Phases for LADWP Service Area*, January 2015.

Area as compared to SCAG forecast, it is anticipated that the total forecast population of the entire City of Los Angeles would be consistent with SCAG. The anticipated increase in demand generated within the Project Area under the Proposed Plan is within the UWMP's projected water supplies for normal, single-dry, and multi-dry years through 2040, and falls within the UWMP's 25-year water demand growth projection. In general, projects that conform to the demographic projection from SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and are located in the City's service area are considered to have been included in LADWP's water planning efforts.[17] Additionally, water conservation efforts, which have shown to be historically effective, would attenuate some of the added demand for water resources from new development as the Proposed Plan is implemented. Moreover, the impacts to water demand for future water resources are minimized as implementation of the Proposed Plan is consistent with the SCAG population forecast for the City and is, therefore, accounted for in the LADWP's long-term water demand planning. The Proposed Plan would respond to regional growth policies to concentrate growth around transit. The increased density is anticipated to be multi-family development that is more water efficient (i.e. less per capita use of water) than single-family uses. Therefore, impacts related to water supplies under the Proposed Plan would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

CUMULATIVE IMPACTS

The issues of water demand and supply are region-wide in the Southern California area and transcend the boundaries of the Project Area and the City. The 2015 UWMP indicates that LADWP can reliably meet the water demands of SCAG forecasted demographic growth in the City of Los Angeles through the year 2040. LADWP's infrastructure is a dynamic and complex system and its ability to provide water supply infrastructure and meet future water demands is determined on a case-by-case basis.[18] Nonetheless, development and population increases under the Proposed Plan when combined with cumulative development could cause an increase in total water consumption. The potential for construction of new water filtration and other large-scale water facilities is not anticipated at the present time. Depending on the location of new water supply facilities, if they are determined to be needed, impacts could occur, although they are too speculative to address in detail at the present time without knowing where development would occur.

The increase in water demand could potentially increase pressure on the City's water infrastructure, including water mainline and trunk lines. In 2016, LADWP prepared a Water Infrastructure Plan, which addresses the City's long-term goals for replacing the City's water infrastructure. The report states that LADWP plans to replace approximately 500 miles of leak-prone and high-risk water mainlines in the next 10 years, and LADWP is increasing the rate at which they replace water distribution mainline to bring the pipe replacement cycle closer to the expected pipe life cycle by year 2020.[19] The upgrading and

[17]LADWP, *Los Angeles Department of Water and Power, Water and Power Services Request Proposed Hollywood Community Plan Update*, Charles C. Holloway, Manager of Environmental Planning and Assessment, February 17, 2017.
[18]*Ibid.*
[19]LADWP, *Water Infrastructure Plan,* 2016.

replacement of the City's water infrastructure generally result in the preparation of an MND or, in some cases, a Categorical Exemption. The City's MNDs for water line replacements typically indicate less-than-significant impacts, including air quality, noise, and traffic impacts. The environmental impacts of the construction and operation of water lines are consistent with the impacts evaluated throughout this EIR. Specifically, the EIR analyzes anticipated effects of citywide growth related to air quality, noise, traffic, and other environmental impact areas. To the extent that any significant impacts could result from the unique characteristics of a specific project site, those impacts are too speculative to analyze at this time. Therefore, the Proposed Plan would not make a cumulatively considerable contribution to impacts related to water.

WASTEWATER

REGULATORY FRAMEWORK

Federal, regional, and local laws, regulations, plans, and guidelines that are potentially applicable to the Proposed Plan are summarized below.

FEDERAL

Federal Water Pollution Control Act (Clean Water Act [CWA]). In 1972, the CWA was amended to provide that the discharge of pollutants to waters of the United States from any point (such as discharge from an industrial facility) or non-point (surface and farmland water runoff) source is unlawful unless the discharge is in compliance with a National Pollution Discharge Elimination System (NPDES) permit.

The CWA was enacted with the primary purpose of restoring and maintaining the chemical, physical, and biological integrity of the nation's waters. The CWA also directs states to establish water quality standards for all "waters of the United States" and to review and update such standards on a triennial basis. Section 319 of the CWA mandates specific actions for the control of pollution from non-point sources. The USEPA has delegated responsibility for implementation of portions of the CWA to the SWRCB and the Regional Water Quality Control Board (RWQCB) and water quality control planning and control programs, such as the NPDES Program. Section 303(c)(2)(b) of the CWA requires states to adopt water quality standards for all surface waters of the United States based on the water body's designated beneficial use. Where multiple uses exist, water quality standards must protect the most sensitive use. Water quality standards are typically numeric, although narrative criteria based upon biomonitoring methods may be employed where numerical standards cannot be established or where they are needed to supplement numerical standards. Water quality standards applicable to the Proposed Project are listed in the California RWQCB's Basin Plan.

National Polluant Discharge Elimination System (NPDES). The NPDES permit system was established in the CWA to regulate point source discharges into waters within the United States. Point sources are discrete conveyances such as pipes or manmade ditches. Individual homes connected to a municipal system are not required to obtain a permit under the NPDES, however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters.

REGIONAL

Los Angeles Regional Water Quality Control Board (LARWQCB). The LARWQCB is one of the nine state RWQCBs that are under the purview of the SWRCB. The SWRCB sets statewide policy and, together with the nine state RWQCBs, implements State and federal laws and regulations that pertain to water quality. The LARWQCB implements state and federal laws and regulations within its jurisdiction and continuously maintains its Water Quality Control Plan (WQCP).

The LARWQCB enforces the Code of Federal Regulations Part 40, Section 122.41(m), which prohibits the bypassing of treatment facilities and sanitary sewer overflows. In addition to the Code of Federal Regulations, the sewer conveyance system is subject to regulation by the South Coast Air Quality Management District (SCAQMD), which responds to complaints regarding nuisance odors. The 10-year Los Angeles Sewers Program also regulates maintenance and construction project schedules and is currently managing approximately 150 sewer infrastructure improvement projects.

The 10-year Los Angeles Sewers Program was put into place in order to carry out the mandates of the Collection System Settlement Agreement (CSSA), which has a compliance term of 10 years. The CSSA is a settlement agreement that was reached in 2004 to resolve a lawsuit brought against the City by the Santa Monica Baykeeper and other community organizations after a number of sanitary sewer overflows occurred in the City in February 1998. The CSSA requires the City to enhance, repair, and update the sewer system and sets specific timelines for the City to complete the upgrades. It also mandates that the City spend $8.5 million in supplemental environmental enhancement projects. Pursuant to the CSSA, the City prepares annual progress reports detailing its success at meeting the terms of the agreement. The ninth progress report for FY 2012/2013, published in August 2013, indicates that the City is in full compliance with the CSSA.[20]

LOCAL

City of Los Angeles General Plan (Framework). The Framework was adopted in 1996 and amended in August 2001. The Framework is a general, long-term, programmatic document that has goals and policies that are implemented by the various individual elements of the City's General Plan. The goals, objectives, and policies of the Framework that are related to water supply, storage, and delivery infrastructure are listed in **Table 4.16-8**.

City of Los Angeles Integrated Resources Plan (IRP). The City's IRP incorporates a future vision of water, wastewater, and runoff management in the City, recognizing the relationships among all of the City's water resources activities and functions. The IRP addresses and integrates the water, wastewater, and runoff need of the City to the year 2020 and utilized comprehensive basin-wide water resources planning. The IRP consists of a Facilities Plan, a Financial Plan, and an EIR for the program. Objectives of the IRP include, but are not limited to, meeting the projected wastewater system needs of the City; complying with all regulations protecting public health and the environment; conforming to the sustainability guidelines of the City; providing for safe use of recycled water; and providing cost-effective services. In developing various alternative approaches to the management of the City's water resources, the City also allowed for application of various criteria to accommodate changes and unanticipated conditions that could be encountered during implementation of the selected alternative. The Los Angeles City Council certified the Final EIR in November 2006 and adopted a final alternative for implementation by 2020. The approved Alternative is intended to increase wastewater collection and treatment capacity, water reclamation storage and beneficial use, water conservation, and runoff management opportunities.

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[20]Los Angeles Department of Public Works, Bureau of Sanitation, *Collection System Settlement Agreement, Ninth Annual Report, Fiscal Year 2012-13.*

TABLE 4.16-8: RELEVANT GENERAL PLAN WASTEWATER TREATMENT AND CONVEYANCE GOALS, OBJECTIVES, AND POLICIES	
Goal/Policy/Objective	**Goal/Policy/Objective Description**
Goal 9A	Adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.
Objective 9.1	Monitor and forecast demand based upon actual and predicted growth.
Policy 9.1.1	Monitor wastewater generation.
Policy 9.1.2	Monitor wastewater flow quantities in the collection system and conveyed to the treatment plants.
Policy 9.1.3	Monitor wastewater effluent discharged into the Los Angeles River, Santa Monica Bay, and San Pedro Harbor to ensure compliance with water quality requirements.
Objective 9.2	Maintain the wastewater collection and treatment system, upgrade it to mitigate current deficiencies, and improve it to keep pace with growth as measured by the City's monitoring and forecasting efforts.
Policy 9.2.1	Collect and treat wastewater as required by law and Federal, State, and regional regulatory agencies.
Policy 9.2.2	Maintain wastewater treatment capacity commensurate with population and industrial needs.
Policy 9.2.3	Provide for additional wastewater treatment capacity in the Hyperion Service Area, as it becomes necessary.
Policy 9.2.4	Continue to implement programs to upgrade the wastewater collection system to mitigate existing deficiencies and accommodate the needs of growth and development.
Policy 9.2.5	Review other means of expanding the wastewater system's capacity.
Objective 9.3	Increase the utilization of Demand Side Management (DSM) strategies to reduce system demand and increase recycling and reclamation.
Policy 9.3.1	Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.
Policy 9.3.2	Consider the use of treated wastewater for irrigation, groundwater recharge, and other beneficial purposes.
Objective 9.4	Ensure continued provision of wastewater collection and treatment after an earthquake or other emergency.
Policy 9.4.1	Restore minimal operations as soon as possible after an emergency, and full operations as soon as feasible.
Policy 9.4.2	Establish joint cooperation agreements with other jurisdictions for mutual assistance during emergencies.
SOURCE: City of Los Angeles, *The Citywide General Plan Framework, An Element of the City of Los Angeles General Plan*, re-adopted 2001.	

Wastewater Capital Improvement Program. Every 10 years, the City of Los Angeles Department of Public Works, Bureau of Sanitation (LASAN) updates the City's 10-Year Capital Improvement Program, which identifies the wastewater system upgrades, equipment, and modifications to be funded by the City within a 10-year period. Many of these improvements are necessary in order to comply with state and CWA regulations. The most recent update, the Wastewater Capital Improvement Program Fiscal Years 2013/2014 through 2022/2023, identifies improvements scheduled through 2016 for the four treatment plants, collection system, pumping plants, and system-wide operations.

Los Angeles Municipal Code (LAMC). LAMC Chapter V (Public Safety and Protection) describes different categories of wastewater discharge and peak flow (the maximum 5-minute rate of wastewater flow). In addition, the LAMC identifies permitted regulations related to industrial wastewater. LAMC Chapter XII (The Water Conservation Plan of the City of Los Angeles) also defines recycled water as treated wastewater suitable for direct beneficial use, or controlled use, as approved by the California Department of Public Health.

LAMC Sections 64.11 and 64.12 require approval of a sewer permit, also called an "S" Permit, prior to connection to the wastewater system. Each new connection is assessed a Sewerage Facilities Charge, which is deposited in the City's Sewer Construction and Maintenance Fund for wastewater-related purposes, including but not limited to industrial waste control and water reclamation purposes. LAMC Section 64.15 requires that a Sewer Capacity Availability Request (SCAR) be performed by the Department of Building and Safety when a sewer permit is sought for a new connection to the City's wastewater system, or in the event that a proposed increase in discharge to a public wastewater line or proposed future development is anticipated to generate 10,000 gallons or more of wastewater per day. A SCAR evaluates the existing wastewater collection system to determine whether adequate capacity exists to convey project-related wastewater to the appropriate treatment plant. If capacity is available, the Department of Building and Safety accepts project plans and specifications for plan check; otherwise, projects are placed on a waiting list to receive an allocation of forthcoming capacity, or applicants are required to construct a connection to the nearest wastewater line with available capacity. The Department of Building and Safety accepts project plans and specification for plan check if the project is on the waiting list, although the project may not connect to the City's wastewater system until capacity is available and a sewer permit is available.

EXISTING SETTING

Wastewater generated within the Project Area is collected and treated by the LASAN wastewater conveyance and treatment infrastructure, which operates and maintains the wastewater collection and treatment for the City and 29 contract cities and agencies. The City's sewage system is comprised of the Hyperion Treatment Plant (HTP) Service Area, the Terminal Island Water Reclamation Plant (TIWRP) Service Area, and more than 6,700 miles of public sewers which convey approximately 400 mgd of wastewater.[21] The City's public sewers are managed within 26 primary sewer basins and 220 secondary basins, or sewer sheds. The City's primary sewer basin boundaries are based solely on sewer drainage and configuration and are independent of political boundaries. The Project Area is located within or intersects the Hollywood, Griffith Park, North Hollywood-Sunland, and Northeast Wilshire Primary Sewer Master Planning Basins. All sewer lines in the Project Area convey wastewater to the HTP.[22] LASAN provides a comprehensive analysis of basin conditions and recommendations for needed improvements to meet current and future demands in each of these areas.

WASTEWATER TREATMENT

City wastewater is treated at several wastewater treatment facilities, including: the HTP located in Playa del Rey; the TIWRP located in San Pedro; the Donald C. Tillman Water Reclamation Plant (DCTWRP) located in Van Nuys; and the Los Angeles-Glendale Water Reclamation Plant (LAGWRP) located in Los Angeles, adjacent to the City of Glendale. Each of these treatment plants is capable of treating a maximum daily flow of approximately 450, 30, 80, and 20 mgd of wastewater, respectively, and experience average daily flows of 362, 17.5, 67, and 20 mgd, respectively.[23] With the exception of the Harbor area, the majority of the City's wastewater conveyance and treatment is served by the Hyperion Sanitary Sewer System. Wastewater in the Hyperion Sanitary Sewer System is treated at the HTP.

[21]Los Angeles Department of Public Works, Bureau of Sanitation, *Sewer System Management Plan*, February 2015.

[22]Los Angeles Department of Public Works, Sanitation Bureau, *Hollywood Community Plan – Request for wastewater Service Information,* Ali Poosti, Division Manager of Wastewater Engineering Services Division, February 6, 2017.

[23]LADWP, *2015 Urban Water Management Plan, Table 4C, Sources of Recycled Water Summary*, adopted April 2016.

As stated previously, the HTP is located in the community of Playa del Rey which is approximately 12 miles southwest of the Project Area. The HTP has a treatment capacity of 450 mgd and its solids handling facilities can process approximately 468 dry tons of solids per day.[24] The HTP performs primary treatment of wastewater (i.e., the removal of large objects) and secondary treatment of wastewater (i.e., degradation of biological content).[25,26]

Treated wastewater from the HTP, also known as effluent, is discharged into the Santa Monica Bay through a five-mile outfall. All effluent discharges into the Santa Monica Bay are regulated by the NPDES Permit Number CA0109991. The HTP outfall discharges primary and secondary treated effluent at a depth of 187 feet. The HTP also has a one-mile outfall which is in standby condition in case of an emergency. A small remaining portion of effluent is reused to recharge barrier walls. Treated sewer sludge, or biosolids are not discharged into the Santa Monica Bay. Biosolids are either reused in agriculture or used by landfills for daily cover.[27]

WASTEWATER CONVEYANCE INFRASTRUCTURE

The City owns, operates, and maintains an extensive collection and conveyance system that collects sewage over a 470-square-mile area from the City's population of four million people, as well as commercial, institutional, and industrial enterprises. The City conveys the sewage to one of the four treatment facilities.[28] The collection system pipelines range in diameter from six inches to 150 inches and consist of approximately 6,700 miles of primary and secondary sewers. To assess and maintain the condition of this expansive system, the City actively conducts an ongoing dry- and wet-weather flow monitoring program. There are 30 automatic "real time" flow monitors and 74 additional "near time" monitors located in the primary sewer system. The monitors use either telephone lines to send data to a central location or staff will download data in the field. Additionally, flow gauging is performed at over 600 strategic locations throughout the City's secondary sewer system on either a quarterly, semi-annual, or annual cycle to monitor flow depth.

The sewer system consists of primary sewers (16-inches and larger in diameter) and secondary sewers (less than 16-inches in diameter). The secondary sewers provide service to property laterals and feed into the primary sewer lines. Primary sewers discharge into trunk, interceptor, and outfall pipes. As noted above, all sewer lines in the Project Area convey wastewater to the HTP.[29] Tributaries to interceptor sewer systems are called sewer reaches. Sewer reaches are usually named after the street to which their alignment is closest. Primary sewers have pipes with a diameter of 15 inches or more, and are found in all the sewer reaches that serve the Basin. Interceptor sewer systems consist of large sewer pipelines that control the conveyance of wastewater to treatment plants. The following major interceptor sewer systems collect wastewater from the North Hollywood-Sunland, and Northeast Wilshire Primary sewer basins that are located within or intersect the Project Area, and conveys the wastewater to the HTP: Central Outfall Sewer (COS) waste, North Central Outfall Sewer-North Outfall Sewer Interceptor System (NCOS-NOS), and North Outfall Sewer-La Cienega-San Fernando Valley Relief Sewer Interceptor System (NOS-LCSFVRS), Coastal Interceptor Sewer System (CIS), North Outfall Replacement Sewer (NORS).[30] Based on structural conditions, the primary sewer lines within the Project Area are in good to very condition. Based on existing

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[24]City of Los Angeles, CEQA *Thresholds Guide*, 2006.

[25]*Ibid.*

[26]City of Los Angeles Department of Public Works, Bureau of Sanitation, *City of Los Angeles Integrated Resources Plan*, December 2006.

[27]*Ibid.*

[28]California Regional Water Quality Control Board, *Waste Discharge Requirements and Authorization to Discharge Under the National Pollutant Discharge Elimination System for the City of Los Angeles (Hyperion Treatment Plant)*, April 7, 2005.

[29]Los Angeles Department of Public Works, Bureau of Sanitation, *Hollywood Community Plan – Request for wastewater Service Information,* Ali Poosti, Division Manager of Wastewater Engineering Services Division, February 6, 2017.

[30]*Ibid.*

gauging information, secondary sewers within the Project Area have no current conveyance capacity constraints.[31]

Sewer capacity planning is prioritized based on two ratios of sewer flow to sewer capacity (d/D): a Trigger ratio and a Relief ratio. Trigger flow is the quantity of flow, that once reached, would initiate planning for a relief or a replacement sewer. The buffer capacity is defined as the product of the estimated years to complete a new sewer project and the rate of recent flow increases in the sewer being evaluated. The Relief d/D is currently 0.75 across the City (i.e., when a sewer is at 75 percent of capacity) for all existing sewers, the Trigger d/D varies on a project by project basis because each project's tributary area has its own unique characteristics such as population growth projection, commercial and industrial discharge forecast, and other contributing factors that determine how quickly flows are projected to increase over time. The Sewer Design Manual requires all new sewers to meet a d/D of 0.5 for the projected design year (i.e., that they be at no more than 50 percent of capacity in their design year).[32] **Table 4.16-9** lists the sewer structural condition ranking schedule used by LASAN.

TABLE 4.16-9: SEWER CONDITION RANKS

Ranking	Description	Action
A	Very Good • Condition is almost like-new sewer reach.	No Repairs Future routine inspection
B	Good • Light Cracks localized • Light Corrosion localized • Light Roots localized	No Immediate Repairs Routine Maintenance Program. Schedule next inspection in the order of sewer system priority.
C	Fair • Moderate Cracks/Fractures • Moderate Corrosion continuous • Moderate Infiltration continuous • Moderate Roots continuous	Routine Repairs as Needed Includes planning, environmental documentation, technical investigations, design, reviews, bid and award following established priorities.
D	Poor • Severe Cracks/Fractures • Broken Reach with Holes • Severe Corrosion • Severe Infiltration/Roots	Repairs Includes regular bid and award, fast track construction, accelerate planning/design, and monitoring.
E	Emergency • Collapsed Pipe (PX) • Dirt Pipe (CPD) • Crown of Pipe Gone (CPC, CG) • Void in Backfill around pipe • Full Flow Obstruction/Blockage	Emergency Repair Initiate Special Order Procedure " Urgent Necessity"

SOURCE: Los Angeles Department of Public Works, Bureau of Sanitation, *Wastewater Collection System Rehabilitation and Replacement Report and Plan*, June 2006.

New and rehabilitated sewers and pump stations are planned, designed, and constructed to meet the highest performance standards in the industry in accordance with the City's Sewer Design Manual. The Sewer Design Manual is a comprehensive set of criteria for planning and designing of new sewers, pump stations, force mains, and appurtenances, and for the rehabilitation of existing sewers. In conjunction with the Sewer

[31]Los Angeles Department of Public Works, Bureau of Sanitation, *Hollywood Community Plan – Request for Wastewater Service Information,* communication with Ali Poosti, Division Manager, February 6, 2017.

[32]Los Angeles Department of Public Works, *Sewer System Management Plan: Hyperion Sanitary Sewer System,* 2011.

Design Manual, the City also maintains Standard Plans, which are used to provide consistency and quality in design. All system components are designed to meet permit requirements of the various federal, state, and local agencies thereby ensuring that projects benefit from the input of all affected and interested parties, including the communities.

The Sewer Design Manual and Standard Plans are updated, maintained, and administered by LASAN. For all projects, LASAN is responsible for determining the sewer capacity availability for new sewer connections for residential, commercial, and industrial developments. This function is part of an overall sewer connection permitting process that involves a combined effort by LASAN and Bureau of Engineering (BOE) personnel. In issuing a sewer connection permit, the BOE Development Services Division determines if further investigation is needed to evaluate the capacity of an existing sewer line to handle the additional flow from the proposed development or project and take appropriate preemptive action to attenuate potential emergency sewer overflow incidences in the future. In addition to preemptive sewer monitoring and permitting activities, the LASAN Wastewater Collection Systems Division also maintains up-to-date Sanitary Sewer Overflow Response and Reporting Procedures. The procedures outline the necessary actions to provide immediate response to sewage overflows. It is City policy that, "[e]very reported sewage spill affecting public or private property within the City of Los Angeles shall be acted upon by the Division." Crew leaders are immediately notified upon receipt of a reported potential sewer overflow and are instructed to respond immediately.[33]

The effect of stringent monitoring practices and sewer design standards are apparent in that the City has not experienced any wet-weather overflows since major relief sewers were completed in 2006. However, some dry-weather overflows still occur occasionally due to tree roots, grease blockages, landslides, and vandalism. Despite these irregular overflow occurrences, the system currently has sufficient capacity to handle peak dry-weather flows.[34]

WATER QUALITY AND FLOW MONITORING

Los Angeles is constantly monitoring the infrastructure to ensure reliable service. Dischargers are regulated under Waste Discharge Requirements (WDRs) and are required to "self -monitor," that is, to collect regular samples of their effluent and receiving waters according to a prescribed schedule to determine facility performance and compliance with their requirements. In addition to self-monitoring by dischargers, the LARWQCB makes unannounced inspections and collects samples to determine compliance with discharge requirements and receiving water objectives and to provide data for enforcement actions. The LARWQCB also responds to a variety of incidents, including accidental and illegal discharges of oil from offshore pipelines, oily waste discharges, and dumping in the storm drains. Each regional board in the state prepares a biennial Water Quality Assessment (WQA) Report using data collected by regional planning, permitting, surveillance, and enforcement programs. The regional reports contain inventories of the pollutants in the major water bodies of the region.

The Flow Monitoring Expansion Program helps operations and maintenance to manage the conveyance system. Flow data is gathered to support resource allocation. There are 120 permanent monitors and 50 temporary monitors which continually measure flow quantities at major sewers.[35]

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[33]Los Angeles Department of Public Works, *Sewer System Management Plan: Terminal Island Water Reclamation Plant Sanitary Sewer System,* 2011.

[34]Los Angeles Department of Public Works, *Sewer System Management Plan: Hyperion Sanitary Sewer System,* 2011.

[35]Los Angeles Department of Public Works, *Sewer System Management Plan,* February 2015.

EXISTING WASTEWATER GENERATION

The estimated wastewater generation of existing land uses within the Project Area is shown in **Table 4.16-10**. The Project Area is estimated to currently generate approximately 22.4 mgd of wastewater. Wastewater generated by the Project Area represents approximately five percent of HTP's current wastewater treatment capacity of 450 mgd.

TABLE 4.16-10: EXISTING (2016) WASTEWATER GENERATED IN THE PROJECT AREA /a/

Land Use	Dwelling Units or Square Footage in Project Area /b/	Daily Wastewater Generation /c/ (gpd)
RESIDENTIAL		
Residential Units	98,868 sf.	14,728,087
	Residential Subtotal	14,728,087 ***(14.7 mgd)***
NON-RESIDENTIAL		
Commercial	26,837,005 sf.	5,367,401
Industrial	8,700,384 sf.	870,038
Public Facilities	12,369,192 sf.	1,462,188
	Non-Residential Subtotal	***7,699,627 (7.7 mgd)***
	Existing (2016) Total	**22,427,714 (22.4 mgd)**

Note: gpd = gallons per day; du = dwelling units; sf. = square feet; 1 mgd = 1,000,000 gpd
/a / LASAN sewer generation rates are utilized to determine daily wastewater generation. See Appendix I of this Draft EIR for detailed calculations of wastewater generation.
/b/ For purposes of calculating wastewater generation, data showing number of dwelling units and area of non-residential development are not rounded. In general, in this EIR, numbers are rounded for purposes of presentation. Total 2016 development in the Project Area is 98,868 du and 47,906,581 sf. of non-residential uses.
/c/ Wastewater calculations assume a 100% of indoor water use becomes wastewater. Therefore, indoor water use generation rates is used to calculate the daily wastewater generated.
SOURCE: City of Los Angeles, Department of City Planning, 2018; TAHA, 2017.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the CEQA Guidelines, the Proposed Plan would have a significant impact related to wastewater if it would:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board;
- Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; and/or
- Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

METHODOLOGY

This guidance is based on CEQA Guidelines Appendix G and provides specific criteria to be considered when making a significance determination.

The impact analysis for wastewater treatment and conveyance is based on the analysis of the existing systems within the Project Area and the analysis of anticipated effects of the Project Area under the Proposed Plan. This analysis utilizes CalEEMod, which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental

professionals to estimate air emissions associated with different types of land use. In developing CalEEMod, CAPCOA developed a number of factors for activities (including water demand, wastewater generation, and solid waste generation) for different activities associated with different land uses in order to aid in calculating air emissions associated with these activities. By applying the CalEEMod factors to existing development and to the estimated buildable square footages by land use type, an estimate is made as to water consumption for Existing Conditions and for the Reasonably Expected Development under the Proposed Plan. CalEEMod water factor rates distinguish indoor and outdoor water uses. For this wastewater analysis, it is assumed indoor water use becomes 100 percent wastewater, and outdoor water use is typically characterized for landscaping and is filtered through pervious surfaces. This increase in wastewater generation is compared to the existing remaining capacity at wastewater treatment facilities that serve the Project Area to determine if the availability of these utilities would be able to accommodate the Proposed Plan's net demands. The analysis also evaluates the adequacy of the treatment plants serving the Project Area and whether existing sewer lines can accommodate the anticipated Proposed Plan. This analysis does not rely upon, or use, population data but rather uses the 2040 Reasonably Expected Development (dwelling units and square footage of non-residential land uses).

IMPACTS

IMPACT 4.16-3 Would implementation of the Proposed Plan exceed wastewater treatment requirements of LARWQCB? **Less than significant impact.**

Table 4.16-10 provides the estimated wastewater generated in the Project Area under Existing (2016) Conditions. As shown therein, the Project Area under Existing (2016) Conditions would generate a total of approximately 22.4 mgd of wastewater. This total includes approximately 14.7 mgd of wastewater generated by residential units and approximately 7.7 mgd of wastewater generated by non-residential uses. As described in the discussion of Impact 4.16-4, below, **Table 4.16-11** shows that the Proposed Plan would generate approximately 27.7 mgd of wastewater, resulting in an increase of approximately 5.3 mgd compared to Existing (2016) Conditions (22.7 mgd), or an increase of 24 percent. All wastewater generated would be treated according to requirements of the NPDES permit authorized by the LARWQCB and the Proposed Plan would not conflict with or exceed applicable wastewater treatment requirements. Therefore, impacts related to wastewater treatment requirements of LARWQCB would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

IMPACT 4.16-4 Would implementation of the Proposed Plan require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? **Less than significant impact.**

Future development under the Proposed Plan would occur incrementally over time through the year 2040. As shown in **Table 4.16-11**, implementation of the Proposed Plan would generate approximately 27.7 mgd of wastewater, resulting in an increase of approximately 5.3 mgd compared to Existing (2016) Conditions, or an increase of 24 percent. For informational purposes and not impact analysis, the Future (2040) No

Project/Existing Plan would generate approximately 25.8 mgd of wastewater. Implementation of the Proposed Plan would generate approximately 1.9 mgd more wastewater than under Future (2040) No Project/Existing Plan, resulting in an approximately seven percent increase. Currently, the HTP has a maximum capacity of 450 mgd. The average daily wastewater flow that the HTP handles is 362 mgd which leaves an additional capacity of approximately 20 percent or 88 mgd.[36] Based on the 24 percent increase (5.3 mgd) compared to the Existing (2016) Condition, implementation of the Proposed Plan would account for approximately six percent of HTP's total wastewater capacity and HTP's additional capacity. The anticipated wastewater generation within the Project Area would represent a small proportion of total average daily flows, and would be well within the capacity of the HTP.

TABLE 4.16-11: FUTURE WASTEWATER GENERATED IN THE PROJECT AREA /a/

Land Use	Dwelling Units or Square Footage in Project Area /b/	Total Wastewater (gpd) /c/
FUTURE (2040) NO PROJECT/EXISTING PLAN		
Residential		
Residential Units	121,277 du	16,736,254
	Residential Subtotal	***16,736,254 (16.7 mgd)***
Non-Residential		
Commercial	31,640,296 sf.	6,328,059
Industrial	10,257,580 sf.	1,025,758
Public Facilities	14,583,031 sf.	1,725,032
	Non-Residential Subtotal	***9,078,849 (9.1 mgd)***
	Future (2040) No Project/Existing Plan Total	**25,815,103 (25.8 mgd)**
PROPOSED PLAN (2040)		
Residential		
Residential Uses	131,897 du	18,201,818
	Residential Subtotal	***18,201,818 (18.2 mgd)***
Non-Residential		
Commercial	35,748,672 sf.	7,149,734
Industrial	8,646,823 sf.	864,682
Public Facilities	12,935,768 sf.	1,530,177
	Non-Residential Subtotal	***9,544,593 (9.5 mgd)***
	Proposed Plan (2040) Total	**27,746,411 (27.7 mgd)**

Note: gpd = gallons per day; du = dwelling units; sf. = square feet; 1 mgd = 1,000,000 gpd
/a/ LASAN sewer generation rates are utilized to determine daily wastewater generation. See Appendix I of this Draft EIR for detailed calculations of wastewater generation.
/b/ For purposes of calculating wastewater generation, data showing number of dwelling units and area of non-residential development are not rounded. In general, in this EIR, numbers are rounded for purposes of presentation. Future (2040) No Project/Existing Plan development in the Project Area includes 121,277 du and 57,118,521 sf of non-residential. Proposed Plan (2040) development in the Project Area includes 131,897 du and 57,331,263 sf of non-residential uses.
/c/ Wastewater calculations assume a 100% of indoor water use becomes wastewater. Therefore, indoor water use generation rates are used to calculate the daily wastewater generated.
SOURCE: City of Los Angeles, Department of City Planning, 2018; TAHA, 2017.

Although the existing treatment plant would have ample capacity, the City is proactively undertaking capital improvement projects to not only maintain the existing infrastructure but also enhance and expand capacity at the treatment plants. Such projects would include rehabilitating old sewer mains and maintenance holes and replacing aging equipment and structures at treatment and pumping plants. The City maintains the Wastewater Capital Improvement Program (WCIP) that contains the capital projects and estimated costs for the renewal of the City's infrastructure at 10-year intervals. The WCIP was originally adopted in 2006 and most recently updated in 2013 and covers a FY 2013/2014 to 2022/2023. The WCIP was developed and evaluated according to projections and preferences contained in the IRP, which anticipates that average

[36]Los Angeles Department of Public Works, Bureau of Sanitation, *City of Los Angeles Integrated Resources Plan,* December 2006, Table 2-5, page 2-9.

daily wastewater flows in year 2020 will increase to 531.4 mgd. To meet anticipated increased wastewater flows, the IRP evaluates five alternatives, and identifies a preferred alternative that addresses the need for increased treatment capacity from the system but does not identify the need to build new treatment plants to meet the anticipated increase in wastewater generation. Instead, the chosen alternative favors adding capacity to existing facilities.[37] The FY 2013/2014 WCIP recognizes necessary projects to maintain, bolster, and expand the existing system, allocating over $4.5 billion to do so during FYs 2008/2009 to 2017/2018. Multiple projects identified in the WCIP are upgrades for the HTP. With completion of these projects, the City will ensure that the HTP complies with RWQCB permit requirements and will refurbish various plant facilities to meet future operating requirements. Many of these upgrades are already funded and under construction and all upgrades are scheduled to be completed by 2020.

The LASAN Wastewater Engineering Services Division is responsible for determining sewer capacity availability for new sewer connections for residential, commercial, and industrial developments. Thus, all development activities that require sewer connection permits are evaluated under the purview of existing capacity of sewer lines in the development site's vicinity at the time of development. By doing so, each new development must adhere to the most current Sewer Design Manual specifications as well as appropriate Standard Plan requirements. The Sewer Design Manual and Standard Plan are continuously updated to incorporate the most recent industry practices and materials ensuring appropriate measures are taken to accommodate any potential project. The City also has immediate response and reporting procedures in place to attend to any unexpected sewer overflows. The procedures are maintained in the Wastewater Collection Systems Division's up-to-date Sanitary Sewer Overflow Response and Reporting Procedures. Moreover, the City proactively monitors the sewer system to preemptively identify and resolve deficiencies before they can become problematic. System deficiencies in need of rehabilitation are then included in the WCIP, which are attended to according to their associated priority ranking.

Implementation of the Proposed Plan could require the construction of new or upgraded wastewater facilities, such as sewer lines, but not major facilities such as a treatment plant. If new sewer lines are determined to be necessary, their construction would not be expected to result in significant environmental impacts. Routine infrastructure projects involving replacing or upgrading sewer lines, generally result in the preparation of an MND or, in some cases, a Categorical Exemption. The City's MNDs for sewer line replacements indicate typical less-than-significant construction-related impacts, including air quality, noise, and traffic impacts. The environmental impacts of the construction and operation of sewer lines are consistent with the impacts evaluated throughout this EIR. Specifically, the EIR analyzes anticipated effects of citywide growth related to air quality, noise, traffic, and other environmental impact areas. To the extent that any significant impacts could result from the unique characteristics of a specific project site, those impacts are too speculative to analyze at this time. Therefore, impacts related to construction of new wastewater facilities or expansion of existing facilities under the Proposed Plan would be ***less than significant.***

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

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[37]Los Angeles Department of Public Works, Bureau of Sanitation, C*ity of Los Angeles Integrated Resources Plan*, December 2006.

IMPACT 4.16-5 Would implementation of the Proposed Plan require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? **Less than significant impact.**

As discussed in Section 4.9, Hydrology and Water Quality, of this Draft EIR, implementation of the Proposed Plan would not result in a substantial increase in impervious surfaces. Accordingly, the Proposed Plan would not cause a substantial increase in the peak flow rates or volumes that would exceed the drainage capacity of existing stormwater drainage facilities. According to LASAN, the stormwater drainage facilities within the Project Area have no current conveyance capacity constraints and the primary sewer lines within in the Project Area are in good to very good condition.[38] Compliance with the City's LID Ordinance would further ensure that any future development resulting from the Proposed Project would not require construction of new stormwater drainage facilities and or expansion of existing facilities. Nevertheless, through continuous monitoring and management efforts of drainage facilities in the Project Area by the City of Los Angeles Department of Public Works, the need for new or an expansion of existing facilities and the funding for such efforts would be determined through the capital improvements program and system upgrades.

The LASAN Watershed Protection Division is responsible for ensuring the implementation of Municipal Stormwater Permit requirements and the Wastewater Engineering Service Division is responsible for determining sewer capacity availability for new sewer connections for residential, commercial, and industrial developments. While most of the Project Area is currently paved and served by the existing drainage system, implementation of the Proposed Plan could require the construction of new or upgraded stormwater drainage facilities. The construction of new stormwater drainage facilities at some point during the 20 plus year plan horizon is reasonably expected. However, at the present time, the location of such facilities is speculative. Depending on the location of new wastewater facilities, if they are determined to be needed, construction and operational impacts could occur; however, such impacts are not foreseeable at this time. Typical infrastructure projects involving replacing or upgrading stormwater drainage lines generally include the preparation of an MND and, in some cases may possibly qualify for a Categorical Exemption. The historical MNDs for these types of projects indicate typical construction-related impacts, including air quality, noise, and traffic impacts. The environmental impacts of the construction and operation of new facilities are consistent with the impacts that have been evaluated throughout this EIR. Specifically, the EIR analyzes anticipated effects of citywide growth related to air quality, noise, traffic, and other environmental impact areas. Therefore, impacts related to construction of new stormwater drainage facilities or expansion of existing facilities under the Proposed Plan would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

[38]Los Angeles Department of Public Works, Bureau of Sanitation, *Hollywood Community Plan – Request for Wastewater Service Information,* communication with Ali Poosti, Division Manager, February 6, 2017.

IMPACT 4.16-6 Would implementation of the Proposed Plan result in a determination by the wastewater treatment provider which serves or may serve the project that it has does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? **Less than significant impact.**

As previously discussed above in Impact 4.16-4, the HTP would have adequate capacity to serve the Proposed Project.[39] Furthermore, compliance with water conservation policies and applicable wastewater regulations, which would be verified during the permit and approval process for individual projects, would ensure that future development occurring within the Project Area would not exceed the capacity of any one treatment plant by generating flows greater than those anticipated. Therefore, impacts related to wastewater capacity as a result of implementation of the Proposed Plan would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

CUMULATIVE IMPACTS

Similar to water, the issue of wastewater is a citywide concern and transcends the boundaries of the Project Area. Reasonably Expected Development under the Proposed Plan is expected to generate wastewater in amounts that equal approximately six percent of the existing and remaining capacity, which represent a small proportion of total average daily flows and would be well within the existing capacity of the HTP. Implementation of the Proposed Plan when combined with cumulative development (including other community plan updates in the City) would contribute to an anticipated citywide increase in wastewater flow and place added demands on the wastewater conveyance system as future development takes place with the implementation of the Proposed Plan. However, as discussed in Section 4.13, Population, Housing, and Employment, of this Draft EIR, the Proposed Plan's Reasonably Expected Development serves to accommodate population growth forecasted by SCAG. Implementation of the Proposed Plan could require the construction of new or upgraded wastewater facilities and/or stormwater drainage facilities. The Proposed Plan is not anticipated to result in the potential construction of new wastewater facilities. There is a potential for construction of new conveyance facilities, but it is too speculative to determine at the present time. As noted above, routine infrastructure projects involving replacing or upgrading sewer lines (and/or storm drains), generally result in the preparation of an MND or, in some cases, a Categorical Exemption. The City's MNDs for sewer line replacements indicate typical less–than-significant construction-related impacts, including air quality, noise, and traffic impacts. The environmental impacts of the construction and operation of sewer lines are consistent with the impacts evaluated throughout this EIR. Specifically, the EIR analyzes anticipated effects of citywide growth related to air quality, noise, traffic, and other environmental impact areas. Replacing or upgrading stormwater drainage facilities are expected to have similar types of environmental impacts as these sewer line projects. To the extent that any significant impacts could result from the unique characteristics of a specific project site, those impacts are too speculative to analyze at this time. Implementation of the Proposed Plan would not result in impacts to wastewater treatment requirements. Therefore, the Proposed Plan would not make a cumulatively considerable contribution to impacts related to wastewater.

[39]Los Angeles Department of Public Works, Bureau of Sanitation, *Hollywood Community Plan – Request for Wastewater Service Information,* communication with Ali Poosti, Division Manager, February 6, 2017.

SOLID WASTE

REGULATORY FRAMEWORK

Federal, state and local laws, regulations, plans, and guidelines that are potentially applicable to the Proposed Plan are summarized below.

FEDERAL

Federal Agencies and Regulations. Title 40 Code of Federal Regulations, Part 258 Subtitle D of the Resource Conservation and Recovery Act (RCRA) establishes minimum location standards for siting municipal solid waste landfills. Because California laws and regulations governing the approval of solid waste landfills meet the requirements of Subtitle D, the USEPA delegated the enforcement responsibility to the State of California.

STATE

California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939). The California Integrated Waste Management Act of 1989, which is commonly known as AB 939, was the first recycling legislation in the country to mandate recycling diversion goals. This Act, codified into the PRC, emphasized a reduction of waste disposed in California landfills by requiring cities and counties to reduce the production of, recycle, and reuse solid waste. To achieve a reduction of waste in California landfills, AB 939 required all city and county plans to include a waste diversion schedule with the goals to divert 25 percent of solid waste from landfills by 1995 and divert 50 percent of solid waste from landfills by the year 2000. Recently, a number of changes to the municipal solid waste diversion requirements under this Act were adopted, including a revision to the statutory requirement of 50 percent diversion of solid waste. Under these provisions, local governments are required to continue to divert 50 percent of all solid waste after January 1, 2000.

Senate Bill (SB) 63. On July 28, 2009, SB 63 was approved and filed, allowing the abolishment of the California Integrated Waste Management Board and transfer of its duties and responsibilities to a new department called the Department of Resources Recycling and Recovery (CalRecycle). This legislation was passed in order to combine the state's solid waste and recycling programs which went into effect on January 1, 2010.

LOCAL

City of Los Angeles General Plan Framework Element. The Framework Element was adopted in 1996 and amended in August 2001. The Framework Element is a general, long-term, programmatic document that has goals and policies that are implemented by the various individual elements of the General Plan. The goals, objectives, and policies of the Framework Element that are related to the solid waste disposal and landfills are listed in **Table 4.16-12**.

TABLE 4.16-12: RELEVANT GENERAL PLAN SOLID WASTE GOALS, OBJECTIVES, AND POLICIES	
Goal/Policy/Objective	**Goal/Policy/Objective Description**
Goal 9D	An integrated solid waste management system that maximizes source reduction and materials recovery and minimizes the amount of waste requiring disposal.
Goal 9E	Adequate Recycling Facility Development - expanded siting of facilities that enhance the City's reduction, recycling and composting efforts using methods and strategies that are economically, socially, and politically acceptable.
Goal 9F	Adequate collection, transfer and disposal of mixed solid waste - the City shall seek to ensure that all mixed solid waste that cannot be reduced, recycled or composted is collected, transferred and disposed of in a manner that minimizes adverse environmental impacts.
Goal 9G	An environmentally sound solid waste management system that protects public health, safety, and natural resources and minimizes adverse environmental impacts.
Goal 9H	A cost-effective solid waste management system that emphasizes source reduction, recycling, reuse, and market development and is adequately financed to meet operational and maintenance needs.
SOURCE: City of Los Angeles, *The Citywide General Plan Framework, An Element of the City of Los Angeles General Plan*, re-adopted 2001.	

Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA Plan). A resource management blueprint called RENEW LA Plan was adopted by the City Council in February 2006. This 20-year plan is the blueprint that will guide the City in reducing the use of landfills by maximizing recycling and reuse and converting much of the solid waste that currently would go to landfills into clean energy and/or valuable raw materials. Many of the plan components have been and continue to be implemented. RENEW LA Plan calls for the following actions:

- Establish RENEW LA Oversight Committee
- Adopt RENEW LA Blueprint and Zero Waste Policy
- Modify Zoning Code to allow Alternative Technology by right in M2 (light industrial) and M3 (heavy industrial) zones with conditions
- Establish site areas for Alternative Technology in each of the Collection Districts
- Site and develop the first and second Alternative Technology facility
- Establish a fund from Sunshine Canyon host fees for development of facilities that reduce landfilling
- Implement recycling in 50 percent of the commercial sector
- Mandate a time-certain reduction in City Municipal Solid Waste disposed at Sunshine Canyon
- Expand Multi-Family Recycling to 50 percent of the City
- Establish City tax breaks for Zero Waste and new re-manufacturing companies
- Establish a green energy producer bonus from the Department of Water and Power
- Add residential food waste to the green bin program

Solid Waste Integrated Resources Plan (SWIRP) – A Zero Waste Master Plan. The SWIRP, most commonly known as the City's Zero Waste Plan, was released in October 2013 and adopted by the City in April 2015. The SWIRP is a long-range master plan for the City's solid waste programs, policies and environmental infrastructure through the year 2030. As discussed more in detail above, the RENEW LA Plan provided a blueprint for Zero Waste identified through the above plan components. The SWIRP proposes an approach for the City to achieve a goal of 90 percent diversion by 2025 through the implementation of existing and new policies and programs, and the development of future facilities to meet the City's recycling and solid waste infrastructure needs.

Citywide Construction and Demolition (C&D) Waste Recycling Ordinance (Ordinance 181519). On March 5, 2010, the City Council adopted the Citywide C&D Waste Recycling Ordinance (Ordinance 181519) that requires all mixed C&D waste generated within City limits be taken to City certified C&D waste processors. All haulers and contractors responsible for handling C&D waste must obtain a Private Solid Waste Hauler Permit from LASAN prior to collecting, hauling and transporting C&D waste and C&D waste can only be taken to City certified C&D Processing Facilities. Effective January 1, 2011, noncompliance penalties of up to $5,000 will be assessed for every load of C&D waste not taken to City certified processors. Among the various purposes of this program is the goal of maintaining an open and competitive market for all companies providing solid waste and disposal services in the City, and to mandate the recycling of construction and demolition waste.

Citywide Recycling Chute Ordinance (Ordinance 181227). On July 7, 2010, the City Council approved the Citywide Recycling Chute Ordinance that requires all new development projects, all existing multi-family residential development projects of four or more units where the addition of floor area is 25 percent or more, and all other existing development projects where the addition of floor area is 30 percent or more, to provide an adequate recycling area or room for the collection and loading of recyclable materials. When a new development project provides a trash chute, or an existing development project adds a trash chute, a recycling chute shall also be provided in both cases. Recycling chutes shall be clearly marked "recycling only" at every point of entry.

Zero Waste LA Franchise System. Zero Waste LA Franchise System is a public-private partnership to address three-million tons of waste disposed yearly by City of Los Angeles businesses, consumers, and residents.[40] The Zero Waste LA Franchise System was approved by City Council in April 2014 and expected to go into full effect by July 2017. As part of the program, the City is divided in to 11 zones that are served by a single trash hauler that would allow for the efficient collection and sustainable management of solid waste resources and recyclables. LASAN solid waste collection services will continue to be provided to current City customers, including the collection of bulky items from all residents. Zero Waste LA goals include the following:

- Reduction of landfill disposal by 1,000,000 tons per year by 2025;
- Transparent and predictable solid waste and recycling service rates for the next 10-20 years;
- Quality customer service standards with LASAN monitoring and enforcement;
- Franchise hauler accountability for program outcomes and customer satisfaction through a series of measures implemented by LASAN, up to and including liquidated damages;
- Compliance with environmental regulations, including mandatory commercial and organics recycling;
- Investment of over $200 million in new and improved solid resources infrastructure;
- Clean fuel vehicles; and
- Decrease and recycling of food waste and increase in food rescue.

EXISTING SETTING

SOLID WASTE CONVEYANCE INFRASTRUCTURE

LASAN and private waste management companies are responsible for the collection, disposal, and recycling of solid waste within the City of Los Angeles, including the Project Area. LASAN collects an average of 6,652 tons per day of refuse, recyclables, yard trimmings, horse manure and bulky items from

[40]Los Angeles Department of Public Works, Bureau of Sanitation, *Zero Waste LA – Franchise*, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwlaf?_adf.ctrl-state=6hfqm18pq_609&_afrLoop=13360884936881243#!, accessed February 9, 2017.

more than 750,000 homes. Commercial and industrial areas of the City which may contain multi-family housing contract with private waste haulers to collect, dispose, and recycle solid waste.

Table 4.16-13 lists the location, permitted capacity, remaining capacity, permitted daily intake capacity, and the average daily volume of solid waste disposed of at the landfills serving the City of Los Angeles at each landfill. "Commerce Refuse to Energy and the Southeast Resource Recovery" are alternate solid waste disposal methods that help extend the landfill capacity by converting solid waste to energy that is sold to local utility companies. While they do not encounter capacity maximum issues, they are restricted in regards to the daily amount and type of solid waste that they can accept and process. Another alternate solid waste disposal method includes recycling businesses, with the most notable location being the Azusa Land Reclamation facility.

TABLE 4.16-13: CLASS III SOLID WASTE LANDFILL FACILITIES SERVING THE CITY OF LOS ANGELES /a/

Facility Name	Location	Permitted Capacity (cubic yards)	Remaining Capacity (tons) /b/	Permitted Daily Intake Capacity (tons/day)	2016 Disposal (tons/year)
Antelope Valley	Palmdale	22,991,651	12,890,000	1,800	494,000
Calabasas	Agoura	14,554,437	5,950,000	3,500	297,000
Chiquita Canyon /c/	Castaic	2,107,302	-- /d/	6,000	1,418,000
Lancaster	Lancaster	14,298,311	10,450,000	3,000	172,000
Sunshine Canyon	LA City	140,900,000	62,110,000	12,100	2,39,000
Commerce - Refuse to Energy Facility /d/	Commerce	N/A	N/A	1,000	109,000
Southeast - Resource Recovery Facility /d/	Long Beach	N/A	N/A	2,240	419,000
Azusa Land Reclamation	Azusa	47,860,029	56,340,000	6,500	369,000
Total Class III Landfill		**242,711,730**	**147,740,000**	**36,140**	**3,278,000**

Note: N/A = Not Applicable
/a/ Class III landfills accept non-hazardous solid waste
/b/ Remaining capacity as of December 2016.
/c/ Conditional Use Permit expires November 24, 2019 or when the maximum capacity is reached, whichever is sooner. The Department of Regional Planning (DRP) issued a "Clean Hands Waiver" on March 17, 2016, allowing the landfill to continue its operation while processing the new Conditional Use Permit application. On July 25, 2017, Los Angeles County Supervisors approved a 30-year Conditional Use Permit for the expansion and continued operation of the Chiquita Canyon Landfill.
/d/ Transforms solid waste into energy.
SOURCE: County of Los Angeles Department of Public Works, *Countywide Integrated Waste Management Plan – 2015 Annual Report*, December 2016.

Approximately 65 percent of the City's solid waste in 2015 was disposed of at the Chiquita Canyon and Sunshine Canyon Landfills (both the City and County portions). The Class III landfill facilities accepting waste from the City have a total daily intake capacity 36,140 tons per day and a remaining capacity of approximately 147.7 million tons.

EXISTING SOLID WASTE GENERATION

In 2016, approximately 3.63 million tons of solid waste was disposed of at the local landfills and other solid waste facilities, as shown in **Table 4.16-13**. As shown in **Table 4.16-14**, the Project Area is estimated to generate approximately 753,566 pounds per day (lb/day) or 377 tons per day of solid waste. Solid waste from existing uses within the Project Area represents approximately 0.9 percent of the permitted daily intake capacity of the landfills serving the Project Area.

TABLE 4.16-14: EXISTING (2016) SOLID WASTE GENERATED IN THE PROJECT AREA /a/		
Land Use	**Dwelling Units or Square Footage in Plan Area /b/**	**Total Solid Waste Generated (lb/day)**
RESIDENTIAL /c/		
Single-Family	19,774 du	133,271
Multi-Family	79,094 du	199,360
	Residential Subtotal	***332,631***
NON-RESIDENTIAL		
Commercial	26,837,005 sf.	121,975
Industrial	8,700,384 sf.	59,115
Public Facilities	12,369,192 sf.	239,844
	Non-Residential Subtotal	***420,934***
	Existing (2016) Total	**753,565**

Note: lb/day = pounds per day; du = dwelling units; sf.= square feet
/a/ CalEEMod solid waste generation factors for residential and non-residential uses were used to determine solid waste generation. See Appendix I of this Draft EIR for detailed calculations of solid waste generation.
/b/ For purposes of calculating solid waste generation, data showing number of dwelling units and area of non-residential development are not rounded; In general, in this EIR, numbers are rounded for purposes of presentation. Total 2016 development in the Project Area includes 98,868 du and 47,906,581 sf. of non-residential uses.
/c/ Solid waste generation factors distinguish between single-family and multi-family units; therefore, to provide a more conservative analysis, 20 percent of the residential uses are single-family, and 80 percent are multi-family units.
SOURCE: City of Los Angeles, Department of City Planning, 2018; TAHA, 2017.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the CEQA Guidelines, the Proposed Plan would have a significant impact related to solid waste if it would:

- Not be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.
- Not comply with federal, state, and local statutes and regulations related to solid waste.

METHODOLOGY

This guidance is based on CEQA Guidelines Appendix G and provides specific criteria to be considered when making a significance determination.

The impact analysis for solid waste examines the estimated remaining capacity at landfills that serve the Project Area to determine if the available space will accommodate the net change anticipated with the implementation of the Proposed Plan. In developing CalEEMod, CAPCOA developed solid waste generation factors for various land uses. By applying the CalEEMod factors to existing development and to the estimated buildable square footages by land use type, an estimate was made as to solid waste generation for Existing Conditions and for the Reasonably Expected Development under the Proposed Plan. This analysis does not rely upon, or use, population data but rather uses future 2040 Reasonably Expected Development (dwelling units and square footage of non-residential land uses).

IMPACTS

IMPACT 4.16-7 Would the Proposed Plan be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? **Less than significant impact.**

The baseline Existing (2016) Condition would generate approximately 753,565 pounds per day of solid waste. As shown in **Table 4.16-15**, implementation of the Proposed Plan could increase the amount of solid waste generated in the Project Area to approximately 945,040 pounds per day or approximately 473 tons per day, representing an approximately 25 percent increase in solid waste compared to the Existing (2016) Condition. For informational purposes and not impact analysis, the Future (2040) No Project/Existing Plan would generate approximately 930,713 pounds per day of solid waste. Implementation of the Proposed Plan would result in a less than two percent increase compared to the Future (2040) No Project/Existing Plan. The calculation of the Proposed Plan's estimated solid waste generation is a conservative estimate and does not take into consideration the City's future efforts to divert disposal of solid waste. Such efforts include compliance with LAMC Section 66.32 that would ensure that at least 50 percent of the demolition and construction waste generated by the future development would be diverted from landfills serving the City; and consistency with all waste reduction goals set forth by the SWIRP, RENEW LA Plan, and the Framework Element. Furthermore, according to Los Angeles County Department of Public Works' 2016 Annual Report, landfills serving the City have various closure dates depending on maximum capacity. Expansion of existing landfills has extended adequate capacity to accommodate anticipated growth to lessen the impact of eventual closures. Therefore, anticipated construction in accordance with the Proposed Plan could be accommodated.

As the combined daily intake capacity of the landfills serving the Project Area is 36,140 tons per day, it is anticipated that there is available capacity to accommodate the estimated daily intake of an additional 473 tons per day that would be generated within the Project Area, representing approximately one percent of the total daily intake capacity. Based on the County of Los Angeles Countywide Integrated Waste Management Plan (CIWMP) 2015 Annual Report, available capacity from Class III landfills is expected for the next 15 years (CIWMP projections extend to 2030) and no new landfills are expected to be permitted during that time.[41] Therefore, sufficient permitted capacity is available to accommodate the Proposed Plan's solid waste disposal needs, and impacts related to solid waste under the Proposed Plan would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

[41]County of Los Angeles Department of Public Works, *Countywide Integrated Waste Management Plan – 2015 Annual Report*, December 2016.

TABLE 4.16-15: FUTURE (2040) SOLID WASTE GENERATED IN THE PROJECT AREA /a/		
Land Use	**Dwelling Units or Square Footage in Plan Area /b/**	**Total Solid Waste Generated (lb/day)**
FUTURE (2040) NO PROJECT/EXISTING PLAN		
Residential /c/		
Single-Family	24,255 du	163,472
Multi-Family	97,022 du	244,549
	Residential Subtotal	***408,021***
Non-Residential		
Commercial	31,640,296 sf.	167,673
Industrial	10,257,580 sf.	69,695
Public Facilities	14,583,031 sf.	285,324
	Non-Residential Subtotal	***522,692***
	Future (2040) No Project/Existing Plan Total	**930,713**
PROPOSED PLAN (2040)		
Residential /c/		
Single-Family	26,379 du	177,787
Multi-Family	105,518 du	265,963
	Residential Subtotal	***443,750***
Non-Residential		
Commercial	35,748,672 sf.	189,445
Industrial	8,646,823 sf.	58,751
Public Facilities	12,935,768 sf.	253,094
	Non-Residential Subtotal	***501,290***
	Proposed Plan (2040) Total	**945,040**

Note: lb/day = pounds per day; du = dwelling units; sf.= square feet
/a/ CalEEMod solid waste generation factors for residential and non-residential uses were used to determine solid waste generation See Appendix I of this Draft EIR for detailed calculations of solid waste generation.
/b/ For purposes of calculating solid waste generation, data showing number of dwelling units and area of non-residential development are not rounded. In general, in this EIR, numbers are rounded for purposes of presentation. Future (2040) No Project/Existing Plan development in the Project Area includes 121,277 du and 57,118,521 sf. of non-residential uses. Proposed Plan (2040) development in the Project Area includes 131,897 du and 57,331,263 sf. of non-residential uses.
/c/ Solid waste generation factors distinguish between single-family and multi-family units; therefore, to provide a more conservative analysis, 20 percent of the residential uses are single-family, and 80 percent are multi-family units.
SOURCE: City of Los Angeles, Department of City Planning, 2018; TAHA, 2017.

IMPACT 4.16-8 Would the Proposed Plan comply with federal, state, and local statutes and regulations related to solid waste? **Less than significant impact.**

Future development occurring under the Proposed Project would be required to comply with LAMC Section 66.32 regarding demolition activities. Compliance with LAMC Section 66.32 would ensure that at least 50 percent of the demolition and construction waste generated by the future development would be diverted from landfills serving the City of Los Angeles. Furthermore, implementation of the Proposed Plan would be consistent with all waste reduction goals set forth by the SWIRP, RENEW LA Plan, and the General Plan Framework Element, which are discussed in the Regulatory Framework section. The Proposed Plan does not conflict with solid waste policies and objectives in the SWIRP, General Plan Framework Element, or the Curbside Recycling Program.

The Proposed Plan could result in development and redevelopment of land uses that would generate solid waste. All solid waste-generating activities within the City of Los Angeles are subject to the requirements set forth in AB 939 and other local ordinances. Therefore, as future development permitted under the Proposed Plan would comply with the applicable solid waste policies and objectives, impacts related to compliance with federal, state, and local statutes and regulations related to solid waste are ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

CUMULATIVE IMPACTS

Solid waste management is another citywide concern, with growing solid waste disposal needs and a finite limit to landfill capacity. Implementation of the Proposed Plan when combined with cumulative development could result in development and redevelopment of land uses that would generate solid waste. All solid waste generating activities within the City are subject to the requirements set forth in AB 939 (LAMC Chapter VI, Article 5, Section 66.32) that decrease the amount of material sent to landfills. While the City/region is likely to eventually need additional landfill capacity, the need for such capacity and how it will be addressed by the City/region is speculative and is, therefore, not addressed in this document. As a result of required recycling, it is anticipated that the Proposed Plan would not make a cumulatively considerable contribution to impacts related to solid waste generation.

ENERGY

REGULATORY FRAMEWORK

Federal, state and local laws, regulations, plans, and guidelines that are potentially applicable to the Proposed Plan are summarized below.

FEDERAL

Public Utility Regulatory Policies Act of 1978 (PURPA), Public Law 95-617. PURPA sought to promote conservation of electric energy. Additionally, PURPA created a new class of nonutility generators (small power producers) from which, along with qualified co-generators, utilities are required to buy power.

PURPA was in part intended to augment electric utility generation with more efficiently produced electricity and to provide equitable rates to electric consumers. Utility companies are required to buy all electricity from qualifying facilities (Qfs) at avoided cost (i.e., the incremental savings associated with not having to produce additional units of electricity). PURPA expanded participation of nonutility generators in the electricity market and demonstrated that electricity from nonutility generators could successfully be integrated with a utility's own supply. In addition, PURPA requires utilities to buy whatever power is produced by Qfs (usually cogeneration or renewable energy). The Fuel Use Act (FUA) of 1978 (repealed in 1987) also helped Qfs become established. Under FUA, utilities were not allowed to use natural gas to fuel new generating technologies, but Qfs, by definition not utilities, were able to take advantage of abundant natural gas and abundant new technologies (such as combined-cycle). The technologies lowered

the financial threshold for entrance into the electricity generation business as well as shortened the lead time for constructing new plants.

Energy Policy Act of 2005. On August 8, 2005, former President George W. Bush signed the National Energy Policy Act of 2005 into law. This comprehensive energy legislation contains several electricity related provisions that aim to:

- Help ensure that consumers receive electricity over a dependable, modern infrastructure;
- Remove outdated obstacles to investment in electricity transmission lines;
- Make electric reliability standards mandatory instead of optional; and
- Give federal officials the authority to site new power lines in U.S. Department of Energy-designated national corridors in certain circumstances.

Clean Air Act (CAA). CAA Section 211(o), as amended by the Energy Policy Act of 2005, requires the Administrator of the USEPA to annually determine a renewable fuel standard (RFS) which is applicable to refineries, importers, and certain blenders of gasoline, and to publish the standard in the Federal Register by November 30 each year. On the basis of this standard, each obligated party determines the volume of renewable fuel that it must ensure is consumed as motor vehicle fuel. This standard is calculated as a percentage, by dividing the amount of renewable fuel that the Act requires to be blended into gasoline for a given year by the amount of gasoline expected to be used during that year, including certain adjustments specified by the CAA.

Renewable Energy: California Renewables Portfolio Standard Program. Established in 2002 under Senate Bill (SB) 1078, accelerated in 2006 under SB 107, expanded in 2011 under SB 2 and further expanded in 2015 under SB 350, California's Renewables Portfolios Standard (RPS) is one of the most ambitious renewable energy standards in the country. The RPS program requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020. On September 12, 2002, then-Governor Gray Davis signed SB 1078. SB 1078 (Chapter 516, Statutes of 2002) requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. SB 107 (Chapter 464, Statutes of 2006) changed the target date to 2010.

In November 2008, then-Governor Arnold Schwarzenegger signed Executive Order S-14-08, which expands the state's RPS to 33 percent renewable power by 2020. In September 2009, former Governor Schwarzenegger continued California's commitment to the RPS by signing Executive Order S-21-09, which directs the California Air Resources Board (CARB) under its AB 32 authority to enact regulations to help the state meet its RPS goal of 33 percent renewable energy by 2020.

The 33 percent by 2020 goal was codified in April 2011 with SB X1-2, which was signed by Governor Edmund G. Brown, Jr. This RPS preempts the CARB 33 percent Renewable Electricity Standard and applies to all electricity retailers in the state, including publicly owned utilities, investor-owned utilities, electricity service providers, and community choice aggregators. These entities must adopt the new RPS goals of 20 percent of retail sales from renewables by the end of 2013 and 25 percent by the end of 2016, with the 33 percent requirement being met by the end of 2020.[42]

[42]At this time, California's top three POUs are well ahead of their respective RPS targets, with PG&E, SCE and SDG&E reporting RPS procurements for 2020 at 33 percent, 28 percent and 43 percent, www.cpuc.ca.gov/rps_homepage/, accessed December 7, 2017.

The Clean Energy and Pollution Reduction Act of 2015, SB 350 (Chapter 547, Statutes of 2015) was approved by Governor Edmund G. Brown, Jr. on October 7, 2015. SB 350 does the following: (1) increases the standards of the RPS program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by December 31, 2030; (2) requires the State Energy Resources Conservation and Development Commission to establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas final end uses of retail customers by January 1, 2030; (3) provides for the evolution of the Independent System Operator into a regional organization; and (4) requires the state to reimburse local agencies and school districts for certain costs mandated by the state through procedures established by statutory provisions. Among other objectives, the legislature intends to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation (SB 350, Clean Energy and Pollution Reduction Act 2015).

STATE

The California Energy Commission (CEC) and California Public Utilities Commission (CPUC) have jurisdiction over Investor Owned Utilities (IOUs) in California. The CEC also collects information for the LADWP.

California Building Energy Efficiency Standards: Title 24. California established statewide building energy standards following legislative action. The legislation required the standards to:

- Be cost effective;
- Be based on the building life cycle; and
- Include both prescriptive and performance-based approaches.

California's building efficiency standards (along with those of energy efficient appliances) have saved more than $56 billion in electricity and natural gas costs since 1978. As technology and design have evolved, the standards have been periodically updated, generally every three years.

Title 24 of the CCR comprises the State Building Standards Code. Part 6 of Title 24 is the California Energy Code that includes the Building Energy Efficiency Standards, which provides provisions applicable to all buildings, residential and non-residential, and describes requirements for documentation to certify that building designs meets the standards. These provisions include mandatory requirements for efficiency and design of the following types of systems, equipment, and appliances:

- Air conditioning systems
- Heat pumps
- Water chillers
- Gas and oil-fired boilers
- Cooling equipment
- Water heaters and equipment
- Pool and spa heaters and equipment
- Gas fired equipment including furnaces and stoves/ovens
- Windows and exterior doors
- Joints and other building structures openings
- Insulation and cool roofs
- Lighting control devices

The standards include additional mandatory requirements for space conditioning (cooling and heating), water heating, indoor and outdoor lighting systems, and equipment in non-residential, high-rise residential

and hotel or motel buildings. Mandatory requirements for low-rise residential buildings cover indoor and outdoor lighting, fireplaces, space cooling and heating equipment (including ducts and fans), and insulation of the structure, foundation and water piping. In addition to the mandatory requirements, the standards call for further energy efficiency measures that can be provided through a choice between performance and prescriptive compliance approaches. The 2016 update to the Building Energy Efficiency Standards focuses on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings, such as improvements to the residential Standards including improvements for attics, walls, water heating, and lighting. The most significant efficiency improvements to the nonresidential Standards include alignment with the ASHRAE 90.1 2013 national standards. New efficiency requirements for elevators and direct digital controls are included in the nonresidential Standards.

The Energy Commission has estimated that the 2016 Building Energy Efficiency Standards may reduce statewide annual electricity consumption by approximately 281 gigawatt-hours per year, electrical peak demand by 195 megawatts, and natural gas consumption by 16 million therms per year. The potential effect of these energy savings to air quality may be a net reduction in the emission of nitric oxide by approximately 508 tons per year, sulfur oxides by 13 tons per year, carbon monoxide by 41 tons per year and particulate matter less than 2.5 microns in diameter by 13.57 tons per year. Additionally, the Energy Commission staff has estimated that the implementation of the 2016 Standards may reduce statewide greenhouse gas (GHG) emissions by 160 thousand metric tons CO_2e per year.

Bio-energy Action Plan (Executive Order S-06-06). Executive Order S-06-06 establishes targets for the use and production of bio-fuels and bio-power and directs state agencies to work together to advance biomass programs in California while providing environmental protection and mitigation. The Executive Order establishes the following targets to increase the production and use of bio-energy, including ethanol and biodiesel fuels made from renewable resources: produce a minimum of 20 percent of its bio-fuels within California by 2010, 40 percent by 2020, and 75 percent by 2050. The Executive Order also calls for the state to meet a target for use of biomass electricity.

State of California 2015 Integrated Energy Policy Report. On April 29, 2015, Governor Edmund G. Brown Jr. signed Executive Order B-30-15, establishing a new statewide goal to reduce greenhouse gas emissions 40 percent below 1990 levels by 2030. SB 1389 (Bowen, Chapter 568, Statutes of 2002) requires the California Energy Commission to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety. The 2015 Integrated Energy Policy Report, adopted by the California Energy Commission in February 2016, provides the results of the California Energy Commission's assessments of a variety of energy issues facing California, including the following:

- energy efficiency
- benchmarking under the AB 758 Action Plan
- strategies related to data for improved decisions in the Existing Buildings Energy Efficiency Action Plan
- building energy efficiency standards, the impact of drought on California's energy system, achieving 50 percent renewables by 2030
- Renewable Action Plan status, the California Energy Demand Forecast
- Natural Gas Outlook
- AB 1257 Report
- methane emissions
- Transportation Energy Demand Forecast
- Alternative and Renewable Fuel and Vehicle Technology Program benefits updates
- landscape-scale planning efforts, transmission projects

- California Independent System Operator energy imbalance market
- Desert Renewable Energy Conservation Plan
- climate change vulnerability and adaptation options
- electricity infrastructure in Southern California
- trends in California's sources of crude oil
- California's nuclear plants[43]

Greenhouse Gas (GHG)

A number of regulations aimed primarily at GHG reductions would affect energy consumption as the consumption of energy generates most greenhouse gases. Please refer to Section 4.7, Greenhouse Gas Emissions, of this Draft EIR for a complete regulatory framework discussion.

Senate Bill 97 (SB 97), CEQA Guidelines for Greenhouse Gas Emissions. SB 97 required the Governor's Office of Planning and Research (OPR) to prepare CEQA Guidelines for the mitigation of GHG emissions, including, but not limited to, effects associated with transportation or energy consumption. OPR and the Resources Agency are required to periodically review the guidelines to incorporate new information or criteria adopted by CARB pursuant to the Global Warming Solutions Act.

Renewable Energy

Renewables Portfolio Standard (RPS) (SB 2). Established in 2002 under SB 1078, accelerated in 2006 under SB 107, and expanded in 2011 under SB 2, RPS is one of the most ambitious renewable energy standards in the country. This law requires investor-owned utilities such as Pacific Gas and Electric (PG&E), Southern California Edison (SCE) and San Diego Gas and Electric (SDG&E), to have 33 percent of their electricity come from renewable sources by 2020. All of these entities had to adopt the new RPS goals of 20 percent of retails sales from renewables by the end of 2013, 25 percent by the end of 2016, and the 33 percent requirement being met by the end of 2020.

Clean Energy and Pollution Reduction Act of 2015 (SB 350). SB 350, signed in October 2015 by Governor Edmund G. Brown Jr., requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from eligible renewable energy resources by 2030. SB 350 also makes additional revisions to the RPS Program and to certain other requirements on public utilities and publicly owned electric utilities.

California Solar Initiative (CSI). On January 12, 2006, the CPUC approved the CSI (R.04-03-017), a solar incentive program for California consumers of the investor-owned utilities - PG&E, SCE, SDG&E. Together with the rebate program for New Solar Homes and rebate programs offered through the dozens of publicly owned utilities in the state the CSI program is a key component of the Go Solar California campaign for California. The CSI program has a total budget of $2.167 billion between 2007 and 2016 and a goal to install approximately 1,940 MW of new solar generation capacity. The CSI-Thermal portion of the program has a total budget of $250 million between 2010 and 2017, and a goal to install 200,000 new solar hot water systems. The CSI program is funded by electric ratepayers and the CSI-Thermal portion of the program is funded by gas ratepayers. The CSI program is overseen by the CPUC and rebates are offered through the Program Administrators.[44]

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[43]California Energy Commission, *2015 Integrated Energy Policy Report*, July 2015, adopted February 2016.

[44]California Energy Commission, California Solar Initiative, *About the California Solar Initiative (CSI)*, http://www.gosolarcalifornia.ca.gov/, accessed February 9, 2017.

CEQA Guidelines Appendix F: Energy Conservation. CEQA Guidelines Appendix F provides a goal of conserving energy in the state of California. The appendix indicates the following methods to achieve this goal: (1) decreasing overall per capita energy consumption, (2) decreasing reliance on natural gas and oil, and (3) increasing reliance on renewable energy sources.

LOCAL

The City of Los Angeles GREEN LA Plan. On May 15, 2007, former Los Angeles Mayor Antonio Villaraigosa released the "GREEN LA – An Action Plan to Lead the Nation in Fighting Global Warming" (GREEN LA Plan) that has an overall goal of reducing the City of Los Angeles' GHG emissions by 35 percent below 1990 levels by 2030. This goal exceeds the targets set by both California and the Kyoto Protocol, and is the greatest reduction target of any large United States city. The cornerstone of the GREEN LA Plan is increasing the City's use of renewable energy to 35 percent by 2020. The Plan discusses City goals for each focus area, as follows:

Energy

- Increase the generation of renewable energy;
- Encourage the use of mass transit;
- Develop sustainable construction guidelines;
- Increase City-wide energy efficiency; and
- Promote energy conservation.

Water

- Decrease per capita water use to reduce electricity demand associated with water pumping and treatment.

Transportation

- Power the City vehicle fleet with alternative fuels; and
- Promote alternative transportation (e.g., mass transit and rideshare).

Other Goals

- Create a more livable City through land use regulations;
- Increase recycling, reducing emissions generated by activity associated with the Port of Los Angeles and regional airports;
- Create more City parks, promoting the environmental economic sector; and
- Adapt planning and building policies to incorporate climate change policy.

Sustainable City Plan (pLAn). On April 8, 2015, Mayor Eric Garcetti released the pLAn, a roadmap to achieve back to basics short-term results while setting the path to strengthen and transform the City. The pLAn is made up of short-term (by 2017) and longer-term (by 2025 and 2035) targets in 14 categories to advance the City's environment, economy and equity. The pLAn provides strategies to create a more sustainable and livable city by: improving land use planning to promote neighborhood quality of life; conserving energy and water; mitigating and adapting to climate change; building transit options for an accessible future; promoting affordability and environmental justice; and restoring and reinventing the Los Angeles River.

EXISTING SETTING

ELECTRICITY

LADWP provides electricity to residents and businesses within the City of Los Angeles, including the Project Area. LADWP supplies more than 24 million megawatt-hours (MWh) of electricity a year to approximately 1.4 million residential and business customers.[45] The LADWP has a capacity of over 7,640 Megawatts (MW) with a record peak in instantaneous demand of 6,396 MW in 2014.[46] LADWP's Power Infrastructure includes 22 Generation Plants, 6,752 miles of overhead distribution lines, 3,626 miles of underground distribution cables and 160 distribution stations.[47] The LADWP is constantly striving for energy efficiency and is procedurally always moving forward, embracing renewable energy and to cut back on emissions. As a result of the shutdown of the Mohave Coal Power Plant in 2005, efficient energy solutions, ongoing repowering programs, and increase development of renewable resources, LADWP CO_2 emissions levels were 12.0 million metric tons (MMT), 23 percent below its 1990 level (17.9 MMT). GHG emissions are expected to be 55 percent below 1990 levels by 2025.[48]

With the advent of energy efficiency, LADWP has developed Smart Grid L.A. in order to upgrade its power grid with communications technologies that will give customers empowerment of control of their energy uses and costs in real-time. There will be continuous communication and feedback from the power grid which will provide a balance of customer electricity demand and power production. Since 2013, the LADWP has already outfitted 52,000 residential and commercial customers with Smart Meters. The use of Smart Meters will enable the LADWP to gather information to better implement the Smart Grid L.A. plan.

Table 4.16-16 shows the source of LADWP's power resources. Approximately 21 percent of power generation is from renewable sources, including biomass and biowaste, geothermal, small hydroelectric, solar, and wind energy. Specifically, wind energy provides the majority of renewable energy accounting for 11 percent of renewable energy. LADWP's eligible renewable "small hydro" resources include the Owens Gorge, the Owens Valley and LAA hydroelectric plants.

TABLE 4.16-16: LADWP POWER RESOURCES (2015)

Energy Source	Percent Contributed to LADWP Power
Renewable Energy	21%
Wind	11%
Biomass & Biowaste	4%
Geothermal	2%
Small hydroelectric	1%
Solar	3%
Coal	37%
Natural Gas	25%
Nuclear	10%
Large Hydroelectric	3%
Other/Unspecified	4%

SOURCE: LADWP, *2016 Power Integrated Resource Plan*, approved January 2017.

[45]LADWP, *Power Today*, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-pastandpresent/a-p-pp-powertoday?_adf.ctrl-state=bsuffzji2_17&_afrLoop=1819179896829263, accessed on February 7, 2017.

[46]LADWP, *Facts and Figures,* https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=bsuffzji2_17&_afrLoop=1819290218268677, accessed on February 7, 2017.

[47]*Ibid.*

[48]LADWP, *2016 Briefing Book*, June 2016.

Electricity from coal-fired power sources represents approximately 37 percent of LADWP's power supply. The Navajo and the Intermountain Generating Stations, located in Arizona and Utah, respectively, supply the LADWP coal-generated electricity.[49] These stations provide low-cost base load generation to Los Angeles; however, these stations also emit twice the amount of CO_2 compared to Natural Gas. Thus, the LADWP will continue to seek replacement options to lower the LADWP's power generation CO_2 emission levels.

Electricity from natural gas-fueled power sources represents approximately 25 percent of LADWP's power supply. The coal generating stations, owned by the LADWP and located throughout the Los Angeles Basin, include the Harbor, Haynes, Scattergood, and Valley generating stations supply the LADWP with natural gas-fueled electricity. Electricity from nuclear-fueled power sources represents approximately 10 percent of LADWP's power supply. The Palo Verde Nuclear Generation Station, located in Arizona, supplies the LADWP with nuclear-generated electricity. Electricity from large hydroelectric and other unspecified power sources represents a total of approximately seven percent of the LADWP's power supply. The Castaic Pumped Storage Power Plant and the Hoover Power Plant supply LADWP with hydroelectric-generated electricity, and are located in Castaic, California and Arizona, respectively.[50]

In 2015, LADWP's electricity generation and distribution infrastructure delivered 24.0 million MWh of electricity to its customers. Commercial users consumed the most electricity supplied by the LADWP in 2015 with approximately 12.8 million MWh, or 53 percent of the total electricity provided by the LADWP. Residential customers consumed approximately 8.4 million MWh, or 35 percent, of electricity supplied by the LADWP in 2015. Industrial users consumed approximately 2.7 million MWh, or 10 percent, while other LADWP customers consumed approximately 0.4 million MWh, or approximately 0.02 percent.[51]

Table 4.16-17 shows the estimated electricity usage of existing uses within the Project Area. The Existing (2016) total electricity usage within the Project Area is estimated to be approximately 2,913,072 kilowatt-hours (kWh) per day or 2,913 MWh per day. Annually, the Project Area is estimated to use approximately 1.06 million MWh per year.[52] Currently the Project Area represents approximately four percent of the 24.0 million MWh of total electricity delivered by the LADWP in 2015.

NATURAL GAS

The City of Los Angeles, including the Project Area, is served by the investor-owned Southern California Gas Company (SoCalGas), a unit of Sempra Energy. SoCalGas serves approximately 21.6 million customers through 5.9 million meters of gas lines within a 20,000-square-mile service area that includes over 500 communities in Central and Southern California.[53] In 2015, a total of approximately 4,947 million therms of natural gas were consumed by SoCalGas' customers. Of the total consumed, residential, industrial, commercial and miscellaneous other customers consumed 2,038 million, 1,614 million, 979 million, and 315 million therms of natural gas, respectively.[54,55]

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[49]LADWP, *2016 Integrated Resource Plan*, January 2017.
[50]LADWP, *2016 Integrated Resource Plan*, January 2017.
[51]California Energy Commission, *Electricity by Entity*, http://www.ecdms.energy.ca.gov/elecbyutil.aspx, accessed February 7, 2017.
[52]Note: 1 kilowatt/day = 0.365 Megawatts/year; 1 Megawatt = 1,000 kilowatt.
[53]Southern California Gas Company, *Company Profile*, https://www.socalgas.com/about-us/company-profile, accessed February 7, 2017.
[54]California Energy Commission, *California Energy Consumption Database*, http://ecdms.energy.ca.gov/, accessed February 7, 2017.
[55]One therm is equal to 96.7 cubic feet of natural gas.

TABLE 4.16-17: EXISTING (2016) ELECTRICITY DEMAND IN THE PROJECT AREA /a/

Land Use	Dwelling Units or Square Footage in Plan Area /b/	Total Electricity (kwh/day)	Total Electricity (kwh/year)
RESIDENTIAL /c/			
Single-Family	19,774 du	462,131	168,677,815
Multi-Family	79,094 du	913,147	333,298,655
	Residential Subtotal	***1,375,278***	***501,976,470 (501,976 MWh/yr)***
NON-RESIDENTIAL			
Commercial	26,837,005 sf.	989,397	361,129,905
Industrial	8,700,384 sf.	269,933	98,525,545
Public Facilities	12,369,192 sf.	278,464	101,639,360
	Non-Residential Subtotal	***1,537,794***	***561,294,810 (561,295 MWh/yr)***
	Existing (2016) Total	**2,913,072**	**1,063,271,280 (1,063,271 MWh/yr)**

Note: du = dwelling units; sf. = square feet; kwh = kilowatt/hour; MWh = megawatt/hour; 1 kwh/day = 0.365 MWh/year; 1 MWh = 1,000 kw
/a/ CalEEMod energy factors for residential and non-residential uses were used to determine the electricity demand. See Appendix I of this Draft EIR for detailed calculations of electricity demand generation.
/b/ For purposes of calculating electricity demand, data showing number of dwelling units and area of non-residential development are not rounded. In general, in this EIR, numbers are rounded for purposes of presentation. Total 2016 development in the Project Area includes 98,868 du and 47,906,581 sf of non-residential uses.
/c/ Solid waste generation factors distinguish between single-family and multi-family units; therefore, to provide a more conservative analysis, 20 percent of the residential uses are single family and 80 percent are multi-family units.
SOURCE: City of Los Angeles, Department of City Planning, 2018; TAHA, 2017.

California anticipates natural gas demand to decline at an annual rate of 1.4 percent between 2016 and 2035 as a result of modest growth in the Natural Gas Vehicle (NGV) market, economic growth, energy efficiency standards, other sources of renewable energy, metering infrastructure and the decline in demand of commercial and industrial sectors.[56] More specifically, from 2016 to 2035, SoCalGas residential demand is expected to decline from 239 billion cubic feet (Bcf) to 218 Bcf, reflecting an annual decline rate of 0.5 percent, non-residential markets are expected to decline from 113 Bcf in 2016 to 105 Bcf by 2035, reflecting an annual decline rate of 0.24 percent.[57]

SoCalGas natural gas supplies originate from sedimentary basins located in California, New Mexico (San Juan Basin), west Texas (Permian Basin), the Rocky Mountains, western Canada, and local California supplies. Interstate pipelines used by SoCalGas and SDG&E have a natural gas upstream capacity of 6,725 million cubic feet per day (MMcf/d).[58] Additionally, SoCalGas and SDG&E currently have firm receipt capacity (i.e., access to supply from interstate pipelines for core customers) of 3,875 MMcf/d of natural gas. Locally, SoCalGas distributes natural gas through an extensive network of approximately 41,500 miles of underground gas mains.

Underground storage of natural gas plays a vital role in balancing the region's energy supply and demand. SoCalGas owns and operates four underground storage facilities located in Aliso Canyon, Honor Rancho, Goleta, and Playa del Rey. These facilities have a total storage capacity of 137.1 Bcf. Stored gas is appropriated as follows: 83 Bcf is allocated to core residential, small industrial and commercial customers; 4.2 Bcf is used for system balancing; and the remainder is available to other customers. In October 2015 the storage facility in Aliso Canyon had a natural gas leak resulting in DOGGR imposing a moratorium on the storage facility with a safety review for all 114 wells within the facility. The safety review requires the wells to be thoroughly tested for safe operation or removed from operation and isolated from the

[56]California Gas and Electric Utilities, 2016 *California Gas Report*, 2016.
[57]*Ibid.*
[58]Beginning in April 2008, gas supplies to serve both SoCalGas' and SDG&E's retail core gas demand are procured with a combined portfolio. SoCalGas and SDG&E plan and design their systems to provide continuous service to their core customers under an extreme peak day event. The extreme peak day design criteria is defined as a 1-in 35 likelihood event for each utility's service area.

underground reservoir. In July 2017, SoCalGas completed steps to safely begin injections at the facility. As of November 2017, SoCalGas has successfully completed required tests for 114 (or 100 percent) of the active wells, with 52 wells approved for use by the Department of Conservation's Division of Oil, Gas, and Geothermal Resources.[59]

Table 4.16-18 shows the estimated natural gas usage of existing land uses within the Project Area. The existing total natural gas usage within the Project Area is estimated to be 5,387,140 thousand British Thermal Units per day (kbtu/d) or 5.28 MMcf/d.

TABLE 4.16-18: EXISTING (2016) NATURAL GAS DEMAND IN THE PROJECT AREA /a/

Land Use	Dwelling Units or Square Footage in Plan Area /b/	Natural Gas Usage (kbtu/day)	Natural Gas Usage (cf/day)	Natural Gas Usage (MMcf/day)
RESIDENTIAL /c/				
Single-Family	19,774 du	1,816,012	1,780,404	1.78
Multi-Family	79,094 du	2,418,326	2,370,908	2.37
	Residential Subtotal	***4,234,338***	***4,151,312***	***4.15***
NON-RESIDENTIAL				
Commercial	26,837,005 sf.	515,333	505,228	0.51
Industrial	8,700,384 sf.	429,060	420,647	0.42
Public Facilities	12,369,192 sf.	208,409	204,323	0.20
	Non-Residential Subtotal	***1,152,802***	***1,130,198***	***1.13***
	Existing (2016) Total	**5,387,140**	**5,281,510**	**5.28**

Note: du = dwelling units; sf. = square feet; kbtu= kilo British thermal units; MMcf/d = million cubic feet per day; cf= cubic feet; 1 kbtu = 1,000 btu; 1 btu = 1,020 cf
/a/ CalEEMod natural gas factors for residential and non-residential uses were used to determine the natural gas demand. See Appendix I of this Draft EIR for detailed calculations of natural gas demand generation.
/b/ Total 2016 development in the Project Area is 98,868 du and 47,906,581 sf of non-residential uses as provided by the City of Los Angeles Department of Planning.
/c/ Solid waste generation factors distinguish between single-family and multi-family units; therefore, to provide a more conservative analysis, 20 percent of the residential uses are single family and 80 percent are multi-family units.
SOURCE: City of Los Angeles, Department of City Planning, 2018; TAHA, 2017.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix F of the CEQA Guidelines, the Proposed Plan would have a significant impact related to energy if they would:

- Result in the wasteful or inefficient use of energy as a result of project implementation.

METHODOLOGY

For purposes of this analysis, the criteria identified in Appendix F are used. As stated in Appendix F of the CEQA Guidelines, the goal of conserving energy implies the wise and efficient use of energy, by decreasing overall per capita energy consumption; decreasing reliance on natural gas and oil; and increasing reliance

[59]Southern California Gas Company, *Aliso Canyon Natural Gas Storage Facility – Latest News*, https://www.socalgas.com/stay-safe/pipeline-and-storage-safety/aliso-canyon-storage-facility; "Aliso Canyon Storage Facility Community Update, November 2017, https://www.socalgas.com/1443741303074/N17G087A_Aliso_Community-email-notification4_v1.pdf, accessed December 5, 2017.

on renewable energy resources. To assure energy implications are considered in project decisions, CEQA requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy. Energy conservation implies that a project's cost effectiveness be reviewed in terms of energy requirements, not in only dollar amount.

The impact analysis for energy compares available energy supplies from LADWP and SoCalGas at the citywide level to the estimated demand for energy of the Proposed Plan. In developing CalEEMod, CAPCOA developed energy demand factors for various land uses. By applying the CalEEMod factors to existing development and to the estimated buildable square footages by land use type, an estimate was made as to energy demand for Existing (2016) Conditions and for the Reasonably Expected Development under the Proposed Plan. This increase in demand is compared to the existing available energy supplies from LADWP and SoCalGas to determine if these utilities would be able to accommodate the Proposed Plan's energy demands. This analysis does not rely upon, or use, population data but rather uses Reasonably Expected Development (dwelling units and area by land use).

IMPACTS

IMPACT 4.16-9 Would implementation of the Proposed Plan result in the wasteful or inefficient use of energy as a result of project implementation? **Less than significant impact.**

As shown in **Table 4.16-19**, implementation of the Proposed Plan would result in an increase in demand for electricity compared to Existing (2016) Conditions and Future (2040) No Project/Existing Plan. The Existing (2016) Conditions are estimated to have an energy demand of approximately 1.06 million MWh/year, consisting of a residential energy demand of 501,976 MWh/year and a non-residential energy demand of 561,295 MWh/year. Implementation of the Proposed Plan would result in an approximately 28 percent increase in energy demand with a total demand of 1.37 million MWh/year, consisting of residential demand of approximately 669,653 MWh/year and a non-residential energy demand of 696,624 MWh/year. As previously discussed, LADWP electricity generation and distribution infrastructure delivered 24.0 million MWh of electricity to its customers in 2015. The dependable plant capability of LADWP is 7,631 MWh with a maximum production of 66.9 million MWh per year by LADWP.[60,61] Further, LADWP has estimated that growth in annual peak demand would increase to 5,674 MW for 2015-2016 and to 7,418 MW for year 2040-2041. LADWP's estimated 2040 peak demand considers potential and likely changes that would increase the amount of electricity people will consume, such as increased use of electric vehicles and purchasing more air conditioners to combat more frequent extreme weather conditions as a result of climate change.

Based on current figures, energy demand increase as a result of the Proposed Plan would be within LADWP's generation and distribution demand and would represent less than one percent of LADWP's demand and capacity. Therefore, LADWP would generate adequate electrical supply at existing and planned facilities to provide electricity to the Proposed Project.

In addition, reasonably expected future development anticipated to occur with the implementation of the Proposed Plan would be subject to Title 24, Part 6 of the California Administrative Code, the Energy

[60]LADWP, *2016 Integrated Resource Plan*, January 2017.

[61]This is a theoretical maximum capacity figure that assumes LADWP being able to utilize all 7,639 MW capacity of their system uninterrupted 24 hours per day for an entire year. This figure was arrived at by multiplying total capacity (7,639 MW) by total hours in year (8,760 hours/year). The following conversions were also used: 1 MW = 1,000 KW; 1 MWh = 1,000 kwh.

Efficiency Standards for Residential and Nonresidential Buildings, which requires local jurisdictions to use energy efficient appliances, weatherization techniques, and efficient cooling and heating systems to reduce energy demand stemming from new development. In addition, future development would also be required to comply with the City of Los Angeles' Green Building Code Energy Efficiency requirements.

TABLE 4.16-19: FUTURE (2040) ELECTRICITY DEMAND IN THE PROJECT AREA /a/

Land Use	Dwelling Units or Square Footage in Plan Area /b/	Electricity Demand (kwh/day)	Electricity Demand (kwh/year)
FUTURE (2040) NO PROJECT/EXISTING PLAN			
Residential /c/			
Single-Family	24,255 du	566,844	206,898,060
Multi-Family	97,022 du	1,120,099	408,836,135
	Residential Subtotal	***1,686,943***	***615,734,195 (615,734 MWh/yr)***
Non-Residential			
Commercial	31,640,296 sf.	1,191,500	434,897,356
Industrial	10,257,580 sf.	318,443	116,231,792
Public Facilities	14,583,031 sf.	331,336	120,937,464
	Non-Residential Subtotal	***1,841,279***	***672,066,612 (672,067 MWh/yr)***
	Future (2040) No Project/Existing Plan Total	**3,528,222**	**1,287,800,807 (1,287,801 *MWh/yr*)**
PROPOSED PLAN (2040)			
Residential /c/			
Single-Family	26,379 du	616,483	225,016,295
Multi-Family	105,518 du	1,218,183	444,636,795
	Residential Subtotal	***1,834,666***	***669,653,090 (669,653 MWh/yr)***
Non-Residential			
Commercial	35,748,672 sf.	1,346,211	491,367,015
Industrial	8,646,823 sf.	268,438	97,979,870
Public Facilities	12,935,768 sf.	293,909	107,276,785
	Non-Residential Subtotal	***1,908,558***	***696,623,670 (696,624 MWh/yr)***
	Proposed Plan (2040) Total	**3,743,224**	**1,366,276,760 *(1,366,278 MWh/yr)***

Note: du= dwelling units; sf. = square feet; kwh = kilowatt/hour; MWh = megawatt/hour; 1 kilowatt/day = 0.365 megawatts/year; 1 megawatt = 1,000 kilowatt
/a/ CalEEMod electricity factors for residential and non-residential uses were used to determine the electricity demand. See Appendix I of this Draft EIR for detailed calculations of electricity demand generation.
/b/ For purposes of calculating electricity demand, data showing number of dwelling units and area of non-residential development are not rounded. In general, in this EIR, numbers are rounded for purposes of presentation. Future (2040) No Project/Existing Plan development in the Project Area includes 121,277 du and 57,118,521 sf of non-residential. Proposed Plan development in the Project Area includes 131,897 du and 57,331,263 sf of non-residential uses.
/c/ Electricity factors distinguish between single-family and multi-family units; therefore, to provide a more conservative analysis, 20 percent of the residential uses are single-family, and 80 percent are multi-family units.
SOURCE: City of Los Angeles, Department of City Planning, 2018; TAHA, 2017.

The Proposed Plan includes several policies that promote energy efficiency. These policies include the following:

- **LU9.2**: Encourage development to use clean, efficient, renewable materials and green building policies. Encourage discretionary and major projects to exceed Green Building Standards.
- **LU9.3**: Encourage flexibility in building designs in developments to use green building practices and incorporate solar, clean, or efficient energy.

- **LU10.5**: Encourage the joint use of public facilities for the purpose of promoting the efficient use of space, energy and public resources.

- **LU10.6**: Promote the use of clean, renewable energy that is diverse in technology and location to decrease dependence on fossil fuels, reduce emissions of greenhouse gases and increase reliability of power supply. Support the use of wind energy, hydropower, geothermal energy, biomass energy and solar power. Encourage passive and active solar energy systems, particularly photovoltaic.

Energy savings are anticipated to occur as a result of improved building construction and insulation, appliance energy efficiency requirements, and utility energy efficiency programs. In addition, multi-family housing is more efficient in its consumption of energy (and water) as compared to single-family homes (as a result of size and the insulation effect of units located immediately adjacent to each other). State and local incentives and regulations related to the purchase and operation of alternate fuel vehicles has led to an average per capita decrease in energy and natural gas usage. In addition, as further discussed below, a decline in per capita demand for natural gas is anticipated to result from the Proposed Plan as a result of a number of factors including technological improvements in appliances and other engines/equipment that use natural gas that are proactively being manufactured to be more energy efficient. Future development would result in a compact land use pattern that facilitates transit and non-motorized transportation are anticipated to also result in less energy consumption.

As projects are built in the Project Area, they will be in compliance with all applicable energy conservation plans and policies of the City. Therefore, impacts related to energy demand as a result of implementation of the Proposed Plan would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

IMPACT 4.16-10 Would the Proposed Plan result in the wasteful or inefficient use of natural gas? **Less than significant impact.**

Over the course of implementation of the Proposed Project, several changes (such as increased outdoor temperatures due to climate change, and the increased use of natural gas vehicles) are expected to affect the demand for natural gas. SoCalGas projects that as a result of a combination of moderate growth in the NGV market and across-the-board declines in all other market segments: residential, commercial, electric generation, and industrial markets, overall demand for natural gas will decrease at an annual rate of 1.4 percent between 2016 and 2035.[62] More specifically, from 2016 to 2035, residential demand is expected to decline from 239 Bcf to 218 Bcf, and non-residential markets are expected to decline from 113 Bcf in 2016 to 105 Bcf. As a result of aggressive energy efficiency programs residential gas demand is expected to decrease at an annual average rate of 0.5 percent and commercial and industrial market demand are expected to decline at an annual rate of 0.24 percent. For 2016, Southern California had a natural gas supply of 3,875 MMcf/d. Total natural gas demand for 2016 was approximately 2,681 MMcf/d and is forecasted to decrease to 2,382 MMcf/day in year 2035.

[62]California Gas and Electric Utilities, 2016 *California Gas Report*, 2016.

As noted above, energy savings are anticipated to result from improved building construction and insulation, appliance energy efficiency requirements, and utility energy efficiency programs. In addition, state and local incentives and regulations related to the purchase and operation of alternate fuel vehicles has led to an average per capita decrease in energy and natural gas usage. A decline in per capita demand for natural gas is anticipated to result from the Proposed Plan as a result of a number of factors including technological improvements in appliances and other engines/equipment that use natural gas that are proactively being manufactured to be more energy efficient. However, overall natural gas use in the Plan Area would still increase because the number of homes would increase and would offset the per capita use decrease.

As shown in **Table 4.16-20**, natural gas usage in the Project Area with the implementation of the Proposed Plan is estimated to be 6,678,098 cf/d (6.68 MMcf/d), a 26 percent increase (1,396,588 cf per day) in natural gas usage compared to Existing (2016) Conditions. The Proposed Project would account for approximately 0.28 percent of the forecasted demand in the year 2035. Further, this projected estimate also takes into account the current trend of energy efficient practices and a decreased dependency on natural gases. As such, the Proposed Project would be within the projected available supply and would consume less-than-one percent of SoCalGas' 2035 projected available supply. This projected estimate also takes into account the current trend of energy efficient practices, increased use of renewable power, and a decreased use of natural gases, as previously discussed above.

TABLE 4.16-20: FUTURE (2040) NATURAL GAS DEMAND IN THE PROJECT AREA /a/

Land Use	Dwelling Units or Square Footage in Plan Area /b/	Natural Gas Usage (kbtu/day)	Natural Gas Usage (cf/day)	Natural Gas Usage (MMcf/day)
FUTURE (2040) NO PROJECT/EXISTING PLAN				
Residential /c/				
Single-Family	24,255 du	2,227,539	2,183,862	2.18
Multi-Family	97,022 du	2,966,481	2,908,315	2.91
	Residential Subtotal	***5,194,020***	***5,092,177***	***5.09***
Non-Residential				
Commercial	31,640,296 sf.	457,069	448,107	0.45
Industrial	10,257,580 sf.	505,853	495,934	0.50
Public Facilities	14,583,031 sf.	247,981	243,119	0.24
	Non-Residential Subtotal	***1,210,903***	***1,187,160***	***1.19***
Future (2040) No Project /Existing Plan Total		**6,404,923**	***6,279,337***	***6.28***
PROPOSED PLAN (2040)				
Residential /c/				
Single-Family	26,379 du	2,422,604	2,375,102	2.38
Multi-Family	105,518 du	3,226,249	3,162,989	3.16
	Residential Subtotal	***5,648,853***	***5,538,091***	***5.54***
Non-Residential				
Commercial	35,748,672 sf.	516,418	506,292	0.51
Industrial	8,646,823 sf.	426,419	418,058	0.42
Public Facilities	12,935,768 sf.	219,970	215,657	0.21
	Non-Residential Subtotal	***1,162,807***	***1,140,007***	***1.14***
	Proposed Plan (2040) Total	**6,811,660**	***6,678,098***	***6.68***

Note: du = dwelling units; sf. = square feet; kbtu =kilo British thermal units; cf = cubic feet; MMcf/d = million cubic feet per day; kbtu = 1,000 btu; 1 btu = 1,020 cubic feet
/a/ CalEEMod natural gas factors for residential and non-residential uses were used to determine the natural gas demand. See Appendix I of this Draft EIR for detailed calculations of natural gas demand generation.
/b/ For purposes of calculating natural gas demand, data showing number of dwelling units and area of non-residential development are not rounded. In general, in this EIR, numbers are rounded for purposes of presentation. Future (2040) No Project/Existing Plan development in the Project Area includes 121,277 du and 57,118,521 sf of non-residential uses. Proposed Plan development in the Project Area includes 131,897 du and 57,331,263 sf of non-residential uses.
/c/ For a conservative analysis, it is assumed that residential uses would consist of 20 percent single-family uses and 80 percent multi-family uses.
SOURCE: City of Los Angeles, Department of City Planning, 2018; TAHA, 2017.

Furthermore, compact land use and growth patterns that facilitate transit and non-motorized transportation are also anticipated to result in less energy consumption. The Existing (2016) Conditions has a natural gas per service population (SP) demand of 17.20 cf/SP/day and the Proposed Plan has a natural gas per service population demand of 17.07 cf/SP/day.[63] By comparison, the Future (2040) No Project/Existing Plan has a natural gas demand of 17.34 cf/SP/day. As the Proposed Plan would result in more multi-family housing in addition to improved building construction and energy efficient requirements, the Proposed Plan would have a reduced natural gas demand per SP relative to Existing Conditions and the Future (2040) No Project/Existing Plan. Therefore, impacts related to natural gas under the Proposed Plan would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

Less than significant.

CUMULATIVE IMPACTS

Implementation of the Proposed Plan when combined with cumulative development could result in an increase in the citywide consumption of the non-renewable energy resources of energy and natural gas. However, state and local policies are increasingly requiring more efficient use of energy and all sectors of society are responding with more energy efficient devices that overall are anticipated to offset increased demand from increasing population. Furthermore, development emphasis on compact land use and growth patterns that facilitate transit and non-motorized transportation are anticipated to result in less energy consumption. While implementation of the Proposed Plan could result in increased demand for energy and natural gas, the impact to the city's energy resources would be less than significant. The Proposed Plan would support energy efficient practices and would not result in wasteful or inefficient use of energy. Therefore, the Proposed Plan would not make a cumulatively considerable contribution to impacts related to energy.

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[63]Daily per service population natural gas demand is calculated by dividing the total daily natural gas use from residential and non-residential uses by the combined sum of population and employment estimates under each scenario.

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5.0 ALTERNATIVES

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) describe a range of reasonable alternatives to the project or to the location of the project that could feasibly avoid or substantially lessen significant environmental impacts while attaining most of the basic objectives of the project.[1] This chapter sets forth potential alternatives to the Proposed Plan and provides a qualitative analysis of each alternative and a comparison of each alternative to the Proposed Plan. The Proposed Plan alternatives are evaluated as to how well they achieve the goals, policies, and objectives, the extent of their environmental impacts compared to the Proposed Plan, and whether or not they reduce or eliminate significant impacts caused by the Proposed Plan.

5.1 CEQA REQUIREMENTS

CEQA Guidelines Section 15126.6 states:

> *An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.*

Key provisions of the CEQA Guidelines pertaining to the alternatives analysis are summarized below.

- The discussion of alternatives shall focus on alternatives to the project, including alternative locations that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly (CEQA Guidelines Section 15126.6(b)).
- The EIR shall include a brief discussion of the rationale for selecting alternatives to be discussed and should identify any alternatives that were considered but were rejected as infeasible during the scoping process and briefly explain the reason underlying the lead agency's decision. Among others, the following factors may be used to eliminate alternatives from detailed consideration in an EIR: (1) failure to meet most of the basic project objectives; (2) infeasibility, or (3) inability to avoid significant environmental impacts (CEQA Guidelines Section 15126.6(c)).
- The No Project Alternative shall be evaluated along with its impacts. The "no project" alternative analysis shall discuss the existing conditions at the time the Notice of Preparation is published, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services (CEQA Guidelines Section 15126.6(e)(2)).
- When the project involves an update to an existing land use or regulatory plan, the "no project" alternative will be the continuation of the existing plan, policy or operation into the future. The projected impacts of the Proposed Plan are compared to the impacts from the continuation of the existing plan (CEQA Guidelines Section 15126.6(e)(3)(A)).

[1] *CEQA Guidelines*, California Code of Regulations (CCR), Title 14, Division 6, Chapter 3, Section 15126.6, 2005.

- The range of alternatives required in an EIR is governed by a "rule of reason." Therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the proposed project (CEQA Guidelines Section 15126.6(f)).
- For alternative locations, only locations that are feasible and would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR. CEQA Guidelines Section 15126.6(f)(2)(A)).
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative (CEQA Guidelines Section 15126.6(f)(3)).
- The evaluation of alternatives should include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the proposed project (CEQA Guidelines Section 15126.6(d)).

- CEQA Guidelines Section 15126.6(a) states:

  > *An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic project objectives but would substantially lessen any of the significant effects of the project," and specifies that, "An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are not feasible.*

- CEQA Guidelines Section 15126.6(f)(1) explains that

  > *...factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries...and whether the proponent can reasonably acquire, control or otherwise have access to the alternative sites...*

  Additionally, CEQA Guidelines Section 15126.6(f)(3) clarifies that,

  > *Alternatives that are considered remote or speculative, or whose effects cannot be reasonably predicted do not require consideration.*

Accordingly, the lead agency may make an initial determination as to which alternatives are feasible, and therefore, merit in-depth consideration. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet project objectives, are infeasible, or do not avoid any significant environmental effects.

The range of feasible alternatives is selected and discussed in a manner intended to foster meaningful public participation and informed decision making. Among the factors that may be taken into account when addressing the feasibility of alternatives (as described in CEQA Guidelines Section 15126.6(f)(1)) are environmental impacts, site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the proponent could reasonably acquire, control, or otherwise have access to the alternative site.

The City of Los Angeles Department of City Planning's (DCP's) effort in this process has been to identify, describe, and evaluate a reasonable range of feasible project alternatives with the same focus as the Proposed Plan, and inform the public and decision-makers of the comparative effects of alternatives that address concerns expressed by the public during the outreach process for the development of the Proposed Plan. The analysis is particularly focused on those alternatives that could achieve most of the project objectives.

5.2 PROJECT OBJECTIVES

As described in Section 3.2 in Chapter 3.0, Project Description, the underlying purpose of the Proposed Plan is to plan for and accommodate foreseeable growth in the Hollywood CPA, consistent with the growth strategies of the City as provided in the Framework Element, as well as the policies of Senate Bill 375 and the Southern California Association of Governments' (SCAG) Sustainable Communities Strategy (SCS).

The **primary objectives** of the Proposed Plan are as follows:

- Accommodate projected population, housing, and employment growth consistent with the growth strategies of the Framework Element, including:
  - Maximize development opportunities around existing transit systems to encourage sustainable land use while minimizing potential adverse impacts,
  - Direct growth to transit hubs and corridors,
  - Plan for increases to the housing supply,
  - Encourage a better balance of jobs and housing with mixed-use development,
  - Accommodate commercial uses for future employment opportunities, and
  - Focus growth into Framework identified Centers and corridors while preserving single-family neighborhoods, hillsides, and open space.
- Direct growth away from low-density neighborhoods; preserve single-family and low-density residential neighborhoods.
- Provide a range of employment opportunities; promote the vitality and expansion of Hollywood's media, entertainment, and tourism industry.
- Protect historic and cultural resources.

The **secondary objectives** of the Proposed Plan are as follows:

- Encourage and promote a variety of mobility options; make streets walkable.
- Improve the function and design of neighborhoods throughout the Project Area by preserving and strengthening the appearance of the overall Project Area to promote pedestrian-friendly environments, nurture neighborhood character, improve economic vitality, create identity, and integrate a combination of land uses to create positive visual experiences.
- Improve open space, parks and public spaces.
- Provide adequate public services and infrastructure.
- Encourage sustainable land use.
- Maintain Land Use and Zoning Consistency.

5.3 SIGNIFICANT AND UNAVOIDABLE IMPACTS

As described in Chapter 4, the following impacts related to the Proposed Plan are determined to be significant and unavoidable after implementation of all feasible mitigation measures:

- **Air Quality**: Criteria Pollutant Emissions and Violation of Air Quality Standards; Construction for NOx, $PM_{2.5}$, PM_{10}; Operational for VOC emissions; Cumulative Criteria Pollutant Emission and Cumulative Air Quality Standard Impacts; Sensitive Receptors for Construction.
- **Biological Resources:** Special Status Species Habitat, Riparian Habitat, Wetlands, Migratory Wildlife.
- **Cultural Resources**: Historical Resources; Cumulative Historical Resources.
- **Noise**: Construction Noise and Construction Vibration; Cumulative Construction Noise and Construction Vibration; Permanent Stationary Sources.
- **Public Services**: Parks – Deterioration; Cumulative Parks - Deterioration.
- **Transportation and Traffic**: Operation of Vehicular Circulation System, Neighborhood Traffic Intrusion [NTI], Congestion Management Plan [CMP], Construction Traffic Disruption; Cumulative Circulation System; NTI, CMP, Construction Traffic Disruption.

As described in Chapter 4.0, the following impacts are considered significant impacts that can be mitigated to less than significant with mitigation.

- **Aesthetics** (Glare)
- **Cultural Resources** (Archaeological Resources, Paleontological Resources, and Tribal Cultural Resources)
- **Hazardous and Hazardous Materials** (Hazardous Materials Upset or Accident, Hazardous Materials Upset or Accident, and Hazardous Materials Sites)

5.4 ALTERNATIVES CONSIDERED AND ELIMINATED FROM FURTHER EVALUATION

The alternatives considered and eliminated from further evaluation include:

NO DEVELOPMENT ALTERNATIVE

The No Development Alternative would permanently freeze development in the Hollywood Community Area by prohibiting all construction activity. Since the Hollywood CPA is subject to the existing 1988 Hollywood Community Plan, which allows redevelopment and future growth within specific use, density and height restrictions (see the discussion of the No Project Alternative below), the No Development Alternative does not represent a scenario that would likely occur. The City has no current mechanisms to halt development within the Project Area. In addition, this Alternative would not accommodate the projected housing, population, and job growth for the Project Area and would not accomplish the underlying purpose of the Proposed Plan and most of the primary project objectives. Therefore, the No Development Alternative is not a realistic or foreseeable option and was rejected as infeasible.

LIMITED DEVELOPMENT ALTERNATIVE

Under a Limited Development Alternative, land use changes would be limited to General Plan Amendments and zone changes necessary to adjust the existing development potential of the Project Area downward to reflect as-built conditions, therefore limiting the future development potential. While this Alternative would involve carrying the existing conditions of the Project Area forward into the future for the most part, unlike the No Development Alternative, this is an "action alternative" that would include the adoption of an updated community plan. This Alternative would reduce the Project Area's development potential, limiting and deterring new development from occurring in the future. Given this reduction in development potential, new construction would be less likely to occur under this Alternative than under the Proposed Plan or the Existing Plan, thereby reducing construction impacts (construction would be permitted to replace existing structures or vacant lots with similar structures). Similarly, because development potential of the Project Area would be reduced compared to the Existing Plan and Proposed Plan, only a limited amount of population and job growth could be accommodated, thereby reducing operational impacts compared to the Proposed Plan. However, this Alternative would not accommodate the projected housing, population, and job growth for the Project Area and would not accomplish the underlying purpose of the Proposed Plan and most of the primary project objectives, as it would not direct growth to transit hubs and corridors, balance jobs and housing growth and create employment opportunities, or have regulations to protect designated and eligible historic resources and promote the vitality and expansion of Hollywood's media, entertainment, and tourism industry. This Alternative could put pressure on lower scale neighborhoods to accommodate housing demand that is not met in the Regional Center and along commercial corridors. Based on the above, the Limited Development Alternative was rejected as infeasible.

UNIFORM CORRIDOR GROWTH ALTERNATIVE

Under the Uniform Corridor Growth Alternative, new development potential at a level consistent with the Proposed Plan would be distributed uniformly along commercial corridors within the Project Area. While this Alternative would accommodate the SCAG projected growth for the Project Area, distributing growth uniformly along the corridors of the Hollywood CPA would not reduce the significant and unavoidable impacts of the Proposed Plan. In addition, distributing growth consistently along the corridors would not achieve the City's goals of maximizing development opportunities around existing transit systems while preserving single-family and low-density residential neighborhoods. Also, there would likely be increased vehicle miles traveled (VMT), as future growth would not be concentrated at existing transit stations and bus corridors and any emerging transportation hubs where residents, employees and visitors can take advantage of existing and planned transit opportunities. Accordingly, this Alternative would likely result in greater impacts than the Proposed Plan, particularly exacerbated along corridors abutting low-density neighborhoods, and would not achieve the underlying purpose of the project to accommodate growth consistent with the City's Framework long-term growth strategy and the SCS, as well as several of the primary and secondary objectives related to preserving single-family and low-density residential neighborhoods, protecting historic and cultural resources, and promoting the vitality and expansion of Hollywood's media, entertainment, and tourism industry. Based on the above, the Uniform Corridor Growth Alternative was rejected as infeasible.

OTHER ALTERNATIVES

As discussed below there are no alternatives that the City can identify that would reduce the identified significant and unavoidable impacts identified in this EIR to less than significant that would meet the underlying purpose of the project to plan for and accommodate foreseeable City growth in the Hollywood CPA, consistent with the growth strategies of the City as provided in the Framework Element, as well as the policies of Senate Bill 375 and SCAG's Sustainable Communities Strategy. All of the significant and unavoidable impacts and less than significant impacts with mitigation that are identified in this EIR are a result of reasonably expected development that occurs with growth, such as construction noise and

vibration, potential for release of hazardous materials in the soil or discovery of archaeological resources discovered during site preparation, impacts to LOS from car trips from new residents. That is why even the No Project alternative and the reduced growth alternative (Alternative 2) would not be expected to result in less than significant to any of the identified significant and unavoidable impacts upon analysis. As discussed above, to the extent that a no development or lower development alternative could stop or slow growth in the CPA such that it would result in turning the significant and unavoidable impacts to less than significant because little to no development would occur are rejected for not meeting the underlying purpose of the Project. Based upon the above, the range of reasonable alternatives that can meet the requirements of CEQA for the Proposed Project are significantly constrained by the need for the City to accommodate growth and the nature of the impacts identified in large part resulting from growth. To comply with CEQA, as discussed in Section 5.5 below, the City has provided a reasonable range of alternatives that would meet the requirements of Guidelines Section 15126.6 discussed above. The City finds that any variations on those alternatives that the City considered including, such as additional lower density alternatives, would not avoid any additional significant environmental impacts, and would not further foster informed decision-making or public participation beyond the alternative considered in the EIR.

5.5 ALTERNATIVES CONSIDERED IN THIS EIR

In accordance with CEQA Guidelines Section 15126.6, the feasible alternatives to the Proposed Plan are presented below.

ALTERNATIVE 1: CONTINUATION OF EXISTING PLAN (NO PROJECT ALTERNATIVE)

CEQA Guidelines Section 15126.6(e) requires that a No Project Alternative be evaluated to allow decision makers to compare the impacts of approving the project with the impacts of not approving the Proposed Plan. This legally mandated alternative is not required to meet the objectives of the Proposed Plan or to substantially lessen any of the significant effects of the Proposed Plan. The No Project Alternative reflects "no project" conditions (i.e., without the adoption of the Proposed Plan). Under the No Project Alternative, no changes to General Plan land use designations and/or zoning would occur, the CPIO District would not be established, and future development would not be subject to the Proposed Plan's development regulations, design regulations, or policies. The No Project Alternative assumes what would be reasonably expected to be developed under the Existing Plan, based on existing General Plan land use designations and zoning in the Hollywood CPA. Based on existing zoning under the Existing Plan's land use designations, the reasonably expected growth in the Hollywood CPA under the No Project Alternative would result in 113,000 to 121,000 housing units, 226,000 to 243,000 residents, and 119,000 jobs.

Table 5-1 shows the population, housing and employment that could be accommodated under the five Alternatives, including the No Project Alternative. The No Project Alternative would result in 8,000 to 11,000 fewer housing units, 17,000 to 21,000 fewer residents, and 5,000 to 8,000 fewer jobs compared to the Proposed Plan. The Transit Oriented Communities (TOC) Guidelines, along with other housing incentive programs like Density Bonus and Accessory Dwelling Units, have been accounted for in the total reasonably expected development potential of each alternative except Alternative 5 (SCAG Forecast Alternative). A range of numbers is used in Alternatives 1 through 4 to represent the potential increase in development from the optional incentive programs.

TABLE 5-1: COMPARISON OF PROJECT ALTERNATIVES

	Existing Conditions (2016)	SCAG Forecast (2040)	Proposed Plan	Alternative 1: No Project	Alternative 2: Reduced Alternative	Alternative 3: Targeted Corridors	Alternative 4: High TOD	Alternative 5: SCAG Forecast Alternative
Population (residents)	206,000	226,000	243,000 – 264,000	226,000 – 243,000	230,000 – 256,000	243,000 – 264,000	243,000 – 264,000	226,000
Housing Units	104,000	113,000	121,000 – 132,000	113,000 – 121,000	115,000 – 128,000	121,000 – 132,000	121,000 – 132,000	113,000
Employment (jobs)	101,000	119,000	124,000 - 127,000	119,000	124,000 – 127,000	124,000 – 127,000	124,000 – 127,000	119,000

The Proposed Plan and all of the Alternatives except Alternative 5 factors in additional units that can be expected from the City's housing incentives. TOC and accessory dwelling units are represented in the higher range. It assumes all units are occupied.

SOURCE: City of Los Angeles, 2018.

ALTERNATIVE 2: REDUCED TOD AND CORRIDORS ALTERNATIVE (REDUCED ALTERNATIVE)

The Reduced TOD and Corridors Alternative (Reduced Alternative) focuses development potential at selected transit stations and corridor areas of the Hollywood CPA, with less development potential for housing and population than the Proposed Plan. The proposed changes under the Reduced Alternative reflect public input on the Proposed Plan. In general, this Alternative consists of similarly-located subareas around transit stations and corridors, but this Alternative reduces development potential in selected subareas. This Alternative would reduce the allowable base floor area ratio (FAR) in selected Regional Center subareas and the allowable base FAR along selected corridors, and also could reduce the proposed density of selected High Medium subareas.

More specifically, increases in development potential primarily near the Metro Hollywood/Vine Station; subareas with High-Medium Residential land use designation; and selected corridors with mixed-use incentives would be reduced under this Alternative. The Proposed Plan increases the allowable base FAR to 4.5:1 in the Regional Center subareas surrounding the Hollywood/Vine Station. The Reduced Alternative would lower the allowable base FAR by approximately 10 percent. These subareas are generally located east of Wilcox Avenue and/or Cahuenga Boulevard, south of Yucca Street, west of Gower Street, and north of De Longpre Avenue. The Reduced Alternative would maintain the existing density of one dwelling unit per 600 square feet of lot area and/or apply this reduced density to selected High Medium subareas. The Proposed Plan incentivizes mixed-use development along selected commercial corridors near transit, which includes bus service, by increasing the allowable FAR for projects that include both housing and commercial or are hotels. The Reduced Alternative would decrease the amount of mixed-use FAR incentive proposed in the following corridors: La Brea Avenue, Western Avenue, and Santa Monica Boulevard.

The Reduced Alternative assumes that the reasonably expected development of the CPA would be reduced compared to the Proposed Plan, but would still meet SCAG's 2040 population, housing and employment projections for the CPA. As shown in **Table 5-1** above, the reasonably expected development under the Reduced Alternative would be approximately 117,000 to 128,000 housing units, 235,000 to 256,000 residents, and 124,000 to 127,000 jobs. This Alternative would result in approximately 4,000 fewer housing units, 8,000 fewer persons and a similar number of jobs compared to the Proposed Plan.

Administrative changes, the CPIO, and most Active Changes that would occur as part of the Proposed Plan would also occur under the Reduced Alternative. The reduction of FAR in selected Regional Center and corridor subareas, however, would cause the potential supply of new housing and non-residential uses to diminish because the incentive for development would be reduced.

This Alternative was included because it would reduce some identified significant impacts in some parts of the Hollywood CPA. It would reduce impacts (although likely not below levels of significance) related to air quality and noise, and traffic. This Alternative was also included to meet the request of community groups. This Alternative would meet the underlying purpose and the primary and secondary project objectives in part, however, to a lesser degree than the Proposed Plan.

ALTERNATIVE 3: TARGETED CORRIDORS ALTERNATIVE

The Targeted Corridors Alternative would generally concentrate development along targeted corridors in the Hollywood CPA that could accommodate new housing, population and jobs. The amount of growth anticipated to occur under the Proposed Plan would occur under the Targeted Corridors Alternative, but it would be less concentrated in the Regional Center and would be dispersed along targeted corridors throughout the CPA. Under the Targeted Corridors Alternative, the Hollywood CPA would meet the same population, housing and employment projections anticipated in the Proposed Plan. This would be achieved through an increase in the maximum permitted FAR along corridors. Heights could range between four to

eight stories and with a maximum FAR of 3:1 along targeted segments of the major commercial corridors mentioned below.

The Targeted Corridors Alternative would concentrate growth along designated corridors, including La Brea Avenue, Vine Street, Western Avenue, Vermont Avenue, Hollywood Boulevard, Sunset Boulevard, Santa Monica Boulevard, and Melrose Avenue. Proposed changes would be focused primarily on corridors with commercial land use designations such as Community Commercial, rather than being focused within the Regional Center Commercial in central Hollywood. The identified commercial corridor subareas in the Proposed Plan would be supplemented with additional corridors and corridor segments where development potential could be intensified to meet the reasonably expected housing, population, and employment.

Areas selected for increased development potential were based on the following criteria: 1) major corridors with a commercial land use designation; 2) existing Rapid or local bus service; 3) distribution of changes geographically throughout the Hollywood CPA; and 4) utilizing the development potential of larger lots and commercial intersections in areas where there is greater opportunity for development. This approach is in contrast to both the Proposed Plan, which focuses growth in the Regional Center and selected commercial corridors, and the High TOD Alternative, which focuses intensified growth within a half mile of five Metro Red Line stations.

This Alternative would not reduce the significant impacts and since it would disperse future development along selected commercial corridors instead of focusing growth in the Regional Center, it could increase impacts related to traffic. This Alternative was included to inform decision makers and foster public participation because it would result in fewer high-rises in the Regional Center, which the City is informed to be of interest to some decision-makers and members of the community. This alternative could lower building heights in the Regional Center, but could result in more mid-rise (four to eight stories) and potentially tall buildings along the targeted corridors.

ALTERNATIVE 4: HIGH TOD ALTERNATIVE

The High TOD Alternative for the Hollywood CPA would increase opportunities for TOD development around existing major rail infrastructure. This Alternative would concentrate the Proposed Plan's reasonably expected housing, population, and employment at the five Metro Red Line station areas in the Hollywood CPA, including East Hollywood. Under the High TOD Alternative, the Hollywood CPA would meet the same population, housing and employment projections anticipated in the Proposed Plan.

The development potential near the Hollywood/Highland and Hollywood/Vine Stations would be further intensified by including some additional change areas within a half-mile radius of the stations, such as parcels along Hollywood Boulevard, and increasing the base FAR of selected subareas near these two stations. Additional selected areas within the half-mile radius would expand the existing Regional Center land use designation boundary to cover the western side of La Brea Avenue and designated multi-family residential areas along and near Yucca Street and Franklin Avenue. Adding more multi-family residential areas to the Regional Center would allow for additional housing and employment opportunities through increases in residential density and commercial intensity. As a result of increased base FARs to possibly 4.5:1, high-rise buildings in the 20-story range could become more common around the Los Angeles County Metropolitan Transportation Authority (Metro) Hollywood/Highland and Hollywood/Vine Stations. Regional Centers, as described in the Framework Element, contain a mix of mid- to high-rise buildings that are generally characterized in height by six- to 20-stories or higher.

The High TOD Alternative would extend the Regional Center land use designation east of the US-101 to selected areas near the Metro Hollywood/Western, Vermont/Sunset, and Vermont/Santa Monica Stations. These three stations and their vicinity areas currently have specific development regulations such as FAR and height limits under the existing Vermont/Western Transit Oriented Specific Plan (SNAP). This

Alternative would require amending the SNAP to allow for additional development by increasing FARs and removing height restrictions. FAR caps could increase from 3:1 today to possibly up to 6:1. Existing SNAP restrictions for maximum height, generally 75 feet for mixed-use projects or 100 feet for hospital uses without discretionary approval, would be removed to allow high-rise buildings in the expanded Regional Center. The hospital core area in East Hollywood near Vermont Avenue and Sunset Boulevard, which has a Community Center land use designation, would be intensified to Regional Center as well. This Alternative was included because it concentrates housing, population, and employment in transit nodes (i.e., around heavy rail infrastructure), and less along the corridors and would result in less severe significant impacts to violations of air quality standards and would be more consistent with SCAG's sustainable communities strategy as well as reduced impacts to circulation. This alternative would be expected to have the lowest daily VMT and the lowest number of daily trips among the alternatives and the Proposed Project.

ALTERNATIVE 5: SCAG FORECAST ALTERNATIVE

This alternative is growth under the SCAG 2040 forecast in the CPA under the 2016-2040 RTP/SCS. The projections are similar to the reasonably expected development at the lower range of the No Project Alternative (Alternative 1). This alternative is therefore substantially the same as Alternative 1. The difference between the No Project Alternative and Alternative 5 is that projected growth under Alternative 5 does not include reasonably expected development from use of the TOC Guidelines because TOC was not adopted before SCAG made its 2040 forecasts. Therefore, Alternative 5 does not include the high range of reasonably expected growth that Alternative 1 includes. For this reason, Alternative 5 would not be as reasonably foreseeable as Alternative 1 if the Proposed Plan were not adopted. Additionally, Alternative 5 is different from Alternative 1 in that the forecasted growth by SCAG is more spread out in the CPA and less development is expected to occur in the regional center and around transit infrastructure systems than in Alternative 1.

5.6 EVALUATION OF PROJECT OBJECTIVES

An EIR must evaluate the comparative merits of a reasonable range of alternatives to the project that could feasibly attain most of the basic objectives of the project while avoiding or lessening any adverse effects of the project. For purposes of this analysis, the five alternatives are evaluated to determine the extent to which they attain the basic objectives of the Proposed Plan. **Table 5-2** provides an evaluation of the project objectives under the five alternatives followed by a general discussion of whether the underlying purpose and basic project objectives are feasibly and substantially attained by each alternative.

ALTERNATIVE 1: NO PROJECT ALTERNATIVE

Although Alternative 1 would meet SCAG's 2040 population, housing and employment projections, it would not achieve most of the primary and secondary objectives. It would not direct growth and maximize development opportunities around existing transit systems, transit hubs, and corridors. Compared to the Proposed Plan, the No Project Alternative would result in 8,000 to 11,000 fewer housing units, 17,000 to 21,000 fewer residents and 5,000 to 8,000 fewer jobs. Under the No Project Alternative, no changes to existing zoning and General Plan land use designations would occur, regardless of the known inconsistencies between existing land uses, zoning and/or General Plan land use designations. In addition, under the No Project Alternative, future development would not be subject to the Proposed Plan's design, neighborhood compatibility, and hillside protections. The CPIO District, which would have regulatory protections for historical resources as well as pedestrian-oriented design regulations, would not be established under the No Project Alternative. The Proposed Plan's transportation and mobility network improvements would also be not implemented under the No Project Alternative.

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TABLE 5-2: EVALUATION OF PROJECT OBJECTIVES					
	Alternative 1: No Project Alternative	**Alternative 2: Reduced Alternative**	**Alternative 3: Targeted Corridors Alternative**	**Alternative 4: High TOD Alternative**	**Alternative 5: SCAG Alternative**
PRIMARY OBJECTIVES					
Accommodate projected population, housing, and employment growth consistent with the growth strategies of the Framework Element, including: (1) Maximize development opportunities around existing transit systems to encourage sustainable land use while minimizing potential adverse impacts, (2) Direct growth to transit hubs and corridors, (3) Plan for increases to the housing supply, (4) Encourage balanced jobs and housing growth with mixed-use development, (5) Accommodate commercial uses for future employment opportunities, and (6) Focus growth into Framework identified Centers and corridors while preserving single-family neighborhoods, hillsides, and open space.	Partially Consistent	Partially Consistent	Partially Consistent	Partially Consistent	Partially Consistent
Direct growth away from low-density neighborhoods; preserve single-family and low-density residential neighborhoods.	Partially Consistent	Consistent	Partially Consistent	Partially Consistent	Partially Consistent
Provide a range of employment opportunities; promote the vitality and expansion of Hollywood's media, entertainment, and tourism industry.	Not Consistent	Consistent	Consistent	Consistent	Not Consistent
Protect historical and cultural resources.	Partially Consistent	Consistent	Partially Consistent	Partially Consistent	Partially Consistent
SECONDARY OBJECTIVES					
Encourage and promote a variety of mobility options; make streets walkable.	Not Consistent	Partially Consistent	Consistent	Consistent	Not consistent
Improve the function and design of neighborhoods throughout the Project Area by preserving and strengthening the appearance of the overall Project Area to promote pedestrian-friendly environments, nurture neighborhood character, improve economic vitality, create identity, and integrate a combination of land uses to create positive visual experiences.	Not Consistent	Consistent	Partially Consistent	Consistent	Not Consistent
Improve open space, parks and public spaces.	Not Consistent	Consistent	Consistent	Consistent	Not Consistent
Provide adequate public services and infrastructure.	Not Consistent	Partially Consistent	Consistent	Consistent	Not Consistent
Encourage sustainable land use.	Not Consistent	Consistent	Partially Consistent	Partially Consistent	Not Consistent
Maintain Land Use and Zoning Consistency.	Not Consistent	Consistent	Consistent	Consistent	Not Consistent

SOURCE: TAHA, 2018.

ALTERNATIVE 2: REDUCED TOD AND CORRIDORS ALTERNATIVE (REDUCED ALTERNATIVE)

Alternative 2 would meet the underlying purpose of meeting SCAG's 2040 population, housing and employment projections and all of the primary and secondary project objectives, although to a lesser degree than the Proposed Plan because it would not maximize development opportunities around existing transit systems, which could result in more development outside of high quality transit areas. The Reduced Alternative would result in approximately 4,000 fewer housing units, 8,000 fewer residents and a similar number of jobs compared to the Proposed Plan. Similar to the Proposed Plan, the Reduced Alternative directs growth to transit stations and corridors, but to a lesser degree. Compared to the Proposed Plan, Alternative 2 would reduce the allowable FAR in selected Regional Center subareas and along selected corridors. The proposed density of selected High Medium subareas could be reduced as well. Similar to the Proposed Plan, protections to historical resources and pedestrian-oriented design regulations through the CPIO District would be established, and future development would be subject to applicable design and neighborhood compatibility protections, hillside protections, and new transportation and mobility network improvements.

ALTERNATIVE 3: TARGETED CORRIDORS ALTERNATIVE

Alternative 3 would achieve the purpose of the project by meeting SCAG's 2040 population, housing and employment projections and would partially achieve the underlying purpose and all of the project objectives although to a lesser degree than the Proposed Plan because it does not focus growth into Framework identified centers. Through an increase in the maximum permitted FAR along corridors, the Targeted Corridors Alternative would meet the same population, housing and employment projections anticipated in the Proposed Plan. However, compared to the Proposed Plan, the reasonably expected development would be less concentrated in the Regional Center and would be dispersed more along selected corridors in the Hollywood CPA. Alternative 2 would partially meet some objectives, but not to the same extent as the Proposed Project. For example, the Targeted Corridors Alternative would primarily concentrate growth along corridors with less intense commercial land use designations rather than the Regional Center area and around Metro rail transit stations. This would be inconsistent with the growth strategies of the General Plan Framework Element, which encourage a jobs/housing balance near transit centers. Although, this Alternative places development potential along corridors served by local bus lines, the many benefits of establishing TOD plans around Metro rail transit stations would not be achieved, including increasing pedestrian-friendly environments and access to transit. Also, there would likely be increased vehicle miles traveled (VMT) with this Alternative, as future growth would not be concentrated at existing transit stations where residents, employees and visitors can take advantage of existing transit opportunities. Similar to the Proposed Plan, protections to historical resources and regulations for pedestrian-oriented design through the CPIO District would be established, and future development would be subject to applicable design and neighborhood compatibility protections, hillside protections, and new transportation and mobility network improvements, although to a lesser degree than the Proposed Plan.

ALTERNATIVE 4: HIGH TOD ALTERNATIVE

Alternative 4 would achieve the purpose of the project by meeting SCAG's 2040 population, housing and employment projections and would partially achieve the underlying purpose and project objectives although to a lesser degree than the Proposed Plan because it would partially focus growth outside of Framework identified centers in East Hollywood and would maintain the low scale development along commercial corridors. The High TOD Alternative would meet the same population, housing and employment projections anticipated in the Proposed Plan, and it would be better aligned with SB743's goal of more urban infill development near transit by concentrating growth at all five Metro Red Line Station areas in the Hollywood CPA, including East Hollywood. As a result of increased base FARs, buildings 20 stories or higher could become more common around the Hollywood/Highland and Hollywood/Vine stations. But

Alternative 4 would require amending the Vermont/Western Transit Oriented District Specific Plan (SNAP) to increase allowable FAR and remove a height limit around Hollywood/Western, Vermont/Sunset, and Vermont/Santa Monica stations, which generally limit the FAR to 3:1 and height to 75 feet. Similar protections to historical resources and pedestrian-oriented design regulations through the CPIO District would be established, and future development would be subject to the Proposed Plan's applicable design and neighborhood compatibility protections, hillside protections, and new transportation and mobility network improvements, although to a lesser degree than the Proposed Plan because Alternative 4 would require amending the SNAP Specific Plan to focus growth outside of Framework identified centers.

ALTERNATIVE 5: SCAG FORECAST ALTERNATIVE

This alternative would be largely considered to be similar to the No Project Alternative (Alternative 1), in terms of meeting primary and secondary objectives and foreseeable impacts, except that because the SCAG Forecast Alternative generally assumes that foreseeable development would be more spread out in the CPA and not directed as much to the Regional Center or around transit infrastructure, it would be less consistent with the growth strategies of the City as provided in the Framework Element than the No Project Alternative

5.7 COMPARISON OF ALTERNATIVES

Per the CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the Proposed Plan.

As to Alternative 5 (SCAG 2040 Forecast Alternative), as discussed above, for comparison purposes, the No Project Alternative (Alternative 1) may serve to identify the difference expected from the Proposed Project and the SCAG Forecast Alternative, with the exception that transportation impacts related to congestion would be expected to be spread out more in the CPA under Alternative 5 compared to Alternative 1.

Table 5-3 provides a summary comparison of the environmental impacts of the five alternatives as compared to the Proposed Plan. Where the net impact of the alternative would be less adverse or more beneficial than the impact of the Proposed Plan, the comparative impact is said to be "less." Where the net impact of the alternative would be more adverse or less beneficial than the Proposed Plan, the comparative impact is said to be "greater." Where the net impacts of the alternative and Proposed Plan would be roughly equivalent, the comparative impact is said to be "similar."

AESTHETICS

Alternative 1: No Project Alternative. Alternative 1 would result in similar, but reduced impacts related to scenic vistas and light compared to the Proposed Plan because of the reduced amount of development expected. There are several publicly accessible locations in the Hollywood CPA that provide scenic vistas, of which there are two publicly available scenic vista points that provide panoramic views of the Project Area. Alternative 1 would be expected to have less development than the Proposed Plan, so in general, there could be fewer taller buildings in the Regional Center that could lead to a lower skyline and lower building heights along commercial corridors compared to the Proposed Plan. There are no state scenic highways within the Hollywood CPA; however, there are City-designated scenic highways, as well as historical resources within the Project Area. The Santa Monica Mountains portion of the Hollywood CPA also contains distinct geologic and topographic features. Similar to the Proposed Plan, the No Project Alternative does not involve any components that would change the scenic features associated with the City-designated scenic highways or the undeveloped natural open space areas within the Project Area.

TABLE 5-3: COMPARISON OF IMPACTS BETWEEN THE PROPOSED PLAN AND ALTERNATIVES

Impact	Proposed Plan	Alternative 1: No Project Alternative	Alternative 2: Reduced Alternative	Alternative 3: Targeted Corridors Alternative	Alternative 4: High TOD Alternative	Alternative 5: SCAG Alternative
AESTHETICS						
Impact 4.1-1: Scenic Vista	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
Impact 4.1-2: Scenic Resources within State Scenic Highway	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.1-3: Visual Character	LTS	Greater, LTS	Less, LTS	Greater, LTS	Greater, LTS	Greater, LTS
Impact 4.1-4: Light and Glare	LTS -- lighting LTS with mitigation -- glare	Less, LTS – lighting Greater, SU- glare	Less, LTS – lighting Less, LTS with mitigation – glare	Greater, LTS – lighting Greater, LTS with mitigation - glare	Greater, LTS – lighting Greater, LTS with mitigation - glare	Less, LTS – lighting Greater, SU- glare
AGRICULTURE AND FORESTRY RESOURCES						
Impact 4.2-1: Important Farmland	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.2-2: Zoning and Williamson Act	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.2-3: Timberland/Forest Land Conflict	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.2-4 and **4.2-5**: Loss of Forest Land/Conversion of Forest Land to Non-Forest Use	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
AIR QUALITY						
Impact 4.3-1: Air Quality Plan	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.3-2: Violate Air Quality Standard	SU for construction for NO_X, $PM_{2.5}$, and PM_{10} and operations for VOC	*Construction:* Less, SU	*Construction:* Less, SU	*Construction:* Similar, SU	*Construction:* Similar, SU	*Construction: Less, SU*
		Operation: Less, SU	*Operation:* Less, SU	*Operation:* Greater, SU	*Operation:* Less, SU	*Operation:* Less, SU
Impact 4.3-3: Cumulative Increase	SU	Less, SU	Less, SU	Similar, SU	Similar, SU	Less, SU
Impact 4.3-4: Sensitive Receptors	*Construction*: SU	*Construction:* Less, SU	*Construction:* Less, SU	Construction: Similar, SU	Construction: Similar, SU	*Construction:* Less, SU
	Operation: LTS	*Operation:* Similar, LTS	*Operation:* Similar, LTS	*Operation:* Similar, LTS	*Operation:* Similar, LTS	*Operation:* Similar, LTS
Impact 4.3-5: Odors	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
BIOLOGICAL RESOURCES						
Impact 4.4-1: Special Status Species Habitat	SU	Greater, SU	Similar, SU	Similar, SU	Similar, SU	Greater, SU
Impact 4.4-2: Riparian Habitat	SU	Greater, SU	Similar, SU	Similar, SU	Similar, SU	Greater, SU
Impact 4.4-3: Wetlands	SU	Greater, SU	Similar, SU	Similar, SU	Similar, SU	Greater, SU

TABLE 5-3: COMPARISON OF IMPACTS BETWEEN THE PROPOSED PLAN AND ALTERNATIVES						
Impact	**Proposed Plan**	**Alternative 1: No Project Alternative**	**Alternative 2: Reduced Alternative**	**Alternative 3: Targeted Corridors Alternative**	**Alternative 4: High TOD Alternative**	**Alternative 5: SCAG Alternative**
Impact 4.4-4: Migratory Wildlife, Biological Resources Plan	SU	Greater, SU	Similar, SU	Similar, SU	Similar, SU	Greater, SU
Impact 4.4-5: Local Policies or Ordinances	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.4-6: Habitat Conservation Plan	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
CULTURAL RESOURCES						
Impact 4.5-1: Historical Resources	SU	Greater, SU	Less, SU	Greater, SU	Greater, SU	Greater, SU
Impact 4.5-2: Archaeological Resources	LTS with mitigation	Greater, SU	Less, LTS with mitigation	Similar, LTS with mitigation	Similar, LTS with mitigation	Greater, SU
Impact 4.5-3: Paleontological Resources	LTS with mitigation	Greater, SU	Less, LTS with mitigation	Similar, LTS with mitigation	Similar, LTS with mitigation	Greater, SU
Impact 4.5-4: Human Remains	LTS	Similar, LTS	Less, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.5-5: Tribal Cultural Resource	LTS with mitigation	Greater, LTS	Less, LTS with mitigation	Similar, LTS with mitigation	Similar, LTS with mitigation	Greater, LTS
GEOLOGY AND SOILS						
Impact 4.6-1: Earthquake Fault	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.6-2: Seismicity	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.6-3: Seismic-Related Ground Failure	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.6-4: Soil Erosion	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.6-5: Geologic Hazards / Unstable Soils	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.6-6: Expansive Soil	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.6-7: Septic Tanks	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
GREENHOUSE GAS EMISSIONS						
Impact 4.7-1 and 4.7-2: Greenhouse Gas Emissions and Applicable Plans, Policies or Regulations	LTS	Greater, SU	Greater, LTS	Greater, LTS	Less, LTS	Greater, SU
HAZARDS AND HAZARDOUS MATERIALS						
Impact 4.8-1: Hazardous Materials Transport, Use, Disposal	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.8-2: Hazardous Materials Upset or Accident	LTS with mitigation	Greater, LTS	Similar, LTS with mitigation	Similar, LTS with mitigation	Similar, LTS with mitigation	Greater, LTS
Impact 4.8-3: Hazards within 1/4 Mile of a School	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.8-4: Hazardous Materials Sites	LTS with mitigation	Greater, LTS	Similar, LTS with mitigation	Similar, LTS with mitigation	Similar, LTS with mitigation	Greater, LTS

TABLE 5-3: COMPARISON OF IMPACTS BETWEEN THE PROPOSED PLAN AND ALTERNATIVES						
Impact	**Proposed Plan**	**Alternative 1: No Project Alternative**	**Alternative 2: Reduced Alternative**	**Alternative 3: Targeted Corridors Alternative**	**Alternative 4: High TOD Alternative**	**Alternative 5: SCAG Alternative**
Impact 4.8-5: Public Airport or Airport Plan	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.8-6: Private Airstrip	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.8-7: Emergency Response Plans	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.8-8: Wildland Fire	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
HYDROLOGY AND WATER QUALITY						
Impact 4.9-1: Water Quality Standards/Discharge Requirements	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.9-2: Groundwater	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.9-3: Drainage - Erosion or Siltation	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.9-4: Drainage - Flooding	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.9-5: Stormwater Drainage Systems	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.9-6: Water Quality	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.9-7: Housing in Flood Hazard Area	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.9-8: Structures Impeding Flood Flows	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.9-9: Risk from Flooding	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.9-10: Risk from Inundation	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.9-11: Flooding During 100-year Event	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
LAND USE AND PLANNING						
Impact 4.10-1: Physically Divide a Community	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.10-2: Land Use Plans and Policy Consistency	LTS	Greater, SU	Greater, LTS	Greater, LTS	Greater, LTS	Greater, SU
Impact 4.10-3: Habitat Conservation Plans	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
MINERAL RESOURCES						
Impact 4.11-1: Statewide/Regional Mineral Resources	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.11-2: Local Mineral Resources (i.e. MRZ-2)	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI

TABLE 5-3: COMPARISON OF IMPACTS BETWEEN THE PROPOSED PLAN AND ALTERNATIVES						
Impact	**Proposed Plan**	**Alternative 1: No Project Alternative**	**Alternative 2: Reduced Alternative**	**Alternative 3: Targeted Corridors Alternative**	**Alternative 4: High TOD Alternative**	**Alternative 5: SCAG Alternative**
NOISE						
Impact 4.12-1: Noise Levels	NI	Less, NI	Less, NI	Similar, NI	Similar, NI	Less, NI
Impact 4.12-2: Groundborne Vibration/Noise	*Construction*: SU	Less, SU	Less, SU	Similar, SU	Similar, SU	Less, SU
	Operations LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.12-3: Permanent Increase - Noise	*Stationary Sources*: SU	Less, SU	Less, SU	Similar, SU	Similar, SU	Less, SU
	Mobile Sources: LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
Impact 4.12-4: Temporary Increase - Noise	SU	Less, SU	Less, SU	Similar, SU	Similar, SU	Less, SU
Impact 4.12-5: Noise Exposure – Airport Plan	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.12-6: Noise Exposure - Private Airstrip	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
POPULATION, HOUSING, AND EMPLOYMENT						
Impact 4.13-1: Induce Substantial Growth	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
Impact 4.13-2: Displacement of Housing	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
Impact 4.13-3: Displacement of People	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
PUBLIC SERVICES						
Impact 4.14-1: Fire Protection & Emergency Services	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
Impact 4.14-2: Police Protection Facilities	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
Impact 4.14-3: Public Schools	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
Impact 4.14-4: Existing Parks and Recreational Facilities a. increased use leading to degradation of existing facilities b. construction impacts from new facilities	Less, a. SU, b. LTS	Less, a. SU, b. LTS	Less, a. SU, b. LTS	Similar, a. SU, b. LTS	Similar, a. SU, b. LTS	Less, a. SU, b. LTS
Impact 4.14-5: Libraries	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS

TABLE 5-3: COMPARISON OF IMPACTS BETWEEN THE PROPOSED PLAN AND ALTERNATIVES

Impact	Proposed Plan	Alternative 1: No Project Alternative	Alternative 2: Reduced Alternative	Alternative 3: Targeted Corridors Alternative	Alternative 4: High TOD Alternative	Alternative 5: SCAG Alternative
TRAFFIC AND TRANSPORTATION						
Impact 4.15-1: Public Transit, Bicycle, or Pedestrian Facilities	LTS	Similar, LTS	Similar, LTS	Greater, LTS	Less, LTS	Similar, LTS
Impact 4.15-2: Circulation System	SU	Less, SU	Less, SU	Greater, SU	Less, SU	Less, SU
Impact 4.15-3: Neighborhood Traffic Intrusion	SU	Less, SU	Less, SU	Greater, SU	Less, SU	Less, SU
Impact 4.15-4: Congestion Management Plan	SU	Less, SU	Less, SU	Greater, SU	Less, SU	Less, SU
Impact 4.15-5: Air Traffic Patterns	NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI	Similar, NI
Impact 4.15-6: Design Feature Hazard	LTS	Less, LTS	Less, LTS	Greater, LTS	Similar, LTS	Less, LTS
Impact 4.15-7: Emergency Access	LTS	Less, LTS	Less, LTS	Greater, LTS	Similar, LTS	Less, LTS
Impact 4.15-8: Transit Facilities	LTS	Less, LTS	Less, LTS	Greater, LTS	Similar, LTS	Less, LTS
Impact 4.15-9: Disruption to Traffic During Construction	SU	Less, SU	Less, SU	Greater, SU	Similar, SU	Less, SU
UTILITIES AND SERVICE SYSTEMS						
Impact 4.16-1: Water Treatment Facilities	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
Impact 4.16-2: Water Supply	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
Impact 4.16-3, 4.16-4 and **4-16-6:** Wastewater Treatment Facilities	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
Impact 4.16-5: Stormwater Drainage Facilities	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
Impact 4.16-7: Solid Waste Disposal	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS
Impact 4.16-8: Solid Waste Regulations	LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS	Similar, LTS
Impact 4.16-9: Energy	LTS	Less, LTS	Less, LTS	Similar, LTS	Similar, LTS	Less, LTS

NI=No Impact; LTS=Less than Significant; SU=Significant and Unavoidable; PS=Potentially Significant
SOURCE: TAHA, 2018.

However, future development within the Hollywood CPA under the No Project Alternative has the potential to occur on, or adjacent to, historical resources similar to the Proposed Plan. The Proposed Plan includes policies and programs to assist in protecting historical resources, and has applicable design and neighborhood compatibility protections contributing to visual character but these would not exist under the No Project Alternative. The No Project Alternative also would not be subject to the CPIO District, which would have regulatory protections for historical resources, and would include regulations for pedestrian-oriented design. The No Project Alternative also would not include Mitigation Measure **AE1**, which would reduce glare impacts from new construction

Therefore, even though less overall development could be accommodated, and future development would be lower in scale compared to the Proposed Plan, since the applicable design and neighborhood compatibility protections and the CPIO District would not be established, and it would not include Mitigation Measure **AE1**, the No Project Alternative would result in greater impacts related to visual character and glare compared to the Proposed Plan.

Alternative 2: Reduced TOD and Corridors Alternative (Reduced Alternative). Alternative 2 would result in similar, but reduced impacts related to aesthetics compared to the Proposed Plan. Compared to the Proposed Plan, the Reduced Alternative directs growth to similarly-located subareas around transit stations and corridors but provides lesser development potential in selected subareas. This Alternative would reduce the allowable base FAR in selected Regional Center subareas. These subareas are generally located east of Wilcox Avenue and/or Cahuenga Boulevard, south of Yucca Street, west of Gower Street, and north of De Longpre Avenue. In addition, compared to the Proposed Plan, the Reduced Alternative would decrease the amount of mixed-use FAR incentive proposed in the La Brea Avenue, Western Avenue, and Santa Monica Boulevard corridors and the density in selected High Medium subareas. There are several publicly accessible locations in the Hollywood CPA that provide scenic vistas, of which there are two publicly available scenic vista points that provide panoramic views of the Project Area. Compared to the Proposed Plan, the Reduced Alternative would result in less anticipated development in the Regional Center and in selected corridors, so there would be lower building heights in these areas. Similar to the Proposed Project, future development under the Reduced Alternative has the potential to create new sources of light and glare, but the impact would be less because of the reduced amount of development. If Alternative 2 is adopted with Mitigation Measure **AE1** imposed, the impact will be less than significant, but if it is not imposed, the impact will be significant and unavoidable. Similar to the Proposed Plan, the Reduced Alternative does not involve any components that would change the scenic features associated with the City-designated scenic highways or the undeveloped natural open space areas within the Project Area. However, future development within the Hollywood CPA under the Reduced Alternative has the potential to occur on, or adjacent to, eligible and designated historical resources similar to the Proposed Plan. Similar to the Proposed Plan, the CPIO District, which will have regulatory protections for historical resources and pedestrian-oriented design regulations and most Active Change Areas that would occur as part of the Proposed Plan would also occur under the Reduced Alternative. Because the maximum allowable FARs (building intensity) would be less than the Proposed Plan in certain change areas, the Reduced Alternative would result in fewer impacts related to visual character compared to the Proposed Plan.

Alternative 3: Targeted Corridors Alternative. Alternative 3 would result in similar impacts related to scenic vistas and scenic resources compared to the Proposed Plan. The Targeted Corridors Alternative would generally concentrate development along targeted corridors in the Hollywood CPA that could accommodate new housing, population and jobs. Compared to the Proposed Plan, the same amount of growth that would occur under the Proposed Plan would occur under the Targeted Corridors Alternative; however, future growth would be less concentrated in the Regional Center and would be dispersed more throughout the Hollywood CPA along the selected corridors. There are several publicly accessible locations in the Hollywood CPA that provide scenic vistas, of which there are two publicly available scenic vista points that provide panoramic views of the Project Area. Compared to the Proposed Plan, the Targeted

Corridors Alternative would result in more dispersed development along commercial corridors, so there would be lower building heights in the Regional Center and taller buildings along the corridors. Similar to the Proposed Plan, the Targeted Corridors Alternative does not involve any components that would change the scenic features associated with the City-designated scenic highways or the undeveloped natural open space areas within the Project Area. Future development within the Hollywood CPA under the Targeted Corridors Alternative has the potential to occur on, or adjacent to, eligible and designated historical resources similar to the Proposed Plan. Similar to the Proposed Plan, future development under Alternative 3 would be subject to the applicable new development regulations and design standards, as well as the CPIO District's regulatory protections for historical resources and regulations for pedestrian-oriented design. However, the Targeted Corridors Alternative could result in the potential for more aesthetic impacts to lower density residential neighborhoods adjacent to certain corridors (i.e., La Brea Avenue, Vine Street, Western Avenue, Vermont Avenue, Hollywood Boulevard, Sunset Boulevard, Santa Monica Boulevard, and Melrose Avenue) since there could be more mid-rise buildings between four to eight stories and potentially tall buildings, which could also create additional sources of light and concentration of reflective surfaces. Therefore, Alternative 3 could result in greater impacts related to visual character and light and glare compared to the Proposed Plan. If the Targeted Corridors Alternative is adopted with Mitigation Measure **AE1** imposed, the impact for glare will be less than significant, but if it is not imposed, the impact will be significant and unavoidable.

Alternative 4: High TOD Alternative. Alternative 4 would result in similar impacts related to scenic vistas and scenic resources as compared to the Proposed Plan. The High TOD Alternative would increase opportunities for TOD development around heavy rail infrastructure. Specifically, Alternative 4 would concentrate reasonably foreseeable housing, population, and employment development at the five Metro Red Line station areas in the Hollywood CPA, including East Hollywood. The High TOD Alternative would also expand the Regional Center land use designation east of the US-101 to selected areas near the Hollywood/Western, Vermont/Sunset, and Vermont/Santa Monica Stations. There are several publicly accessible locations in the Hollywood CPA that provide scenic vistas, of which there are two publicly available scenic vista points that provide panoramic views of the Project Area. Compared to the Proposed Plan, the High TOD Alternative would result in taller buildings near the three Red Line stations in East Hollywood. Similar to the Proposed Plan, the High TOD Alternative would not include any components that would change the scenic features associated with the City-designated scenic highways or the undeveloped natural open space areas within the Project Area. However, future development within the Hollywood CPA under the High TOD Alternative has the potential to occur on, or adjacent to, eligible and designated historical resources similar to the Proposed Plan. Similar to the Proposed Plan, future development under Alternative 4 would also be subject to new applicable design and neighborhood compatibility protections, as well as the CPIO District's regulations to protect historical resources and pedestrian-oriented design. Compared to the Proposed Plan, the High TOD Alternative could result in the potential for more aesthetic impacts to lower density neighborhoods adjacent to Metro Red Line station areas in East Hollywood. The potential height and FAR of new construction in Change Areas would be greater than under the Proposed Plan. As a result of increasing heights in concentrated areas, which could also create additional concentration of light sources and reflective surfaces, Alternative 4 could result in greater impacts related to visual character and light and glare compared to the Proposed Plan. If the High TOD Alternative is adopted with Mitigation Measure **AE1** imposed, the impact of glare will be less than significant, but if it is not imposed, the impact will be significant and unavoidable.

AGRICULTURE AND FORESTRY RESOURCES

Alternatives 1 through 4. Alternatives 1 through 4 would result in similar impacts related to agriculture and forestry resources compared to the Proposed Plan. The Hollywood CPA is an urbanized area and does not contain prime or important farmlands, timberland, or forest land. Hollywood Forever Cemetery, Forest Lawn – Hollywood Hills, Mt. Sinai Memorial Park, and a portion of the Los Angeles River along the northern boundaries of the Project Area between Barham Boulevard and Bob Hope Drive are the only areas

within the Project Area that are zoned for agricultural purposes. However, these areas are not used for agricultural purposes and are not under a Williamson Act contract. In regards to forestry resources, the hillsides in the northern portion of the Project Area contain Southern Cottonwood Willow Riparian Forest, Southern Sycamore Alder Riparian Woodland, Southern Coast Live Oak Riparian Forest, and California Walnut Woodland. These areas are zoned for open space and are not defined as forest land, timberland or zoned Timberland Production. Similar to the Proposed Plan, Alternatives 1 through 4 would not affect the existing use or zoning of these areas. Therefore, similar to the Proposed Plan, no impacts related to agriculture and forestry resources would occur under Alternatives 1 through 4.

AIR QUALITY

Alternative 1: No Project Alternative. Alternative 1 would result in similar, but reduced impacts (as a result of less anticipated new development) related to air quality compared to the Proposed Plan. During the construction of future development under the No Project Alternative, regional and localized emissions could still exceed the South Coast Air Management District (SCAQMD) daily significance thresholds, resulting in a significant and unavoidable impact, similar to the Proposed Plan. The No Project Alternative would not be subject to Mitigation Measure **AQ1** related to construction equipment and practices, therefore daily emissions at individual sites could be greater than under the Proposed Plan. Because less new development could be accommodated, overall construction emissions would be less under the No Project Alternative. Compared to the Proposed Plan, the No Project Alternative would result in approximately 8,000 to 11,000 fewer housing units, 17,000 to 21,000 fewer residents and 5,000 to 8,000 fewer jobs. In the future, with buildout under the Proposed Plan, Alternative 1 would result in lower daily vehicle trips and daily VMT than the Proposed Plan. As a result of less development under the Proposed Plan, operational emissions generated by mobile sources and area sources would be less than the Proposed Plan. When compared to existing conditions, operational volatile organic compound (VOC) emissions would increase as a result of architectural coating emissions and use of consumer products (e.g., cleaning supplies, cosmetics, and toiletries) associated with new residential land uses. Similar to the Proposed Plan, the increase in VOC emissions would be greater than the SCAQMD daily significance threshold; as a result of less new development VOC emissions would be less than under the Proposed Plan but still significant. Therefore, similar to the Proposed Plan, impacts related to construction-related regional and localized emissions and operational regional emissions under the No Project Alternative would be significant and unavoidable, and all other impacts related to air quality would be less than significant.

Alternative 2: Reduced TOD and Corridors Alternative (Reduced Alternative). Alternative 2 would result in similar, but reduced (as a result of less anticipated development) impacts related to air quality as compared to the Proposed Plan. During the construction of future development under the Reduced Alternative, regional and localized emissions would exceed the SCAQMD daily significance thresholds, resulting in a significant and unavoidable impact, similar to the Proposed Plan. With the adoption of Alternative 2 subject to Mitigation Measure **AQ1** related to construction equipment and practices, emissions would be reduced but could still exceed the established thresholds and would remain significant and unavoidable. Because less new development could be accommodated, overall construction emissions would be less under the Reduced Alternative compared to the Proposed Plan. The Reduced Alternative would result in approximately 4,000 fewer housing units, 8,000 fewer residents and a similar number of jobs compared to the Proposed Plan. In addition, daily vehicle trips and VMT would be lower in Alternative 2 compared to the Proposed Plan. As a result of less new development, operational emissions generated by mobile sources and area sources would be less than the Proposed Plan. When compared to existing conditions, operational VOC emissions would increase as a result of architectural coating emissions and use of consumer products (e.g., cleaning supplies, cosmetics, and toiletries) associated with new residential land uses. Similar to the Proposed Plan, the increase in VOC emissions would be greater than the SCAQMD daily significance threshold; as a result of less new development VOC emissions would be less than under the Proposed Plan but still significant. Therefore, similar to the Proposed Plan, impacts related to construction-related regional and localized emissions and operational regional emissions would be less

under the Reduced Alternative but would be significant and unavoidable, and all other impacts related to air quality would be less than significant.

Alternative 3: Targeted Corridors Alternative. Alternative 3 would result in similar impacts related to air quality as compared to the Proposed Plan. During the construction of future development under the Targeted Corridors Alternative, regional and localized emissions would exceed the SCAQMD daily significance thresholds, resulting in a significant and unavoidable impact, similar to the Proposed Plan. With the adoption of Alternative 3 subject to Mitigation Measure **AQ1** related to construction equipment and practices, emissions would be reduced but could still exceed the established thresholds and would be similarly significant and unavoidable. Because the same amount of development could be accommodated, overall construction emissions would be similar under the Targeted Corridors Alternative as compared to under the Proposed Plan. However, Alternative 3 results in a greater total mobile source exposure due to increased VMT. Operational emissions generated by mobile sources would be greater than the Proposed Plan. When compared to existing conditions, operational VOC emissions would increase as a result of architectural coating emissions and use of consumer products (e.g., cleaning supplies, cosmetics, and toiletries) associated with new residential land uses. Similar to the Proposed Plan, the increase in VOC emissions would be greater than the SCAQMD daily significance threshold. Therefore, similar to the Proposed Plan, impacts related to construction-related regional and localized emissions and operational regional emissions under the Targeted Corridors Alternative would be significant and unavoidable, and all other impacts related to air quality would be less than significant.

Alternative 4: High TOD Alternative. Alternative 4 would result in similar impacts related to air quality as compared to the Proposed Plan. During the construction of future development under the High TOD Alternative, regional and localized emissions would exceed the SCAQMD daily significance thresholds, resulting in a significant and unavoidable impact, similar to the Proposed Plan. With the adoption of Alternative 4 subject to Mitigation Measure **AQ1** related to construction equipment and practices, emissions would be reduced but could still exceed the established thresholds and would be similarly significant and unavoidable. Because the same amount of development could be accommodated, overall construction emissions would be similar under the High TOD Alternative as compared to the Proposed Plan. However, Alternative 4 results in a slightly lower total mobile source exposure due to decreased VMT. Operational emissions generated by mobile sources would be less than the Proposed Plan. When compared to existing conditions, operational VOC emissions would increase as a result of architectural coating emissions and use of consumer products (e.g., cleaning supplies, cosmetics, and toiletries) associated with new residential land uses. Similar to the Proposed Plan, the increase in VOC emissions would be greater than the SCAQMD daily significance threshold. Therefore, similar to the Proposed Plan, impacts related to construction-related regional and localized emissions and operational regional emissions under the High TOD Alternative would be significant and unavoidable, and all other impacts related to air quality would be less than significant.

BIOLOGICAL RESOURCES

Alternative 1: No Project Alternative. Alternative 1 would result in greater impacts related to biological resources as compared to the Proposed Plan. There are no Natural Community Conservation Plans (NCCPs) or other local, regional, or state-adopted Habitat Conservation Plans (HCPs) within or near the Project Area, so similar to the Proposed Plan the impact on local policies or ordinances would be less than significant, and there would be no impact on a habitat conservation plan. However, most of the Santa Monica Mountains east of US-101, including Griffith Park, are part of a Significant Ecological Area (SEA). Other areas within the Project Area that have the potential to support biological resources include the portion of the Los Angeles River that flows within the Project Area and various open space areas within the Project Area. Although areas that have the potential to support biological resources within the Project Area would remain unchanged under Alternative 1, it is reasonably foreseeable that properties in these areas could potentially be developed. Compared to the Proposed Plan, No Project Alternative would not include Mitigation

Measures **BR1** to **BR6**. Therefore, impacts related to biological resources under the No Project Alternative would be greater than the Proposed Plan, and would also be significant and avoidable.

Alternatives 2 through 4: Reduced Alternative, Targeted Corridor Alternative, and High TOD Alternative. Alternatives 2 through 4 would result in similar impacts related to biological resources as compared to the Proposed Plan. There are no Natural Community Conservation Plans (NCCPs) or other local, regional, or state-adopted Habitat Conservation Plans (HCPs) within or near the Project Area, so similar to the Proposed Plan the impact on local policies or ordinances would be less than significant, and there would be no impact on a habitat conservation plan. However, most of the Santa Monica Mountains east of US-101, including Griffith Park, are part of a Significant Ecological Area (SEA). Other areas within the Project Area that have the potential to support biological resources include the portion of the Los Angeles River that flows within the Project Area and various open space areas within the Project Area. Under the Proposed Plan, there are two subareas located within the SEA where consistency corrections are proposed to ensure that these areas are protected. The remaining areas of the SEA and Santa Monica Mountains are in Non-Change Areas. Although areas that have the potential to support biological resources within the Project Area would remain unchanged under Alternatives 2 through 4, it is reasonably foreseeable that properties in these areas could potentially be developed. If one of Alternatives 2 through 4 is adopted subject to Mitigation Measures **BR1** to **BR6,** it would reduce impacts to special status species, riparian habitat, wetlands, and biological resources, although not to a less-than-significant level. Therefore, similar to the Proposed Plan, impacts related to biological resources under Alternatives 2 through 4 would be significant and unavoidable.

CULTURAL RESOURCES

Alternative 1: No Project Alternative. Alternative 1 would result in greater impacts related to historical, archaeological resources, and paleontological resources compared to the Proposed Plan. Compared to the Proposed Plan, under the No Project Alternative the CPIO District, which has regulations to protect historical resources, would not be established, and future development would not be subject to the Proposed Plan's applicable design and neighborhood compatibility protections. Similar to the Proposed Plan, construction-related ground disturbing activities associated with future development under Alternative 1 could lead to the discovery of previously unknown archaeological or paleontological resources as well as tribal resources or human remains. Overall construction would be less under the No Project Alternative, which could lead to less potential to encounter these resources. However, the No Project Alternative would not include the mitigation measures included under the Proposed Plan to protect archaeological or paleontological resources, although likely project-specific environmental review would impose similar requirements on discretionary projects. Although it is a misdemeanor for anyone to remove anything of archeological or paleontological interest, it could potentially occur through negligence during grading and excavation absent monitoring and enforcement. Compliance with existing regulations, including California Health and Safety Code Section 7050.5, which states that, if human remains are unearthed during construction, then no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to Public Resources Code (PRC) Section 5097.98.[2] Therefore, similar to the Proposed Plan, impacts related to tribal resources and human remains under Alternatives 1 and 5 would be less than significant, while compared to the Proposed Plan, impacts related to archaeological and paleontological resources would be significant and unavoidable.

Alternative 2: Reduced TOD and Corridors Alternative (Reduced Alternative). Alternative 2 would result in similar but reduced impacts (as a result of less anticipated development) related to historical and tribal cultural resources compared to the Proposed Plan. Similar to the Proposed Plan, the Reduced Alternative focuses development at transit stations and corridors within the CPA, although with less

[2]Section 5097.98 outlines the Native American Heritage Commission notification process and the appropriate procedures if the County Coroner determines the human remains to be Native American.

development potential for housing and population. Similar to the Proposed Plan, the CPIO District, which has regulations to protect historical resources and regulations for pedestrian-oriented design, would be established, and future development would be subject to new design and neighborhood compatibility protections as applicable. However, as with the Proposed Plan, even with the CPIO, there is a risk of loss of historical resources with new development or redevelopment over a 20-year plan horizon, so the impact would be significant and unavoidable. Therefore, Alternative 2 would result in similar but reduced impacts related to historical resources compared to the Proposed Plan. Construction-related ground disturbing activities associated with future development under Alternative 2 could lead to the discovery of previously unknown archaeological or paleontological resources as well as tribal resources or human remains similar to the Proposed Plan. Overall construction would be less under Alternative 2, which could lead to less potential to encounter resources. The Reduced Alternative adopted with the same mitigation measures identified for the Proposed Plan to protect archaeological, paleontological and tribal resources would result in less than significant impacts to these resources, but without the mitigation measure the impact would be significant. Compliance with existing regulations, including California Health and Safety Code Section 7050.5, which states that, if human remains are unearthed during construction, then no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to PRC Section 5097.98[3] would result in less than significant impacts to human remains. Since overall construction would be less under Alternative 2, there would also be less impacts to human remains compared to the Proposed Plan.

Alternative 3: Targeted Corridors Alternative. Alternative 3 would result in incrementally greater impacts related to historical resources as compared to the Proposed Plan. Under the Targeted Corridors Alternative, growth would be less concentrated in the Regional Center and would be dispersed more throughout the Project Area along designated corridors instead of focused around the heavy rail stations compared to the Proposed Plan. The Targeted Corridors Alternative would concentrate growth along commercial corridors such as Santa Monica Boulevard and Melrose Avenue, which are outside of the CPIO boundaries. Since the CPIO regulations to protect historical resources would apply to less of the targeted growth areas than the Proposed Plan, it could result in incrementally greater impacts related to historical resources than the Proposed Plan. As discussed in Alternative 2, even if the CPIO was expanded to include the corridors, the impacts would be significant and unavoidable. Similar to the Proposed Plan, construction-related ground disturbing activities associated with future development under Alternative 3 could lead to the discovery of previously unknown archaeological or paleontological resources as well as tribal resources or human remains. The Targeted Corridors Alternative adopted with the same mitigation measures identified for the Proposed Plan to protect archaeological, paleontological or tribal resources would result in less than significant impacts to these resources, without the mitigation measure the impact would be significant. Compliance with existing regulations, including California Health and Safety Code Section 7050.5, which states that, if human remains are unearthed during construction, then no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to PRC Section 5097.98[4] would result in less than significant impacts to human remains. Therefore, impacts to human remains would be similar to the Proposed Plan.

Alternative 4: High TOD Alternative. Alternative 4 would result in incrementally greater impacts related to historical resources as compared to the Proposed Plan. The High TOD Alternative would increase opportunities for TOD development around heavy rail infrastructure within the Project Area and would concentrate the anticipated new housing, population, and employment at the five Metro Red Line station areas in the CPA, including East Hollywood. The High TOD Alternative would also expand the Regional Center land use designation east of the US-101 to selected areas near the Hollywood/Western, Vermont/Sunset, and Vermont/Santa Monica Metro stations. Since these areas in East Hollywood are

[3]Section 5097.98 outlines the Native American Heritage Commission notification process and the appropriate procedures if the County Coroner determines the human remains to be Native American.

[4]*Ibid.*

outside of the CPIO boundaries, the CPIO District's protections for historical resources would apply to less of the targeted growth areas than the Proposed Plan. Therefore, Alternative 4 could result in incrementally greater impacts related to historical resources than the Proposed Plan. As discussed in Alternative 2, even if the CPIO was expanded to include the corridors, the impacts would be significant and unavoidable. Construction-related ground disturbing activities associated with future development under Alternative 4 could lead to the discovery of previously unknown archaeological or paleontological resources as well as human remains similar to the Proposed Plan. The High TOD Alternative adopted with the same mitigation measures identified for the Proposed Plan to protect archaeological, paleontological or tribal resources would result in less than significant impacts to these resources, without the mitigation measure the impact would be significant. Compliance with existing regulations, including California Health and Safety Code Section 7050.5, which states that, if human remains are unearthed during construction, then no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to PRC Section 5097.98[5] would result in less than significant impacts to human remains. Therefore, impacts to human remains would be similar to the Proposed Plan.

GEOLOGY AND SOILS

Alternatives 1 through 4. Alternatives 1 through 4 would result in similar impacts related to geology and soils compared to the Proposed Plan. The Project Area, like all communities in the City of Los Angeles, is in a seismically active region, and is subject to risk of damage as a result of seismic ground shaking from earthquakes originating on one or more of the active faults in the region. Similar to the Proposed Plan, Alternatives 1 through 4 would not exacerbate existing geologic conditions, and compliance with existing California Building Code (CBC) and Los Angeles Building Code (LABC) regulations would minimize the effects of seismic and geologic hazards to the maximum extent feasible. Likewise, all future construction activities that involve earthwork and grading under Alternatives 1 through 4 would be required to comply with applicable provisions of Chapter IX, Division 70 of the Los Angeles Municipal Code (LAMC), which addresses grading, excavations, and fills, and the recommendations of a site-specific geotechnical report. Similar to the Proposed Plan, site-specific projects under Alternatives 1 through 4 would also be required to comply with the City's Low Impact Development Ordinance, which would help reduce soil erosion and the loss of topsoil. Therefore, similar to the Proposed Plan, impacts related to geology and soils under Alternatives 1 through 4 would be less than significant and/or have no impact.

GREENHOUSE GAS EMISSIONS

Alternative 1: No Project Alternative. Alternative 1 would result in greater impacts related to GHG and GHG reduction plans compared to the Proposed Plan. Compared to the Proposed Plan, the decreased development under the No Project Alternative would result in less stationary source emissions in the Project Area, but regionally, the decreased development under this Alternative could result in development occurring in locations outside of Framework designated centers and corridors that are less compatible with GHG reduction policies. Similar to the Proposed Plan, estimated GHG emissions associated with transportation emissions in the Project Area would be less than existing conditions due to lower vehicle exhaust resulting from lower vehicle emissions resulting from increased engine efficiency and cleaner burning fuels. However, because the No Project Alternative is a continuation of the Existing Plan, future development would not be directed toward major transit nodes. As a result, this Alternative would not be consistent with the Framework Element, AB 32, SB 32, SB 375, 2016-2040 RTP/SCS, and other regional strategies to reduce GHG. Therefore, while overall emissions in the plan area would be reduced, impacts related to consistency with GHG reduction plans would be greater than the Proposed Plan and would be significant and unavoidable.

[5]Section 5097.98 outlines the Native American Heritage Commission notification process and the appropriate procedures if the County Coroner determines the human remains to be Native American.

Alternative 2: Reduced TOD and Corridors Alternative (Reduced Alternative). Alternative 2 would result in similar, but greater impacts related to GHG compared to the Proposed Plan. The Reduced Alternative would be consistent with applicable GHG plans, policies, and regulations, as a result of the concentration of future development in major transit areas under this Alternative. Similar to the Proposed Plan, Alternative 2 focuses new development at major transit nodes consistent with the Framework Element, AB 32, SB 32, SB 375, and SCAG policies, in order to increase transit ridership and reduce automobile dependence, which contributes to the reduction of GHG emissions in the long-term compared to unplanned growth that is dispersed throughout the CPA. Furthermore, estimated emissions would be less than existing conditions due to lower vehicle exhaust resulting from increased engine efficiency and cleaner burning fuels. This Alternative would not result in as much density next to transit as the Proposed Plan, which, regionally, could result in development occurring in locations less compatible with GHG reductions policies. Overall, impacts related to GHG emissions and consistency with GHG reduction plans would be greater than the Proposed Plan but would still be less than significant.

Alternative 3: Targeted Corridors Alternative. Alternative 3 would result in greater impacts related to GHG compared to the Proposed Plan. Under the Targeted Corridors Alternative, future growth is concentrated along targeted corridors of the Hollywood CPA, however, in contrast to the Proposed Plan, Alternative 3 would not focus growth at heavy rail transit nodes. As a result, the Targeted Corridors Alternative would be partially consistent with GHG reduction plans (e.g., AB 32, SB 32, SB 375) compared to the Proposed Plan. Nonetheless, impacts related to consistency with applicable GHG plans, policies and regulations would remain less than significant. Similar to the Proposed Plan, estimated emissions under the Targeted Corridors Alternative would be less than existing conditions due to lower vehicle exhaust resulting from increased engine efficiency and cleaner burning fuels. Similar to the Proposed Plan, impacts related to GHG emissions and consistency with GHG reduction plans would be less than significant.

Alternative 4: High TOD Alternative. Alternative 4 would result in similar, but reduced impacts related to GHG compared to the Proposed Plan. Similar to the Proposed Plan, the High TOD Alternative focuses development potential at major transit nodes consistent with the Framework Element, AB 32, SB 32, SB 375, and SCAG policies, in order to increase transit ridership and reduce automobile dependence, which contributes to the reduction of GHG emissions in the long-term compared to unplanned growth that is dispersed throughout the CPA. Therefore, Alternative 4 would be consistent with applicable GHG plans, policies, and regulations, as a result of the concentration of future development in major transit areas under this Alternative. Furthermore, estimated emissions would be less than existing conditions due to lower vehicle exhaust resulting from increased engine efficiency and cleaner burning fuels. Therefore, similar to the Proposed Plan, impacts related to GHG emissions and consistency with GHG reduction plans would be less than significant.

HAZARDS AND HAZARDOUS MATERIALS

Alternative 1: No Project. Compared to the Proposed Plan, Alternative 1 would result in greater impacts related to hazardous materials as a result of site disturbance or redevelopment of sites that have previously used hazardous materials on site. Due to the age of development in the Project Area, some properties likely have structures that contain Asbestos-Containing Materials (ACMs) and Lead-Based Paint (LBPs). Likewise, there are some properties within the Project Area with potential hazardous concerns. Future development in the Project Area under the No Project Alternative would be required to comply with federal and state regulations regarding materials containing ACMs and LBPs similar to the Proposed Plan. Implementation of the No Project Alternative would also allow development on sites currently or historically used for industrial uses that may have used hazardous materials in their operations similar to the Proposed Plan. The use of hazardous materials is typically associated with industrial land uses, and there are several clusters of low-intensity industrial uses scattered throughout the Project Area. Therefore, because unknowns may exist with regard to existing soil or other contaminants in the areas currently or historically zoned as industrial in the Project Area, there is the possibility that future development may

uncover previously undiscovered soil and other forms of contamination and since Alternative 1 would not include Mitigation Measure **HM1**, the impact related to unknown hazardous materials would be significant and unavoidable. Compliance with applicable regulations would ensure that future development under Alternative 1 would not create a significant hazard to the public, schools, or the environment through the transport, use, and disposal of hazardous materials. Similar to the Proposed Plan, Alternative 1 would not impair implementation of, or physically interfere with, the Safety Element of the City's General Plan, as it would not introduce new streets or otherwise change the overall land use pattern in the Project Area.

Alternatives 2 through 4. Alternatives 2 through 4 would result in similar impacts related to hazards and hazardous materials as compared to the Proposed Plan. Due to the age of development in the Project Area, some properties likely have structures that contain Asbestos-Containing Materials (ACMs) and Lead-Based Paint (LBPs). Likewise, there are numerous properties within the Project Area with potential hazardous concerns. Future development in the Project Area under Alternatives 2 through 4 would be required to comply with federal and state regulations regarding materials containing ACMs and LBPs similar to the Proposed Plan. Implementation of Alternatives 2 through 4 would also allow development on sites currently or historically used for industrial uses that may have used hazardous materials in their operations similar to the Proposed Plan. The use of hazardous materials is typically associated with industrial land uses, and there are several clusters of low-intensity industrial uses scattered throughout the Project Area. Therefore, because unknowns may exist with regard to existing soil or other contaminants in the areas currently or historically zoned as industrial in the Project Area, there is the possibility that future development may uncover previously undiscovered soil and other forms of contamination, including the release of hazardous materials. If one of Alternatives 2 through 4 is adopted with Mitigation Measure **HM1** imposed, the impact will be less than significant, but if the mitigation measure is not adopted the impact will be significant and unavoidable. Compliance with applicable regulations would ensure that future development under Alternatives 2 through 4 would not create a significant hazard to the public, schools, or the environment through the transport, use, or disposal of hazardous materials. Similar to the Proposed Plan, Alternatives 2 through 4 would not impair implementation of, or physically interfere with, the Safety Element of the City's General Plan, as the alternatives would not introduce new streets or otherwise change the overall land use pattern in the Project Area. Therefore, similar to the Proposed Plan, impacts related to hazards and hazardous materials under Alternatives 1 through 4 would be less than significant or have no impact similar to the Proposed Plan.

HYDROLOGY AND WATER QUALITY

Alternatives 1 through 4. Alternatives 1 through 4 would result in no impacts or less than significant impacts related to hydrology and water quality compared to the Proposed Plan. Similar to the Proposed Plan, the overall land use patterns of the Project Area would remain relatively unchanged under Alternatives 1 through 4 compared to existing conditions. The undeveloped open space areas within the Project Area would remain undeveloped under Alternatives 1 through 4. Thus, the rate and volume of stormwater runoff within the Project Area would remain relatively unchanged since only a modest amount of the remaining developable land in the Project Area is vacant or undeveloped. In addition, because the overall land use patterns of the Project Area would remain relatively unchanged, Alternatives 1 through 4, potential changes in the types of pollutants in stormwater runoff would be similar to existing conditions. Alternatives 1 through 4 do not contain any specific guidelines or changes that would violate any water quality standards or waste discharge requirements which are subject to the federal, state, and local standards and regulations. Therefore, similar to the Proposed Plan, impacts related to hydrology and water quality under Alternatives 1 through 4 would be less than significant and/or have no impact.

LAND USE AND PLANNING

Alternative 1: No Project Alternative. Alternative 1 would result in greater impacts related to land use and planning compared to the Proposed Plan. The No Project Alternative is the continuation of the existing 1988 Hollywood Community Plan (Existing Plan). Similar to the Proposed Plan, the No Project Alternative does not include any extension of roadways or other transit infrastructure through currently developed areas that could physically divide or isolate existing neighborhoods or an established community. However, under the No Project Alternative, no changes to existing zoning and General Plan land use designations would occur, regardless of the known inconsistencies between existing and surrounding land uses, zoning and/or General Plan land use designations. In addition, the CPIO District, which would have regulatory protections for historical resources as well as regulations for pedestrian-oriented design, would not be established, and future development within the Project Area would not be subject to the Proposed Plan's applicable development regulations or policies. Additionally, planning in the Project Area would not be updated to address state and regional requirements to reduce GHG emissions consistent with SB 375 and the SCAG SCS. Therefore, impacts related to land use and planning under the No Project Alternative would be greater than the Proposed Plan and significant and unavoidable.

Alternative 2: Reduced TOD and Corridors Alternative (Reduced Alternative). Alternative 2 would result in greater impacts related to land use and planning compared to the Proposed Plan. Similar to the Proposed Plan, the Reduced Alternative does not include any extension of roadways or other transit infrastructure through currently developed areas that could physically divide or isolate existing neighborhoods or an established community. Consistent with City's General Plan Framework Element, as well other City and SCAG policies, which call for new growth to be directed towards transit, the Reduced Alternative focuses development potential at transit stations and corridors within the Project Area with less development potential for housing and population compared to the Proposed Plan. Since Alternative 2 would not result in as much density next to transit as the Proposed Plan, regionally it could result in development occurring in locations outside of Framework identified centers and corridors. However, the Reduced Alternative would still meet SCAG's 2040 population, housing and employment projections for the Project Area. This Alternative would reduce the allowable base FAR in selected Regional Center subareas, the FAR along selected corridors and maintain and/or set a reduced residential density in selected High Medium Residential subareas. Similar to the Proposed Plan, future development would be subject to the new applicable design and neighborhood compatibility protections, as well as the CPIO District, which will have regulatory protections for historical resources and pedestrian-oriented design regulations. Therefore, impacts related to land use and planning under the Reduced Alternative would be greater than the Proposed Plan but would still be less than significant.

Alternative 3: Targeted Corridors Alternative. Alternative 3 would result in greater impacts related to land use and planning compared to the Proposed Plan. Similar to the Proposed Plan, this Alternative does not include any extension of roadways or other transit infrastructure through currently developed areas that could physically divide or isolate existing neighborhoods or an established community. Under the Targeted Corridors Alternative, growth would be less concentrated in the Regional Center and would be dispersed more in the Project Area along designated corridors instead of focused around rail stations compared to the Proposed Plan. Compared to the Proposed Plan, the same amount of growth would occur under the Targeted Corridors Alternative, but it would be less concentrated in the Regional Center and would be dispersed more throughout the Hollywood CPA along the designated corridors. Similar to the Proposed Plan, future development would be subject to the new applicable design and neighborhood compatibility protections, as well as the CPIO District, which will have regulatory protections for historical resources and pedestrian-oriented design standards. Therefore, impacts related to land use and planning under the Targeted Corridors Alternative would be greater than the Proposed Plan but would still be less than significant.

Alternative 4: High TOD Alternative. Alternative 4 would result in greater impacts related to land use and planning compared to the Proposed Plan. Similar to the Proposed Plan, this Alternative does not include any extension of roadways or other transit infrastructure through currently developed areas that could physically divide or isolate existing neighborhoods or an established community. The High TOD Alternative would increase opportunities for TOD development around heavy rail infrastructure within the Project Area and concentrate new housing, population, and employment at the five Metro Red Line station areas in the CPA, including East Hollywood. The High TOD Alternative would also extend the Regional Center land use designation east of the 101 Freeway to selected areas near the Hollywood/Western, Vermont/Sunset, and Vermont/Santa Monica stations, which are outside of the Framework identified Regional Centers. Similar to the Proposed Plan, future development under Alternative 4 would be subject to applicable new design and neighborhood compatibility protections, as well as the CPIO District, which will have regulatory protections for historical resources and pedestrian-oriented design regulations. Therefore, impacts related to land use and planning under the Alternative 4 would be greater than the Proposed Plan but would still be less than significant.

MINERAL RESOURCES

Alternatives 1 through 4. Alternatives 1 through 4 would result in similar impacts related to mineral resources compared to the Proposed Plan. Portions of the Project Area are classified as MRZ-2 which indicates the presence of significant mineral resources. The MRZ-2 classified areas within the Project Area include Griffith Park, Mount Hollywood, Spring Canyon, Fern Canyon, Interstate 5, and State Route 134. Regardless of the MRZ-2 classification, the existing zoning and land use designations do not allow for the extraction of mineral resources, and resource recovery does not occur in the Project Area. Similar to the Proposed Plan, Alternatives 1 through 4 do not include provisions to reduce the availability of mineral resources or include policies that would encourage extraction of known mineral resources in the Project Area. Because of the urban nature of the Project Area, mining activities would likely be incompatible with existing uses. The Project Area is not underlain with active oil fields, and the existing oil wells located in the Project Area are inactive and designated as buried-idle, plugged or idle. Similar to the Proposed Plan, Alternatives 1 through 4 do not include provisions that would introduce new oil districts or oil producing uses and do not include provisions to reduce the availability of these resources. Therefore, similar to the Proposed Plan, there would be no impacts related to mineral resources under Alternatives 1 through 4.

NOISE

Alternative 1: No Project Alternative. Alternative 1 would result in similar, but reduced impacts (as a result of less anticipated new development) related to noise and vibration compared to the Proposed Plan. Similar to the Proposed Plan, construction activity occurring within the Hollywood CPA under the No Project Alternative would result in temporary increases in noise and vibration levels on an intermittent basis. In the absence of detailed noise analyses associated with specific projects, it is anticipated that construction noise levels at various sensitive land uses would result in significant impacts similar to the Proposed Plan. The No Project Alternative would not be subject to Mitigation Measures **N1** to **N4** that would reduce construction-related noise and vibration impacts, although likely project-specific environmental review would impose similar requirements on discretionary projects. Nonetheless, Alternative 1 would result in significant and unavoidable impacts related to construction noise and groundborne vibration similar to the Proposed Plan (although total construction would be less under Alternative 1). Total mobile source noise exposure would increase over existing conditions because of increased VMT under the No Project Alternative. However, total mobile source noise exposure would be less compared to the Proposed Plan due to Alternative 1 resulting in less VMT than the VMT of the Proposed Plan. Similar to the Proposed Plan, new development may border residential areas, leading to noise incompatibility between land uses and operational noise from stationary sources. However, mobile noise would not increase significantly on area roadways and would be less than significant, similar to the Proposed Plan. It is not anticipated that the Hollywood CPA would be developed with substantial sources

of noise or vibration (e.g., certain loud industrial processes). Therefore, similar to the Proposed Plan, the No Project Alternative would result in significant and unavoidable impacts related to construction noise, groundborne vibration noise from construction, and permanent noise increase from operational stationary sources, and impacts related to operational vibration noise and permanent noise increase from mobile sources would be less than significant.

Alternative 2: Reduced TOD and Corridors Alternative (Reduced Alternative). Alternative 2 would result in similar, but reduced impacts (as a result of less anticipated new development) related to noise and vibration compared to the Proposed Plan. Similar to the Proposed Plan, construction activity occurring within the Hollywood CPA would result in temporary increases in noise and vibration levels on an intermittent basis, and new development could border residential areas leading to noise incompatibility between land uses. In the absence of detailed noise analyses associated with specific projects, it is anticipated that construction noise levels at various sensitive land uses would exceed the City's thresholds of significance similar to the Proposed Plan. However, because development under Alternative 2 would be generally reduced (by approximately 4,000 housing units, 8,000 residents and with a similar number of jobs) compared to the Proposed Plan, noise associated with construction of future development would be less. If the Reduced Alternative is adopted with Mitigation Measures **N1** to **N4** imposed**,** construction-related noise and vibration impacts would be reduced, although not to a less-than-significant level. Under the Reduced Alternative, total mobile source noise exposure would be less than the Proposed Plan due to Alternative 2 resulting in less VMT. Therefore, similar to the Proposed Plan, mobile noise under Alternative 2 would not generate a significant increase in ambient noise levels and would be less than significant. It is not anticipated that the Hollywood CPA would be developed with substantial sources of noise or vibration (e.g., certain loud industrial processes) under Alternative 2. Therefore, although incrementally less than the Proposed Plan as a result of less overall development, the Reduced Alternative would result in significant and unavoidable impact related to construction noise, groundborne vibration noise from construction, and permanent noise increase from operational stationary sources, and impacts related to operational vibration noise and permanent noise increase from mobile sources would be less than significant.

Alternative 3: Targeted Corridors Alternative. Alternative 3 would result in similar, impacts related to noise and vibration as compared to the Proposed Plan. Similar to the Proposed Plan, construction activity occurring within the Hollywood CPA would result in temporary increases in noise and vibration levels on an intermittent basis, and new development could border residential areas leading to noise incompatibility between land uses. In the absence of detailed noise analyses associated with specific projects, it is anticipated that construction noise levels at various sensitive land uses would exceed the City's thresholds of significance similar to the Proposed Plan. The Targeted Corridors Alternative would result in the same anticipated population, housing and employment as the Proposed Plan, but it would be less concentrated in the Regional Center and would be dispersed more in the Hollywood CPA along designated corridors. Therefore, noise associated with construction of future development would be similar but more dispersed. If the Targeted Corridors Alternative is adopted with Mitigation Measures **N1** to **N4** imposed, construction-related noise and vibration impacts would be reduced, although not to a less-than-significant level. Alternative 3 results in a greater total mobile source noise exposure due to increased VMT. However, similar to the Proposed Plan, mobile noise would not generate a significant increase in ambient noise levels and would be less than significant. It is not anticipated that the Hollywood CPA would be developed with substantial sources of noise or vibration (e.g., certain loud industrial processes) under Alternative 3. Therefore, similar to the Proposed Plan, the Targeted Corridors Alternative would result in significant and unavoidable impact related to construction noise, ground borne vibration noise from construction, and permanent noise increase from operational stationary sources, and impacts related to operational vibration noise and permanent noise increase from mobile sources would be less than significant.

Alternative 4: High TOD Alternative. Alternative 4 would result in similar, impacts related to noise and vibration as compared to the Proposed Plan. Similar to the Proposed Plan, construction activity occurring within the Hollywood CPA would result in temporary increases in noise and vibration levels on an intermittent basis, and new development may border residential areas leading to noise incompatibility between land uses. In the absence of detailed noise analyses associated with specific projects, it is anticipated that construction noise levels at various sensitive land uses would exceed the City's thresholds of significance similar to the Proposed Plan. The High TOD Alternative would result in the same population, housing and employment development potential as the Proposed Plan, but would direct the growth to the five Metro Red Line station areas in the Hollywood CPA, including East Hollywood. The High TOD Alternative would also expand the Regional Center land use designation east of the 101 Freeway to selected areas near the Hollywood/Western, Vermont/Sunset, and Vermont/Santa Monica Metro stations. Therefore, noise associated with construction of future development would be similar, but concentrated near the five Metro Red Line station areas. If the High TOD Alternative is adopted with Mitigation Measures **N1** to **N4** imposed, construction-related noise and vibration impacts would be reduced, although not to a less-than-significant level. Alternative 4 would result in a less total mobile source noise exposure due to increased VMT. However, similar to the Proposed Plan, mobile noise would not generate a significant increase in ambient noise levels and would be less than significant. It is not anticipated that the Hollywood CPA would be developed with substantial sources of noise or vibration (e.g., certain loud industrial processes) under Alternative 4. Therefore, similar to the Proposed Plan, the High TOD Alternative would result in significant and unavoidable impact related to construction noise, groundborne vibration noise from construction, and permanent noise increase from operational stationary sources, and impacts related to operational vibration noise and permanent noise increase from mobile sources would be less than significant.

POPULATION, HOUSING AND EMPLOYMENT

Alternative 1: No Project Alternative. Alternative 1 would result in less impacts related to population, housing and employment compared to the Proposed Plan. Similar to the Proposed Plan, Alternative 1 would not result in the substantial displacement of housing or people as no housing units are specifically proposed to be demolished, converted to market rate, or removed through other means. Based on existing development potential under the Existing Plan's land use designations, the No Project Alternative would result in 113,000 to 121,000 housing units, 226,000 to 243,000 residents, and 119,000 jobs. Compared to the Proposed Plan, the No Project Alternative would result in 8,000 to 11,000 fewer housing units, 17,000 to 21,000 fewer persons and 5,000 to 8,000 fewer jobs. Similar to the Proposed Plan, impacts related to population, housing and employment under the No Project Alternative would be less than significant.

Alternative 2: Reduced TOD and Corridors Alternative (Reduced Alternative). Alternative 2 would result in less impacts related to population, housing and employment compared to the Proposed Plan. Similar to the Proposed Plan, the Reduced Alternative would not result in the substantial displacement of housing or people as no housing units are specifically proposed to be demolished, converted to market rate, or removed through other means. While the Reduced Alternative would meet SCAG's 2040 population, housing and employment projections for the Project Area, the development potential of the Project Area would be reduced compared to the Proposed Plan. The reasonably expected development potential under the Reduced Alternative would be approximately 117,000 to 128,000 housing units, 235,000 to 256,000 residents, and 124,000 to 127,000 jobs. Compared to the Proposed Plan, the Reduced Alternative would result in approximately 4,000 fewer housing units, 8,000 fewer residents and a similar number of jobs. Therefore, similar to the Proposed Plan, impacts related to population, housing and employment under the Reduced Alternative would be less than significant.

Alternative 3: Targeted Corridors Alternative. Alternative 3 would result in similar impacts related to population, housing and employment compared to the Proposed Plan. Similar to the Proposed Plan, the Targeted Corridors Alternative would not result in the substantial displacement of housing or people as no housing units are specifically proposed to be demolished, converted to market rate, or removed through other means. However, compared to the Proposed Plan, the growth would be less concentrated in the Regional Center and would be dispersed more throughout the Project Area. Nonetheless, the Targeted Corridors Alternative would meet the same population, housing and employment projections anticipated in the Proposed Plan. Therefore, similar to the Proposed Plan, impacts related to population, housing and employment under the Targeted Corridors Alternative would be less than significant.

Alternative 4: High TOD Alternative. Alternative 4 would result in similar impacts related to population, housing and employment compared to the Proposed Plan. Similar to the Proposed Plan, the High TOD Alternative would not result in the substantial displacement of housing or people as no housing units are specifically proposed to be demolished, converted to market rate, or removed through other means. However, compared to the Proposed Plan, the growth would be concentrated at all five Metro Red Line station areas in the Hollywood CPA, including East Hollywood. Nonetheless, the High TOD Alternative would meet the same population, housing and employment projections anticipated in the Proposed Plan. Therefore, similar to the Proposed Plan, impacts related to population, housing and employment under the High TOD Alternative would be less than significant.

PUBLIC SERVICES

Alternatives 1 through 4. Alternatives 1 through 4 would result in similar impacts related to public services compared to the Proposed Plan. Alternatives 1 through 4 would be expected to have increased development compared to existing conditions, also increased demand for schools, police and fire services, parks, and/or library facilities. The demand for these services under Alternatives 1 and 2 would be less than the Proposed Plan. Over the 20-year Plan horizon, this increased demand could result in the need for, and construction of new or expanded police, fire, park, and library facilities. It is assumed that such facilities would occur where allowed under the designated land use. The environmental impacts of the construction and operation of new facilities, as an allowed land use, have been evaluated throughout this EIR. Therefore, similar to the Proposed Plan, impacts related to the construction of new or expanded fire, police, and library facilities under Alternatives 1 through 4 would be less than significant. However, similar to the Proposed Plan, any increase in population would exacerbate the existing deficit in parks in the Project Area, resulting in the substantial physical deterioration of existing park facilities creating a significant and unavoidable impact under Alternatives 1 through 4 (although less than the Proposed Project for Alternatives 1 and 2).

TRANSPORTATION AND TRAFFIC

Table 5-4 provides a comparison of existing traffic conditions to the Proposed Plan and the five alternatives.

Alternative 1: No Project Alternative. Alternative 1 would result in similar, but reduced (as a result of less anticipated development) impacts related to transportation (roadway LOS, CMP, public transit, bicycle, or pedestrian facilities) as compared to the Proposed Plan. The No Project Alternative assumes a continuation of the Existing Plan and reasonably foreseeable planned transportation network projects. Peak period weighted average V/C is improved under Alternative 1 compared to the Proposed Plan, but in both periods the network degrades to LOS E compared to LOS D under Existing Conditions. The No Project Alternative results in lower daily vehicle trips and daily VMT than the Proposed Plan. However, daily VMT per capita is higher under this Alternative than for the Proposed Plan. In contrast to the Proposed Plan, the growth in housing and jobs is more dispersed across the Hollywood CPA rather than concentrated around transit, such as the Metro Red Line stations.

TABLE 5-4: COMPARISON BETWEEN EXISTING TRAFFIC CONDITIONS, THE PROPOSED PLAN AND ALTERNATIVES

Transportation Metrics	Existing Conditions (2016)	Proposed Plan	Alternative 1: No Project Alternative*	Alternative 2: Reduced Alternative	Alternative 3: Targeted Corridors Alternative	Alternative 4: High TOD Alternative
AM Peak Period	0.876	0.972	0.935	0.971	0.975	0.971
Weighted Average V/C	(LOS D)	(LOS E)	(LOS E)	(LOS E)	(LOS E)	(LOS E)
Percentage (%) of Street Segments at LOS E or F	37%	49%	42%	49%	50%	49%
PM Peak Period	0.89	1.017	0.955	1.016	1.020	1.015
Weighted Average V/C	(LOS D)	(LOS F)	(LOS E)	(LOS F)	(LOS F)	(LOS F)
Percentage (%) of Street Segments at LOS E or F	37%	50%	43%	50%	51%	50%
Daily Vehicle Trips	706,000	785,000	752,000	781,900	793,200	779,900
Daily Vehicle Miles Traveled (VMT)	5,624,000	5,901,000	5,708,000	5,876,500	5,972,600	5,876,500
Daily VMT per Capita	18.3	15.2	16.5	15.3	15.3	15.0

Note: For the purpose of the Alternatives analysis, the comparison is shown here to Year 2040 Plan "Option 2" Alternative metrics estimated based on sensitivity tests conducted with Hollywood Travel Demand Model.
* Alternative 5 (SCAG Forecast Alternative) would generally have similar transportation metrics as Alternative 1, except Alternative 5 would assume less development in the Regional Center and more development in other parts of the CPA than Alternative 1.
SOURCE: Fehr & Peers, 2018.

Similar to the Proposed Plan, the No Project Alternative would not result in significant impacts related to air traffic patterns; increased hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or result in inadequate emergency access. Similar to the Proposed Plan, the No Project Alternative would also have no impact to air traffic patterns. Alternative 1 does not contain the network enhancements identified in MP 2035 and incorporated into the Proposed Plan. Impacts to the transportation network would be significant and unavoidable as under the Proposed Plan.

Alternative 2: Reduced TOD and Corridors Alternative (Reduced Alternative). Alternative 2 would result in similar, but reduced impacts (as a result of less anticipated development) to transportation (roadway LOS, and CMP as compared to the Proposed Plan. The Reduced Alternative assumes the same transportation network enhancements as the Proposed Plan. However, the potential development of housing would be less than the Proposed Plan. Peak period weighted average V/C under this Alternative would be slightly better compared to the Proposed Plan, as would be the percentage of roadway miles operating at LOS E or worse. Daily vehicle trips and VMT would be lower in Alternative 2 compared to the Proposed Plan, although daily VMT per capita would increase slightly. Similar to the Proposed Plan, Alternative 2 would also have no impact to air traffic patterns. As a result of less anticipated development this alternative would result in similar but reduced impacts related to hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); inadequate emergency access; transit facilities; and traffic during construction. This Alternative contains the network enhancements identified in MP 2035 and incorporated into the Proposed Plan. Impacts to the transportation network would remain significant and unavoidable.

Alternative 3: Targeted Corridors Alternative. Alternative 3 would result in similar, but slightly increased impacts related to transportation (roadway LOS, CMP, public transit, bicycle, or pedestrian facilities) as compared to the Proposed Plan. The Targeted Corridors Alternative assumes the same transportation network enhancements as the Proposed Plan, but instead disperses reasonably expected development along major and/or selected boulevards in the Hollywood CPA. The peak period weighted average V/C in this Alternative would be slightly worse compared to the Proposed Plan, as would be the percentage of the road network operating at LOS E or worse. Daily vehicle trips, VMT, and VMT per

capita would be higher in Alternative 3 compared to the Proposed Plan. Similar to the Proposed Plan, Alternative 3 would also have no impact to air traffic patterns. The Targeted Corridors Alternative would disperse reasonably expected development more along targeted corridors rather than concentrated near heavy rail stations, which would result in similar but greater impacts related to hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); inadequate emergency access, transit facilities; and traffic during construction. This Alternative contains the network enhancements identified in MP 2035 and incorporated in to the Proposed Plan. Impacts to the transportation network would be significant and unavoidable similar to the Proposed Plan.

Alternative 4: High TOD Alternative. Alternative 4 would result in similar, but reduced impacts related to transportation (roadway LOS, CMP, public transit, bicycle, or pedestrian facilities) as compared to the Proposed Plan. The High TOD Alternative assumes the same transportation network enhancements as the Proposed Plan, but instead concentrates development potential for housing and employment around the five major transit stations along the Metro Red Line. Peak period weighted average V/C in Alternative 4 would be expected to be slightly better than the Proposed Plan, as would be the percentage of road miles operating at LOS E or worse. Daily VMT, daily vehicle trips, and VMT per capita would be expected to be slightly lower compared to the Proposed Plan. Similar to the Proposed Plan, Alternative 3 would also have no impact to air traffic patterns. The High TOD Alternative would not result in similar impacts related to increased hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or result in inadequate emergency access. This Alternative contains the network enhancements identified in MP 2035 and incorporated into the Proposed Plan. Impacts to the transportation network would be significant and unavoidable similar to the Proposed Plan.

UTILITIES AND SERVICES SYSTEMS

Alternative 1: No Project Alternative. Alternative 1 would result in similar, but reduced impacts related to utilities and services systems as compared to the Proposed Plan. Compared to the Proposed Plan, the No Project Alternative would result in 8,000 to 11,000 fewer housing units, 17,000 to 21,000 fewer residents and 5,000 to 8,000 fewer jobs. Therefore, although new development under the Existing Plan would increase the demand for utilities and service systems, the demand under the No Project Alternative would be less than the Proposed Plan. Impacts related to utilities and service systems under Alternative 1 would be less than significant.

Alternative 2: Reduced TOD and Corridors Alternative (Reduced Alternative). Alternative 2 would result in similar, but reduced (as a result of less anticipated development) impacts related to utilities and services systems as compared to the Proposed Plan. Compared to the Proposed Plan, the Reduced Alternative would result in approximately 4,000 fewer housing units, 8,000 fewer persons and a similar number of jobs. Therefore, although new development under the Reduced Alternative would increase the demand for utilities and service systems, the demand under the Reduced Alternative would be less than the Proposed Plan. Impacts related to utilities and service systems under Alternative 2 would be less than significant.

Alternative 3: Targeted Corridors Alternative. Alternative 3 would result in similar impacts related to utilities and services systems as compared to the Proposed Plan. The Targeted Corridors Alternative would result in the same population, housing and employment development potential as for the Proposed Plan. Therefore, the demand for utilities and service systems under the Targeted Corridors Alternative would be similar to the Proposed Plan. Impacts related to utilities and service systems under Alternative 3 would be less than significant.

Alternative 4: High TOD Alternative. Alternative 4 would result in similar impacts related to utilities and services systems as compared to the Proposed Plan. The High TOD Alternative would result in the same population, housing and employment development potential as for the Proposed Plan. Therefore, the demand for utilities and service systems under the High TOD Alternative would be similar to the Proposed Plan. Impacts related to utilities and service systems under Alternative 4 would be less than significant.

5.8 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines Section 15126.6 requires that an "environmentally superior" alternative be selected among the alternatives that are evaluated in an EIR. In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. If the No Project alternative is identified as environmentally superior, then another environmentally superior alternative shall be identified among the other alternatives.

Based on the ability to result in reduced environmental impacts and meet project objectives, the Reduced Alternative (Alternative 2) is the Environmentally Superior Alternative. None of the alternatives analyzed are capable of avoiding the significant and unavoidable impacts that would occur under the Proposed Plan. However, the Reduced Alternative would reduce the severity of Proposed Plan's significant and unavoidable impacts related to air quality, greenhouse gas emissions, noise and traffic.

6.0 OTHER CEQA CONSIDERATIONS

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines requires that all phases of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development and operation. As part of this analysis, the Environmental Impact Report (EIR) must also identify (1) significant environmental effects of the Proposed Plan, (2) significant environmental effects that cannot be avoided if the Proposed Plan is implemented, (3) significant irreversible environmental changes that would result from implementation of the Proposed Plan, and (4) growth-inducing impacts of the Proposed Plan, (5) mitigation measures proposed to minimize the significant impacts of the Proposed Plan, and (6) alternatives to the Proposed Plan. Items 3 and 4 are covered in this chapter. Items 1, 2 and 5 are covered in Chapter 4. Item 6 is covered in Chapter 5.

6.1 SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PLAN

Table 2-1 in Chapter 2.0, Executive Summary and Sections 4.1 through 4.16, of this EIR, provide a comprehensive identification of the environmental effects of the Proposed Plan, including the level of significance both before and after mitigation.

6.2 SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PLAN IS IMPLEMENTED

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Implementation of the Proposed Plan would result in the following significant and unavoidable impacts:

- **Air Quality** (Construction and Operational Emissions, Cumulative Increase, and Sensitive Receptors – Construction)
- **Biological Resources** (Special Status Species Habitat, Riparian Habitat, Wetlands, and Migratory Wildlife)
- **Cultural Resources** (Historical Resources)
- **Noise** (Construction Noise, Operational Stationary Noise, and Vibration)
- **Public Services** (Parks)
- **Transportation and Traffic** (Operation of Vehicular Circulation System, Neighborhood Traffic Intrusion, Congestion Management Plan [CMP], Construction Traffic Disruption)

6.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

Section 15126.2(c) of the CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project. Specifically, Section 15126.2(c) states:

> *Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irreversible commitments of resources should be evaluated to assure that such current consumption is justified.*

Generally, a project would result in significant irreversible environmental changes if any of the following would occur:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Resources that would be consumed as a result of the Proposed Plan include water, electricity, natural gas, and fossil fuels; however, the amount and rate of consumption of these resources would not result in significant environmental impacts related to the unnecessary, inefficient, or wasteful use of resources. In addition, construction activities related to the Proposed Plan's reasonably expected development would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobile and construction equipment.

With respect to operation activities, compliance with all applicable building codes, as well as mitigation measures, would ensure that natural resources are conserved or recycled to the maximum extent feasible. It is also likely that in response to GHG reduction mandates, new technologies or systems will emerge, or will become more cost-effective or user-friendly, that will further reduce the Project Area's reliance upon nonrenewable natural resources. However, even with implementation of conservation measures, consumption of natural resources would generally increase with implementation of the Proposed Plan.

In summary, implementation of the Proposed Plan would involve irreversible environmental changes to existing natural resources, such as the commitment of energy and water resources as a result of the operation and maintenance of future development. However, the Proposed Plan would not involve wasteful or unjustifiable use of energy or other resources, and energy conservation efforts would also occur with new construction. New development associated with the Proposed Plan would be constructed and operated in accordance with specifications contained in Title 24 California Code of Regulation. Therefore, the use of energy related to the Proposed Plan would occur in an efficient manner.

6.4 GROWTH INDUCING IMPACTS

Section 15126.2(d) of the CEQA Guidelines requires that growth inducing impacts of a proposed project be considered. Growth inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment. Generally, a project is considered to result in growth inducing effects if it causes one of the following:

- The extension of infrastructure (sewer, water, etc.) to an area currently undeveloped and/or lacking adequate infrastructure; and/or
- The provision of housing or employment to an area currently undeveloped or lacking in adequate housing or employment.

As analyzed in Section 4.13, Population, Housing, and Employment, of this EIR, the Proposed Plan would not induce substantial growth in population through employment-generating uses and would be consistent with state, regional and local policies to locate new development close to transit. In addition, the Proposed Plan would not increase reasonably expected development in the Project Area in a way that would be inconsistent with growth projections, or in a way that would be inconsistent with City, regional and other adopted housing growth policies. The Proposed Plan would not result in unplanned growth; rather it would ensure projected growth is accommodated. The Project Area is an urbanized community that consists of commercial, industrial, and residential uses. Utility and other infrastructure upgrades are also intended to meet project-related demand. The Proposed Plan would provide for both residential and commercial growth. New demand for commercial goods and services would be met by new retail, services, and community facilities and by existing retail, service, and other resources currently located within the Project Area and its vicinity. In conclusion, the Proposed Plan is anticipated to satisfy a portion of the anticipated population growth in the region in an efficient manner consistent with state, regional and City policies. The Proposed Plan would be consistent with the projected growth forecast for the Los Angeles region and regional policies to reduce urban sprawl. It would efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality.

6.5 POTENTIAL SECONDARY EFFECTS

CEQA Guidelines Section 15126.4(a)(1)(D) states that, "[i]f a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measures shall be discussed but, in less detail, than the significant effects of the project as proposed." In accordance with the Guidelines, the following provides a discussion of the potential impacts that could occur from implementation of the proposed mitigation measures.

AESTHETICS

Mitigation Measure **AE1** requires the use of building materials that are no more reflective than necessary to comply with Green Building Code or other state or local UV requirements. This measure would ensure that glare impacts are reduced to less-than-significant levels without creating a potential secondary effect.

AIR QUALITY

Mitigation Measure **AQ1** involves reducing air emissions from construction. This mitigation measure would reduce regional and local emissions generated by various construction activities, including equipment operation and truck trips. Implementation of this measure would have a beneficial impact on reducing air quality impacts and would not result in adverse secondary impacts.

BIOLOGICAL RESOURCES

Mitigation Measures **BR1**, **BR2**, and **BR3** require development projects on certain sites to conduct biological resources assessments and/or surveys to ensure that sensitive species and/or habitats are not adversely affected. Mitigation Measure **BR5** requires development projects on certain sites to prepare a Preliminary Delineation Report for Waters of the U.S. and to obtain a Clean Water Act Section 404 permit. These mitigation measures are procedural actions that would not result in physical changes in the environment that could result in secondary impacts.

Mitigation Measure **BR4** involves the preparation of a compensatory plan for development projects that could affect Waters of the U.S. and Waters of the State. Mitigation Measure **BR6** would require development projects on certain sites to analyze how the development project could affect wildlife corridors. These mitigation measures are procedural actions that have the potential to physically improve the environment through restoration activities and maintaining wildlife corridors without creating adverse secondary impacts.

CULTURAL RESOURCES

Mitigation Measures **CR1** through **CR7** involve reducing impacts to archaeological, paleontological, and tribal cultural resources to less-than-significant levels. These mitigation measures are procedural actions that would not result in physical changes in the environment that could result in secondary impacts.

HAZARDS AND HAZARDOUS MATERIALS

Mitigation Measure **HM1** involves requiring future developments to conduct a database search and/or prepare a Phase I and, as needed, Phase II Environmental Site Assessment to ensure that any potential hazards on a development site are evaluated and remediated. This mitigation measure is a procedural action that would not result in physical changes in the environment that could result in secondary impacts.

NOISE

Mitigation Measures **N1**, **N2**, and **N4** involve specific construction-related measures to reduce vibration levels. These measures are considered part of the construction phase of any development project and, thus, are generally included within the analysis contained in this EIR and would not result in additional secondary impacts. While the use of barriers could result in visual impacts, such impacts would be temporary in nature and considered less than significant. These measures would not result in secondary impacts.

Mitigation Measure **N3** involves the preparation of noise studies for development projects within the CPIO and discretionary projects outside of the CPIO. This mitigation measure also involves specific operation-related measures to reduce noise levels on development sites, including industrial activity yards that use heavy equipment and parking structures within 200 feet of residential uses. The potential use of some measures, such as sound barriers and building designs, could affect the visual environment. However, the potential visual effects from this mitigation measure are expected to be similar to the effects that have been evaluated in the Section 3.1, Aesthetics, of this EIR. No adverse secondary impacts would result from these measures.

TRANSPORTATION AND TRAFFIC

Mitigation Measures **T1**, **T2**, and **T4** involve physical improvements and programs that are designed to reduce traffic impacts. The physical improvements include ITS signal and corridor upgrades, intersection improvements, and congestion monitoring technology upgrades. A Neighborhood Traffic Management Program would be implemented on impacted residential streets; and a Traffic Control Plan would be implemented during construction activities to mitigate the impact of traffic disruption and to ensure the safety of all users of the affected roadway. Mitigation Measure **T3** would require coordination with other agencies to identify transportation improvements and seek opportunities to jointly pursue funding if future development projects could potentially impact vehicular operations on transportation systems managed by other agencies. It is possible that some physical improvements may be implemented through the coordination and funding efforts. Implementation of some of the improvements and program in Mitigation Measures **T1** through **T4** may result in temporary air quality and noise effects, as well as traffic impacts, along the associated roadways during the period construction of the improvement would occur. Such activities would not be of sufficient scale to create new significant impacts or to compound a previously analyzed impact such that a less-than-significant impact would exceed established thresholds of significance. No adverse secondary impacts would result from these measures.

6.6 SIGNIFICANT IMPACTS THAT CAN BE MITIGATED TO LESS-THAN-SIGNIFICANT IMPACTS

Based on the analysis contained in this EIR, the following issues were found to be impacted to a less-than-significant level with implementation of mitigation measures:

- **Aesthetics** (Glare)
- **Cultural Resources** (Archaeological Resources, Paleontological Resources, Tribal Cultural Resources)
- **Hazards and Hazardous Materials** (Hazardous Materials Upset or Accident, Hazardous Materials Sites)

6.7 LESS-THAN-SIGNIFICANT IMPACTS

The following issues were found to have a less-than-significant impact in this EIR:

- **Aesthetics** (Scenic Vistas, Visual Character, Light)
- **Air Quality** (Conflict with Applicable Air Quality Plan, Odors)
- **Biological Resources** (Conflict with Policies or Ordinances Protecting Biological Resources)
- **Cultural Resources** (Human Remains)
- **Geology and Soils** (Soil Erosion)
- **Greenhouse Gas Emissions** (GHG Emissions; Conflict with Applicable Plan, Policy or Regulation Adopted for the Purpose of Reducing GHG Emissions)
- **Hazards and Hazardous Materials** (Transport, Use, or Disposal of Hazardous Materials; Hazardous Materials within ¼-Mile of School; Interference with Adopted Emergency Response Plan or Evacuation Plan; Wildland Fires)

- **Hydrology and Water Quality** (Water Quality; Groundwater Supplies; Drainage Patterns; Runoff Water; Water Quality; Flood Hazard)
- **Land Use and Planning** (Conflict with Any Applicable Land Use Plan, Policy, or Regulation)
- **Noise** (Operational Vibration, Operational Mobile Sources)
- **Population, Housing and Employment** (Inducing Substantial Population Growth; Displacement of Existing Housing and Population)
- **Public Services** (Fire Protection and Emergency Facilities, Police Protection Facilities, Public Schools, Libraries)
- **Transportation and Traffic** (Conflict with Adopted Policies, Plans, and Programs; Hazards associated with a Design Feature or Incompatible Uses; Emergency Access; Transit Facilities)
- **Utilities and Service Systems** (Water Treatment Facilities, Water Supply, Wastewater Treatment Facility, Stormwater Drainage Facility, Solid Waste, Energy – Electricity and Gas)

6.8 NO IMPACT

The following issues were found to have a no impact in this EIR:

- **Aesthetics** (State Scenic Highways)
- **Agriculture and Forestry Resources** (Farmlands, Forest Lands)
- **Biological Resources (**Conflict with Habitat Conservation Plans)
- **Geology and Soils** (Fault Rupture, Seismic Ground Shaking, Seismic-Related Ground Failure, Unstable Geologic Unit or Soil, Expansive Soil, Septic Tanks)
- **Hazards and Hazardous Materials** (Airport Hazards)
- **Hydrology and Water Quality** (Flood Hazards from Levee or Dam Failure; Seiche; Tsunami; Mudflow/Mudslides)
- **Land Use and Planning** (Physically Dividing an Established Community; Conflict with Habitat Conservation Plans or Natural Community Conservation Plans)
- **Mineral Resources** (Loss of Availability of Mineral Resources, Loss of Availability of Locally-Important Mineral Resource Recovery Site)
- **Noise** (Noise Level Standards of Agencies, Operational Mobile Noise, Airport Noise)
- **Transportation and Traffic** (Air Traffic Patterns)

7.0 PREPARERS OF THE DRAFT EIR

7.1 LEAD AGENCY

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7.2 DRAFT EIR PREPARATION

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