



Environmental Review Section

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



FINAL ENVIRONMENTAL IMPACT REPORT

HOLLYWOOD COMMUNITY PLAN AREA

Hollywood & Gower

Case No. ENV-2007-5750-EIR
SCH No. 2008011113

Council District No. 13

Project Address: 6100, 6104 & 6116 W. Hollywood Boulevard and 1633, 1645, 1647 & 1649 N. Gower Street, Los Angeles, CA

Project Description: The proposed project involves demolition of the existing parking lot and construction of an approximately 197,503 square foot mixed-use development that would rise to 20 stories, and would contain one subterranean parking level. The proposed building would extend approximately 270 feet in height. The proposed project would contain 7,200 square feet of retail space and 176 residential units. The proposed project would potentially include a 2-foot street dedication along Hollywood Boulevard and a 5-foot dedication along the southern half of Gower Street. A 5-foot merger is being requested along the northern half of Gower Street. As previously stated, the project site is currently zoned C4-2D-SN and C4-2D. The existing “D” limitation restricts total Floor Area Ratio (FAR) on the project site to 2:1 (per Ordinance No. 165,662, effective May 7, 1990). In order to allow for the proposed project, the Applicant proposes to rezone the project site such that the current “D” limitation of 2:1 maximum FAR would be removed and replaced with a “D” limitation allowing a maximum FAR of 4.5:1. This would permit approximately 197,503 square feet of total floor area (after dedications).

APPLICANT:
6104 Hollywood, LLC

PREPARED BY:
Christopher A. Joseph & Associates

June 2010

EAF NO.: ENV-2007-5750-EIR

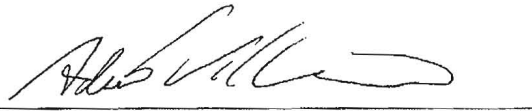
SCH NO.: 2008011113

PROJECT NAME: Hollywood and Gower Project

RECOMMENDATION FOR EIR CERTIFICATION

Pursuant to California Code of Regulations, Title 14, Section 15090, this EIR has been completed in compliance with the California Environmental Quality Act and current State and City Guidelines and based on information available may be accepted and considered prior to making a final decision on the project. The decision-maker or decision-making body must certify that it has reviewed and considered the information contained in this Environmental Impact Report prior to making such decision.

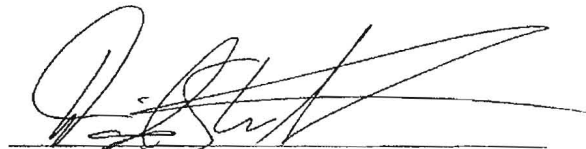
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I. INTRODUCTION

A. INTRODUCTION

In accordance with Sections 15088, 15089, and 15132 of the California Environmental Quality Act (CEQA) Guidelines, the Los Angeles Department of City Planning has prepared this Final Environmental Impact Report (Final EIR) for the Hollywood Gower Project. The City of Los Angeles is the lead agency for this project. The project applicant is 6104 Hollywood, LLC, 5847 San Felipe, Suite 3600, Houston, TX 77057.

Organization of Final EIR

This Final EIR is organized into four sections, as follows:

Section I. Introduction: This section provides an introduction to the Final EIR, a summary of the proposed project description, discretionary actions, alternatives to the proposed project, and environmental impacts and mitigation measures from the Draft EIR.

Section II. Comments and Responses: This section includes all comments received on the Draft EIR during the public review period, as well as a response to each comment.

Section III. Corrections and Additions to the Draft EIR: This section provides additions and corrections to update the Draft EIR, based on comments received during and after the public review period.

Section IV. Mitigation Monitoring and Reporting Program: This section is designed to monitor implementation of all feasible mitigation measures as identified in the Draft and Final EIRs for the proposed project. Mitigation measures are indicated below and are numbered consistent with the relevant section numbering provided in the Draft EIR.

B. LOCATION

The project site is an approximately 1-acre parcel (44,169 square feet), located in the Hollywood community of the City of Los Angeles at 6100, 6104, and 6116 Hollywood Boulevard, and 1633, 1645, 1647, and 1649 N. Gower Street. After anticipated dedications and a proposed 5-foot merger along Gower Street on the northerly half of the site, the project site is reduced to approximately 43,890 square feet (approximately 1 acre). The project site is located within the Hollywood Community Plan, Los Angeles State Enterprise Zone Area, the Hollywood Redevelopment Project Area, and the Hollywood Signage Supplemental Use District (SUD) of the CRA Area. The project site is designated for “Regional Center Commercial” use in the Hollywood Community Plan and is zoned C4-2D-SN on the northerly half of the site and C4-2D on the southerly half of the site.

The project site is located at the eastern gateway to Hollywood’s commercial core. Several theaters and entertainment-oriented destinations are located within the project vicinity, and the section of Hollywood

Boulevard that borders the project site to the north contains the easternmost section of the Hollywood Walk of Fame.

The project site is bounded by Hollywood Boulevard on the north, Gower Street on the east, The Music Box at Fonda (Henry Fonda Theater) on the west and a two-story commercial building on the south.

Regional access to the project site is provided by the Hollywood Freeway (US-101). Major north-south streets serving the area containing the project site include Vine Street and Gower Street. Primary east-west access to the project area is provided by Franklin Avenue, Sunset Boulevard, and Hollywood Boulevard.

C. SUMMARY OF THE PROPOSED PROJECT

Existing Uses

The proposed project consists of the removal/demolition of all existing uses on the project site and the construction and operation of a mixed-use development containing residential and commercial uses and associated parking facilities on the project site. The project site presently contains an asphalt surface parking lot.

Proposed Project Characteristics

The proposed project involves demolition of the existing parking lot and construction of an approximately 197,503-square-foot mixed-use development that would rise to 20 stories, and would contain one subterranean parking level. The proposed building would extend approximately 270 feet in height. The proposed project would potentially include a 2-foot street dedication along Hollywood Boulevard and a 5-foot dedication along the southern half of the project's Gower Street frontage. A 5-foot merger is being requested along the northern half of the project's Gower Street frontage. As previously stated, the project site is currently zoned C4-2D-SN and C4-2D. The existing "D" limitation restricts total Floor Area Ratio (FAR) on the project site to 2:1 (per Ordinance No. 165,662, effective May 7, 1990). In order to allow for the proposed project, the Applicant proposes to rezone the project site such that the current "D" limitation of 2:1 maximum FAR would be removed and replaced with a "D" limitation allowing a maximum FAR of 4.5:1. This would permit approximately 197,503 square feet of total floor area (after dedications).

The single structure would be irregular in shape and would be sited with the tallest portions of the building towards the northeastern corner of the project site. The subterranean level would contain residential parking. The ground floor would include approximately 7,200 square feet of retail space located along Hollywood Boulevard and Gower Street, which would create a commercially-oriented street level presence, a residential lobby located on the corner of Hollywood Boulevard and Gower Street, and portions of the parking structure. Levels two through four would consist of the podium-style parking garage which, in combination with the parking on the subterranean level and ground floor, would provide

a total of 345 parking spaces. Access to the parking structure, for both residential tenants and retail customers, would be located on the ground level along Gower Street. Level five would contain various resident-only, indoor and outdoor amenities. These amenities would include outdoor recreational features such as a pool and spa, and a BBQ area, and indoor residential amenities would include a fitness center, a club room complete with bar and kitchen, and a screening room. Levels six through 19 form the residential tower and would contain 176 residential units. The 176 residential units would comprise 25 studio units, 107 one-bedroom units, 42 two-bedroom units, and two three-bedroom units. These units would vary in size from 575 square feet to 3,250 square feet. Level 20 would include approximately 5,300 square feet of usable space for additional residential amenities with the remaining area serving as the roof top for Level 20 with mechanical equipment. Level 20 residential amenities would include an approximately 2,310 foot “Sky Lounge,” which would be a private lounge-type space and a 3,000 square foot covered roof terrace with bar area. Total open space provided by the proposed project would be approximately 19,275 square feet, which meets the Los Angeles Municipal Code (LAMC) requirements. Located above the covered roof terrace would be a helipad.

Design Concept

The proposed project would be approximately 270 feet tall featuring a stepped design to minimize the massing of the structure. The building is modern in style. The retail component of the proposed project would include a canopy over the pedestrian entry on Hollywood Boulevard, measuring six feet from the face of the building. Several trees would be planted along the sidewalk on both Hollywood Boulevard and Gower Street to enhance the streetscape. New light poles, designed to match the existing lights along Hollywood Boulevard, would also be added along Gower Street to improve the walkability of this location, and enhance the pedestrian environment. The proposed project would be constructed to maximize building efficiency with LEED characteristics.

LEED Silver Certification

The following statements broadly describe several aspects of the proposed project in which a LEED Silver certification is being sought from the U.S. Green Building Council:

- The site is located within 1/2 mile of the Hollywood & Vine Metro Station, which offers a convenient alternative transportation option.
- A stormwater pollution prevention plan will be implemented during construction.
- The building will provide secure bicycle storage for occupants and visitors¹.

¹ *The project would include residential bike racks for 44 bikes (0.25/unit) to be located in the parking garage in secured rooms and retail bike parking rack for 7 bikes (1/1,000 square feet) to be located at the Gower Street side open plaza by the retail.*

- Preferred parking incentives for low-emitting and fuel efficient vehicles will be offered.
- Stormwater management and filtration systems will help minimize downstream pollution from roof and site water runoff.
- Landscaping will be designed to minimize or eliminate potable water usage.
- Low-flow plumbing fixtures will be specified throughout the building to reduce water waste.
- The building's energy consuming systems (lighting, air conditioning, etc) and envelope (windows, roof, and walls) will be designed with the aid of energy modeling software to meet the 2008 Title 24 standards, which are 14 percent more stringent than the former Title 24 standards.
- The building's mechanical systems will be analyzed by a third party commissioning agent during installation and start-up to confirm they will function as originally designed.
- Building occupants will have access to recycling services.
- The demolition and construction processes will be managed to ensure at least 75 percent of debris is recycled rather than sent to a landfill.
- Building materials and interior finishes with high levels of recycled content and materials that can be found regionally will be specified where appropriate.
- The building's fresh air ventilation system will be optimized for energy efficiency and occupant health and comfort.
- Smoking will be prohibited in the building and within 25 feet of any exterior opening, including windows and balcony doors.
- Low-emitting materials complying with recognized third-party standards (South Coast Air Quality Management District Rules, Green Seal Standards, Carpet & Rug Institute Green Label Plus Program) will be installed to help ensure occupant and installer comfort and well-being.

Signage

The project site is located within the boundaries of the adopted Hollywood Signage Supplemental Use District (SUD). The applicant has not submitted to the Planning Department any application for signage. However, since the applicant may apply for signage in the future, the EIR evaluated the environmental impacts of signage that the applicant may seek approval for in the future. The project's signage program consists of two proposed supergraphic signs, one wall sign and a projecting vertical sign. In addition to these signs, there will be individual tenant signs on the ground floor retail space.

The two super-graphic signs included in the project are located at opposite ends of the building and are not visible simultaneously. The larger supergraphic measuring 4,028 square feet is inset into the western elevation, in a blank wall area. The second, smaller supergraphic located on Gower Street at the corner of Hollywood Boulevard totals 2,100 square feet. Both proposed super-graphic signs are integrated with adjacent architectural features and are of a scale compatible of their respective elevations.

The wall sign measuring 300 square feet would be placed facing Hollywood Boulevard (north elevation) and situated on the wall adjacent to the Music Box Theater.

The Projecting Sign would measure approximately 650 square feet and would be a vertical blade sign projecting from the Hollywood Boulevard façade (as shown in the Draft EIR, Figure II-17) and visible from both the east- and westbound traffic and pedestrians on Hollywood Boulevard. This sign is proposed to spell out “Hollywood+Gower”.

Project signage would be complementary to and compatible with the building architecture, and responsive to the building’s location at the eastern gateway to the Hollywood Entertainment District, as well as the Hollywood Signage SUD.

The City has adopted a prohibition on supergraphic and off-site signage such as those studied in the Draft EIR. As long as the local regulations prohibit without exception the type of signage studied in the Draft EIR, the applicant will not seek approvals to implement the signage program. However, as noted in LAMC Sections 14.4.4.B.9 and 14.4.4.B.11, exceptions to these prohibitions will be permitted to the extent deemed constitutional in the resolution of a U.S. District Court case². These exceptions would be permitted pursuant to a legally-adopted specific plan, supplemental use district (such as the Hollywood Signage SUD), or an approved development agreement. If these exceptions become allowed following the resolution of the court case, then the applicant may submit an application to seek approvals to implement the signage program. Therefore, the prohibition will not result in a changed level of land use impacts (consistency with local regulations) because no supergraphic or off-site signage will be sought during any period of time which local regulations would prohibit such signage. Furthermore, the aesthetic impacts of the signage program discussed in the Draft EIR do not change because a change to local regulation is independent of aesthetic impacts, which regard the existing physical environment regardless of past existing, or possible future regulation.

Parking

The proposed project would provide 345 parking spaces on one level of subterranean parking and four above-grade levels, including 331 spaces for the residential development and 14 spaces for the

² **World Wide Rush, LLC v. City of Los Angeles, United States District Court Case No. CV 07-238 ABC. This case was decided in the City’s favor on May 26, 2010, but at the time of publication of this FEIR, the City had not yet received a written mandate directing how exactly to implement the ruling.**

commercial development. The four levels of above-grade parking would be an enclosed concrete parking garage that would be hidden behind an architectural façade to complement the building and its surroundings. The access driveway would be located on Gower Street.

The residential portion of the project, which would be available to prospective tenants as apartments, would be subject to the parking requirements of the Los Angeles Municipal Code [LAMC Section 12.21A4(a)]. As a result of the proposed tract map for condominium purposes, the proposed project is subject to the City of Los Angeles Advisory Agency Parking Policy AA 2000-1, which requires 2.0 spaces per unit, plus 0.5 guest spaces per unit for congested areas. Although the proposed project exceeds the number of Municipal Code required parking spaces for apartments by 38 parking spaces, the project would not meet the requirements of Advisory Agency Parking Policy AA 2000-1. Accordingly, Applicant is requesting a deviation from the Advisory Agency's Residential Parking Policy. The project is in a location with employment and urban amenities accessible by walking or by public transit.

The project is located within the Hollywood Redevelopment Project Area and a Los Angeles State Enterprise Zone (EZ) which offer a provision for utilizing a lower parking ratio for certain commercial uses. As per LAMC Section 12.21A4(x)(3), projects within these areas are allowed 2.0 parking spaces for every 1,000 square feet of combined gross floor area of commercial office, business, retail, restaurant, bar and related uses, trade schools, or research and development buildings on any lot. The proposed project meets the parking requirements of the LAMC with a total of 14 parking spaces for the commercial components.

Public Transportation Opportunities

As previously stated the proposed project has a location with employment and urban amenities accessible by walking or by public transit. There are multiple public transportation opportunities in the subject site's immediate area. The Metro Red Line Hollywood/Vine Station is located approximately 1,000 feet away from the Project. The Metro Red Line is the 17-mile subway that runs from Union Station in downtown Los Angeles to Highland Avenue and then on to North Hollywood in the San Fernando Valley. The Metro Red Line also connects to the Blue Line at the 7th/Metro Center Station and the Gold Line at Union Station. These Metro Lines further connect to points throughout the City and the greater Los Angeles area.

Additionally, the Los Angeles Metropolitan Authority (Metro) routes a number of bus lines with stops conveniently located near the project site. Bus Line 217 and 163 have stops on the northeast and southwest corners of Hollywood Boulevard and Gower Street. MTA also routes Bus Line 302, which provides limited stop services that run east/west on Sunset Boulevard (connecting to Union Station). The Metro Bus Line 180 has a stop located on the project site block with eastbound service to Sierra Madre Villa Station and Bus Line 181 to North Lake - Altadena. Also, the Metro Rapid Bus Line 780 has a stop on the southwest corner of Hollywood Boulevard and Argyle Avenue, providing service to Pasadena City College and running along Santa Monica Boulevard. The project site is also located approximately 1,000

feet from the stops for the three to the Hollywood DASH routes and Metro routes 212 and 2, which are located on Hollywood Boulevard and Argyle Avenue.

Lighting

The project site would be illuminated with lighting from within the commercial portions of the proposed project, signage lighting and security lighting in the parking levels, in the stairwells, open space areas, and in the hallways of the residential levels. These lights would either be shielded and focused on the project site or located completely indoors. The lights on the address signage would also be shielded and focused to avoid unnecessary light spillover.

Grading

Site grading is required to prepare the proposed project building pad. Based upon the project building site, approximately 45,000 cubic yards (with a 15% contingency) of cut material would be exported.

Construction Schedule

Construction of the proposed project is anticipated to begin in May 2011 with a duration of approximately 24 months, ending May 2013. However, actual completion of the proposed project is dependent upon local economic conditions.

Haul Route

The proposed haul route is described as follows:

- From 6100 Hollywood Boulevard, Los Angeles to Puente Hills Landfill at 13130 Crossroads Parkway.
- Loaded Trucks: Trucks exit site and head east on Hollywood Boulevard toward Gower Street and turn right onto Hollywood Freeway (US-101) heading south to CA-60 Highway East toward Pomona to Exit 13, Crossroads Parkway South to the Puente Hills Landfill.
- Empty Trucks: Leave Puente Hills Landfill toward the site, taking CA-60 Highway West toward Los Angeles to US-101 North and exit Gower Street, entering the site.
- Maximum Gross Volume and Weight: 14 cubic yards on bottom dumps. Weight not to exceed 40 tons.
- Number and Type of Vehicles: Semi trailer bottom dumps (10-wheel) and standard dump trucks (6-wheel and/or 10-wheel).
- Hours: 7 AM to 7 PM Monday through Saturday; no hauling on Sunday.

- Total Trips per day: approximately 100 trips per day.
- Duration of the project: 15 days of hauling (non-consecutive) over a 60 day period.

D. PROJECT OBJECTIVES

The objectives of the proposed Hollywood Gower mixed use project are as follows:

- Reuse and redevelop the currently underutilized project site to provide housing and retail space to serve the local community.
- Replace a parking lot with a mixed-use tower that will help define the gateway of Hollywood.
- Maximize the amount of housing provided on the project site to address housing needs in the community.
- Provide ground floor retail consistent with the City's walkability policies and urban design priorities.
- Provide a development that is compatible and complementary with surrounding land uses.
- Provide manifest signage consistent with the Hollywood Signage Supplemental Use District that contributes to the eastern gateway to Hollywood and fulfills the identity and commerce objectives of Regional Center development.
- Provide a mixed use project in close proximity to numerous public transportation options for the purpose of reducing vehicular trips.
- Mitigate, to the extent feasible, the potential environmental impacts of the proposed project.

E. DISCRETIONARY ACTIONS

The Applicant, 6104 Hollywood, LLC, is seeking the following discretionary approvals:

1. VESTING TENTATIVE TRACT MAP (VTT NO. 70119), PURSUANT TO L.A.M.C. SECTION 17.15, for a merger and re-subdivision of the subject property into 6 lots for condominium purposes, as follows:

- a. One master lot ("Lot 1"), which includes everything but the specified airspace lots,
- b. One airspace lot with a maximum of 176 residential units ("Airspace Lot 2"),
- c. One airspace lot with approximately 4,200 square feet of commercial space ("Airspace Lot 3"),

- d. One airspace lot with approximately 1,500 square feet of commercial space (“Airspace Lot 4”),
- e. One airspace lot with approximately 1,500 square feet of commercial space (“Airspace Lot 5”),
- f. One airspace lot with approximately 145,000 square feet of commercial and residential parking space (“Airspace Lot 6”),
- g. A deviation from the Advisory Agency’s Residential Parking Policy No. AA 2000-1 to allow a residential parking ratio of 1.88 residential parking spaces per unit (at a rate of 1.63 parking spaces + 0.25 guest parking spaces per unit), in lieu of the 2.5 spaces per unit as required by the Advisory Agency’s Parking Policy for projects in a parking congested area,
- h. That Hollywood Boulevard be considered the front yard, the southerly property line that is most distant from and parallel to Hollywood Boulevard be considered the rear yard, and Gower Street and all other property lines be considered the side yards.
- i. Approval of the proposed haul route, and
- j. A 5-foot and variable width merger of a portion of Gower Street as dedicated in Instrument No. 212, recorded January 4, 1971.

2. ZONE CHANGE AND HEIGHT DISTRICT CHANGE FROM C4-2D-SN AND C4-2D TO C4-2D-SN AND C4-2D WITH NEW “D” LIMITATIONS, PURSUANT TO L.A.M.C. SECTION 12.32 F, to permit the construction of a 20-story mixed-use development with a maximum building height of 270 feet and comprised of a total of 176 residential units (166,583 square feet of residential floor area), approximately 7,200 square feet of retail uses, and a total 345 parking spaces (331 spaces for the residential and 14 spaces for the retail.) The Applicant proposes to replace the existing “D” Development Limitation, which limits the Floor Area Ratio (FAR) to 2:1 (per Ordinance No. 165,662), with a new “D” Limitation to allow a maximum FAR of 4.5:1 on this site, consistent with the Hollywood Community Plan.

3. PURSUANT TO L.A.M.C. SECTION 12.28, ZONING ADMINISTRATOR’S ADJUSTMENT FROM L.A.M.C. SECTION 12.16.C.2 to allow a 0-foot westerly side yard (including the side yards located at the southwest corner of the project site), in lieu of the 16-foot side yard required in the C4 Zone, and a 10-foot rear yard, in lieu of the 20-foot rear yard required in the C4 Zone. These reduced setbacks would apply only to the proposed parking podium levels (Parking Levels 1 through 4) which contain residential parking.

4. PURSUANT TO L.A.M.C. SECTION 16.05, the Applicant requests the approval of **SITE PLAN REVIEW.**

5. Pursuant to various sections of Los Angeles Municipal Code, the Applicant will request approvals and permits from the Building and Safety Department (and other municipal agencies) for project construction

activities including, but not limited to the following: demolition, excavation, shoring, grading, foundation, haul route, building and tenant improvements.

6. PURSUANT TO L.A.M.C. SECTION 11.5.7.C.2., PROJECT PERMIT COMPLIANCE WITH THE HOLLYWOOD SIGNAGE SUPPLEMENTAL USE DISTRICT, ORDINANCE NO. 176,172, to permit signs in conformance with the applicable regulations of the Hollywood Signage Supplemental Use District

No discretionary approvals are currently being sought for any signage not already allowed by existing regulations. If future signage regulations allow the supergraphic sign program evaluated in this EIR, then approvals may be sought according to such future regulations.

F. SUMMARY OF ALTERNATIVES CONSIDERED

The Draft EIR considers a range of alternatives to the proposed project to provide informed decision-making in accordance with Section 15126(f) of the CEQA Guidelines. The alternatives analyzed in this Draft EIR include: 1) No Build/No Project Alternative; 2) Reduced Density Alternative; 3) Existing Zoning Alternative; and 4) Reduced Height Alternative.

Alternative 1: No Build/No Project Alternative

Under the No Build/No Project Alternative, the project site would remain developed with the 44,169-square-foot surface parking lot. The parking lot would continue in its current state and would continue to operate as a paid parking lot available to adjacent uses. This Alternative assumes the continuation of existing conditions on the project site as well as the development of the related projects.

Alternative 2: Reduced Density Alternative

Under the Reduced Density Alternative, the project site would be developed with a 144,105-square-foot mixed-use development, similar to the proposed project, but at a 25% reduction in dwelling units and retail space. The number of residential units provided would be 132 and the amount of retail space provided would be 5,400 square feet. The building would be reduced by five stories to a maximum height of approximately 189 feet. Parking would be provided in 4 above grade parking levels with approximately 259 parking spaces. All other aspects of the project would be the same as described under the proposed project.

Alternative 3: Existing Zoning Alternative

Under the Existing Zoning Alternative, there would be two development options that have been identified as potential development scenarios under the existing zoning: residential or office.

Residential

Under this Existing Zoning Alternative, the existing surface parking lot would be demolished and an approximately 95,974-square-foot mixed-use building would be developed. The structure would consist of 140 residential units, 3,100 square feet of ground floor retail, and 3,100 square feet of ground floor restaurant uses. Parking for 365 vehicles would be provided in a five-level aboveground parking garage. The building would rise 16 stories, reaching a height of 165 feet.

Office

Under this Existing Zoning Alternative, the existing surface parking lot would be demolished and an approximately 95,974-square-foot mixed-use building would be constructed. The structure would consist of 89,774 square feet of office space, 3,100 square feet of ground floor retail, and 3,100 square feet of ground floor restaurant uses. Parking for 383 vehicles would be provided in a five-level above grade parking garage. The building would rise 11 stories, reaching a height of 155 feet. Due to market demand, the floor plate size for an office building would be approximately 20,000 square feet as compared to a residential floor plate size of 10,000. In addition, the height of each floor would be greater at 15 feet as compared to a residential floor height of 10 feet. Therefore, the building under this alternative would be shorter but wider.

Alternative 4: Reduced Height Alternative

Under the Reduced Height Alternative, the project site would be developed with a mixed use development that contains the same number of residential units, retail space, and parking as the proposed project. However, the structure would be 150 feet tall containing on subterranean parking level, four levels of above grade parking with 345 parking spaces and 10 levels of residential units. As a result the residential tower would be much shorter and wider than the proposed project. Retail uses would be located on the ground floor along Hollywood Boulevard. All other aspects of the project would be the same as described under the proposed project.

G. NOTICING AND AVAILABILITY OF THE DRAFT EIR

The Draft EIR for the proposed Hollywood Gower Project was prepared by the City of Los Angeles with the assistance of Christopher A. Joseph & Associates. The City of Los Angeles Planning Department forwarded copies of the Draft EIR as well as a Notice of Completion form to the California State Clearinghouse in Sacramento. The public review period for the report extended from October 15, 2009 to November 30, 2009. The purpose of the review period is to provide interested public agencies, groups

and individuals the opportunity to comment on the contents and completeness of the Draft EIR and to submit testimony on the possible environmental effects of the proposed project.

This document, together with the Draft EIR, makes up the Final EIR as defined in the State CEQA Guidelines Section 15132 as follows:

The final EIR shall consist of:

- (a) The Draft EIR or a revision of the draft.*
- (b) Comments and recommendations received on the Draft EIR either verbatim or in summary.*
- (c) A list of persons, organizations, and public agencies commenting on the Draft EIR.*
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.*
- (e) Any other information added by the lead agency.*

H. SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

The following pages summarize the various environmental impacts associated with the construction and operation of the proposed project. Mitigation measures are proposed for significant environmental impacts, and the level of impact significance after mitigation is also identified.

**Table I-1
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
B. AESTHETICS		
1. Aesthetics/Views		
<p>Valued Visual Character</p> <p>The project site contains no valued visual character. Although the parking lot operates as a paid parking lot available to adjacent uses, and it has been recently repaved and re-striped, the current state of the site brings an underutilized and unattractive visual character to a historical area.</p>	No mitigation measures are required.	Less than significant.
<p>Natural Open Space</p> <p>The site does not contain any natural open space areas. Since the project site is located in an urban area, there is no concern regarding the placement of the proposed mixed-use complex within a natural or open space area. Therefore, the project impact on grading of natural open space areas and placement of the proposed structure within open space areas is not significant.</p>	No mitigation measures are required.	Less than significant.
<p>Aesthetic Value and Image</p> <p>Implementation of the proposed project would improve the aesthetic image and value of the project site and the neighborhood with a new, contemporary building while respecting architectural style and elements of the area. The new building will improve the visual character of the area by replacing a surface parking lot with an architectural style that is visually compatible with the historical landmarks in the area (perhaps even improving the visual interest in an area rich in architectural variety). The project building's contemporary design does not emulate the older structures of the area and does not distract from the unique image of other taller buildings of the area. Thus, the project building is sensitive to the unique visual</p>	No mitigation measures are required.	Less than significant.

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Significance
<p>character and image of the area and project impacts to the area's aesthetic value and image would be less than significant.</p>		
<p>Applicable Guidelines and Regulations</p> <p>According to the Hollywood Community Plan, there is no Community Design Overlay for the project site and immediate area. Consequently, there are no corresponding site planning or design guidelines specifically oriented to the project neighborhood. Therefore, no impacts would occur to Applicable Guidelines and Regulations pertaining to site planning or design.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>Viewshed Analysis</p> <p>In the immediate vicinity of the project site views of the Hollywood Sign are blocked by structures or trees. Views of the Hollywood Sign are visible when traveling north along Gower Street. The proposed project was designed with the residential tower positioned along a north-south axis, creating a more slender profile as viewed when traveling north along Gower Street, and preserving views of the Hollywood Sign. Therefore the proposed project would have a less than significant impact with respect to viewsheds.</p> <p>Though project implementation would create a minor diminishment of this valued view (of the Hollywood Hills/Santa Monica Mountains), views are limited and intermittent and views of the hills can be afforded in many other locations. Therefore, the impact on the view of the hills looking north would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>Views From a Designated Scenic Highway</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
None of the streets surrounding the project site are designated scenic highways or roadways. Therefore, the project impact on a designated scenic highway is less than significant.		
Views From a Public Roadway Though project implementation would create a minor diminishment in this valued view (of the Hollywood Hills), views are limited and intermittent and views of the hills can be afforded in many other locations. Therefore, the impact on the view of the mountains from a public roadway looking north would be less than significant.	No mitigation measures are required.	Less than significant.
Signage Three signs, including two supergraphic signs, are included in the design of the proposed project. Although the proposed signs would increase the number of signs in the project vicinity, this increase would be less than significant with respect to visual character because several existing signs are located in the vicinity of the project site. With the signage in conformance with the Hollywood Signage Supplemental Use District standards, the potential impact on the visual character of the project site and surrounding area would be less than significant, as these standards ensure that signage does not cause significant impacts to surrounding community.	No mitigation measures are required.	Less than significant.
Cumulative Impacts Development of the proposed project in conjunction with the related projects would result in redevelopment or infilling of residential, restaurant, theater and commercial land uses in the Hollywood community. These projects would redevelop and revitalize an area that is currently underutilized, thereby improving	No mitigation measures are required.	Less than significant.

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>the visual character of the area. This cumulative development would also be consistent with the urban character of Hollywood Boulevard and with the concept of increased development density above subway stations that is encouraged in regional and local plans, including the Hollywood Community Plan. No substantial scenic resources are located in the area surrounding the project site that could be affected by a cumulatively considerable reduction in views. Therefore, the proposed project in conjunction with the related projects would not result in cumulatively considerable impacts with regard to view impacts of the “Hollywood” sign and impacts would be less than significant. The Community Redevelopment Agency (CRA) shall review any development project within the Hollywood Redevelopment Project Area, which would ensure that the development of the related projects would be consistent with the height, mass and visual character of the existing urban Hollywood community. Therefore, the proposed project in conjunction with the related projects would not result in cumulatively considerable impacts with regard to the aesthetic and visual character of the area.</p>		
<p>2. Shade/Shadow</p>		
<p>Summer Shadows</p> <p>At 9:00AM, shadows would cast towards the west shading the Music Box and Fonda Theater which is adjacent to the project site to the west. At midday (noon) shadows to the north would be very short and would only encroach on the sidewalk adjacent to the project site to the north. At 3:00PM the shadows begin to move eastwards and extend into the intersection of Hollywood Boulevard and Gower Street. At 5:00PM the shadows elongate, stretching across Gower Street and encroach on the strip mall which is located on the southeast corner of Hollywood Boulevard and Gower Street. No shadow-sensitive uses would be encroached upon by the summer shadows cast by the proposed structure. Therefore, summer shadow</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>impacts from the proposed project to surrounding land uses would be less than significant.</p>		
<p>Winter Shadows</p> <p>Shadow-sensitive uses are located primarily to the northwest and north. Of these shadow-sensitive uses only two multifamily homes, located on the south side of Carlos Avenue, west of Gower Street, would experience any shading. This shading would be very minimal consisting of only a sliver of shade encroaching upon a small portion of these properties at 9:00AM. Given that the shadow is at the start of the day, it is not expected that the shadow would last more than three hours. By noon the shadows shift in a northerly direction and encroach upon the parking lot of Pep Boys located across Hollywood Boulevard to the north. By 3:00PM the shadows continue to move to the northeast covering the intersection of Hollywood Boulevard and Gower Street, and the strip mall which is located at the northeast corner of the intersection. Therefore, winter shadow impacts from the proposed project to surrounding shadow-sensitive land uses would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>Cumulative Impacts</p> <p>The only shadow sensitive related project that could be potentially affected by project shadows would be related project number 24 (86 room hotel and 5,000 square feet of specialty retail) located north of the project site, across Hollywood Boulevard. Shading of project number 24 would only occur in the winter months. At 9:00 AM the shadow has not yet reached project number 24. By noon the shadows have encroached upon related project 24 on the southern half of the project site. By 3:00 PM the shadows are no longer affecting any related projects. Given the shadow is cast onto this related project does not last longer than three hours, impacts would be less than significant. Since the shadows in the winter are</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>cast towards the north, the only related project that would potentially be considered cumulative would be related project number 24. Therefore, the proposed project's shadows are not cumulatively considerable when considered with related project shadows and cumulative impacts would be less than significant.</p>		
3. Illuminations/Glare		
<p>Illumination</p> <p>The project site is currently developed with a surface parking lot which is lit at night. Implementation of the proposed project however, would create additional sources of illumination on the project site as the site would be built with residential, and retail uses, which would intensify the uses currently on-site. Though the proposed project would increase ambient light levels on the project site and in the vicinity, the increase would be considered nominal, as the area is located in an urbanized location that is already illuminated at night. Therefore, project lighting spilling off the project site effecting adjacent light-sensitive areas would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>Glare</p> <p>The proposed project has been designed with a variety of exterior materials with careful consideration given to exclude materials that would create glare impacts. Further, compliance with the Los Angeles Municipal Code's reflective materials design standards (City Municipal Code Lighting Regulations, Chapter 9, Article 3, Section 93.0117), which limits reflective surface areas and the reflectivity of architectural materials used, would reduce any adverse impact from window glass glare. Implementation of the project would therefore not produce glare which would create a visual nuisance, a hazard or result in differential warming of</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
adjacent residential properties. The project impact with regard to glare would be less than significant.		
<p>Cumulative Impacts</p> <p>Development of the proposed project in conjunction with the related projects would result in redevelopment or infilling of residential and commercial land uses in the community. Artificial illumination from the proposed project and related projects would cumulatively increase the nighttime lighting of the areas surrounding those sites. These projects in addition to the proposed project are located in highly urbanized areas with existing nighttime illumination. The additional glow from these projects is considered negligible and not cumulatively considerable. Further, the related projects are subject to the City Zoning Code’s reflective materials design standards which limit reflective surface areas and materials. Thus, potential glare created from these related projects is not cumulatively considerable. Therefore, cumulative impacts from artificial light and glare are not expected and not significant.</p>	No mitigation measures are required.	Less than significant.
C. AIR QUALITY		
<p>AQMP Consistency</p> <p>The project site is located in a highly urbanized area of the City of Los Angeles which provides several modes of public transit service. The site is located within walking distance of the Metro Red Line station, employment and shopping sites for project residents. This type of infill development is consistent with the goals of the AQMP for reducing the emissions associated with new development. Based on this information, the proposed project would be consistent with the 2007 AQMP, and a</p>	No mitigation measures are required.	Less than significant.

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
less than significant impact would occur.		
<p>Construction - Emissions</p> <p>The analysis of daily construction emissions has been prepared utilizing the URBEMIS 2007 computer model recommended by the SCAQMD. Due to the construction time frame and the normal day-to-day variability in construction activities, it is difficult, if not impossible, to precisely quantify the daily emissions associated with the proposed construction activities. Construction is anticipated to occur over 22 days each month for approximately 24 months.</p> <p>Construction related daily emissions would not exceed SCAQMD significance thresholds for ROG, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} during construction. Therefore, the potential air quality impact associated with the construction of the proposed project would be less than significant.</p>	<p>The SCAQMD recommends the following measures which are required by the City of Los Angeles:</p> <p>C-1: The project developer shall implement the following measures to reduce the emissions of pollutants generated by heavy-duty diesel-powered equipment operating at the project site throughout the project construction phases. The project developer shall include in construction contracts the control measures as may required under Rule 403, at the time of development, including the following:</p> <ul style="list-style-type: none"> ▪ Keep all construction equipment in proper tune in accordance with manufacturer’s specifications. ▪ Use late model heavy-duty diesel-powered equipment at the project site to the extent that it is readily available in the South Coast Air Basin (meaning that it does not have to be imported from another air basin and that the procurement of the equipment would not cause a delay in construction activities of more than two weeks. 	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
	<ul style="list-style-type: none"> ▪ Use low-emission diesel fuel for all heavy-duty diesel-powered equipment operating and refueling at the project site to the extent that it is readily available and cost effective in the South Coast Air Basin (meaning that it does not have to be imported from another air basin, that the procurement of the equipment would not cause a delay in construction activities of more than two weeks, that the cost of the equipment use is not more than 20 percent greater than the cost of standard equipment. (This measure does not apply to diesel-powered trucks traveling to and from the site.) ▪ Utilize alternative fuel construction equipment (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent that the equipment is readily available and cost effective in the South Coast Air Basin (meaning that it does not have to be imported from another air basin, that the procurement of the equipment would not cause a delay in construction activities of more than two weeks, that the cost of the equipment use is not 	

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
	<p>more than 20 percent greater than the cost of standard equipment.</p> <ul style="list-style-type: none"> ▪ Limit truck and equipment idling time to five minutes or less and post a sign at the site to inform drivers of this law. ▪ Rely on the electricity infrastructure surrounding the construction sites rather than electrical generators powered by internal combustion engines to the extent feasible. ▪ General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. 	
<p>Construction - Localized Air Quality Impacts</p> <p>On-site emissions generated by the proposed project during the different phases of construction would not exceed the established SCAQMD localized thresholds for NO_x, CO, PM₁₀, and PM_{2.5} at a receptor distance of 50 meters (164 feet). Thus, the on-site construction emissions would also not exceed the SCAQMD localized thresholds at receptor distances beyond 50 meters. Therefore, the localized air quality impacts resulting from construction emissions associated with the proposed project would be less than significant for NO_x, CO, PM₁₀ and PM 2.5.</p>	<p>C-2: The project developer shall implement fugitive dust control measures in accordance with SCAQMD Rule 403. The project developer shall include in construction contracts the control measures as may be required under Rule 403 at the time of development, including but not limited to the following</p> <ul style="list-style-type: none"> ▪ Use watering to control dust generation during demolition of structures or break-up of pavement. The construction area and vicinity (500-foot radius) must be swept (preferably with 	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
	<p>water sweepers) and watered at least twice daily. Site wetting must occur often enough to maintain a 10 percent surface soil moisture content throughout all earth moving activities. All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.</p> <ul style="list-style-type: none"> ▪ Water active grading/excavation sites and unpaved surfaces at least three times daily. ▪ All paved roads, parking and staging areas must be watered at least once every two hours of active operations. ▪ Site access points must be swept/washed within thirty minutes of visible dirt deposition. ▪ Sweep daily (preferably with water sweepers) all paved parking areas and staging areas. ▪ Onsite stockpiles of debris, dirt or rusty material must be covered or watered at 	

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
	<p>least twice daily.</p> <ul style="list-style-type: none"> ▪ Cover stockpiles with tarps or apply non-toxic chemical soil binders. ▪ All haul trucks hauling soil, sand, and other loose materials must either be covered or maintain two feet of freeboard. ▪ At least 80 percent of all inactive disturbed surface areas must be watered on a daily basis when there is evidence of wind drive fugitive dust. ▪ Install wind breaks or green screens at the windward sides of construction areas. ▪ Operations on any unpaved surfaces must be suspended when winds exceed 25 mph. ▪ Suspend excavation and grading activity when winds (instantaneous gusts) exceed 15 miles per hour over a 30-minute period or more, so as to prevent excessive amounts of dust. ▪ All haul trucks hauling soil, sand, and other loose materials must either be covered or maintain two feet of freeboard. ▪ All haul trucks must have a capacity of 	

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
	<p>no less than twelve and three-quarter (12.75) cubic yards.</p> <ul style="list-style-type: none"> ▪ All loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust. ▪ Traffic speeds on unpaved roads must be limited to 15 miles per hour. ▪ Provide daily clean-up of mud and dirt carried onto paved streets from the site. ▪ Install wheel washers or rumble plates for all exiting trucks, or wash off the tires or tracks of all trucks and equipment leaving the site. ▪ All materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust. ▪ Operations on any unpaved surfaces must be suspended during first and second stage smog alerts. ▪ An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints 	

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Significance
	regarding excessive fugitive dust generation. Any reasonable complaints shall be rectified within 24 hours of their receipt.	
<p>Operation - Regional Emissions</p> <p>The analysis of daily operational emissions has been prepared utilizing the URBEMIS 2007 computer model recommended by the SCAQMD. The proposed project would generate daily emissions of ROG, NO_x, CO, SO_x and PM_{2.5}, and PM₁₀ which would not exceed the SCAQMD thresholds of significance. Therefore, impacts associated with regional operational emissions from the proposed project would be less than significant.</p>	No mitigation measures are required.	Less than significant.
<p>Operation - Localized Air Quality Impacts</p> <p>To determine whether operational emissions generated by the proposed project would result in localized air quality impacts, the operational emissions of the proposed project are analyzed against the SCAQMD's LSTs for a receptor location of 50 meters. The proposed project would generate a net increase in average daily emissions that does not exceed the thresholds of significance recommended by the SCAQMD. Therefore, operational emissions impacts would be less than significant.</p>	No mitigation measures are required.	Less than significant.
<p>Operation - Local CO Concentrations</p> <p>Motor vehicles are the primary source of pollutants in the project vicinity. For this analysis, CO concentrations were calculated based on the simplified CALINE4 screening procedure developed by the Bay Area Air Quality Management District</p>	No mitigation measures are required.	Less than significant.

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>and utilized by the SCAQMD. Future CO concentrations near the study intersections would not exceed national or State ambient air quality standards. Therefore, CO hotspots would not occur near these intersections in the future with operation of the proposed project. Therefore, impacts related to local CO concentrations at these intersections would be less than significant</p>		
<p>Cumulative Impacts – Construction</p> <p>Cumulative air quality impacts from construction, based on SCAQMD guidelines, are not analyzed in a manner similar to project-specific air quality impacts. Cumulative methods are different than the methodology used throughout this EIR in which all-foreseeable future development within a given service boundary or geographical area is predicted and quantified. Instead, the SCAQMD’s recommends that cumulative air quality analysis methods be based on performance standards and emission reduction targets necessary to attain the federal and State air quality standards identified in the AQMP, which was established to attain future air quality standards. If an individual project is consistent with the AQMP performance standards, the project’s cumulative impact should be considered less than significant. Based on the analysis provided earlier in this air quality analysis section, the proposed project would be consistent with the AQMP performance standards and consequently, would not result in a significant cumulative air quality impact and impacts would be less than significant.</p>	<p>C-3: For the residential development, in accordance with LEED New Construction Energy and Atmosphere Credit 1, the project shall be constructed with materials that reduce thermal loss and energy demand that meet the 2008 Title 24 regulations, or LEED Homes by 10% or greater.</p> <p>C-4: For the residential development, in accordance with LEED New Construction Indoor Environmental Quality Credit 6.1 or LEED Homes (Multi-family for California) Energy and Atmosphere Credit 8.2, the Applicant shall install lighting system controllability as well as energy-efficient lighting fixtures.</p>	<p>Less than significant.</p>
<p>Cumulative Impacts - Regional Operational Impacts</p> <p>The project site is in the Los Angeles City sub-area. The City has projected growth to the year 2020 in the 2007 AQMP. SCAG has determined that as long as the new population accommodated by a project is within the total population forecast for the sub-area for the build-out year, the proposed project is consistent with the AQMP</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>and cumulative impacts are offset by the AQMP. The proposed project is not anticipated to cause significant population growth. As such, the proposed project would be consistent with the total population forecast in the AQMP. Therefore, the impact of the proposed project, in conjunction with other projected growth, would not be cumulatively considerable with respect to regional emissions.</p>		
<p>Cumulative Impacts - Local Operational Impacts</p> <p>The traffic study for the project contains a list of proposed new projects in the vicinity of the project site. Traffic from these related projects was included in the analysis of local traffic impacts and potential carbon monoxide hotspots. Since future one-hour and eight-hour CO concentrations would be below national and State ambient air standards when the traffic from the proposed project and the other related projects is included in the analysis, impacts of the proposed project in conjunction with related projects would not be cumulatively considerable with respect to local air quality, and impacts would be less than significant.</p>	<p>C-5: The Applicant shall provide informational packets to new residents within the development locating nearby public transportation options.</p>	<p>Less than significant.</p>
<p>D. CULTURAL RESOURCES</p>		
<p>Historic Resources – Construction</p> <p>Hollywood Walk of Fame</p> <p>The Hollywood Walk of Fame is located directly north of the project site, on the sidewalk running along Hollywood Boulevard. The Hollywood Walk of Fame along Hollywood Boulevard could potentially be damaged during project construction. Without measures to protect the portion of the Hollywood Walk of Fame fronting the project site, this Historic-Cultural Monument (#194) could result</p>	<p>D-1 The Project shall not remove or damage any portion of the Hollywood Walk of Fame located adjacent to the Project site, consistent with a Retention, Repair and Restoration Plan (the "Walk of Fame Plan") to be approved by the Cultural Heritage Commission and the Hollywood Chamber of Commerce. The Walk of Fame Plan shall describe methods to be used to protect the Walk of Fame from damage during</p>	

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>in a potentially significant impact.</p> <p>Further, the City of Los Angeles Department of Transportation would require the project to widen Gower Street along the project frontage (refer to Section IV.L. Traffic/Transportation). The roadway widening is a requirement for the street to conform to the City’s Secondary Highway street standards. The required roadway improvements potentially affect the Hollywood Walk of Fame at the southwest corner of Hollywood Boulevard and Gower Street. The result of the roadway widening would involve the removal of the easternmost star on Hollywood Boulevard at Gower Street. In addition, the second easternmost star would be impacted with new curb work and required handicap ramps at the intersection, also requiring relocation. Therefore, as a result of the required roadway widening of Gower Street, a potentially significant impact would occur to the Hollywood Walk of Fame for the two easternmost stars located west of the intersection of Hollywood Boulevard and Gower Street. It should be noted that the roadway widening requirement and its impacts to the Hollywood Walk of Fame would occur regardless of the proposed project.</p>	<p>construction. The Walk of Fame Plan shall include the following provisions:</p> <ul style="list-style-type: none"> • The retention and protection of the Walk of Fame from damage during construction. • Standards for the repair of the Walk of Fame to its original condition at the time of construction commencement when construction is completed if damage occurs. • In situ protection with material such as plywood in the vicinity of construction activities. • Identification of specific construction access points to the site for trucks and heavy equipment. To the maximum extent feasible, these access points shall not cross the Walk of Fame. If it is necessary for heavy equipment to cross the Walk of Fame, the applicant shall provide additional protection for the Walk that avoids damage. • Repair or restoration of the Walk of Fame to its original condition at the time of construction commencement. • New paving material next to the Walk of Fame shall be compatible with the charcoal terrazzo used in the Walk of Fame but shall 	

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
	<p>not duplicate it.</p> <p>D-2 The Project Applicant shall contact the Hollywood Chamber of Commerce to determine an appropriate relocation plan for the two easternmost impacted stars, west of Gower Street and Hollywood Boulevard along the project site frontage, and shall work with the City of Los Angeles Office of Historic Resources and the Board of Public Works to implement the relocation plan. All parties involved (Project Applicant, Hollywood Chamber, Office of Historic Resources, and Board of Public Works) must agree on the relocation plan prior to issuance of building permits for the Project. The physical relocation of the affected stars may take place concurrent with the construction of street improvements per implementation of Project Mitigation Measure L-1.</p>	
<p>Historic Resources</p> <p>Construction Vibrations</p> <p>The Henry Fonda/Music Box Theater is located immediately west of the project site. As discussed in greater detail in Section I., Noise, of this Draft EIR, the Henry Fonda/Music Box Theater would be exposed to levels of groundborne vibration during project construction that would exceed the applicable City of Los Angeles</p>	<p>The project applicant would be required to comply with Mitigation Measure I-10, provided in Section IV.I. Noise</p> <p>I-10 The project developer shall provide ongoing monitoring during the construction phase of the proposed project to ensure that the operation of vibration-generating equipment at the project site would not result in any</p>	

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
thresholds, thereby resulting in potential physical damage to the theater. This is a potentially significant impact.	structural damage to the adjacent Music Box Theater.	
<p>Historic Resources – Operation</p> <p>The construction of a 20-story building directly next to and adjacent to the Henry Fonda/Music Box Theater would not diminish the potential historic status of the Henry Fonda/Music Box Theater. Hollywood is characterized by a diverse combination of building uses, styles, and eras, all densely arranged in close proximity. The setting of the area is typified by a mix of historic and non-historic buildings of varying height and massing. Numerous high-rise buildings are located on Sunset and Hollywood Boulevard in the general vicinity of the project site. At least two high-rise development projects are under construction within two blocks of the project site. Moreover, as previously mentioned, the project site is not located within the boundaries or adjacent to a historic district. As the Hollywood community is characterized by diversity in heights and massing, the proposed project would not impact the Henry Fonda/Music Box Theater potential historic resource.</p>	No mitigation measures are required.	Less than significant.
<p>Archaeological Resources</p> <p>The project site is located in an urbanized area, which has been previously disturbed by construction activities. As previously discussed, the Native American Heritage Commission preformed a Sacred Lands File (SLF) search for the project site and immediate project area. There are no known archaeological resources located on the project site or in the immediate vicinity.</p> <p>While it is possible that archaeological resources could be discovered during construction activities, it is unlikely due to the previous activity on the project site.</p>	<p>D-3 If any archaeological materials are encountered during the course of the project development, construction shall be halted. The services of an archaeologist shall be secured by contacting the Center for Public Archaeology - Cal State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist to assess the resources and</p>	

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Significance
<p>Nevertheless, since archaeological resources could be located in the subsurface, and impacts to these resources would be unknown until encountered during excavation, impacts to such resources would be potentially significant.</p>	<p>evaluate the impact. Copies of the archaeological survey, study or report shall be submitted to the UCLA Archaeological Information Center. A covenant and agreement shall be recorded prior to obtaining a grading permit.</p>	
<p>Paleontological Resources</p> <p>The project site is located in an urbanized area which has been previously disturbed by past activities associated with the construction of the existing building. According to the records of the Natural History Museum of Los Angeles County, no paleontological resources exist on the project site. However, fossil vertebrate localities do exist immediately due east of the project site within the same sedimentary deposits that occur on the project property. Deeper excavations may encounter significant remains of fossil vertebrates. Following the Society of Vertebrate Paleontology guidelines for paleontological mitigation, the paleontological sensitivity of the area including the proposed project site is considered of high potential. Since paleontological resources could be located subsurface and impacts to these resources would be unknown until encountered during excavation, impacts to such resources would be potentially significant.</p>	<p>D-4 If any paleontological materials are encountered during the course of the project development, construction shall be halted. The services of a paleontologist shall be secured by contacting the Center for Public Paleontology - USC, UCLA, Cal State Los Angeles, Cal State Long Beach, or the County Natural History Museum to assess the resources and evaluate the impact. Copies of the paleontological survey, study or report shall be submitted to the Los Angeles County Natural History Museum. A covenant and agreement shall be recorded prior to obtaining a grading permit.</p>	
<p>Human Remains</p> <p>No known human burials have been identified on the project site or within recorded resources located in the vicinity. While it is possible that human remains could be discovered during construction activities, it is unlikely due to the previously disturbed nature of the project site. Nevertheless, since human remains could be</p>	<p>D-5 If human remains are discovered at the project site during construction, work at the specific construction site at which the remains have been uncovered shall be suspended, and the City of L.A. Public Works Department and County Coroner shall</p>	

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>located subsurface and impacts to these resources would be unknown until encountered during excavation, impacts to such resources would be potentially significant.</p>	<p>be immediately notified. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains.</p>	
<p>Cumulative Impacts</p> <p>Cumulative impacts on historic resources evaluate whether impacts of the proposed project and related projects, when taken as a whole, substantially diminish the number of extant resources within the same or similar context or property type. It is not known at this time if future development of the related project sites would involve historic resources. It is possible that construction of the proposed project in conjunction with the related projects could physically damage the Henry Fonda/Music Box Theater as a result of construction vibration. However, it is anticipated that if historic resources are potentially affected, the related projects would be subject to the requirements of CEQA and City of Los Angeles historic resource protection ordinances. It is further anticipated that the effects of cumulative development on historic resources would be mitigated to the extent feasible in accordance with CEQA and other applicable legal requirements. Consequently, cumulative impacts on historic resources as a result of related project development are expected to be less than significant and thus, when evaluated in conjunction with the proposed project would not be cumulatively considerable. Development of the related projects would also require grading and excavation that could potentially affect archaeological, paleontological resources or human remains. The cumulative effect of these projects would contribute to the continued loss of subsurface cultural resources, if these resources are not protected</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>upon discovery. CEQA requirements for protecting archaeological, paleontological resources and human remains are applicable to development in the City of Los Angeles, as are local cultural resource protection ordinances. If subsurface cultural resources are protected upon discovery as required by law, impacts to those resources would be cumulatively less than significant and would not be cumulatively considerable.</p>		
E. GEOLOGY AND SOILS		
<p>Ground Surface Rupture</p> <p>No known active faults are mapped as crossing the project site or projecting towards the project site. The closest active fault is the Hollywood Fault, which is located about 0.5 miles north of the project site and is capable of generating a magnitude 6.4 earthquake. The Santa Monica Fault and the Newport-Inglewood Fault are located at a distance of 5.7 and 5.8 miles from the project site and are considered capable of generating magnitude 6.6 and 6.9 earthquakes, respectively. None of these faults pose a surface rupture potential to the project site. On this basis, ground rupture due to faulting is not considered a significant hazard at the project site and impacts would be less than significant.</p>	<p>Because the <u>Geotechnical Exploration Report, Proposed Multi-Level Development, SWC Hollywood Boulevard and Gower Street, Hollywood, California</u>, found that impacts associated with geology and soils would be less than significant, mitigation measures are not required pursuant to CEQA Guidelines Section 15126.4. However, the following mitigation measures are recommended which reflect existing legal requirements and/or good planning principles and would further reduce the project's less than significant impacts:</p> <p>E-1 The project shall comply with the recommendations listed on pages 10 through 18 in the Geotechnical Exploration Report, Proposed Multi-Level Development, SWC Hollywood Boulevard and Gower Street, Hollywood, California, prepared by Professional Service Industries, Inc., dated June 8, 2007 (herein incorporated by</p>	<p>Less than significant.</p>

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Significance
	reference).	
<p>Ground Shaking</p> <p>Although the project site is located within 0.5 miles of the active Hollywood Fault, and by many other faults on a regional level, the potential seismic hazard to the project site would not be higher than in most areas of the City of Los Angeles or elsewhere in the region. As the entire Southern California area is considered a seismically active region, every building in the region is susceptible to groundshaking and earthquakes. The City of Los Angeles Building Code includes regulations and requirements designed to reduce risks to life and property to the maximum extent feasible. Therefore, the risks from seismic ground shaking are considered to be less than significant.</p>	See Mitigation Measure E-1.	Less than significant.
<p>Liquefaction</p> <p>Subsurface exploration, performed for the Geotechnical Report, encountered interlayered silty, gravelly and clayey sands, clayey sands with silts and sandy clays and groundwater at an approximate maximum depth of 70 feet below existing grade. According to the Seismic Hazard Zone Maps of the California Division of Mines and Geology (CDMG), the project site is not located in an area prone to liquefaction. While a detailed liquefaction analysis was beyond the scope of the Geotechnical Report, based on the deep groundwater levels and subsurface composition, the site is considered to have a low liquefaction potential. Therefore impacts associated with liquefaction would be less than significant.</p>	See Mitigation Measure E-1.	Less than significant.
<p>Landslides</p>	See Mitigation Measure E-1.	Less than significant.

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>The topography of the project site is relatively flat and the site is not located in close proximity to any foothills or mountains, meaning that the possibility of landslides occurring on the project site is minimal. Based on the absence of significant slopes in the project area and the CDMG Seismic Hazard Zone Map for Beverly Hills the potential impact associated with landslides would be less than significant.</p>		
<p>Subsurface Conditions</p> <p>According to the geotechnical engineer, the on-site soil conditions are favorable for the proposed project design. Therefore, the proposed project would not expose people or structures to potential substantial adverse effects due to construction on an unstable geologic unit.</p>	<p>See Mitigation Measure E-1.</p>	<p>Less than significant.</p>
<p>Erosion and Topsoil</p> <p>Although project development has the potential to result in the erosion of soil during site preparation and construction activities, erosion would be reduced by implementation of appropriate erosion controls during grading. Additionally, the potential for soil erosion during the operation of the proposed project is low due to the generally level topography of the area and the fully developed aspects of the project site at the completion of build-out. With implementation of the applicable grading and building permit requirements and the application of Best Management Practices, a less than significant impact would occur with respect to erosion or loss of topsoil.</p>	<p>See Mitigation Measure E-1.</p>	<p>Less than significant.</p>
<p>Expansive Soils</p> <p>Expansive soils are typically associated with fine-grained clayey soils that have the</p>	<p>See Mitigation Measure E-1.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>potential to shrink and swell with repeated changes in the moisture content. A representative sample of the soil was tested to identify its expansive characteristics. The test result indicated that the tested soil has a low expansion potential. With construction of the proposed project in accordance with the Los Angeles Building Code Chapter IX, a less than significant impact associated with expansive soils would occur.</p>		
<p>Cumulative Impacts</p> <p>Geotechnical impacts related to future development in the City would involve hazards related to site-specific soil conditions, erosion, and ground shaking during earthquakes. These impacts would be site-specific and would not be common to nor shared with the impacts on other sites. Furthermore, development of each of the related projects and the proposed project would be subject to uniform site development and construction standards that are designed to protect public safety.. Therefore, cumulative geotechnical impacts would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>F. HAZARDS AND HAZARDOUS MATERIALS</p>		
<p>Hazardous Materials/Hazardous Wastes</p> <p>Given the storage of hazardous materials onsite and the observed staining of the pavement, there is the potential for contaminated soils to be present onsite. Therefore, as part of the Phase II ESA, soil samples were taken in the vicinity of the waste oil storage where the stained pavement was noted. These samples were tested for volatile organic compounds (VOC) by the US Environmental Protection Agency Method 8260 and total petroleum hydrocarbons by California Department of Health Services modification to EPA Method 8015. The detected concentrations are well below this soil screening level. Although no significant soil contamination</p>	<p>F-1 The project applicant shall prepare a contingency plan and reserve funding in the event that a fugitive UST or area of impacted soil is encountered during site redevelopment. This plan shall include the closure or abandonment of an identified UST under the supervision and in general accordance with the procedures of all appropriate local agencies and the disposal of impacted soil in accordance with all state,</p>	<p>Less than significant</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>was identified on the project site, due to the long period of operations as a gasoline station at the project site and the inability of PSI to access portions of the property due to the presence of vehicles and structures, it is not possible to rule out the potential for isolated areas of impacted soils to exist onsite. Therefore, a potentially significant impact would occur with project implementation with regard to soil contamination.</p>	<p>local and federal disposal regulations.</p>	
<p>Polychlorinated Biphenyls (PCBs)</p> <p>During site reconnaissance three pole-mounted electrical transformers on the western boundary of the project site were observed. Based on the long history of development on the project site the potential exists for the pole-mounted transformers to contain PCBs. However, transformers appeared to be in good condition with no signs of leaks or staining. The transformers are owned and maintained by Southern California Edison. PSI does not consider the transformers to be recognized environmental condition in connection with the project site and therefore a less than significant impact would occur.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>Asbestos-Containing Materials (ACMs)</p> <p>Friable materials that could potentially contain ACMs, such as drywall and acoustical ceiling tiles, were observed in the automotive service garage. However, the automobile service shop was demolished in June of 2007, and replaced with an asphalt paved parking lot. The asbestos removal operations were conducted in accordance with CAL-OSHA Asbestos for the Construction Industry Standard, SCAQMD and EPA rules and regulations and industry standards. As onsite ACMs were removed in accordance with all applicable regulations, the potential for ACM exposure no longer exists. Therefore impacts with regards to ACMs would be less</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
than significant.		
<p>Lead-Based Paint (LBP)</p> <p>Based on site observations and the age of the building (1935) the likelihood of occurrence of lead-base paint was considered high. However, the building has since been demolished. All abatement rules and regulations were followed during demolition of the automobile service shop. Lead-based paint is no longer present on the project site, and impacts caused by exposure to lead-paint would be less than significant.</p>	No mitigation measures are required.	Less than significant.
<p>Underground Storage Tank (UST)</p> <p>According to the HIST UST database, two 10,000-gallon and one 5,000-gallon fuel UST as well as one 1,000-gallon waste oil UST were installed on the project site in 1970. According to the SWEEPS UST database, four 10,000-gallon fuel tanks were installed on the project site in 1988. However, previous environmental reports reviewed as part of the Phase I ESA, the above mentioned USTs were removed in 1999. Closure status was granted to this facility by the Los Angeles City Fire Department in 2000. PSI requested a file review at the City of Los Angeles Fire Department to obtain a copy of this closure letter. At the Time of the Phase I ESA was prepared, no letter had been received. As part of the Phase II ESA soil borings were preformed at the historical locations of each of the four USTs. No USTs, VOCs, or TPHs were detected. Although no USTs or significant soil contamination was identified, due to the project site’s long period of operations as a gasoline station, and the inability of PSI to access portions of the property due to the presence of vehicles and structures, it is not possible to rule out the potential for fugitive USTs or isolated areas of impacted soils to exist onsite. Therefore, a</p>	See Mitigation Measure F-1.	Less than significant.

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>potentially significant impact would occur with project implementation.</p>		
<p>Methane Gas</p> <p>The project site is located approximately 300 feet north of a City of Los Angeles Methane Hazard Buffer Zone. As a result, limited methane soil gas testing was preformed as part of the Phase II ESA. During the first round of testing on May 21st, 2006, methane gas was detected at only one location at a concentration of 27 ppm. During the second round of testing on May 22nd, 2006, methane gas was not detected in the soil-gas samples. Since the proposed development is not located in a methane hazard zone or buffer zone, and only one out of five test probes detected very low levels of methane, impacts associated with methane gas would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>Operational Impacts</p> <p>The implementation of the proposed project would use, at most, minimal amounts of hazardous materials for routine cleaning and therefore would not pose any substantial potential for accident conditions involving the release of hazardous materials. The proposed project would not involve the routine transport, use or disposal of hazardous material. The proposed project would not produce hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste. Therefore, impacts concerning release of hazardous materials into the environment would be less than significant.</p>	<p>The following shall be implemented to reflect good planning principles during both construction and operation phases, where applicable:</p> <p>F-2 Sediment carries with it other work-site pollutants such as pesticides, cleaning solvents, cement wash, asphalt, and car fluids that are toxic to sea life.</p> <ul style="list-style-type: none"> • All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete; wood, and vegetation. Non 	

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
	<p>recyclable materials/wastes shall be taken to an appropriate landfill. Toxic waste shall be discarded at a licensed regulated disposal site.</p> <ul style="list-style-type: none"> • Leaks, drips, and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains. • Workers shall not hose down pavement at material spills. Dry cleanup methods shall be used whenever possible. • Dumpsters shall be covered and maintained. Place uncovered dumpsters under a roof or cover with tarps or plastic sheeting. • Where truck traffic is frequent, gravel approaches shall be used to reduce soil compaction and limit the tracking of sediment into streets. • All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. 	

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
	Drip pans or drop cloths shall be used to catch drips and spills.	
<p>Cumulative Impacts</p> <p>Development of the proposed project in combination with the 139 related projects has the potential to increase the use, storage, transport, and/or accidental release of hazardous materials during construction and operation. However, impacts with respect to hazards and hazardous materials are generally site specific. Further, local municipalities are required to follow local, state, and federal laws regarding hazardous materials and other hazards. Therefore, with compliance with local, state, and federal laws pertaining to hazards and hazardous materials, cumulative impacts would be less than significant.</p>	No mitigation measures are required.	Less than significant.
G. HYDROLOGY AND WATER QUALITY		
<p>Surface Water Quality - Construction</p> <p>Construction of the proposed project has the potential to affect the quality of storm water runoff. There are three general sources of short-term construction-related stormwater pollution associated with the proposed project: (1) the handling, storage, and disposal of construction materials containing pollutants; (2) the maintenance and operation of construction equipment, and (3) earth moving activities which, when not controlled, may generate soil erosion. According to the Los Angeles City Bureau of Engineering, routine safety precautions for handling and storing toxic and hazardous materials, and maintaining construction equipment in proper working condition, may effectively control the potential pollution of stormwater by these materials. These same types of common sense, “good housekeeping” procedures can also be extended to non-hazardous stormwater</p>	<p>G-1 All grading activities require grading permits from the Department of Building and Safety which include requirements and standards designed to limit potential impacts to acceptable levels. Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. The application of BMPs shall include, but is not limited to, the following mitigation measures:</p> <ul style="list-style-type: none"> • Excavation and grading activities shall be scheduled 	

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>pollutants such as sawdust and other solid wastes. Construction activities must adhere to the relevant stormwater management regulations under Los Angeles County’s NPDES Permit No. CA0061654. When properly designed and implemented, these Best Management Practices (BMPs) would ensure that short-term construction related water quality impacts are not significant.</p>	<p>during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.</p> <ul style="list-style-type: none"> • Appropriate erosion control and drainage devices shall be provided to the satisfaction of the Building and Safety Department. These measures include interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code, including planting fast-growing annual and perennial grasses in areas where construction is not immediately planned. • Stockpiles and excavated soil shall be covered with secured tarps or plastic sheeting. <p>G-2 To reduce the sediment that carries with it</p>	

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
	<p>other work-site pollutants such as pesticides, cleaning solvents, cement wash, asphalt, and car fluids that are toxic to sea life the following mitigation measures shall be implemented:</p> <ul style="list-style-type: none"> • All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete; wood, and vegetation. Non recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes shall be discarded at a licensed regulated disposal site. • Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains. • Do not hose down pavement at material spills. Dry cleanup methods shall be used 	

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
	<p>whenever possible.</p> <ul style="list-style-type: none"> • Waste containers shall be covered and maintained. Place uncovered waste containers under a roof or cover with tarps or plastic sheeting. • Where truck traffic is frequent, gravel approaches shall be used to reduce soil compaction and limit the tracking of sediment into streets. • All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop cloths shall be used to catch drips and spills. 	
<p>Surface Water Quality - Operations</p> <p>If not properly designed and constructed, the proposed project could increase the rate of urban pollutant introduction into stormwater runoff, and increase erosion, transport of sediment load and downstream siltation, all of which constitute avoidable impacts to surface water quality. In order to prevent these potential impacts, the project would be designed in compliance with Order No. 90-079 of the</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Significance
<p>Regional Water Quality Control Board, Los Angeles Region, which regulates the issuance of water discharge requirements to Los Angeles County (including Cities that are tributaries to the County for stormwater discharge), under NPDES Permit No. CA0061654. Because there would be no substantial increase in runoff as a result of the proposed project, urban contaminants that may be present in urban runoff from the site would not differ substantially in type or quantity than that which currently exists. The proposed project would be required to submit site drainage plans to the City Engineer and other responsible agencies for review and approval prior to development of any drainage improvements. Impacts to stormwater quality as a result of project implementation would be less than significant.</p>		
<p>Groundwater</p> <p>The proposed project would not contribute to groundwater depletion or interfere with groundwater recharge to an environmentally significant degree. The proposed project would not increase the amount of impervious surfaces (e.g., structures, concrete, and asphalt). Therefore, potential impacts to groundwater supplies or recharge would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>Surface Water Hydrology</p> <p>The proposed development would not result in a change in the project site coverage from existing setting conditions and would include approximately the same impervious and permeable surface ratios. Thus, there would be no increase in the total run-off from the project site. Due to the urban setting of the site and the surrounding area, the project would not significantly change drainage patterns.</p> <p>Therefore, the project would not result in any significant impacts related to the</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>amount of rate of stormwater runoff or drainage system effects. Furthermore, the proposed project would not substantially reduce or increase the amount of surface water in a water body as the site conditions pre- and post-project would not result in additional storm-water runoff. Since the project site is located in a built-out urban environment with impervious surfaces, surface water run-off would not increase to produce substantial change in the current or direction of water flow. Project specific impacts associated with drainage and surface runoff and the potential for increased flooding would be less than significant.</p>		
<p>Stormwater Runoff</p> <p>Runoff from the project site currently is and would continue to be collected on the site and directed towards existing storm drains in the project vicinity. All contaminants gathered during such routine drainage would be disposed of through compliance with applicable stormwater pollution prevention permits. Therefore, the proposed project would not provide substantial additional sources of polluted runoff to the storm drain system or increase storm water runoff from the project site above existing levels. Therefore, impacts related to project surface stormwater runoff would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>Flooding</p> <p>There are no lakes, rivers, or streams that flow within, through, or near the project site, and no ephemeral ponds exist on the project site. The closest major waterways/dams to the project site are the Hollywood and Silver Lake Reservoirs which are located approximately 1.5 and 2.5 miles to the northwest and east, respectively, of the project site. The project site is not located within the boundaries of the inundation zones for either of these reservoirs. The City of Los Angeles Bureau of Engineering designates the project site as within Flood Zone C.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>According to Federal Emergency Management Agency (FEMA), Flood Zone C describes flood insurance rate zones that are located outside of the 500-year floodplain, with minimal chance of flooding. Furthermore, the project site is located in a dense urban area that is completely surrounded by existing urban uses. Also, development of the proposed project would not introduce persons or structures into an area where they might be subject to flood hazards not previously experienced. In addition, implementation of the proposed project would not place structures which would impede or redirect flood flows. Therefore, flooding impacts as a result of project implementation would be less than significant.</p>		
<p>Seiche or Tsunami</p> <p>A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, lake or storage tank. Although the project site is located near the Hollywood Reservoir water storage facility, according to the LADWP no seiche at an LADWP facility has ever been recorded, even during the 1994 Northridge earthquake, and therefore, the LADWP does not consider seiches to be a potentially significant hazard. The project site is not located proximate to coastal waters, and as such, is not susceptible to tsunami (seismically induced tidal wave) hazards. Therefore, impacts relating to seiche and tsunami would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>Cumulative Impacts</p> <p>Development of the proposed project in combination with the 139 related projects would result in further development or redevelopment in an already urbanized area. As discussed above, the project site and the surrounding area are served by existing storm drains. Runoff from the project site and the surrounding urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the related projects would also</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>drain to the surrounding street system. However, little, if any additional cumulative runoff would be expected from the project site and the related project sites since this part of the City is already fully developed with impervious surfaces. Therefore, cumulative impacts to the existing or planned stormwater drainage system would be less than significant. In addition, development on each site would be subject to uniform site development and construction standards that are designed to ensure water quality and hydrological conditions are not adversely affected. All of the related projects would be required to implement BMPs and to conform to the existing NPDES water quality program. Therefore, cumulative water quality impacts would not be cumulatively considerable and would be less than significant.</p>		
H. LAND USE		
<p>Physically Divide an Established Community</p> <p>The potential for the proposed project to physically divide an established community is based on comparison of the existing land uses on and adjacent to the proposed project site. As previously discussed, the project site is developed with a surface parking lot. The entire project site is surrounded by either existing structures or surface parking areas. Therefore, the proposed project would not physically divide any established community or uses (and existing neighborhoods, communities, or land uses would not be disrupted, divided or isolated) and impacts would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>Land Use Consistency – General Plan Framework Element</p> <p>The project site is located within the Regional Center category of the General Plan Framework. The General Plan Framework is a guiding point for the future of the community. The Framework suggests that a Regional Center would contain</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>structures between 6- and 20- stories with a floor area ratio of between 1.5:1 and 6.0:1. The proposed project is proposing a floor area ratio of 4.5:1, which is within the envisioned range of floor area ratio for this type of development. However, the current “D” limitation on the site restricts the FAR to 2:1 FAR. The applicant proposes a new “D” limitation of 4.5:1 FAR which is still within the FAR range envisioned for the site and immediate area’s Regional Center Designation. Further, the proposed project’s integration of housing and commercial uses in a commercially-designated area is consistent with the goals and policies of the General Plan Framework in reinforcing the Regional Center character of the area. Therefore, no significant impacts due to consistency with land use designations in the General Plan Framework are anticipated.</p>		
<p>Land Use Designation – Hollywood Community Plan</p> <p>The Hollywood Community Plan designates the project site as Regional Center Commercial and refers to the City of Los Angeles Municipal Code for specific land uses permitted within this designation. The Regional Center Commercial land use designation is a commercial designation which allows for the construction of retail uses, offices, hotels, hospitals, service stations and garages, churches, schools, museums, broadcasting studios, parking areas and buildings, parks and playgrounds as well as multiple-family residential uses (such as apartments condominiums and multiple family housing units). This land use designation corresponds to Footnote 9 in the Community Plan, which limits development intensity to Height District 2, with a FAR or 4.5:1. The proposed project involves the construction of an approximately 197,503 square foot mixed-use development, consisting of commercial and residential components, with a maximum FAR of 4.5:1. The development features approximately 7,200 square feet of retail uses and 176 residential units. This type of development would be consistent with the Regional Center Commercial land use designation. Therefore, impacts on the existing land</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
use designation would be less than significant.		
<p>Land Use Designation – Hollywood Redevelopment Plan</p> <p>Under the First Amendment to the Hollywood Redevelopment Plan, the land use designations of the Hollywood Redevelopment Plan were updated to conform with the land use designations of the Hollywood Community Plan and a mechanism was established whereby the land use designations of the Hollywood Redevelopment Plan would automatically conform to any future changes in the Hollywood Community Plan. Redevelopment Plan Section 502. Because the proposed project would be consistent with the land use designations of the Hollywood Community Plan, as discussed above, the proposed project would be consistent with the land use designations of the Hollywood Redevelopment Plan.</p>	No mitigation measures are required.	Less than significant.
<p>Hollywood Signage Supplemental Use District</p> <p>The project site is located in the Hollywood Signage SUD. There would be two supergraphic signs included as part of the proposed project. One would be located at the corner of Hollywood Boulevard and Gower Street and the other on the western elevation. The proposed signage would meet the requirements of the Hollywood Signage SUD. No exceptions from the standards of the Hollywood Signage SUD are being requested as part of the proposed project. A Project Permit Compliance approval would be obtained from the City to document this consistency. Project signage would be complementary to and compatible with building architecture.</p>	No mitigation measures are required.	Less than significant.
<p>City of Los Angeles Planning and Zoning Code</p> <p>The zoning designation for the project site is C4-2D-SN on the northerly portion of</p>	No mitigation measures are required.	Less than significant.

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>the project site (Commercial, Height District No. 2, and Signage District), and C4-2D on the southerly portion of the project site (Commercial and Height District No. 2). The proposed project includes discretionary approval to change the current zoning for the site from C4-2D-SN and C4-2D to C4-2D-SN and C4-2D pursuant to L.A.M.C Section 12.32.F of the Los Angeles Municipal Code. The Zone/Height District Change (replace the “D” limitation for the site’s floor area ratio), Zoning Administrators Adjustment to allow for a zero-foot side yard (westerly side yard), in lieu of the 16-foot side yard required in the C4 Zone, and a 10-foot rear yard, in lieu of the 20-foot rear yard required in the C4 Zone, for the proposed parking podium levels (parking levels two through five) which contain residential parking, and other various discretionary actions would permit the new construction on the project site of a 20-story, 270 foot, mixed use building comprising a total of 176 residential units, and 7,200 square feet of retail space. With approval of the zone/height district change, Zoning Administrator’s Adjustment and other discretionary actions, impacts to zoning designation would be less than significant.</p>		
<p>Height/Floor-Area-Ratio</p> <p>The site is currently zoned C4-2D-SN and C4-2D. By right, Height District 2 permits an FAR of 6:1; however, the “D” limitation further restricts the FAR to 2:1. The proposed project would exceed the currently permissible 2:1 FAR for the site. The applicant has requested a zone change from the existing C4-2D-SN and C4-2D to a new C4-2D-SN and C4-2D, replacing the existing “D” limitation pursuant to L.A.M.C. Sections 12.32F. L.A.M.C. Section 12.32B authorizes the owner of a property to apply for a change of zone to delete the existing “D” limitation. Without the “D” limitation, the applicable Height District 2 floor area ratio standard of 6:1 would apply to the project site. However, the Hollywood Community Plan footnote 9 limits the FAR on the project site to 4.5:1, or 197,503.55 square feet. Also, although the Hollywood Community Plan Update is still in its draft phase, the</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>project would be consistent with the Hollywood Community Plan Update FAR designation of 4.5:1 for the site, if approved in its current form. This is noted for informational purposes only as plans are not binding until approved. Therefore, impacts with respect to floor area ratio would be less than significant with approval of the requested Zone Change.</p>		
<p>Density</p> <p>The proposed project is a mixed use development on a site zoned C4 and designated as a Regional Center. In accordance with Section 12.22.A18 of the City of Los Angeles Planning and Zoning Code, the proposed project’s residential density is governed by the R5 standards. Per Section 12.12 C 4 (c), the R5 zone requires a minimum of 200 square feet of lot area per dwelling unit. Based on the project site total area of 43,889.70 square feet (1.0076 acres) after dedications and the requested 5-foot merger along Gower, a maximum total of 219 residential units could be constructed. The proposed project would provide a total of 176 residential units. Therefore, the proposed project is consistent with residential zoning density requirements and impacts would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>Setback Requirement</p> <p>The applicant requests a Zoning Administrators Adjustment pursuant to L.A.M.C. Section 12.28 to permit a zero-foot side yard (westerly side yard), in lieu of the 16-foot side yard required in the C4 Zone, and a 10-foot rear yard, in lieu of the 20-foot rear yard required in the C4 Zone, for the proposed parking podium levels (Parking Levels 2 through 5) which contain residential parking. The area surrounding the project site is entirely commercial, observing no required yards. Observing the required yards would create a streetscape that is not uniform with the surrounding area. Therefore the granting of an adjustment would result in</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>development compatible and consistent with the surrounding uses and the impacts of the adjustment would be less than significant.</p>		
<p>Parking Requirement</p> <p>The proposed project would provide 345 parking spaces on one level subterranean and 4 level above grade parking levels, including 331 spaces for the residential development and 14 spaces for the retail development. Under the requirements of the LAMC, 194 parking spaces would be required for the development. As the proposed project would supply an excess of 151 parking spaces, the proposed project would be consistent with the LAMC parking requirements.</p> <p>The City of Los Angeles Planning Department Residential Parking Policy for Division of Land – No. AA 2000-1 establishes a standard parking requirement of 2 spaces per dwelling unit for condominium subdivisions of six or more units plus 0.25 space/unit for guest parking in non-parking congested areas or 0.5 space/unit for guest parking in parking congested areas. The project site is located in a parking congested area.</p> <p>Using this policy of two spaces/unit, plus 0.5 space/unit for guest parking results in a requirement of 440 parking spaces for the 176 residential units. However, the project proposes only 331 residential units resulting in 109 parking spaces less than required. The project applicant is confident the amount of proposed parking would meet the needs of the proposed project, since the residential portion of the project will operate as apartments and the applicant only requests a subdivision for financing purposes. The project is targeted to individuals and households attracted to a location with employment and urban amenities accessible by walking or by public transit. There are a number of public transit opportunities available within the project vicinity including the Metro Red Line Hollywood and Vine Station, and</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
Los Angeles Metropolitan Authority Bus Lines with stops located near the project site. With approval of the reduced parking requirements, project impacts to parking requirements would be less than significant.		
Land Use Compatibility There are no impacts identified with placement of project uses in relation to the existing surrounding uses of the project site. Therefore, no significant impacts would result from the proposed project with regard to land use compatibility.	No mitigation measures are required.	Less than significant.
Cumulative Impacts Development of the related projects is expected to occur in accordance with adopted plans and regulations. Development of the proposed project in conjunction with the related projects (as listed in Section III.B. Environmental Setting, Related Projects) would result in an intensification of existing prevailing land uses in the project area. In addition, based upon the information available regarding the related projects, it is reasonable to assume that the projects under consideration in the surrounding area would implement and support important local and regional planning goals and policies. The cumulative impacts of the project and related projects are less than significant.	No mitigation measures are required.	Less than significant.
I. NOISE		
Construction Noise Located to the east of the project site, across Gower Street, is a two-story and one-story recording facility. Even though office buildings and other commercial facilities are generally not considered sensitive receptors, and even though the	I-1 The project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at	Significant and Unavoidable

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>rooms in which the recording equipment is located are likely insulated against noise, due to presence of recording equipment which could be affected during the grading and construction phases of the proposed project, this use is conservatively assumed to be a sensitive receptor. Single-family residences are located approximately 230 feet to the southeast of the project site. The Music Box Theater is located directly west of the project site. Due to the use of heavy equipment during the construction phase, the proposed project would expose the surrounding off-site sensitive receptors to increased ambient exterior noise levels. Construction activities associated with the proposed project would only be allowed to occur between 7:00 A.M. through 9:00 P.M. in accordance with Section 41.40 of the LAMC and would not occur during recognized sleep hours for the single-family residences to the southeast. Nonetheless, an increase in ambient exterior noise levels exceeding 10 dBA would occur at the surrounding sensitive receptors as a result of construction activities at the project site. In addition, construction noise levels associated with the proposed project would exceed existing ambient noise levels by more than 5 dBA for more than 10 days in a three-month period, and therefore may impact daytime activities and the adjacent Music Box theater and recording facility. Therefore, construction related noise levels would continue to exceed the thresholds outlined in the L.A. CEQA Thresholds Guide, thus resulting in a significant impact.</p>	<p>adjacent uses unless technically infeasible.</p> <p>I-2 Noise-causing and groundborne vibration-causing construction activities whose specific location on the project site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses.</p> <p>I-3 Construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.</p> <p>I-4 The use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized. Examples include the use of drills, and jackhammers.</p> <p>I-5 The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.</p> <p>I-6 All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building</p>	

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
	<p>and Safety, which shall avoid residential areas and other sensitive receptors to the extent feasible.</p> <p>I-7 Two weeks prior to the commencement of construction at the project site, notification must be provided to the immediate surrounding off-site residential uses that discloses the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period.</p> <p>I-8 Construction times shall be limited to between 7:00 A.M. and 6:00 P.M. so as to not interfere with evening performances at the Music Box Theater.</p> <p>I-9 A construction liaison shall be provided to inform the nearby recording facility and Music Box Theater when peak noise and vibration activities are scheduled to occur.</p>	
<p>Construction-Related Groundborne Vibration</p> <p>The vibration velocities forecasted to occur at the off-site sensitive receptors would range from 0.003 PPV at the single-family residences located southeast of the</p>	<p>I-10 The project developer shall provide ongoing monitoring during the construction phase of the proposed project to ensure that the operation of vibration-generating equipment</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>project site to 0.995 PPV at Music Box Theater located immediately directly west of the project site. For the purposes of this analysis, the Music Box Theater is considered to be an “engineered concrete and masonry building,” while the recording facility and single-family residences located east and southeast, respectively, of the project site are considered to be “non-engineered timber and masonry buildings.” The Music Box Theater to the west of the project site would be exposed to a PPV groundborne vibration level that exceeds 0.3 inches per second during construction of the proposed project, while the recording facility and single-family residences located east and southeast, respectively, of the project site would not be exposed to PPV groundborne vibration levels that exceed 0.2 inches per second during construction of the proposed project. Thus, in terms of building damage, a potentially impact would occur at the Music Box Theater. The impact at the remaining identified off-site sensitive receptors would be a less than significant impact.</p> <p>In terms of human annoyance, the vibration levels forecasted to occur at the off-site sensitive receptors would range from 58 VdB at the single-family residences located southeast of the project site to 108 VdB at the Music Box Theater located directly west of the project site. As the vibration level at the Music Box Theater and recording facility would exceed the FTA’s 65 VdB threshold for land uses where vibration would interfere with interior operations, the vibration impacts at these two off-site receptors would be potentially significant. In regards to the single-family residences located southeast of the project site, the vibration levels experienced by these receptors would not exceed the FTA’s 80 VdB threshold for residences or places where people may sleep during construction of the proposed project. Thus, the vibration impacts at these nearby single-family residences would be less than significant.</p>	<p>at the project site would not result in any structural damage to the adjacent Music Box Theater.</p>	

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Significance
<p>Operational Noise - Vehicular Noise on On-Site Residential Uses</p> <p>The calculated future exterior noise levels at the proposed on-site residential units closest to Hollywood Boulevard would be approximately 72.9 dBA CNEL. Exterior-to-interior reduction of noise levels in newer residential units is generally 30 dBA or more. With this assumption, future noise levels associated with roadway traffic would result in an interior noise level of approximately 42.9 dBA CNEL and would therefore not exceed City or California Title 24 standards at the Project site for the units which face Hollywood Boulevard. Therefore, this impact would be less than significant.</p>	<p>I-11 All exterior windows associated with the proposed residential uses at the Project Site shall be constructed with double-pane glass and use exterior wall construction which provides a Sound Transmission Class of 50 or greater as defined in UBC No. 35-1, 1979 edition or any amendment thereto. The applicant, as an alternative, may retain an acoustical engineer to submit evidence, along with the application for a building permit, any alternative means of sound insulation sufficient to mitigate interior noise levels to below a CNEL of 45 dBA in any habitable room.</p>	<p>Less than significant.</p>
<p>Operational Noise - On-Site Parking Facilities</p> <p>Noise would be generated by activities within the one level of subterranean parking and four levels of above-grade podium parking that would be constructed with the development of the proposed project. Sources of noise within the above-ground parking levels would include engines accelerating, doors slamming, car alarms, and people talking. Noise levels within these parking levels would fluctuate with the amount of automobile and human activity. Noise levels would be highest in the early morning and evening when the largest number of people would enter and exit the project site. Automobile movements would comprise the most continuous noise source and would generate a noise level of approximately 56 dBA Leq (1-hour) at a distance of 50 feet, while car alarm and horn events, which would occur less frequently, would generate maximum noise levels as high as 49 dBA Leq (1-hour)</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>at a distance of 50 feet. Overall a composite noise level of 60 dBA Leq (1-hour) at a distance of 50 feet is typically associated with parking structures.</p> <p>As the subterranean parking level would be fully enclosed on all sides, noise generated at these levels would not affect the existing off-site sensitive receptors located adjacent to the project site. In addition, as part of the project design, the four levels of above-grade parking would also be an enclosed concrete parking garage that would be hidden behind an architectural façade to complement the building and its surroundings. As such, due to the enclosed design of the four above-grade parking levels, the noise levels generated within these levels would also not affect the existing off-site sensitive receptors located adjacent to the project site. Furthermore, operational-related noise levels generated by motor driven vehicles within the project site are also regulated under the LAMC. Specifically, with regard to motor driven vehicles, Section 114.02 of the LAMC prohibits the operation of any motor driven vehicles upon any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than five decibels. Therefore, this impact would be less than significant.</p>		
<p>Operational Noise - Off-Site Vehicular Noise</p> <p>An increase in traffic resulting from implementation of the proposed project may increase the ambient noise levels at sensitive off-site locations in the project vicinity. The proposed project would increase local noise levels by a maximum of 0.1 dBA CNEL for several roadway segments. It should be noted that several of the analyzed roadway segments would not experience an increase in roadway noise as a result of the proposed project. Because the increase in local noise levels at all of the analyzed roadway segments resulting from implementation of the proposed project would not exceed the thresholds in the L.A. CEQA Thresholds Guide, they</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>would not represent a substantial permanent increase in ambient noise levels. Therefore, this impact would be less than significant.</p>		
<p>Operational Noise - HVAC Systems</p> <p>The proposed project would include rooftop HVAC units, and exhaust fans would be installed on the proposed mixed-use building. Although the operation of this equipment would generate noise, the distances of the recording facility and single-family residential uses to the east and southeast, respectively, of the project site would be adequate enough such that these noise sources would not potentially disturb the existing off-site sensitive receptors. The noise levels generated by the new HVAC units and exhaust fans for the project could potentially disturb the Music Box Theater to the west of the Project Site due to its proximity to the project site. However, the design of these on-site HVAC units and exhaust fans would be required to comply with the regulations under Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Thus, the on-site equipment would be designed such that they would be shielded and appropriate noise muffling devices would be installed on the equipment to reduce noise levels that affect nearby noise-sensitive uses. In addition, nighttime noise limits would be applicable to any equipment items required to operate between the hours of 10:00 PM and 7:00 AM. As such, noise impacts on off-site sensitive uses from operation of mechanical equipment at the project site would be less than significant.</p> <p>In order to ensure that on-site operational noise would not adversely affect the future residents at the Project Site, and as part of the City’s Standard Conditions of Approval, Mitigation Measure I-11 would be implemented to ensure that all exterior windows associated with the proposed residential uses would be</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
constructed such that sufficient sound insulation is provided to ensure that interior noise levels would be below a CNEL of 45 dBA in any residential unit.		
<p>Operational Vibration</p> <p>The proposed project, as a mixed-use development consisting of residential and commercial uses, would not include stationary equipment that would result in high vibration levels, which are more typical for large commercial and industrial projects. While groundborne vibration at the project site and immediate vicinity may currently result from heavy-duty vehicular travel (e.g., refuse trucks, delivery trucks, and transit buses) on the nearby local roadways, the proposed land uses at the project site would not result in the increased use of these existing heavy-duty vehicles on the local roadways. As such, vibration impacts associated with operation of the proposed project would be less than significant.</p>	No mitigation measures are required.	Less than significant.
<p>Cumulative Construction Noise</p> <p>The nearest related project to the project site is the proposed hotel and specialty retail development located at 6107 Hollywood Boulevard (Related Project No. 23), which is located across Hollywood Boulevard from the proposed project. As the potential exists such that the construction of this related project could occur at the same time as that of the proposed project, and due to the proximity of these two sites, it is anticipated that under the circumstances where construction at these sites were to occur concurrently, the culmination of the construction noise levels from these two sites would result in a substantial increase in ambient noise levels at the nearby sensitive receptors in the general area. Therefore, even with implementation of the proposed mitigation measures, the cumulative noise impact that would occur, should construction of the nearby related project occur at the same time as the</p>	No mitigation measures are required.	Significant and Unavoidable.

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>proposed project, would be significant and unavoidable and the proposed project's contribution cumulatively considerable.</p>		
<p>Cumulative Construction Vibration</p> <p>The nearest related project to the project site where construction activities could potentially occur concurrently with that of the proposed project is the proposed hotel and specialty retail development at 6107 Hollywood Boulevard. As the potential exists such that the construction of this related project could occur at the same time as that of the proposed project, and due to the proximity of these two sites, it is anticipated that under the circumstances where construction at these sites were to occur concurrently, the culmination of the construction vibration levels from these two sites would result in a substantial increase in ambient noise levels at the nearby sensitive receptors (i.e., Music Box Theater) in the general area. Therefore, even with implementation of the proposed mitigation measures, the cumulative vibration impact that would occur, should construction of the nearby related project occur at the same time as the proposed project, would be significant and unavoidable and the proposed project's contribution cumulatively considerable.</p>	<p>No mitigation measures are required.</p>	<p>Significant and Unavoidable.</p>
<p>Cumulative Operational Noise</p> <p>The increase in roadway noise from cumulative traffic volumes would not exceed the applicable 3.0 dBA CNEL and 5.0 dBA CNEL thresholds at any of the study roadway segments. Thus, the noise increase would not be substantial, and the cumulative impact associated with mobile source noise would be less than significant.</p> <p>With respect to stationary sources, all related projects would be required to comply with the regulations under Section 112.02 of the LAMC, which prohibits noise</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dB. In addition, all related projects would require exterior walls to be constructed to provide a Sound Transmission Class of 50 or greater as defined in UBC No. 35-1, 1979 edition or any amendment thereto, or to mitigate interior noise levels below a CNEL of 45 dBA in any habitable room. Consequently, all on-site equipment would be designed such that they would be shielded and appropriate noise muffling devices would be installed on the equipment to reduce noise levels that affect nearby noise-sensitive uses. Thus, with conformance with LAMC Section 112.02 and UBC No. 35-1, 1979 edition, the cumulative noise impact associated with stationary sources would be less than significant.</p>		
J. POPULATION AND HOUSING		
<p>Direct Growth - Population</p> <p>Based on an average household size of 2.3 persons for households in the HCPA, approximately 405 people would occupy the 176 residential units. The increase in residential population resulting from implementation of the proposed project (405 persons) is considered minimal, as it would represent approximately 2.7 percent of the anticipated population growth of 14,821 persons in Hollywood by 2020. This would not be considered a substantial increase, because the addition of 405 persons would be within the population projection in the HCPA. As a result, the development of the proposed project would not directly induce substantial residential population growth not planned or anticipated, and impacts relating to residential population would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Significance
<p>Direct Growth - Housing</p> <p>The proposed project would add 176 housing units to the City's housing inventory. The proposed project's residential component would provide additional units to the City's and Community Plan's housing stock. However, this would not be a substantial increase, because the addition of 176 housing units to the Community's housing inventory would represent approximately 3 percent of the anticipated new housing units between 2005 and 2010 would not exceed the projected growth rates for the Community. As a result, the development of the proposed project would not directly induce substantial housing growth, and impacts relating to housing would be less than significant.</p>	No mitigation measures are required.	Less than significant.
<p>Construction-Related Population and Housing Growth</p> <p>Construction of the proposed project would result in increased employment opportunities during the project's construction period. However, the employment opportunities provided by the construction of the proposed project would not likely result in household relocation. Since construction workers would not relocate to the area, such workers would not cause an increase population or housing. Overall, the construction of the proposed project would have a less than significant direct impact on housing and population growth.</p>	No mitigation measures are required.	Less than significant.
<p>Indirect Growth</p> <p>The proposed project would include 7,200 square feet of retail space. The proposed project would generate job opportunities for approximately 16 net new employees onsite. Based on a ratio of approximately 2.3 persons per household, the 16 net jobs generated by the proposed project would generate an additional 37 new residents.</p>	No mitigation measures are required.	Less than significant.

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Significance
<p>The total project population, including the residential component combined with the commercial uses (405 + 37 = 442 people), would constitute approximately 3 percent of the Hollywood population growth expected by 2010. This is not considered to be a substantial increase, as the project's contribution to the growth does not exceed the population estimate for the Hollywood Community Plan by 2010. As such, the population growth associated with the proposed project has already been anticipated and planned for in the HCPA, and impacts would be less than significant.</p>		
<p>Housing or Population Displacement</p> <p>The project site is currently improved with a parking lot and does not contain any housing or people. The implementation of the proposed project would not displace any housing or people, necessitating the construction of replacement housing elsewhere. Therefore, no impacts with respect to housing or population displacement would occur.</p>	No mitigation measures are required.	Less than significant.
<p>Cumulative Impacts - Employees</p> <p>The commercial related projects in combination with the proposed project would potentially yield a combined employee increase of approximately 19,234 employees. Based on an estimate of one new housing unit per new employee, the cumulative employment would indirectly result in demand for approximately 19,234 new residences within the related projects area. Based on a Citywide population increase between 2000 and 2010 of approximately 395,305 individuals, the development of the proposed project would not indirectly induce substantial cumulative population and housing growth as a result of new employment opportunities, and the associated cumulative impact would be less than significant.</p>	No mitigation measures are required.	Less than significant.

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>Cumulative Impacts - Housing</p> <p>The dwelling units that would be developed with the related projects in combination with the proposed project’s dwelling units would potentially yield a combined population increase of approximately 27,726 persons. While the number of people that would be generated by the proposed project in combination with the related projects would potentially exceed the projected 2005-2010 population increase for the HCPA, this overall growth has been anticipated in SCAG, City and CRA regional forecasts. Moreover, the concentration of population and employment growth in a highly urbanized area such as Hollywood, with excellent access to the regional transportation system, is promoted in numerous regional and local land use plans and policies. Therefore, the proposed project’s incremental contribution to cumulative population and housing growth would not be considerable, and cumulative impacts associated with population and housing would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>K. PUBLIC SERVICES</p>		
<p>1. FIRE SERVICES</p>		
<p>Construction</p> <p>Construction of the proposed project would increase the potential for accidental on-site fires from such sources as the operation of mechanical equipment, use of flammable construction materials, and from carelessly discarded cigarettes. In most cases, the implementation of “good housekeeping” procedures by the construction contractors and the work crews would minimize these hazards. Good housekeeping procedures that would be implemented during construction of the proposed project include: the maintenance of mechanical equipment in good operating condition; careful storage of flammable materials in appropriate containers; and the immediate</p>	<p>K.1-1 Prior to recordation of a final map or the approval of a building permit, the applicant shall submit the plot plan for review and approval by the Fire Department.</p> <p>K.1-2 Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>and complete cleanup of spills of flammable materials when they occur.</p> <p>Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and by partial lane closures during street improvements and utility installations.</p> <p>These impacts, while potentially adverse, are considered to be less than significant for the following reasons: construction impacts are temporary in nature and do not cause lasting effects; and partial lane closures would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the project site, flagmen would be used to facilitate the traffic flow until construction is complete. Therefore, construction-related impacts to fire protection services would be less than significant.</p>	<p>than 28 feet in width.</p> <p>K.1-3 No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant</p> <p>K.1-4 Access for Fire Department apparatus and personnel to and into the structure, including the parking facility, shall be required.</p>	
<p>Response Distance</p> <p>The project site is within a 0.3-mile radius of a LAFD fire station housing a Fire Engine Company. In addition, the project site is within a 0.6-mile radius of a LAFD fire station housing another Fire Engine Company, Paramedic Rescue Ambulance Company, a Light Force Truck and Engine, and a Basic Life Support Rescue Ambulance. A third fire station within a 2.2-mile radius would be able to provide additional support to the project site. The response distance from these fire stations meets LAMC recommendations, and therefore, the project site's proximity to three well-equipped fire stations, fire protection response would be considered adequate with respect to response distance and impacts would be less than</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Significance
significant.		
<p>Emergency Access</p> <p>The proposed project would not involve any other activities during its operational phase that could impede public access or travel upon public rights-of-way or would interfere with an adopted emergency response or evacuation plan. Thus, project implementation would not require the construction or expansion of fire stations or other fire protection facilities, the construction of which could cause significant environmental impacts. Therefore, impacts would be less than significant.</p>	No mitigation measures are required.	Less than significant.
<p>Fire Flows</p> <p>Currently, water pressure and availability in the project are expected to be sufficient to meet the existing LAFD's fire flow requirements. The Water Operations Division of the DWP would perform a fire flow study at the time of permit review in order to ascertain whether further water system or site-specific improvements would be necessary. Hydrants, water lines, and water tanks would be installed per Fire Code requirements and would be based upon the specific land uses of the proposed project. Therefore, with respect to fire flows, fire protection would be adequate.</p>	No mitigation measures are required.	Less than significant.
<p>LAFD Review</p> <p>Based on the existing staffing levels, equipment, facilities, and most importantly, response distance from existing stations, it is expected that the LAFD could accommodate the proposed project's demand for fire protection service. Therefore, the proposed project would not necessitate the construction or expansion of a fire station to maintain acceptable service ratios, response times, or other performance</p>	No mitigation measures are required.	Less than significant.

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>objectives of the LAFD, the construction of which could cause significant environmental impacts. Thus, with respect to LAFD review, a less than significant impact would occur.</p>		
<p>Cumulative Impacts</p> <p>The proposed project, in combination with the construction and operation of the 139 related projects would increase the demand for fire protection services in the project area. Similar to the proposed project, each of the related projects would be individually subject to LAFD review and would be required to comply with all applicable construction-related and operational fire safety requirements of the LAFD and the City of Los Angeles in order to adequately mitigate fire protection impacts. If any of the related projects would create demands on fire protection staffing, equipment, or facilities such that a new station would be required, potential environmental impacts would be addressed in conjunction with the environmental review for that project. Therefore, the proposed project would not have a cumulatively considerable incremental effect upon fire protection services and the proposed project and related project’s cumulative impact would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>2. POLICE SERVICES</p>		
<p>Construction</p> <p>Construction sites can be sources of attractive nuisances, providing hazards, and inviting theft and vandalism. When such common sense precautions are taken, there is less need for local law enforcement at the construction site.</p> <p>Construction of the proposed project is not expected to cause significant congestion</p>	<p>K.2-1 During construction activities, the project developer shall ensure that all onsite areas of active development, material and equipment storage, and vehicle staging, that are adjacent to existing public roadways, be secured to prevent trespass.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>at the local study intersections. Although minor traffic delays may occur during construction, particularly during the construction of utilities and street improvements, impacts to police response times would be minimal and temporary. Therefore, the proposed project’s construction-related impacts to police protection services would be less than significant.</p>		
<p>Operation</p> <p>The proposed project would introduce 405 new residents to the project site. In addition, the commercial component of the proposed project would introduce 14 new employees. Thus, an increase in the demand for police protection services is anticipated. The needs projection for the project area (i.e. RD 637) is considered low compared to other areas of the city. An increase of police service calls from the project site would not be expected to increase the crime rate in the Hollywood area to the extent that a new or expanded police station or other facilities would be required. The LAPD has stated that the Hollywood Community Police Station is staffed and equipped to provide full service to the Hollywood area, which includes the project site, and that the proposed project would not result in the need for construction or expansion of police stations or other police protection facilities. As such, no new or expanded police stations would be needed, the construction of which could cause significant environmental impacts, as a result of the proposed project. Therefore, there would be no operational impacts to police protection services.</p>	<p>K.2-2 Prior to site plan approval, the building and layout design of the proposed project shall include crime prevention features, such as nighttime security lighting, building security systems, and secure parking facilities.</p> <p>K.2-3 Prior to recordation of a final map or the approval of a building permit, the project developer shall submit a plot plan for the proposed development to the LAPD’s Crime Prevention Section for review and comment. Security features subsequently recommended by the LAPD shall be implemented, to the extent feasible.</p>	<p>Less than significant.</p>
<p>Cumulative Impacts</p> <p>The cumulative increase of police service would require additional officers to maintain the existing ratios of officers to civilians. As the proposed project would</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>not incrementally contribute to the cumulative demand for police protection services therefore not cumulatively considerable and impacts would be less than significant. Furthermore, any new or expanded police station would be funded via existing mechanisms (i.e., sales taxes, government funding) to which the proposed project and related projects would contribute. It is possible that the additional officers generated by the proposed project in combination with the related projects could be accommodated within the Hollywood Community Police Station. It is likely that over time a new or expanded police station would be needed to accommodate the additional officers hired as a result of cumulative growth. However, it is anticipated that any new or expanded police station would be subject to environmental review in accordance with CEQA and any potential environmental impacts would be addressed at that time.</p> <p>As the proposed project would not incrementally contribute to the cumulative demand for police protection services therefore not cumulatively considerable and impacts would be less than significant.</p>		
3. SCHOOL SERVICES		
<p>Project Impacts</p> <p>The proposed residential and commercial uses are estimated to generate a total of 31 elementary students, 15 middle school students, and 15 high school students. Impacts would be less than significant with reference to Grant Elementary School and Le Conte Middle School. However, project impacts would be potentially significant with reference to Hollywood High. However, with the opening of the two additional schools in fall 2008, Dorothy V. Johnson Community Day School and Helen Bernstein, the overcrowding at Hollywood would be relieved. The new schools have already opened well before the proposed project, so impacts to</p>	<p>K.3-1 The applicant will pay all applicable mandatory school impact fees to LAUSD to offset the impact of additional student enrollment at schools serving the project area.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
schools would be less than significant. Further, the project applicant is required to pay applicable school fees to LAUSD to offset the impact of additional students enrolled in District schools serving the project site.		
<p>Cumulative Impacts</p> <p>The 139 related projects would generate approximately 2,536 elementary school students, 1,211 middle school students, and 1,219 high school students, for a total of 4,956 students. None of the public schools that would serve the proposed project and the related projects would have adequate capacity to accommodate the cumulative student generation. Therefore, new or expanded schools may be needed, which would result in a potentially significant cumulative impact. However, related project nos. 46, 47, 49, 53, 57, 58, and 96 involve the addition of school space. As such, these projects will not involve the generation of students, but will instead increase available school space. Additionally, as for the proposed project, the applicants of the related commercial and residential projects would be expected to pay required developer school fees to the LAUSD (pursuant to SB 50) to help reduce any impacts they may have on school services. Therefore, the proposed project's impact on schools would not be cumulatively considerable and cumulative impacts would be less than significant.</p>	No mitigation measures are required.	Less than significant.
4. PARKS & RECREATION		
<p>Project Impacts</p> <p>The proposed project would introduce approximately 405 permanent residents to the project site. Though the proposed project would provide approximately 16,775 square feet of open space, the project population increase would generate additional demand for recreation and park services when the project is complete. Applying</p>	<p>K.4-1 The applicant shall pay the required \$200 per dwelling unit fee paid to the Department of Building and Safety in accordance to the Dwelling Unit Construction Tax required by the Los Angeles Municipal Code Section</p>	Less than significant.

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>the long range planning goal in the Public Recreation Plan of four acres of parkland per 1,000 residents, the 405 additional residents created by the project would demand an equivalent of 1.62 acres of recreational space and uses. However, the proposed project would fall short of the recommended acreage of parkland. The City requires developers of subdivisions to dedicate parkland or to pay fees in lieu of parkland dedication. If and to the extent the proposed onsite recreational and outdoor facilities do not fully satisfy the requirements of the Quimby Act, the project developer would be required to pay Quimby fees to the City, to satisfy the balance of its obligations under the Quimby Act. The incorporation of onsite recreational amenities and fulfillment of Quimby Act obligations would offset the increased demand for park and recreational services generated by the proposed project. For these reasons, the project’s impact on park and recreational facilities would be less than significant.</p>	<p>21.10.3(b). K.4-2 The applicant shall comply with the obligation to pay Quimby/Park Fees as required by the Los Angeles Municipal Code Section 17.12.</p>	
<p>Cumulative Impacts</p> <p>The increase in the residential population by cumulative growth in the Hollywood CPA and proposed project area would, in the absence of mitigation, lower the City’s existing parkland to population ratio, which is below their preferred standard. This could potentially result in a cumulative impact on recreational and park services. However, the inclusion of onsite recreational facilities and satisfaction of Quimby Act obligations would reduce the project’s impacts to less than significant. Therefore, the proposed project would not result in a cumulatively considerable contribution to a potential significant cumulative impact to demand for recreational and park services.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
5. LIBRARY SERVICES		
<p>Project Impacts</p> <p>Development of the proposed project would increase the demand for library services in the area, with the addition of 405 new permanent residents. Therefore, based on the State of California standards, the proposed project would generate need for 203 square feet (405 x 0.5) of library space. The Goldwyn Hollywood Branch currently meets the demands of the surrounding community and is one of the busiest branches in the Los Angeles Public Library system. The addition of 203 square feet is less than the size of one bedroom. The expansion of the Library by 203 square feet would not result in a substantial adverse physical impact as the construction of which would not cause a significant environmental impact.</p>	No mitigation measures are required.	Less than significant.
<p>Cumulative Impacts</p> <p>Of the 139 related projects, only those projects that would generate residents were analyzed with respect to library service demands. The proposed project and the residential related projects would generate a cumulative population increase of 27,446 residents. This would result in a demand for approximately 13,723 square feet of library space. The Goldwyn Hollywood Branch Library currently meets the demands of the surrounding community, but this library is not likely to meet the cumulative demand of the proposed project in combination with the related projects. The Hollywood Redevelopment Plan Amendment EIR concluded that cumulative impacts with respect to libraries would be less than significant. Therefore, the proposed project's impact on libraries would not be cumulatively considerable and cumulative impacts would be less than significant.</p>	No mitigation measures are required.	Less than significant.

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
L. TRAFFIC AND TRANSPORTATION		
<p>Construction Impacts</p> <p>a large number of projects are either currently underway or are proposed for construction within the project vicinity (the “related projects”). As a result, the Hollywood community is currently experiencing a substantial amount of construction related activity, producing substantial congestion and delay at various locations due to street closures, lane closures, large construction vehicles, and other factors. Although the proposed timelines for some of the area developments are known, the City does not have any specific knowledge or control of the construction schedules for most of the area projects.</p>	<p>L-1 Construction activities such as lane closures and haul truck routes shall not overlap or peak at the same time in the same area, or along the same routes. This coordination shall also extend to the approved locations of the haul truck staging and construction worker parking locations, to avoid secondary parking impacts in or near the project vicinity due to large trucks or numerous worker vehicles.</p> <p>L-2 Should project construction activity temporarily affect the operations of the bus stop itself (including repair and/or replacement of existing broken curb or sidewalks), the project applicant shall contact Metro to coordinate temporary relocation of the bus stop or other applicable measures to maintain bus service to the project area throughout project construction.</p>	<p>Less than significant.</p>
<p>Future Traffic Conditions</p> <p>Expected ambient traffic growth and traffic increases from other developments in and around the project vicinity will have a substantial detrimental effect on traffic conditions throughout the study area. As compared to the existing (2007)</p>	<p>In addition to the two potentially significant intersections identified (Hollywood Blvd. & Gower St.; Sunset Blvd. & Gower St.), a third potentially significant impact at Gower Street and Selma Avenue was identified in the Traffic Study; however, LADOT</p>	<p>Significant and unavoidable at:</p> <ul style="list-style-type: none"> • Hollywood Boulevard and Gower Street, • Sunset Boulevard and Gower Street.

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>conditions, where only four intersections exhibited LOS E or F conditions during the peak hours, by the future year 2011, a total of nine intersections are expected to operate at LOS E or F during at least one of the peak hours, with four of these locations showing LOS F conditions during both the AM and PM peak hours. Further, the ambient and related projects' traffic growth, coupled with a lack of available roadway improvements along the major surface street corridors in the area, will result in high congestion levels along most of the key travel facilities in the project vicinity, with a number of intersections exhibiting traffic volume demands in excess of 100 percent of their design capacities, with a few locations forecast to experience traffic demands ranging from 125 to 175 percent of capacity. These conditions are indicative of a substantial breakdown in corridor-level operations, with stop-and-go traffic flow and significant delays extending well beyond the typical peak periods.</p> <p>Once developed, traffic generated by the proposed project will add to the cumulative traffic increases expected in the project vicinity, and could also have an effect on the operations of the study intersections. The net traffic from the proposed development could be expected to produce a significant impact at two of the 13 study intersections examined during both the AM and PM peak hours: at the site adjacent intersection of Hollywood Boulevard and Gower Street, and at Gower Street and Sunset Boulevard. A third potential significant impact at Gower Street and Selma Avenue was identified in the project traffic study; however, recent LADOT Policy Memo 09-01, included in Appendix H to this Draft EIR, notes that this location, which is unsignalized, is not appropriate for identification as "significantly impacted", and was therefore evaluated only with regard to potential installation of a new traffic signal. Therefore, based on LADOT's current policy, no significant project impact will occur at this location. However, project traffic impacts at the remaining 10 study intersections are generally relatively minor, and</p>	<p>Policy Memo 09-01 notes that this location, which is unsignalized, is not appropriate for identification as "significantly impacted", and was therefore evaluated only with regard to potential installation of a new traffic signal. Therefore, based on LADOT's current policy, no significant project impact will occur at this location). The project will be responsible for mitigating, to the extent feasible, the traffic-related impacts of its own development, and therefore, a number of preliminary roadway improvements were identified and presented to LADOT for consideration. Following their review, the recommended mitigation measures were deemed infeasible due to the potential for significant secondary impacts (primarily the removal of existing on-street parking within the study area).</p> <p><i>Intersection Mitigation Measures</i></p> <p><u>Hollywood Boulevard and Gower Street</u></p> <p>Due to right-of-way constraints, and the City's desire to maintain sidewalk widths and preserve on-street parking, LADOT determined that no feasible improvements are available to offset the potential significant impact of the project at this location. Removal of on-street parking would likely cause secondary impacts to traffic and parking because Hollywood has less available public parking than</p>	<p>All other impacts would be less than significant</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>do not approach the levels of significance.</p>	<p>current demand. Removing street parking would cause traffic congestion as vehicles search the neighborhood for street parking and may result in parking intrusion on residential streets.</p> <p><u>Gower Street and Sunset Boulevard</u></p> <p>LADOT has determined that no feasible mitigation improvements are available for this location to offset the potential significant impact of the project.</p> <p><u>Gower Street and Selma Avenue</u></p> <p>This intersection is currently unsignalized, and controlled only by STOP signs on the Selma Avenue approaches. While the installation of a new traffic signal at this intersection would reduce the project's impacts, LADOT does not recommend installation of a new traffic signal. In addition, although this intersection was selected as a study intersection for analysis in the traffic study, the traffic study was prepared prior to LADOT Policy Memo 09-01 (included in Appendix H to this Draft EIR), which became effective immediately on its release on March 18, 2009. Pursuant to this policy, unsignalized intersections shall not be included in the impact analysis. Although the traffic study identified a significant impact at this intersection, LADOT's policy supersedes the analysis contained in the</p>	

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
	<p>traffic study.</p> <p><i>Other Operational Mitigation Measures</i></p> <p>However, LADOT did recommend several alternative traffic mitigation measures, now required by the EIR, including traffic signal upgrades to improve area traffic conditions and/or provide needed operational enhancements, as well as a project-specific transportation management program, as described below.</p> <p>L-3 The project shall upgrade the traffic signal controllers to Type 2070 at the following intersections:</p> <ul style="list-style-type: none"> • Bronson Avenue and Franklin Avenue • Gower Street and Sunset Boulevard • Gower Street and Franklin Avenue • Vine Street and Yucca Street <p>L-4 Additionally, the project shall install a new CCTV camera at:</p> <ul style="list-style-type: none"> • Gower Street and Franklin Avenue 	

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
	<ul style="list-style-type: none"> • Sunset Boulevard and Vine Street <p>L-5 Since the project traffic study did not assume any type of project-related trip reduction strategy in the analysis of potential project impacts, the applicant shall implement trip-reduction measures designed to reduce the number of vehicle trips generated by the project, in addition to those that may already be required per the provisions of Ordinance No. 168,700. The applicant shall be required to work with LADOT to develop a Transportation Demand Management (TDM) plan that includes trip reduction goals. A preliminary TDM program shall be prepared and provided for LADOT review prior to issuance of the first building permit for the project, and a final TDM program be approved by LADOT prior to issuance of any temporary or final certificate of occupancy for the project.</p>	
<p>Parking and Access</p> <p>The project in its entirety will require a total of approximately 454 parking spaces, including approximately 352 residential spaces, 88 residential guest spaces, and 14 retail/commercial parking spaces based on the applicable Advisory Agency recommended residential (condominium) parking ratios, and retail use reductions identified in the LAMC for the CRA/LA's Hollywood Redevelopment Area and/or</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>the City’s Enterprise Zone projects. The project will provide the required number of retail/commercial parking spaces, but will be approximately 109 spaces deficient under the Advisory Agency’s policy for the residential component, including 65 resident and 44 guest spaces. The residential parking provided for the project, a total of 331 spaces, results in an average of approximately 1.88 parking spaces per unit, including approximately 1.63 assigned resident spaces per unit, and 0.25 guest spaces per unit. Given the urban surroundings of the project, and the availability of public transit opportunities adjacent to and in close proximity to the site, the proposed amount of residential parking is anticipated to be adequate to meet the needs of the project. It is also of note that a recently approved project located nearby in the vicinity (Paseo Plaza) was required to only provide 0.25 guest parking spaces per unit, rather than the 0.50 spaces identified by the Advisory Agency. If this standard were to be applied to the proposed project, the development would only be 65 “resident” spaces deficient. However, due to these parking shortages with respect to the Advisory Agency’s policy for condominiums the applicant will request that the Advisory Agency reduce the required parking for this project.</p>		
M. UTILITIES		
1. WASTEWATER		
<p>Project Impacts</p> <p>The proposed project is estimated to generate a total of 28,736 gallons per day (pgd) of wastewater. This increase in wastewater is within the total amount anticipated under the maximum wastewater generation of the 2003 Hollywood Redevelopment Plan Amendment EIR. Therefore, the increase in wastewater generation would be less than significant.</p> <p>The existing sewer lines in the immediate project vicinity would likely have the</p>	<p>M.1-1 Gauging of the current flow level (d/D) in the 8-inch lines on Hollywood Boulevard, Selma Avenue, and Sunset Boulevard, the 21-inch line on Sunset Boulevard, the 30-inch line on El Centro Avenue, and the 10-inch and 18-inch lines on El Centro Avenue shall be required before hook-up.</p> <p>M.1-2 The developer shall either have to increase</p>	

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>capacity to handle the sewage generation flows from the proposed project, based on the estimated flow in the area. The proposed project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities. Therefore, the proposed project’s impact on sewer systems would be less than significant.</p>	<p>the capacity of any lines that would not have sufficient capacity for the project discharge or retain discharge on-site for release during off-peak flow.</p>	
<p>Cumulative Impacts</p> <p>The cumulative wastewater generation of the related projects in combination with the proposed project would be approximately 3,142,554 gpd. The Hyperion Treatment Plant (HTP) has a remaining capacity of approximately 75 mgd. The cumulative sewage generation would be well within the design capacity of the HTP, representing approximately 4.2 percent of the remaining capacity. Therefore, the cumulative impact of the related projects in combination with the proposed project on wastewater facilities would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>2. WATER SUPPLY</p>		
<p>Project Impacts</p> <p>The proposed project would result in the demand for 34,483 gallons per day of water. The LADWP has indicated in its Urban Water Management Plan that it will provide an adequate water supply to meet current and future growth until at least 2020. Therefore, impacts to water supply would be less than significant.</p>	<p>M.2-1 The project shall comply with Ordinance No. 170,978 (Water Management Ordinance) which imposed numerous water conservation measures in landscape, installation, and maintenance (e.g. drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during early morning or evening hours to minimize water lose due to evaporation, and water</p>	

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
	<p>less in the cooler months and during the rainy season).</p> <p>M.2-2 If conditions dictate, the Department of Water and Power may postpone new water connections for this project until water supply capacity is adequate.</p> <p>M.2-3 Unless otherwise required, and to the satisfaction of the Department of Building and Safety, the applicant shall install:</p> <ul style="list-style-type: none"> • High-efficiency toilets (maximum 1.28 gpf) (for example, dual-flush water closets), and high-efficiency urinals (maximum 0.5 gpf) (for example, no-flush or waterless urinals), in all restrooms as appropriate. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs of these installations. • Restroom faucets with a maximum flow rate of 1.5 gallons per minute. • Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on 	

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
	<p>the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)</p> <p>M.2-4 Unless otherwise required, all restroom faucets except those in residential units shall be of a self-closing design, to the satisfaction of the Department of Building and Safety.</p> <p>M.2-5 Unless otherwise required, and to the satisfaction of the Department of Building and Safety, the applicant shall:</p> <ul style="list-style-type: none"> • Install no more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute. • Install and utilize only high-efficiency clothes washers (water factor of 6.0 or less) in the project, if proposed to be provided in either individual units and/or in a common laundry room(s). If such appliance is to be furnished by a tenant, this requirement shall 	

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
	<p>be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs of these installations.</p> <ul style="list-style-type: none"> • Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance. <p>M.2-6 The availability of recycled water should be investigated as a source to irrigate large landscaped areas.</p> <p>M.2-7 Significant opportunities for water savings exist in air conditioning systems that utilize evaporative cooling (i.e., employ cooling towers). LADWP should be contacted for specific information on appropriate measures.</p>	
<p>Cumulative Impacts</p> <p>The related projects in combination with the proposed project would be</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>approximately 3,766,879 gallons per day. The design capacity of the Los Angeles Filtration Plant (LAFP) is 600 mgd, and the LAFP's current average water flow is 475 mgd. Therefore, the LAFP has a remaining capacity of approximately 125 mgd. This represents 3 percent of the total remaining daily capacity. Further, the other related projects would not require major water infrastructure improvements that could result in temporary construction-related impacts.</p> <p>For projects that meet the requirements established pursuant to SB 610, SB 221, and Sections 10910-10915 of the State Water Code, a Water Supply Assessment demonstrating sufficient water availability is required on a project-by-project basis. Similar to the project, each related project would be required to comply with City and State water conservation programs. Therefore, no significant cumulative water supply impact is anticipated from development of the proposed project and the related projects. As such, the proposed project would not contribute to a cumulatively considerable effect on water supply infrastructure.</p>		
3. SOLID WASTE		
<p>Construction</p> <p>Based on a construction generation rate of 4.38 pounds of waste for every square foot of new residential construction and 3.89 pounds of waste for every square foot of new nonresidential construction, the construction of the proposed project is estimated to generate approximately 869,581 pounds (435 tons) of solid waste over the construction period. Recycling of construction-related waste materials in compliance with AB 939 would substantially reduce this waste stream that would otherwise go to a landfill. Therefore, approximately 434,791 pounds (218 tons) of construction waste would be disposed of in the landfills. The remaining combined daily intake of the Sunshine Canyon and Chiquita Canyon Landfill is 5,619 tons per</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Level of Significance
<p>day. As such, they would have adequate capacity to accommodate the average daily construction waste of 218 tons generated by the proposed project over its entire construction period. Therefore, a less than significant impact associated with construction waste would occur.</p>		
<p>Operation</p> <p>The proposed project would be expected to generate 2,189 pounds or 1.1 tons of solid waste per day. As discussed above, the AB 939 requirement to reduce the solid waste stream in landfills by 50 percent means that 1,095 pounds (2,189/2) or 0.55 tons must be recycled rather than disposed of in a landfill. Thus, the proposed project would generate 939 pounds or 0.47 tons per day that would be disposed in local landfills. The Sunshine Canyon Landfill can receive the additional 4,559 tons per day. If the entire 1,095 pounds or 0.55 tons per day of solid waste generated by the proposed project was disposed of in the Sunshine Canyon Landfill, the Sunshine Canyon Landfill would have more than enough permitted capacity to accommodate this additional contribution of one third of one ton per day. As the long-term solid waste that would be generated by the proposed project could be accommodated at the Sunshine Canyon Landfill without causing the landfill to exceed its permitted daily capacity in the foreseeable future, the proposed project's long term impact on solid waste facilities is considered less than significant.</p>	<p>M.3-1 The construction contractor shall make an effort to contract for waste disposal services with a company that recycles construction related wastes.</p> <p>M.3-2 The project applicant shall separate onsite drywall materials from the construction trash debris and shall contract with a waste disposal company to sort and recycle remaining materials.</p> <p>M.3-3 Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. The proposed project shall comply with all applicable adopted recycling and waste diversion policies of the City of Los Angeles.</p>	
<p>Cumulative Impacts</p> <p>The estimated solid waste generation by the related projects in combination with the proposed project would be approximately 194,837 pounds (97 tons) per day.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

**Table I-1 (Continued)
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Level of Significance
<p>The Sunshine Canyon Landfill currently receives approximately 2,360 tons of solid waste daily from the City and 4,081 tons of solid waste daily from the County. Therefore the total daily intake is 6,441 tons daily and has a remaining daily capacity of 4,559 tons. Assuming that all of the cumulative solid waste is sent to the Sunshine Canyon Landfill with no waste stream diversion, the additional 97 tons per day would not cause the Sunshine Canyon Landfill to exceed its permitted daily capacity. Similar to the proposed project, the related projects would be subject to the requirements of AB 939 (i.e., divert 50 percent of the solid waste generated from landfills through waste reduction, recycling, and composting). Because landfill capacities would be sufficient to accommodate the solid waste generation by cumulative growth, the proposed project would not contribute a cumulatively considerable effect on solid waste disposal facilities and impacts would be less than significant.</p>		

II. COMMENT LETTERS AND RESPONSES

A. OVERVIEW

The purpose of the public review of the Draft EIR (DEIR) is to evaluate the adequacy of the environmental analysis in terms of compliance with CEQA. Section 15151 of the CEQA Guidelines states the following regarding standards from which adequacy is judged:

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 experts. The courts have not looked for perfection but for adequacy, completeness, and a good faith effort at full disclosure.

The purpose of each response to a comment on the Draft EIR is to address the significant environmental issue(s) raised by each comment. This typically requires clarification of points contained in the Draft EIR. Section 15088 (b) of the CEQA Guidelines describes the evaluation that CEQA requires in the response to comments. It states that:

The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the lead agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice.

Section 15204(a) (Focus of Review) of the CEQA Guidelines helps the public and public agencies to focus their review of environmental documents and their comments to lead agencies. Case law has held that the lead agency is not obligated to undertake every suggestion given them, provided that the agency responds to significant environmental issues and makes a good faith effort at disclosure. Section 15204.5(a) of the CEQA Guidelines clarifies this for reviewers and states:

In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as

the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

The guideline encourages reviewers to examine the sufficiency of the environmental document, particularly in regard to significant effects, and to suggest specific mitigation measures and project alternatives. Given that an effect is not considered significant in the absence of substantial evidence, subsection (c) advises reviewers that comments should be accompanied by factual support. Section 15204(c) states:

Reviewers should explain the basis for their comments, and, should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.

B. LIST OF COMMENTERS

The City of Los Angeles Department of City Planning received a total of four comment letters on the Draft EIR. Each comment letter has been assigned a corresponding number, and comments within each comment letter are also numbered. For example, comment letter “1” is from METRO. The comments in this letter are numbered “1-1”, “1-2”, “1-3”, etc.

Written comments made during the public review of the Draft EIR intermixed points and opinions relevant to project approval/disapproval with points and opinions relevant to the environmental review. The responses acknowledge comments addressing points and opinions relevant to consideration for project approval, and discuss as necessary the points relevant to the environmental review. The response “comment noted” is often used in cases where the comment does not raise a substantive issue relevant to the review of the environmental analysis. Such points are usually statements of opinion or preference regarding a project’s design or its presence as opposed to points within the purview of an EIR: environmental impact and mitigation. These points are relevant for consideration in the subsequent project approval process. In addition, the response “comment acknowledged” is generally used in cases where the commenter is correct.

During and after the public review period, the following organizations/persons provided written comments on the Draft EIR to the City of Los Angeles Department of City Planning:

<u>Commenters</u>	<u>Date</u>
1. METRO, Long Range Planning Department	November 23, 2009
2. Doug Haines	November 30, 2009

- | | | |
|----|------------------------------|-------------------|
| 3. | Darryl Ford | November 30, 2009 |
| 4. | Department of Transportation | November 24, 2009 |

C. RESPONSES TO COMMENTS

The following pages are arranged by comment letters received, as previously identified, with responses to each comment. The comment is numbered according to the letter and order of comment. For example the first comment in Letter 1 is labeled Comment No.1-1, followed by the corresponding response, labeled Response to Comment 1-1, etc.

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Metro

Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

November 23, 2009

Adam Villani
Environmental Review Coordinator
Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

Dear Mr. Villani:

Los Angeles County Metropolitan Transportation Authority (Metro) is in receipt of the Draft Environmental Impact Report for the Hollywood Gower Project. This letter conveys recommendations concerning issues that are germane to Metro's statutory responsibilities in relation to the proposed project.



1-1

The Traffic Impact Analysis prepared for the Draft EIR satisfies the traffic and transit requirements of the proposed project. However, the following issues should be addressed for the Final EIR:

1. The Metro Red Line subway runs along and directly under Hollywood Boulevard adjacent to the project site.
2. Because of the project's close proximity to Metro's Red Line subway, excavation and plans for new construction of building foundations and the subterranean parking garage shall be submitted for review and coordination with Metro.
3. Aspet Davidian, Director, Project Engineering Facilities, should be contacted at 213-922-5258 regarding the project's potential impacts on Metro's Red Line.
4. The developer should coordinate with Metro to maintain the availability of the bus stops located along Hollywood Boulevard. While it may be feasible to temporarily re-locate the bus stop at the southwest corner of Hollywood and Gower during construction, the existing stop will be returned upon completion of the project. The Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that might require temporary modification to the affected bus stops.



1-2



1-3

Metro looks forward to reviewing the Final EIR. If you have any questions regarding this response, please call me at 213-922-6908 or by email at chapmans@metro.net. Please send the Final EIR to the following address:

1-4

Metro CEQA Review Coordination
One Gateway Plaza MS 99-23-2
Los Angeles, CA 90012-2952
Attn: Susan Chapman

Sincerely,



Susan F. Chapman
Program Manager, Long Range Planning

cc: Aspet Davidian
Pete Serdienis

LETTER NO. 1

Susan F. Chapman, Program Manager, Long Range Planning
METRO
One Gateway Plaza MS 99-23-2
Los Angeles, CA 90012-2952
November 23, 2009

Comment No. 1-1

Los Angeles County Metropolitan Transportation Authority (Metro) is in receipt of the Draft Environmental Impact Report for the Hollywood Gower Project. This letter conveys recommendations concerning issues that are germane to Metro's statutory responsibilities in relation to the proposed project.

The Traffic Impact Analysis prepared for the Draft EIR satisfies the traffic and transit requirements of the proposed project. However, the following issues should be addressed for the Final EIR:

Response to Comment No. 1-1

This comment is an introductory statement and is acknowledged for the record. Responses to issues raised are provided below.

Comment No. 1-2

1. The Metro Red Line subway runs along and directly under Hollywood Boulevard adjacent to the project site.
2. Because of the project's close proximity to Metro's Red Line subway, excavation and plans for new construction of building foundations and the subterranean parking garage shall be submitted for review and coordination with Metro.
3. Aspet Davidian, Director, Project Engineering Facilities, should be contacted at 213-922-5258 regarding the project's potential impacts on Metro's Red Line.

Response to Comment No. 1-2

The comment does not raise an issue regarding environmental impacts and does not identify a potential environmental impact, but instead requests that excavation and construction plans be submitted for review and coordination with Metro since the Red Line subway runs along and directly under Hollywood Boulevard adjacent to the project site. The project applicant agrees with this request and will request that the City add this to the conditions of approval.

Comment No. 1-3

4. The developer should coordinate with Metro to maintain the availability of the bus stops located along Hollywood Boulevard. While it may be feasible to temporarily re-locate the bus stop at the southwest corner of Hollywood and Gower during construction, the existing stop will be returned upon completion of the project. The Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that might require temporary modification to the affected bus stops.

Response to Comment No. 1-3

The comment suggests coordination with Metro regarding availability of bus stop locations along Hollywood Boulevard. No roadway or right-of-way improvements to Hollywood Boulevard at the location of the subject bus stop (southwest corner of Hollywood Boulevard/Gower Street) are anticipated, based on LADOT's review and approval of the project traffic study. However, should project construction activity temporarily affect the operations of the bus stop itself (including repair and/or replacement of existing broken curb or sidewalks), the project applicant shall contact Metro to coordinate temporary relocation of the bus stop or other applicable measures to maintain bus service to the project area throughout project construction. This will be a new mitigation measure listed as L-2.

Comment No. 1-4

Metro looks forward to reviewing the Final EIR. If you have any questions regarding this response, please call me at 213-922-6908 or by email at chapmans@metro.net. Please send the Final EIR to the following address:

Metro CEQA Review Coordination
One Gateway Plaza MS 99-23-2
Los Angeles, CA 90012-2952
Attn: Susan Chapman

Response to Comment No. 1-4

This comment contains a concluding remark and contact information. The comment is acknowledged for the record.

November 30, 2009



CITY PLANNING
DIVISION OF LAND

VIA PERSONAL DELIVERY

Doug Haines
P.O. Box 93596
Los Angeles, CA 90093-0596

Mr. Adam Villani, Environmental Review
Los Angeles City Planning Department
200 N. Spring Street, Room 750
Los Angeles, CA 90012

**RE: Comments to the Draft *Environmental Impact Report* for “Hollywood & Gower.”
ENV-2007-5750-EIR; located at 6100, 6104 & 6116 Hollywood Blvd., and 1633,
1645, 1647 & 1649 Gower St., Hollywood.**

Dear Mr. Villani:

INTRODUCTION

Please note the following comments on the Draft Environmental Impact Report (“DEIR”) for the proposed Hollywood & Gower mixed-use project. If developed as described in the DEIR, the project would consist of a 20-story, 270-foot-tall skyscraper of 176 residential units and 7,200 square feet of ground-level retail. Parking would consist of 345 spaces in five levels, comprised of one subterranean parking level and four at- and above-ground parking levels. Total residential/retail floor area would be 197,503 square feet on a 43,890 net square foot site. Total floor area for the 5-level parking podium would be 145,000 square feet. Total site development would be 342,503 square feet (hereinafter the “Project”).

2-1

The existing site zoning is C4-2D-SN and C4-2D. The “D” limiting condition restricts the site’s floor area ratio (“FAR”) to 2:1. The applicant proposes rezoning the site to replace the “D” qualified restriction to allow a 4.5 FAR (note that the Los Angeles Municipal Code does not require inclusion of parking area in FAR calculations; inclusion of the parking podium’s square footage in determining the proposed building’s physical floor area ratio would result in a project FAR of 7.8:1); elimination of a required 16-foot side yard on the western side of the site; reduction of the required 20-foot rear yard to 10 feet; and reduction of the required Advisory Agency parking for the subdivided dwelling units from 440 stalls to 331 spaces – a reduction of 109 stalls.

2-2

The Project as proposed also conflicts with the restrictions of the Hollywood Redevelopment Plan and the Hollywood Boulevard District Urban Design Plan.

2-3

Please note the following comments:

2-4



Section 1, "Introduction/Summary," on page I-4 lists under the subheading "Areas of Controversy," the concerns raised in letters responding to the Notice of Preparation: "(1) air quality, (2) transportation/traffic, (3) cultural, (4) impacts to police protection, (5) impacts to parks and recreational facilities, (6) impacts to schools, and (7) impacts to solid waste." No reference is made to a 2/26/08 letter from Robert Nudelman of Hollywood Heritage, included in the DEIR appendices, which states that the proposed development is illegal under state redevelopment law. The DEIR's analysis of the Hollywood Redevelopment Plan, pages IV.H-4, 7, also explicitly ignores this issue.

2-4

To ensure that Mr. Nudelman's objections are responded to, note his letter's reproduction below:

"The project as described in this Notice of Preparation (NOP) is illegal under state redevelopment law. This is due to the code restrictions on the proposed site as described in the Hollywood Redevelopment Plan, Amended 2003, Ordinance #175236 (HRP) and the Hollywood Boulevard District Urban Design Plan, Revised March 1993 (HBDUDP) and approved by the CRA board. Violation of the HRP also violates CEQA by illegally amending its EIR.

2-5

"These two planning documents are binding on this site and variances, as proposed here, can *only* be accomplished by an amendment to the HRP and the HBDUDP, not through an action as proposed here. The city planning department does not have authority to overrule the redevelopment plan.

"As described in the NOP the site has an FAR of 2:1. Provisions to increase this by a maximum of 30% are described in the HBDUDP on page 3-22, '4. Housing Incentive Units,' which in turn is based on Section 505.3 of the HRP. The objectives that are required to obtain the 30% bonus are not mentioned as part of the proposed project either in the NOP or the developer's public presentations. Therefore the proposed project does not meet the legally described conditions for a 30% increase in FAR, never mind one 225% as asked for in the NOP.

2-6

"The HBDUDP also describes height limits for this site as 45 feet (page 7-11, Figure 7-13 'Height Standards'). This is considerably less than the proposed height of 258 feet in the NOP. The HRP describes a general height limit for the Hollywood Boulevard District in Section 5065.2.1-'#2 Assure that new development is sympathetic to and compliments existing scale of development.' The 45-foot height limit does that while 258 foot proposed height would exceed the height of any structure in Hollywood.

2-7

"The conclusions must be that the project proposed is vastly out of compliance with the HRP and the HBDUDP. The variances from code, 125% above the FAR and over 550% of the height limit, are both extraordinary.

2-8

"The owner of the property purchased the site several years after the approval of these plans and therefore is prohibited under local, state, and federal laws to claim any hardship variance, even at much more reasonable levels of increase. If they overpaid for property, or did not perform proper due diligence, that is their loss. It is not the purpose of variances to create bad planning nor break the law.

2-9

“For the city to even consider a project such as this for review is preposterous. It opens the city to litigation by the community as well as by the developer. It also creates hope for other wannabe illegal projects, increasing the city’s expenditures and its vulnerability to additional litigation. This proposed project requires the amending of HRP and cannot be met by any other legal means of state redevelopment law or CEQA.

2-9

“Sincerely, Robert W. Nudelman, Director of Preservation Issues, Hollywood Heritage INC.”

Table I-1, “Summary of Impacts/Mitigation Measures,” under the subheading “Aesthetics,” states on page I-8: *“Though project implementation would create a minor diminishment of this valued view (of the Hollywood Hills/Santa Monica Mountains), views are limited and intermittent and views of the hills can be afforded in many other locations. Therefore the impact on the view of the hills looking north would be less than significant.”*

Stating that people can find views of the Hollywood Hills somewhere else is not an acceptable mitigation measure for a building that would be the tallest in Hollywood and would obstruct scenic views for miles around. This DEIR response is followed on page I-9 with a similarly nonsensical assessment of “Cumulative Impacts,” with the comment: *“No substantial scenic resources are located in the area surrounding the project site that could be affected by a cumulatively considerable reduction in views. Therefore, the proposed project in conjunction with the related projects would not result in cumulatively considerable impacts with regard to view impacts of the ‘Hollywood’ sign and impacts would be less than significant.”*

2-10

The proposed development would be 270 feet in height. Immediately south of the project site at Columbia Square another development proposes two towers of 315 feet and 270 feet in height. Four blocks southeast of the proposed site the Sunset/Gordon development would reach 260 feet in height. Skyscrapers are also under consideration for the Palladium site at Sunset and Argyle, and for the area near the Capitol Records tower. If the combination of all of these proposed skyscrapers does not in the applicant’s view justify a significant impact to scenic resources, then at what point would the applicant consider obstruction of views to be cumulatively significant?

Table I-1, under the subheading D “Cultural Resources,” on page I-20 states: *“The construction of a 20-story building directly next to and adjacent to the Henry Fonda/Music Box Theater would not diminish the potential historic status of the Henry Fonda/Music Box Theater...At least two high-rise development projects are under construction within two blocks of the project site...As the Hollywood community is characterized by diversity in heights and massing, the proposed project would not impact the Henry Fonda/Music Box Theater potential historic resource.”*

2-11

The DEIR does not identify the two high-rise development projects “*under construction within two blocks of the project site*” that are comparable in scale to the 270-foot-tall proposed project, which if built would be the tallest structure in Hollywood, nor does the DEIR identify which areas represent the “*diversity in heights and massing*” that it claims characterize Hollywood.

The DEIR does list on page IV.B-3 what it defines as “*high-rise buildings along Hollywood Boulevard and Vine Street including the Hollywood Taft building (12 stories), the Broadway Hollywood building (10 stories) and the 13-story Capitol Records Tower...*” None of these buildings approaches the height of the proposed 20-story project.

Building the tallest structure in Hollywood directly adjacent to the Music Box Theater will obviously impact the theater’s significance, especially since the applicant also seeks an adjustment for a zero-foot westerly side yard. Impacts to the Music Box’s historic status are therefore potentially significant.

Table I-1, under subheading H, “Land Use,” on page I-35 states “*The project would be consistent with the Hollywood Community Plan Update FAR designation of 4.5:1 for the site. Therefore, impacts with respect to floor area ratio would be less than significant with approval of the requested Zone Change.*” (Reiterated on page IV.H-24).

The Hollywood Community Plan Update has yet to release its environmental impact report. Public review, comment, and final city approval is still far in the future. In the meantime, the Project’s DEIR is required under the California Environmental Quality Act (“CEQA”) to assess impacts to land use based on the **existing** zoning regulations. The DEIR is also required to assess such impacts based on any other controlling land use regulations, which requires analysis of the project’s conformance with the Hollywood Redevelopment Plan and the Hollywood Boulevard District Urban Design Plan. This DEIR is deficient and evasive in regards to such analysis, as contained in Section IV.H, “Land Use and Planning,” avoiding the significant impacts associated with the Project.

Table I-1, under subheading I, “Population and Housing,” on page I-44 states: “*Based on an average household size of 2.3 persons for households in the HCPA, approximately 405 people would occupy the 176 residential units.*” On page I-55, however, under the topic **Parking and Access**, the DEIR states that residential parking will consist of only 331 spaces, or 1.63 assigned resident spaces per unit and 0.25 guest spaces per unit. The DEIR claims the “*proposed amount of residential parking is anticipated to be adequate to meet the needs of the project.*” The DEIR also references another project (Paseo Plaza) as being required to only provide 0.25 guest parking spaces per unit, in lieu of the 0.50 guest spaces required in congested parking areas.

The mixed-use Paseo Plaza project at 5651 Santa Monica Blvd. (CPC-2006-4392-GPA-ZC-HD-ZV-ZAA-ZAI-SPR) was approved for 1,811 parking spaces and 437 dwelling units. That project’s slight reduction in guest parking was granted based on its parking surplus for its retail component. The Paseo Plaza project also received approval to construct its subterranean parking garage below the water table. In contrast, Hollywood & Gower proposes a mere half level of subterranean parking and four levels of at- and above-grade parking. The Paseo Plaza project is also providing a 10% affordable housing component, while Hollywood & Gower offers no affordable housing.

Comparable developments in the vicinity of the Project would include the Clarett/Boulevard 6200 development at 6139 Hollywood Blvd. (CPC 2006-7301-ZC-ZV-YV-SPR), a 1,014-unit mixed-use project with 2,696 parking spaces. The Clarett project’s 4/9/07 City Planning Commission Determination Letter states that “*the Project will provide a surplus of parking, and will not lead to residents, tenants and guests searching streets and adjacent properties for parking spaces.*”

2-11

2-12

12-13

Please note that the Clarett/Boulevard 6200 project is located immediately across from the Hollywood/Vine Red Line subway stop, and is also voluntarily setting aside 10% of the residential units as permanent affordable housing -- unlike Hollywood & Gower's utter lack of any affordable housing.

2-13

Section 2, "Project Description," under subheading **"D. Project Objectives,"** lists among its objectives on page II-8: *"Maximize the amount of housing provided on the project site to address housing needs in the community,"* and *"provide a development that is compatible and complementary with surrounding land uses."*

2-14

The Project offers no affordable housing, and therefore does not *"address housing needs in the community."*

Additionally, if constructed the Project would be the tallest building in Hollywood on a site surrounded by low-level structures. The Project therefore is in no manner *"compatible and complementary with surrounding land uses."*

2-15

Section 3, "Environmental Setting," subheading **"B. Related Projects,"** omits the Hollywood Freeway Cap Park.

Hollywood's Central Park is proposed over the 101 Freeway from North Bronson Avenue and Hollywood Boulevard to Santa Monica Boulevard. A mile in length, it will provide 44 acres of park space.

According to the Community Redevelopment Agency's ("CRA") July 15, 2009 staff report, the "Cap Park" will include at the southeast corner of Fountain Avenue and St. Andrews Place a large plaza and baseball field, playgrounds, plaza spaces, viewing platforms, water features, picnic areas, open fields and community gardens. The CRA report also states that the project seeks to *"transform a freeway corridor into a destination."* The park is anticipated to generate 4,500 construction jobs (hollywoodfreewaycentralpark.org). The intensity and controversy of this development has led to a \$3,000,000 budget for just the EIR. Impacts from the Cap Park development are likely substantial. The Cap Park Memorandum of Understanding was approved by the CRA in January of 2007, and the feasibility study was made public in November of 2008.

2-16

A project that is under environmental review is a "reasonably foreseeable probable future project" within the meaning of the Guidelines. (Guidelines, § 15355, subd. (b).) This is because once review is begun, a significant investment of time, money and planning has probably occurred. Thus, once environmental review commences, the project is probable rather than merely possible. Friends of the Eel River v. Sonoma County Water Agency, 108 Cal.App.4th at p. 870; San Franciscans for Reasonable Growth v. City and County of San Francisco, supra, 151 Cal.App.3d at pp. 74-75

The Court of Appeal has held that a "proposed project" under environmental review is a reasonably foreseeable future project. Schaeffer Land Trust v. San Jose City Council (1989) 215 Cal.App.3d 612, 630; San Franciscans for Reasonable Growth v. City and County of San Francisco (1984) 151 Cal.App.3d 61, 72-77; § Guidelines 15130.

“The Guidelines explain that a discussion of cumulative effects should encompass ‘past, present, and *reasonably anticipated future projects.*’” Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal.3d 376, 394; citing Guidelines § 15130 (b)(1)(A); italics in original.

2-16

The DEIR Related Projects list also omits the 4.8-acre, 1.3 million sq. ft. mixed-use Millennium Hollywood project at Yucca Street and Argyle Avenue, misidentifies the 200,000 sq. ft. Academy Museum of Motion Pictures at Vine Street and Fountain Ave. as a 75,000 sq. ft. project, and does not provide the square footage for #113, the Target retail development at Sunset Boulevard and Western Avenue (192,680 sq. ft.) -- even though that project’s environmental studies were completed by the same firm as for the Hollywood & Gower DEIR (Christopher Joseph & Associates).

2-17

Section 4, “Environmental Impact Analysis,” subheading “B. Aesthetics,” states on page IV.B-7 (and reiterated on page IV.D-8):

“The new building will improve the visual character of the area by replacing a surface parking lot with an architectural style that is visually compatible with the historical landmarks in the area (perhaps even improving the visual interest in an area rich in architectural variety). The project building’s contemporary design does not emulate the older structures of the area and does not distract from the unique image of other taller buildings of the area. Thus, the project building is sensitive to the unique visual character and image of the area and project impacts to the area’s aesthetic value and image would be less than significant.”

2-18

Please note that the proposed 270-foot-tall Project is not of “*an architectural style visually compatible with the historical landmarks in the area.*”

The DEIR clearly states that the project’s “*contemporary design does not emulate the older structures of the area.*” How then can the 270-foot tall Project be “visually compatible” with historic landmarks such as Columbia Square, the Pantages Theatre, the Palladium, or the Music Box Theater? How can the DEIR further claim that the 20-story Project is “*sensitive to the unique visual character and image of the area,*” which is described in the DEIR as “low to mid-rise urban development,” and that the Project’s impacts to aesthetics would somehow be less than significant?

Constructing the tallest building in Hollywood immediately adjacent to one and two-level structures, and doing so with a contemporary design, *will* create a significant impact to aesthetics that will scar Hollywood’s visual character for generations to come. One need only glance at the horrifically ugly W Hotel development at Hollywood and Vine to see visual proof that such “contemporary” design is neither compatible nor sensitive to historic structures – even when built at a scale of similar height and massing.

2-19

In contrast, the Project would be almost double the height of the W Hotel, would overwhelm the Music Box Theater, and offers a cheap, monolithic design whose primary point of aesthetic interest will be the supergraphics masking its surface.

Impacts to aesthetics are significant, with the only mitigation being a reduced-scale project.

Section 4, “Environmental Impact Analysis,” subheading “B. 2. Shade/Shadow”

The DEIR conducts no cumulative analysis of shade/shadow impacts combined with the two skyscrapers proposed in related project #41 (Columbia Square). The DEIR also identifies only related project #23 as a potentially shadow-impacted residential development, but ignores related project #22, with 1,014 approved residential units (incorrectly listed as 952 dwelling units; also incorrectly listed as 1,042 units at #110). The DEIR Shade/Shadow study is therefore inadequate.

2-20

Table IV.H-2, “Hollywood Redevelopment Plan Objectives Discussion,” on page IV.H-21, 22 lists a number of objectives that conflict with the Project.

Listed objectives include standards for height, building setback, and continuity of street façade, none of which the Project will comply with. The Project’s contemporary architectural style and 270-foot height is **NOT** complementary to the existing low-level streetscape.

2-21

The Hollywood Redevelopment Plan also seeks to “increase the supply and improve the quality of housing for all income and age groups, especially for persons with low and moderate incomes; and to provide home ownership opportunities and other housing choice, which meet the needs of the resident populations.” The DEIR states that the proposed project will “*provide modern condominium units with varying unit sizes...that will improve the quality of housing in the Hollywood community for different income and age groups.*”

The Project would provide only market rate dwelling units with no units of affordable housing. The applicant’s representatives at public meetings have refused to include any affordable housing in the Project, stating that it is not in the applicant’s “financial interest” to do so. The Project, therefore, does **NOT** improve the quality of housing for all income and age groups, **especially** for persons with low and moderate incomes. The Project has also been promoted as rental units; is the DEIR incorrect in stating that the units will be condominiums (a claim repeated in Table IV.H-4), and if so how then is the Project adhering to the Redevelopment Plan objective to “provide home ownership opportunities?”

2-22

Furthermore, the Project does not conform with the objective to be sensitive to historic and architecturally significant Hollywood. Constructing a 270-foot tall, contemporary skyscraper immediately adjacent to a low-level, historically significant theater displays a callous insensitivity to Hollywood’s rich architectural and cultural history.

2-23

The Project does not “promote and encourage development of recreational and cultural facilities “ by offering a tenants-only swimming pool, or by having a private lounge on the roof.

2-24

The Project does not “support and encourage a circulation system which will improve the quality of life in Hollywood” by creating significant traffic impacts at three intersections (including Selma/Gower), or by purposely underparking the development.

2-25

The Project does nothing to reflect “Hollywood’s position as the entertainment center,” provide facilities for tourists, or reinforce Hollywood’s history and architecture. A residential skyscraper at Hollywood Blvd. and Gower St. is not a self-described “gateway” to Hollywood’s commercial core.

2-26

Under the heading “Cumulative Impacts,” the DEIR on page IV.H-29 states:
“Development of the related projects is expected to occur in accordance with adopted plans and regulations.” None of the 139 projects contained in the Related Projects list is a by-right development; all seek discretionary approvals for exemptions from the Planning Code. How then can the DEIR conclude that cumulative impacts of the Project and related projects to land use and planning are less than significant, and that *“it is reasonable to assume that the projects under consideration in the surrounding area would implement and support important local and regional planning goals and policies?”*

2-27

The only “reasonable” conclusion is that the Project and those on the Related Projects list will instead set major land use precedents

The Project as proposed would set a precedent in changes to established zoning limitations, which will then set in motion a domino effect where other property owners seek to copy its vastly increased height and FAR. The DEIR fails to adequately examine the growth-inducing impacts of this Project and ignores the cumulative environmental impacts that the Project will precipitate. Moreover, the DEIR fails to present any potential mitigation measures regarding these growth-inducing impacts.

2-28

If the City approves the zoning changes requested for the Project and in the future attempts to mitigate these growth-inducing impacts by denying similar applications from neighboring developments, then the City would merely place itself in legal jeopardy. Interestingly, nowhere in the DEIR is the word “hardship” found. As such, the DEIR is in effect admitting that there is no hardship justification for any of the requested entitlements, and therefore significant precedents would be established were the city to approve them.

Section 6, “Alternatives to the Proposed Project,” lists Alternative 3, “Existing Zoning Alternative,” as a 16-story, 165-foot-tall building. This assessment ignores the limitations on the site in the Hollywood Redevelopment Plan and Hollywood Boulevard District Urban Design Plan, which restrict Project height to 45 feet. The DEIR therefore avoids its legal obligation under CEQA to accurately present an existing zoning alternative.

2-29

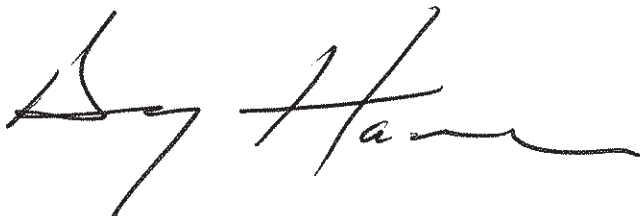
CONCLUSION.

The DEIR is inadequate to fairly and accurately present the impacts associated with the Project. Instead, the DEIR excels at a superficial “analysis” which for the most part simply assumes its conclusion. In its current form, the DEIR should not be approved.

2-30

Please note that I retain the right to submit additional comments regarding the Project at a future date.

Thank you for your courtesy and attention to this matter.



LETTER NO. 2

Doug Haines
P.O. Box 93596
Los Angeles, CA 90093-0596
November 30, 2009

Comment No. 2-1

Please note the following comments on the Draft Environmental Impact Report ("DEIR") for the proposed Hollywood & Gower mixed-use project. If developed as described in the DEIR, the project would consist of a 20-story, 270-foot-tall skyscraper of 176 residential units and 7,200 square feet of ground-level retail. Parking would consist of 345 spaces in five levels, comprised of one subterranean parking level and four at- and above-ground parking levels. Total residential/retail floor area would be 197,503 square feet on a 43,890 net square foot site. Total floor area for the 5-level parking podium would be 145,000 square feet. Total site development would be 342,503 square feet (hereinafter the "Project").

Response to Comment No. 2-1

This comment summarizes the proposed project as described Section II Project Description of the Draft EIR.

Comment No. 2-2

The existing site zoning is C4-2D-SN and C4-2D. The "D" limiting condition restricts the site's floor area ratio ("FAR") to 2:1. The applicant proposes rezoning the site to replace the "D" qualified restriction to allow a 4.5 FAR (note that the Los Angeles Municipal Code does not require inclusion of parking area in FAR calculations; inclusion of the parking podium's square footage in determining the proposed building's physical floor area ratio would result in a project FAR of 7.8: 1); elimination of a required 16-foot side yard on the western side of the site; reduction of the required 20-foot rear yard to 10 feet; and reduction of the required Advisory Agency parking for the subdivided dwelling units from 440 stalls to 331 spaces - a reduction of 109 stalls.

Response to Comment No. 2-2

The commenter notes the existing zoning of the site and summarizes the discretionary requests made by the Applicant in conjunction with the proposed mixed-use project, including the requested rezoning of the site to replace the existing "D" Development Limitation (per Ordinance No. 165,662) with a new "D" Limitation to allow a maximum FAR of 4.5:1. The project site is designated for a Regional Center Commercial land use by the Hollywood Community Plan, with an associated Footnote allowing "Development intensity [to be] limited to Height District 2, with a floor area ratio (FAR) of 4.5:1; a maximum FAR of 6:1 is possible through a Transfer of Development Rights procedure and/or City Planning." Thus, the proposed "D" Limitation is compatible and consistent with the Hollywood

Community Plan's designation of the site. However, the commenter suggests that the proposed change in the "D" Limitation would result in a project with an FAR of 7.8:1, if including the area of the proposed parking podium. By definition, according to LAMC Section 12.03, Floor Area (which is calculated based on the FAR of the site) does not include parking areas with associated driveways, among other excluded areas. Therefore, since the Code specifically excludes this area from the FAR calculation, it is an inaccurate and irrelevant statement to claim that the inclusion of the parking podium square footage would result in a project FAR of 7.8:1. Furthermore, the commenter claims that the Applicant proposes the elimination of a required 16-foot side yard on the western side of the site and a reduction of the required 20-foot rear yard to 10 feet, which suggests that the proposal is for the complete elimination or reduction of these yards. However, the Applicant's requests for relief of the westerly side yard and rear yard requirements apply only to the proposed parking podium levels (Parking Levels 1 through 4). The residential tower located above the parking podium levels will be setback in full compliance with the yard requirements

Comment No. 2-3

The Project as proposed also conflicts with the restrictions of the Hollywood Redevelopment Plan and the Hollywood Boulevard District Urban Design Plan.

Response to Comment No. 2-3

The commenter expresses an opinion that the proposed project is in conflict with the restrictions in the Hollywood Redevelopment Plan ("HRP") and the Hollywood Boulevard District Urban Design Plan ("UDP"). The Draft EIR discusses the project's consistency with the HRP on pages IV.H-4 through IV.H-8. Contrary to the commenter's assertion, the proposed project is consistent with the land use designation and floor area restrictions in the HRP. HRP designates the project site Regional Center Commercial and allows a Floor Area Ratio of 4.5:1. The proposed mixed-use project is consistent with the Regional Center Commercial designation and the floor area ratio limitation. Furthermore, HRP Section 506.3 states: "New and rehabilitated residential uses shall be encouraged within the Regional Center Commercial land use designation."

The definition of floor area and FAR used in this EIR is used consistently throughout the City and specified in LAMC Section 12.03.

The project is located within the Hollywood Boulevard District of the HRP. The Hollywood Boulevard District ("HBD") objectives are as follows:

- 1) Encourage preservation, restoration and appropriate reuse of historically or architecturally significant structures;
- 2) Assure that new development is sympathetic to and complements the existing scale of development;
- 3) Provide pedestrian oriented retail uses along the street level;

- 4) Encourage entertainment, theater and tourist related uses;
- 5) Provide adequate parking for new and existing uses; and
- 6) Reinforce and enhance the existing pedestrian environment.

The proposed project is consistent with these objectives. The proposed project does not involve the preservation, restoration or re-use, nor demolition or alteration of a historical structure. The project is consistent with the floor area ratio limits in the HRP and is consistent with other large developments along Hollywood Boulevard and is designed to be sympathetic and complimentary to the existing scale of development. For example, the following is a list of other large developments, which are compatible and consistent with the proposed project in that these are other similar mixed-use projects in the area:

- **Boulevard 6200/Clarett Project** (1614-1736 Argyle Avenue) – approved for 1,014 apartment units, 28 joint live/work condominiums, and 175,000 square feet of retail (VTT-67429).
- **Camden Project/Whole Foods Market** (1540 N. Vine Street) – approved for 306 units, 69,000 square feet of retail space, and a maximum height of 145 feet (CPC-2006-3871-ZC-CUB-SPR).
- **Hollywood & Vine** (6253 Hollywood Boulevard) – approved for 60 joint live/work condominiums and 8 commercial condominiums (TT-60544).
- **W Hotel** (6252 Hollywood Boulevard) – approved for 300 hotel rooms, 150 residential condominiums, 375 apartment units, and 61,500 square feet of commercial retail floor area, with a maximum height of 150 feet (CPC-2005-4358-ZC-ZAA, VTT-63297).
- **Sunset & Vine** (6301 Sunset Boulevard) – approved for 300 condominium units and 105,000 square feet of retail/restaurant uses (ZA-98-0898-CUB-CUZ-ZV, VTT-53206).
- **Pali House** (1717 Vine Street) – proposed to provide 57 residential condominium units and 2 commercial condominium units with a 5,498 square foot restaurant (VTT-62636 and ZA-2005-2518-CUX).
- **Sunset & Gordon** (5935 Sunset Boulevard at the site of the Old Spaghetti Factory) – Proposed to provide 311 condominium units, 13,500 square feet of ground floor retail, a 8,500 square foot restaurant, and 40,000 square feet of office floor area (CPC-2007-515-GPA-ZC-HD-CU-PAB-ZV-ZAA-SPR-SPE-SPP).

The project redevelops an under-utilized property and thereby upgrades the eastern gateway corridor to Hollywood, thereby encouraging entertainment, theater, and tourist –related uses by eliminating a surface parking lot and replacing it with a new mixed-use building. Although the project requests a parking reduction from the City’s condominium parking standards, the project is adequately parked. See Page IV.H-25. Finally, the project enhances the pedestrian environment by establishing ground floor retail.

With regard to the UDP, the commenter mischaracterizes the UDP as a “restriction.” The UDP has not been adopted and is not in force and effect. The CRA produced a draft UDP on March 30, 2010 for public review and comment. A previous draft UDP was approved by the CRA Board in 1993, but was never finally adopted, and the failure to adopt the 1993 UDP was the subject of a lawsuit brought by Hollywood Heritage, Inc. As a result of that law suit, the CRA commenced the preparation of the UDP. The CRA treats the 1993 draft UDP as a guideline, but not as a regulation. Proposed projects are not required to be consistent with the Draft 1993 UDP.

Comment No. 2-4 Please note the following comments:

Section I. "Introduction/Summary," on page I -4 lists under the subheading "Areas of Controversy," the concerns raised in letters responding to the Notice of Preparation: "(1) *air quality*, (2) *transportation/traffic*, (3) *cultural*, (4) *impacts to police protection*, (5) *impacts to parks and recreational facilities*, (6) *impacts to schools*, and (7) *impacts to solid waste*." No reference is made to a 2/26/08 letter from Robert Nudelman of Hollywood Heritage, included in the DEIR appendices, which states that the proposed development is illegal under state redevelopment law. The DEIR's analysis of the Hollywood Redevelopment Plan, pages IV.H-4, 7, also explicitly ignores this issue.

To ensure that Mr. Nudelman's objections are responded to, note his letter's reproduction below:

Response to Comment No. 2-4

The commenter references a February 26, 2008 letter from the late Robert Nudelman in which he states that the project is "illegal under State redevelopment Law." Mr. Nudelman's letter is included in the appendices in the Draft EIR. In addition, Mr. Nudelman's letter asserts a legal conclusion. There is no evidence that Mr. Nudelman is an attorney, and assertions of law are not considered environmental impacts. In addition, CEQA does not require express reference to every letter received in response to a Notice of Preparation. Nevertheless, the Draft EIR included a discussion of consistency with the HRP and this Response to Comment appears in the Final EIR and will provide additional direct responses to these concerns. To the extent that Mr. Nudelman's comment letter asserts a land use compatibility impact with regard to the HRP, both the Draft and this Response addresses those assertions.

Comment No. 2-5

"The project as described in this Notice of Preparation (NOP) is illegal under state redevelopment law. This is due to the code restrictions on the proposed site as described in the Hollywood Redevelopment Plan, Amended 2003, Ordinance #175236 (HRP) and the Hollywood Boulevard District Urban Design Plan, Revised March 1993 (HBDUDP) and approved by the CRA board. Violation of the HRP also violates CEQA by illegally amending its EIR.

"These two planning documents are binding on this site and variances, as proposed here, can *only* be accomplished by an amendment to the HRP and the HBDUDP, not through an action as proposed here. The city planning department does not have authority to overrule the redevelopment plan.

Response to Comment No. 2-5

The comment asserts that the proposed project violates the HRP. With regard to the project's consistency with the HRP, see Response 2-3, above. Furthermore, the comment incorrectly treats the 1993 Draft UDP as a binding regulation (see Response 2-3, above). Furthermore, the commenter incorrectly asserts that variances from the HRP and UDP are being sought by this project. The proposed project's anticipated discretionary approvals are set forth in Section IV. H. Land Use and Planning on pages IV.H-15 and

IV.H-16 of the Draft EIR. No variances are being sought for this project (see also Section II. Project Description, pages II-8 through II-10, Discretionary Actions).

Comment No. 2-6

"As described in the NOP the site has an FAR of 2: 1. Provisions to increase this by a maximum of 30% are described in the HBDUDP on page 3-22, '4. Housing Incentive Units,' which in turn is based on Section 505.3 of the HRP. The objectives that are required to obtain the 30% bonus are not mentioned as part of the proposed project either in the NOP or the developer's public presentations. Therefore the proposed project does not meet the legally described conditions for a 30% increase in FAR, never mind one 225% as asked for in the NOP.

Response to Comment No. 2-6

The comment misconstrues section 505.3 of the HRP and the D limitation that limits FAR to 2:1. The comment also confuses density and FAR, which are separate and distinct measurements. Density refers to the amount of residential units allowed on a given site—it limits the amount of dwelling units. FAR is a limit on square-footage of usable floor area. FAR regulates square footage. Density regulates number of units. HRP section 505.3 relates to density, and restates the voluntary density bonuses available to projects that *voluntarily* include affordable housing units. The D limitation of 2:1 FAR is not part of the HRP and refers only to FAR—not density. It is incorrect to treat a 30% increase in FAR as 30% increase in density—they are separate calculations measuring separate things. Furthermore, the comment is not correct that affordable housing units are required to eliminate the D Limitation and establish an FAR of 4.5:1. HRP section 505.3 is unrelated to FAR. Furthermore, Section 505 of the HRP only applies to areas of the Redevelopment Project Area that are designated Residential. The project site is designated Regional Center in the HRP. Consequently, none of the provisions of section 505 apply to the site.

Comment No. 2-7

"The HBDUDP also describes height limits for this site as 45 feet (page 7-11, Figure 7-13 'Height Standards'). This is considerably less than the proposed height of 258 feet in the NOP. The HRP describes a general height limit for the Hollywood Boulevard District in Section 5065.2.1-'#2 Assure that new development is sympathetic to and compliments existing scale of development.' The 45-foot height limit does that while 258 foot proposed height would exceed the height of any structure in Hollywood.

Response to Comment No. 2-7

The comment mischaracterizes the 1993 Draft UDP as a land use restriction, which it is not. The 1993 Draft UDP is used as guideline by the CRA, but the CRA does treat the 1993 Draft UDP as a regulation. See Response 2-3, above. The HRP imposes no height limit on the project site, and specifically allows an FAR of 4.5:1. With regard to project compatibility with the objectives of the HBD as they are set forth in the HRP, see Response 2-3, above.

Comment No. 2-8

"The conclusions must be that the project proposed is vastly out of compliance with the HRP and the HBDUDP. The variances from code, 125% above the FAR and over 550% of the height limit, are both extraordinary.

Response to Comment No. 2-8

The comment restates its position that the project is "out of compliance" with the HRP and 1993 Draft UDP. As previously-stated in the responses above, the project is not out of compliance with these documents, and the 1993 UDP is not a binding regulation applicable to the project.

Comment No. 2-9

"The owner of the property purchased the site several years after the approval of these plans and therefore is prohibited under local, state, and federal laws to claim any hardship variance, even at much more reasonable levels of increase. If they overpaid for property, or did not perform proper due diligence, that is their loss. It is not the purpose of variances to create bad planning nor break the law.

"For the city to even consider a project such as this for review is preposterous. It opens the city to litigation by the community as well as by the developer. It also creates hope for other wannabe illegal projects, increasing the city's expenditures and its vulnerability to additional litigation. This proposed project requires the amending of HRP and cannot be met by any other legal means of state redevelopment law or CEQA.

"Sincerely, Robert W. Nudelman, Director of Preservation Issues, Hollywood Heritage INC."

Response to Comment No. 2-9

The comment claims that there is no evidence of hardship to support the granting of a variance. However, the proposed project's anticipated discretionary approvals are set forth on pages II- 8 through II-10 and IV.H-15 and IV.H-16 of the Draft EIR and no variances are being sought for this project. In addition, whether evidence supports the requisite findings to grant the approvals is a policy and evidentiary matter for the City's decision-makers, and do not relate to environmental impacts or CEQA compliance. The commenter incorrectly characterizes the project as requiring "the amending of the HRP." No amendment of the HRP is required. As discussed in the Draft EIR and in the responses above, the project is consistent with the land use and FAR limits in the HRP, and with the objectives of the HBD.

Comment No. 2-10

Table I-1, "Summary of Impacts/Mitigation Measures," under the subheading "Aesthetics," states on page I-8: *"Though project implementation would create a minor diminishment of this valued view (of the Hollywood Hills/Santa Monica Mountains), views are limited and intermittent and views of the hills can*

be afforded in many other locations. Therefore the impact on the view of the hills looking north would be less than significant."

Stating that people can find views of the Hollywood Hills somewhere else is not an acceptable mitigation measure for a building that would be the tallest in Hollywood and would obstruct scenic views for miles around. This DEIR response is followed on page I-9 with a similarly nonsensical assessment of "Cumulative Impacts," with the comment: *"No substantial scenic resources are located in the area surrounding the project site that could be affected by a cumulatively considerable reduction in views. Therefore, the proposed project in conjunction with the related projects would not result in cumulatively considerable impacts with regard to view impacts of the 'Hollywood' sign and impacts would be less than significant."*

The proposed development would be 270 feet in height. Immediately south of the project site at Columbia Square another development proposes two towers of 315 feet and 270 feet in height. Four blocks southeast of the proposed site the Sunset/Gordon development would reach 260 feet in height. Skyscrapers are also under consideration for the Palladium site at Sunset and Argyle, and for the area near the Capitol Records tower. If the combination of all of these proposed skyscrapers does not in the applicant's view justify a significant impact to scenic resources, then at what point would the applicant consider obstruction of views to be cumulatively significant?

Response to Comment No. 2-10

The comment expresses an opinion regarding obstruction of views of the Santa Monica Mountains and the Hollywood Sign. The Draft EIR on page IV.B-3 states that there are existing views looking northward on Gower Street of both the Santa Monica Mountains and the Hollywood Sign. As demonstrated in the view simulations provided in the Draft EIR, the proposed project does not obstruct views of the Hollywood Sign (see Figure IV.B-6 of the Draft EIR). Further, as discussed in the Draft EIR, views of the Santa Monica Mountains are afforded from all over the Los Angeles area.

The comment further asserts that the cumulative effect of this project along with other projects in the vicinity would constitute a significant impact. Again, the visual resources under consideration are the Santa Monica Mountains and the Hollywood sign. In determining a *cumulative* impact to visual resources, the geographic scope of the both the obstruction and the visual resource is necessarily expanded to correlate with the geographic scope of the related projects and the resource itself. In certain locations, the cumulative projects in the Hollywood area may partially block some small portion of the mountains. However, views of the Santa Monica Mountains are afforded all over the Los Angeles basin. The cluster of proposed buildings would not completely obstruct views of the mountains from the Los Angeles area, as the mountains are a natural topographical feature that runs for several miles in an east-west direction. Views of the Hollywood sign, a notable visual feature, can also be seen for several miles in many directions in the Los Angeles area. Therefore, the cumulative impact of the Hollywood area projects would not obstruct these views. If the resource is not visually prominent like the mountains or the Hollywood sign, and can only be seen in one location, which could potentially be blocked by proposed

man-made structures, then an obstruction may be considered significant. The Santa Monica Mountains and the Hollywood sign would not fall into this category as discussed.

Comment No. 2-11

Table I-1, under the subheading D "Cultural Resources," on page I-20 states: *"The construction of a 20-story building directly next to and adjacent to the Henry Fonda/Music Box Theater would not diminish the potential historic status of the Henry Fonda/Music Box Theater .. At least two high-rise development projects are under construction within two blocks of the project site . .As the Hollywood community is characterized by diversity in heights and massing, the proposed project would not impact the Henry Fonda/Music Box Theater potential historic resource."*

The DEIR does not identify the two high-rise development projects *"under construction within two blocks of the project site"* that are comparable in scale to the 270-foot-tall proposed project, which if built would be the tallest structure in Hollywood, nor does the DEIR identify which areas represent the *"diversity in heights and massing"* that it claims characterize Hollywood.

The DEIR does list on page IV.B-3 what it defines as *"high-rise buildings along Hollywood Boulevard and Vine Street including the Hollywood Taft building (12 stories), the Broadway Hollywood building (10 stories) and the 13-story Capitol Records Tower ... "* None of these buildings approaches the height of the proposed 20-story project.

Building the tallest structure in Hollywood directly adjacent to the Music Box Theater will obviously impact the theater's significance, especially since the applicant also seeks an adjustment for a zero-foot westerly side yard. Impacts to the Music Box's historic status are therefore potentially significant.

Response to Comment No. 2-11

The comment asserts that the proposed project, being adjacent to the Music Box, and the height of the proposed project would impact the theater's (historical) significance. The intent of the EIR is to examine physical changes caused by a project to the existing physical conditions in the affected area (CEQA Guidelines, Section 15126.2). The potential historic significance of the Music Box Theater relates to the age of the building and its historic use, as discussed in the Draft EIR, page, IV.D-5. The impacts that could potentially affect the building due to its age and proximity to the proposed project site would be construction noise and vibration, which have been discussed in Section IV. I of the Draft EIR.

CEQA Guidelines Section 15064.5(b) states: "a project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." The Guidelines further state: "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 impaired." The proposed height and proximity of the project (or nearby projects under construction) to the Music Box Theater will not cause a physical change to that structure, or involve demolition, destruction, relocation or alteration of the theater. Having a taller building next to a shorter building is not in and of itself an impact,

especially when considering the variety of building types and sizes found along Hollywood Boulevard. Whether the building will be the tallest in Hollywood is not a fact relevant to the cultural resources impact suggested by Comment No. 2-11.

Comment No. 2-12

Table I-1, under subheading H, "Land Use," on page I-35 states *"The project would be consistent with the Hollywood Community Plan Update FAR designation of 4.5:1 for the site. Therefore, impacts with respect to floor area ratio would be less than significant with approval of the requested Zone Change."* (Reiterated on page IV.H-24).

The Hollywood Community Plan Update has yet to release its environmental impact report. Public review, comment, and final city approval is still far in the future. In the meantime, the Project's DEIR is required under the California Environmental Quality Act ("CEQA") to assess impacts to land use based on the existing zoning regulations. The DEIR is also required to assess such impacts based on any other controlling land use regulations, which requires analysis of the project's conformance with the Hollywood Redevelopment Plan and the Hollywood Boulevard District Urban Design Plan. This DEIR is deficient and evasive in regards to such analysis, as contained in Section IV.H, "Land Use and Planning," avoiding the significant impacts associated with the Project.

Response to Comment No. 2-12

The comment asserts that the Draft EIR Land Use section did not assess the impacts to land use based on existing zoning regulations. Page IV.H-18 clearly states that the Hollywood Community Plan is currently in the process of being updated and that the land use analysis is based on existing regulations. Consequently, a number of discretionary actions have been requested, which include a zone change and height district change (see pages II-8 through II-10 and IV.H-15 and H-16 of the Draft EIR). If the Draft EIR were to analyze the proposed project to the Hollywood Community Plan Update (that is not yet approved), no zone change or height district change would be necessary and the FAR of the project would be in compliance. The Draft EIR merely acknowledges that the project would be consistent with the Update Plan in terms of FAR (if the Update Plan were to be approved in its current form).

For clarification, the following sentence on pages I-35 and IV.H-24 of the Draft EIR is revised to read (see also Section III. Corrections and Additions of this Final EIR):

Also, although the Hollywood Community Plan Update is still in its draft phase, the project would be consistent with the Hollywood Community Plan Update FAR designation of 4.5:1 for the site, if approved in its current form. This is noted for informational purposes only as plans are not binding until approved.

Comment No. 2-13

Table I-1, under subheading I, "Population and Housing," on page I-44 states: *"Based on an average household size of 2.3 persons for households in the HCPA, approximately 405 people would occupy the 176 residential units."* On page I-55, however, under the topic Parking and Access, the DEIR states that residential parking will consist of only 331 spaces, or 1.63 assigned resident spaces per unit and 0.25 guest spaces per unit. The DEIR claims the *"proposed amount of residential parking is anticipated to be adequate to meet the needs of the project."* The DEIR also references another project (Paseo Plaza) as being required to only provide 0.25 guest parking spaces per unit, in lieu of the 0.50 guest spaces required in congested parking areas.

The mixed-use Paseo Plaza project at 5651 Santa Monica Blvd. (CPC-2006-4392-GPA-ZC-HD-ZV-ZAA-ZAI-SPR) was approved for 1,811 parking spaces and 437 dwelling units. That project's slight reduction in guest parking was granted based on its parking surplus for its retail component. The Paseo Plaza project also received approval to construct its subterranean parking garage below the water table. In contrast, Hollywood & Gower proposes a mere half level of subterranean parking and four levels of at- and above-grade parking. The Paseo Plaza project is also providing a 10% affordable housing component, while Hollywood & Gower offers no affordable housing.

Comparable developments in the vicinity of the Project would include the Clarett/Boulevard 6200 development at 6139 Hollywood Blvd. (CPC 2006-7301-ZC-ZV-YV-SPR), a 1,014-unit mixed-use project with 2,696 parking spaces. The Clarett project's 4/9/07 City Planning Commission Determination Letter states that *"the Project will provide a surplus of parking, and will not lead to residents, tenants and guests searching streets and adjacent properties for parking spaces."*

Please note that the Clarett/Boulevard 6200 project is located immediately across from the Hollywood/Vine Red Line subway stop, and is also voluntarily setting aside 10% of the residential units as permanent affordable housing -- unlike Hollywood & Gower's utter lack of any affordable housing.

Response to Comment No. 2-13

The commenter implies that the proposed amount of residential parking is not adequate to meet the needs of the project. The proposed project will include 176 residential units, 7,200 square feet of commercial/retail spaces, and 345 parking spaces in total, 331 of which are designated for the residential units (at a ratio of 1.88 residential spaces per unit, including 1.63 residential spaces and 0.25 guest spaces per unit) and 14 spaces for the commercial uses. The project includes 1 level of subterranean parking and 4 levels of above-grade parking within an enclosed concrete parking garage that will be screened by an architectural facade that complements the building and its surroundings.

It is the intent of the applicant to operate the residential portion of the project as apartments, and as apartments it would comply with and exceed the parking requirements for apartments. A Subdivision map is being requested that will allow the apartments to become condominiums in the future, should the market demand additional for sale residential units. However, there are no current plans to sell individual residential condominium units. Nevertheless, a deviation from the city condominium parking policy has

been requested and justification for this deviation has been provided.). The proposed project exceeds the number of Code required parking spaces for apartment uses by 38 parking spaces. However, the Applicant is requesting a Subdivision and is therefore also subject to the City of Los Angeles Advisory Agency Parking Policy AA 2000-1 for residential *condominium* subdivisions, which identifies a residential parking requirement of 2.0 spaces per unit, plus 0.5 guest spaces per unit within parking congested areas for condominiums. Since a subdivision is being requested, the Applicant will require a deviation from the Advisory Agency's Residential Parking Policy for subdivisions in parking impacted areas. But this deviation is justified based on the various transportation options available within close proximity of the project site (including the Metro Red Line Hollywood/Vine Station, which is located less than 1/4 mile to the west of the project site), and the number of proposed parking spaces is anticipated to meet the needs of the project. The project is in an urban location that offers employment as well as commercial and cultural amenities located within walking distance or accessible by public transit.

The proposed residential parking reduction to provide 1.88 residential parking spaces per unit in lieu of 2.5 spaces per unit is consistent with the Los Angeles City Planning Commission's *Do Real Planning* principle (Principle No. 12) to *Identify Smart Parking Requirements* to replace parking standards with project and location-specific tools. In many recent cases, the City Planning Commission has encouraged and supported less parking in projects near public transit as a tool to promote the use of public transportation. Other projects in the vicinity that are comparable to the proposed project in that they have received approval for reduced parking, or have been encouraged to provide less parking, include, but are not limited to, the Sunset/Gordon mixed-use project located at 5929-5945 Sunset Boulevard & 1512-1540 N. Gordon Street which was granted a residential parking ratio of one parking space per bedroom (Case Nos. CPC-2007-515-GPA-ZC-HD-CU-CUB-ZV-ZAA-SPR-SPE-SPP and VTT-68501) as well as the Tribune site development located at 5800 Sunset Boulevard (corner of Sunset and Van Ness), which, although it did not include a parking reduction request, received a City Planning Commission action that included support for reduced parking on-site due to adequate Transportation Demand Management (TDM) measures and advisement to apply for 75 percent parking reduction Variance (Case No. CPC-2005-8984-ZC-HD-DA.)

The commenter also inaccurately claims that the proposed project is comparable to the much more larger-scale Clarett/Boulevard 6200 project, which is a development that provides almost six times the number of residential units and 25 times more retail space than the proposed project. In addition, the Clarett project is subject to parking requirements of the LAMC for apartments, not the Advisory Agency's Parking Policy for condominiums, which means they too provide a parking ratio of less than 2.5 spaces per residential unit once the amount of retail parking (provided for 175,000 square feet of retail space) is subtracted from the total count.

The Draft EIR was merely noting that a precedent has been set with other approved Hollywood projects with regards to 0.25 guest parking spaces rather than 0.50 spaces identified by the Advisory Agency. It is correct assertion that the proposed project does not include affordable housing and is not a requirement for the Hollywood area to provide such housing.

Comment No. 2-14

Section 2, "Project Description," under subheading "D. Project Objectives," lists among its objectives on page II-8: *"Maximize the amount of housing provided on the project site to address housing needs in the community, "* and *"provide a development that is compatible and complementary with surrounding land uses."*

The Project offers no affordable housing, and therefore does not *"address housing needs in the community."*

Response to Comment No. 2-14

The comment asserts that the project doesn't address housing because no affordable housing is proposed. The provision of affordable housing is not the only means of addressing housing issues for the Hollywood area. The proposed project provides additional housing to the Hollywood area that contains a high concentration of employment. Therefore, additional housing in these areas provides greater opportunities to bring people closer to employment and entertainment centers. Further, additional housing in the area, as opposed to farther out in the metro area, potentially reduces commute times on local freeways. While the project does not directly supply affordable housing, adding to the supply of housing in high-demand areas reduces the pricing pressure across a broad range of affordability levels, not just at the level of the new housing.

Comment No. 2-15

Additionally, if constructed the Project would be the tallest building in Hollywood on a site surrounded by low-level structures. The Project therefore is in no manner *"compatible and complementary with surrounding land uses."*

Response to Comment No. 2-15

The comment asserts that the height of the proposed project would be incompatible with surrounding uses. The height of the proposed project building at 270 feet doesn't necessarily constitute incompatibility with surrounding land uses. Many areas in the city, including Hollywood, contain mixture of uses and building heights. For example, Hollywood Boulevard, Sunset Boulevard, Wilshire Boulevard and Ventura Boulevard corridors contain high-rise structures in proximity to low-rise multi-family and single-family structures. Furthermore, there is a distinction between design compatibility and use compatibility. Design compatibility regards height and massing and aesthetics; use compatibility regards the type of activity for which the land is put to use. The Project objective refers to use compatibility. The uses are not necessarily incompatible. In fact, many urban areas include mixture (both vertical and horizontal) of commercial, retail and residential uses which is not uncommon development pattern in other urban areas throughout the country. An example of an incompatible use would be manufacturing/heavy industrial use next to residential structures or schools.

Comment No. 2-16

Section 3, "Environmental Setting," subheading "8. Related Projects," omits the Hollywood Freeway Cap Park.

Hollywood's Central Park is proposed over the 101 Freeway from North Bronson Avenue and Hollywood Boulevard to Santa Monica Boulevard. A mile in length, it will provide 44 acres of park space.

According to the Community Redevelopment Agency's ("CRA") July 15, 2009 staff report, the "Cap Park" will include at the southeast corner of Fountain Avenue and St. Andrews Place a large plaza and baseball field, playgrounds, plaza spaces, viewing platforms, water features, picnic areas, open fields and community gardens. The CRA report also states that the project seeks to "*transform a freeway corridor into a destination.*" The park is anticipated to generate 4,500 construction jobs (hollywoodfreewaycentralpark.org). The intensity and controversy of this development has led to a \$3,000,000 budget for just the EIR. Impacts from the Cap Park development are likely substantial. The Cap Park Memorandum of Understanding was approved by the CRA in January of 2007, and the feasibility study was made public in November of 2008.

A project that is under environmental review is a "reasonably foreseeable probable future project" within the meaning of the Guidelines. (Guidelines, § 15355, subd. (b).). This is because once review is begun, a significant investment of time, money and planning has probably occurred. Thus, once environmental review commences, the project is probable rather than merely possible. *Friends of the Eel River v. Sonoma County Water Agency*, 108 Cal.App. at p. 870; *San Franciscans for Reasonable Growth v. City and County of San Francisco*, supra, 151 Cal.App3d at pp. 74-75

The Court of Appeal has held that a "proposed project" under environmental review is a reasonably foreseeable future project. *Schaeffer Land Trust v. San Jose City Council* (1989) 215 Cal.App.3d 612, 630; *San Franciscans for Reasonable Growth v. City and County of San Francisco* (1984) 151 Cal.App.3d 61, 72-77; § Guidelines 15130.

"The Guidelines explain that a discussion of cumulative effects should encompass 'past, present, and *reasonably anticipated future projects.*'" *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.1.3d 376, 394; citing Guidelines § 15130 (b)(I)(A); italics in original.

Response to Comment No. 2-16

The comment describes a conceptual Cap Park proposed for development above the 101 Freeway at Fountain Avenue and St. Andrews Place, and claims that the Cap Park should have been included as a related project for purposes of cumulative analysis. This conceptual future park is located approximately 0.8 miles from the project site.

The comment correctly recites a portion of the applicable law that once environmental review commences for a proposed project, that the project's implementation is reasonably foreseeable for purposes of impact analysis. However, the commenter misapplies the applicable law to the facts and overlooks the CEQA

rule that an environmental baseline for a proposed project is set at the time the Notice of Preparation is published.

Environmental review for the Cap Park has not commenced. The CRA has begun planning the Cap Park and various stakeholders have commenced raising money for the Cap Park, but no CEQA review of the Cap Park has commenced. No applications to the California Department of Transportation or other agencies have been filed requesting permits and approvals for the Cap Park. Consequently, under the CEQA precedents cited by the commenter, the Cap Park is not yet a reasonably foreseeable project.

Furthermore, neither the July 15, 2009 CRA staff report nor the November 2008 Cap Park Feasibility Study existed at the time the Notice of Preparation was published for the proposed Hollywood Gower project. The NOP for the project Draft EIR was circulated for a 30-day review period starting on January 28, 2008 and ending on February 27, 2008. The NOP was delivered to the CRA, and the CRA did not comment that the Cap Park should be included as a reasonably foreseeable project. At the time the NOP was circulated for the proposed project, only a Memorandum of Understanding to explore the feasibility of the Cap Park existed. Consequently, the Cap park is correctly excluded from the related projects list for purposes of cumulative impacts analysis.

CEQA Guideline §15125(a) establishes the environmental baseline as:

“the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, *at the time environmental analysis is commenced*, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.” [emphasis added]

Finally, it is mere speculation to conclude that the Cap Park will be developed when it is not yet fully funded and no environmental review has commenced. It is also speculative to assume that both the proposed project and Cap Park could be under construction at the same time—this is especially true given that the proposed project is much further along in the environmental review process than is the Cap Park.

Comment No. 2-17

The DEIR Related Projects list also omits the 4.8-acre, 1.3 million sq. ft. mixed-use Millennium Hollywood project at Yucca Street and Argyle Avenue, misidentifies the 200,000 sq. ft Academy Museum of Motion Pictures at Vine Street and Fountain Ave. as a 75,000 sq. ft. project, and does not provide the square footage for #113, the Target retail development at Sunset Boulevard and Western Avenue (192,680 sq. ft.) -- even though that project's environmental studies were completed by the same firm as for the Hollywood & Gower DEIR (Christopher Joseph & Associates).

Response to Comment No. 2-17

The comment asserts omission of a related project and misidentification of two related projects. Related project lists are developed in concert with the Department of Transportation, Planning Department, and

other sources. Related project lists constitute individual developments that have submitted applications with the City of Los Angeles and, consequently, are proposed, approved for construction or are underway in the study area. The purported "Millennium Hollywood" project did not have an application submitted with the City of Los Angeles at the time the related project list was developed and no such application has been submitted yet. Therefore, there was no omission of this project for purposes of cumulative analysis in the Draft EIR.

For clarification, the Academy Museum of Motion Pictures and Target Retail Development Projects square footages are revised in this Final EIR (see Section III. Changes and Additions of this Final EIR).

Comment No. 2-18

Section 4, "Environmental Impact Analysis," subheading "B. Aesthetics," states on page IV.B-7 (and reiterated on page IV.D-8):

"The new building will improve the visual character of the area by replacing a surface parking lot with an architectural style that is visually compatible with the historical landmarks in the area (perhaps even improving the visual interest in an area rich in architectural variety). The project building's contemporary design does not emulate the older structures of the area and does not distract from the unique image of other taller buildings of the area. Thus, the project building is sensitive to the unique visual character and image of the area and project impacts to the area's aesthetic value and image would be less than significant."

Please note that the proposed 270-foot-tall Project is not of *"an architectural style visually compatible with the historical landmarks in the area."*

The DEIR clearly states that the project's *"contemporary design does not emulate the older structures of the area."* How then can the 270-foot tall Project be "visually compatible" with historic landmarks such as Columbia Square, the Pantages Theatre, the Palladium, or the Music Box Theater? How can the DEIR further claim that the 20-story Project is *"sensitive to the unique visual character and image of the area,"* which is described in the DEIR as "low to mid-rise urban development," and that the Project's impacts to aesthetics would somehow be less than significant?

Response to Comment No. 2-18

The comment expresses an opinion that the height of the proposed project building and architectural style is not compatible with historical landmarks in the area. See Responses to Comments 2-11 and 2-15, above, regarding height of the proposed project building with historic resources.

There are existing buildings in the immediate area that vary widely in design, size and scale, from the other high-rise buildings along Hollywood Boulevard and Vine Street including the Hollywood Taft building (12 stories), the Broadway Hollywood building (10 stories) and the 13-story Capitol Records Tower across from the Palace and Pantages Theaters. The Capitol Records Building is very modern compared to the Taft Building and the Broadway Building. Further, the W Hotel, condos and apartment

project, rising to approximately 14-stories (150-feet in height) is directly across the street from the Pantages Theater and is also a modern design. Thus, the Hollywood area already includes modern high-rise structures among historic older buildings.

Also, historic status of a structure does not necessarily relate to architectural style but with age, use, and association with people or events. In the case of the proposed project, the potential historic resource of the Music Box Theater relates to the age and historic use of the theater. When a project involves new construction as part of a historic resource, the Secretary of the Interior's Standards for Treatment of Historic Properties contain guidelines that are specifically detailed to not detract from that resource. The Draft EIR merely attempted to state that the contemporary design would not detract visually from the Music Box Theater or any other older structures in the project area.

For clarification, the following sentence on page IV.B-4 is revised to read (see also Section III. Changes and Additions of this Final EIR):

In the immediate vicinity west of the project site, the visual environment of Hollywood Boulevard is characterized by low to ~~mid-rise~~ **high-rise** urban development.

Comment No. 2-19

Constructing the tallest building in Hollywood immediately adjacent to one and two-level structures, and doing so with a contemporary design, *will* create a significant impact to aesthetics that will scar Hollywood's visual character for generations to come. One need only glance at the horrifically ugly W Hotel development at Hollywood and Vine to see visual proof that such "contemporary" design is neither compatible nor sensitive to historic structures - even when built at a scale of similar height and massing.

In contrast, the Project would be almost double the height of the W Hotel, would overwhelm the Music Box Theater, and offers a cheap, monolithic design whose primary point of aesthetic interest will be the supergraphics masking its surface.

Impacts to aesthetics are significant, with the only mitigation being a reduced-scale project.

Response to Comment No. 2-19

The comment expresses opinion regarding the proposed project and the W Hotel and Residences project contemporary designs and did not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. The commenter is neither an architect nor provides any credential demonstrating expertise in design to support his opinion. Furthermore, although the Draft EIR studies the impacts of supergraphic signage, no applications have been submitted for such signage—and there currently exists a moratorium preventing such signage. Nevertheless, the EIR studied the aesthetic impacts of proposed signage. Although opinions differ on the desirability of signage of in Hollywood, the fact is that large signs are ubiquitous in the existing Hollywood environment, so the project's proposed signage is compatible with the existing environment. Finally, the comment express only an

opinion about the desirability of signage, but provides no comment regarding an environmental impact related to proposed signage. Therefore, a response is not required pursuant to CEQA. The comment also asserted opinion that the aesthetic impacts are significant and only mitigation is a reduced scale project. A reduced scale project is studied as an alternative to the proposed project. These comments are acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 2-20

Section 4, "Environmental Impact Analysis," subheading "B. 2. Shade/Shadow"

The DEIR conducts no cumulative analysis of shade/shadow impacts combined with the two skyscrapers proposed in related project #41 (Columbia Square). The DEIR also identifies only related project #23 as a potentially shadow -impacted residential development, but ignores related project #22, with 1,014 approved residential units (incorrectly listed as 952 dwelling units; also incorrectly listed as 1,042 units at #110). The DEIR Shade/Shadow study is therefore inadequate.

Response to Comment No. 2-20

The comment asserts that the cumulative shade/shadow analysis is inadequate for not considering related project number 41. This related project is located on Sunset Boulevard, south of the project site location on Hollywood Boulevard and Gower Street. The potential winter solstice shadows cast from this related project site would reach the project site at 1 p.m. and leave approximately one hour later. Winter solstice shadows from the proposed project over the same area occur at 12 p.m. Therefore, the potential for both the proposed project and related project shadows to overlap is very brief time period. In addition, this overlap would primarily be over surrounding commercial uses along Hollywood Boulevard. Only if the related project and the proposed project cast shadows that overlap and overlap over shadow sensitive uses (e.g., residential) for a period longer than two hours, then a significant impact would occur. Since the shadows do not overlap to a significant degree, there is no impact. For these reasons, related project number 41 was not included in the Draft EIR analysis regarding shade/shadow.

Comment No. 2-21

Table IV.H-2, "Hollywood Redevelopment Plan Objectives Discussion," on page IV.H- 21, 22 lists a number of objectives that conflict with the Project.

Listed objectives include standards for height, building setback, and continuity of street facade, none of which the Project will comply with. The Project's contemporary architectural style and 270-foot height is NOT complementary to the existing low-level streetscape.

Response to Comment No. 2-21

The comment expresses an opinion that the project conflicts with a number of Hollywood Redevelopment Plan objectives. The comment misrepresents these objectives as standards for development regarding

height, setback and street facade. The fourth bullet objective on Table IV.H-2, page IV.H-21, is a policy to improve the quality of the environment and to promote a positive image for Hollywood and a safe environment. The policy reads as follows (from page IV.H-21 of the Draft EIR):

“Improve the quality of the environment, promote a positive image for Hollywood and provide a safe environment through mechanisms such as: adopting land use standards; promoting architectural and urban design standards including: standards for height, building setback, continuity of street façade, building materials, and compatibility of new construction with existing structures and concealment of mechanical appurtenances; promoting landscape criteria and planting programs to ensure additional green spaces; encouraging maintenance of the built environment; promoting sign and billboard standards; coordinating the provision of high quality public improvements; promoting rehabilitation and restoration guidelines; and integrate public safety concerns into planning efforts.”

As shown, the “standards for height, building setback, continuity of street façade” are imbedded in the policy and do not contain actual development standards. The policy does not include restrictions on height, setback and street façade. Rather, the intent of the policy is for the Redevelopment Agency to ensure that the quality of the environment is improved and to guide future development by using architectural and urban design standards such as height, setback and streetscape facades, as well as more landscape for additional green spaces. The proposed project will have varying setbacks including ground floor pedestrian space along both Hollywood Boulevard and Gower Street with retail uses as well as additional street trees and landscaping to enhance the pedestrian environment. Currently the project site is a surface parking lot that doesn’t include those pedestrian amenities. The policy does not include restrictions on architectural and urban design. Hollywood and the immediate area include an eclectic mix of architectural styles from contemporary to Spanish/Mediterranean and from different eras. The proposed project’s contemporary design would not be out of step with this mix of styles. As mentioned in Response to Comment 2-11, the height of the proposed project building would not detract from low-rise structures in the area such as the adjacent Music Box Theater.

Comment No. 2-22

The Hollywood Redevelopment Plan also seeks to "increase the supply and improve the quality of housing for all income and age groups, especially for persons with low and moderate incomes; and to provide home ownership opportunities and other housing choice, which meet the needs of the resident populations." The DEIR states that the proposed project will "*provide modern condominium units with varying unit sizes ... that will improve the quality of housing in the Hollywood community for different income and age groups.*"

The Project would provide only market rate dwelling units with no units of affordable housing. The applicant's representatives at public meetings have refused to include any affordable housing in the Project, stating that it is not in the applicant's "financial interest" to do so. The Project, therefore, does

NOT improve the quality of housing for all income and age groups, especially for persons with low and moderate incomes. The Project has also been promoted as rental units; is the DEIR incorrect in stating that the units will be condominiums (a claim repeated in Table IV.H-4), and if so how then is the Project adhering to the Redevelopment Plan objective to "provide home ownership opportunities?"

Response to Comment No. 2-22

The comment expresses opinion regarding the proposed project's lack of affordable housing provision. It is correct that the proposed project would not include affordable housing. The project applicant is not obligated or required to provide housing for all income and age groups. The intent of the Redevelopment Agency policy (found on page IV.H-22 of the Draft EIR) is to ensure comprehensively for the Hollywood community that over time and through different projects that all income and age groups are accommodated. It is not the intent to burden one project or to require every project to provide opportunities for home ownership. Market rate apartment projects such as proposed in this project provide quality housing to persons who cannot afford to purchase a home. Nevertheless, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

The provision of affordable housing is not the only means of addressing housing issues for the Hollywood area. The proposed project provides additional housing to the Hollywood area that contains a high concentration of employment. Therefore, additional housing in these areas provides greater opportunities to bring people closer to employment and entertainment centers. Further, additional housing in the area, as opposed to farther out in the metro area, potentially reduces commute times on local freeways. While the project does not directly supply affordable housing, adding to the supply of housing in high-demand areas reduces the pricing pressure across a broad range of affordability levels, not just at the level of the new housing.

Comment No. 2-23

Furthermore, the Project does not conform with the objective to be sensitive to historic and architecturally significant Hollywood. Constructing a 270-foot tall, contemporary skyscraper immediately adjacent to a low-level, historically significant theater displays a callous insensitivity to Hollywood's rich architectural and cultural history.

Response to Comment No. 2-23

Please refer to Response to Comment 2-11, above.

Comment No. 2-24

The Project does not "promote and encourage development of recreational and cultural facilities" by offering a tenants-only swimming pool, or by having a private lounge on the roof.

Response to Comment No. 2-24

The comment asserts the opinion that the project doesn't meet the Hollywood Redevelopment Plan objective of promoting the development of recreational and cultural facilities. It is correct that the project will include recreational amenities (e.g., roof top pool and lounge) only available to project site residents (see page IV.H-23 of the Draft EIR). This comment opinion is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 2-25

The Project does not "support and encourage a circulation system which will improve the quality of life in Hollywood" by creating significant traffic impacts at three intersections (including Selma/Gower), or by purposely underparking the development.

Response to Comment No. 2-25

The comment asserts the opinion that the project doesn't support the Hollywood Redevelopment Plan objective of encouraging a circulation system that will improve the quality of life Hollywood by creating three significantly impacted intersections and providing less parking than required. It is correct that the proposed project would result in significant impacts at Hollywood Boulevard/Gower Street, Gower Street/Sunset Boulevard and Gower Street/Selma Avenue. The Draft EIR identified mitigation measures (see L-2 and L-3, page IV.L-47 of the Draft EIR) to help improve overall traffic flow operations in the project vicinity. As noted in the Draft EIR, these measures will not reduce the project's impact at these three significantly impacted locations to less than significant. However, as noted in the Draft EIR, the proposed project would provide housing and jobs in proximity to public transit services. The project thus supports and encourages a circulation system based on walking and public transit. Several MTA and LADOT bus routes have stops within reasonable walking distance and the MTA Red Line station is located two blocks west of the project site. For parking discussion see Response to Comment 2-13. This comments opinion is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 2-26

The Project does nothing to reflect "Hollywood's position as the entertainment center," provide facilities for tourists, or reinforce Hollywood's history and architecture. A residential skyscraper at Hollywood Blvd. and Gower St. is not a self-described "gateway" to Hollywood's commercial core.

Response to Comment No. 2-26

The comment asserts an opinion regarding the proposed project and Hollywood as an entertainment center. The proposed project does not purport being the "gateway" but rather contributor to the existing Hollywood commercial core and the gateway beginning at the Hollywood Walk of Fame that starts at Gower Street on Hollywood Boulevard (in front of the proposed project site). It is correct that the project does not contain public entertainment venues or facilities catering to tourists. However, there are a

number of other ideas projected in the fifth objective found in Table IV H-2 (Hollywood Redevelopment Plan Objectives) that the project does embody. These other ideas, as listed in the objective, include active retail uses at the street level, provision of residential uses and pedestrian orientation. It is the intent with the provision of these ideas from the objective that the proposed project would “contribute” to the Hollywood commercial core as a unique place.

Comment No. 2-27

Under the heading "Cumulative Impacts." the DEIR on page IV.H-29 states: *"Development of the related projects is expected to occur in accordance with adopted plans and regulations."* None of the 139 projects contained in the Related Projects list is a by-right development; all seek discretionary approvals for exemptions from the Planning Code. How then can the DEIR conclude that cumulative impacts of the Project and related projects to land use and planning are less than significant, and that *"it is reasonable to assume that the projects under consideration in the surrounding area would implement and support important local and regional planning goals and policies?"*

The only "reasonable" conclusion is that the Project and those on the Related Projects list will instead set major land use precedents

Response to Comment No. 2-27

The comment implies that the related projects seeking discretionary approvals results in a *per se* significant cumulative land use impact. This implication assumes that projects that are not “by-right” developments cannot implement important local and regional planning goals and policies. The comment essentially voices an opinion that only by-right projects can implement important local and regional planning goals and policies, and that projects requiring discretionary approvals must cause significant land use impacts. This opinion is not supported by evidence or standard planning practice. The comment fails to identify the nature of discretionary approvals for 139 projects referenced in the comment. A project may implement important land use goals despite requiring discretionary approvals—even changes to zoning and General Plan designation. Furthermore, and as set forth in the Draft EIR, the proposed project meets and implements many of the existing land use goals of the Community Plan and other applicable regional plans and policies.

In addition, it is not correct that any discretionary land use approval or combination of discretionary land use approvals sets a precedent. The City is not legally bound to grant to a subsequent application what was granted to a previous application.

Comment No. 2-28

The Project as proposed would set a precedent in changes to established zoning limitations, which will then set in motion a domino effect where other property owners seek to copy its vastly increased height and FAR. The DEIR fails to adequately examine the growth-inducing impacts of this Project and ignores the cumulative environmental impacts that the Project will precipitate. Moreover, the DEIR fails to present any potential mitigation measures regarding these growth inducing impacts.

If the City approves the zoning changes requested for the Project and in the future attempts to mitigate these growth-inducing impacts by denying similar applications from neighboring developments, then the City would merely place itself in legal jeopardy. Interestingly, nowhere in the DEIR is the word "hardship" found. As such, the DEIR is in effect admitting that there is no hardship justification for any of the requested entitlements, and therefore significant precedents would be established were the city to approve them.

Response to Comment No. 2-28

The comment asserts a legal opinion regarding the precedential effect of zone changes, and there is no evidence that the commenter is an attorney or possesses any legal expertise. Pursuant to CEQA Guidelines Section 15204 (c), the comment does not provide "data or references offering facts or expert opinion supported by facts in support of the comment" that the Hollywood Gower project would induce other property owners in the vicinity to seek exemptions from the height and density restrictions on their property, thereby creating a "domino effect". A zone change or height district change for a nearby property may not be the only issue or deciding factor for development or redevelopment. There are many issues to consider or influence a decision to develop or redevelop a property. The development process is costly and lengthy and not all property owners wish to under take or have the means to pursue that process. Other issues that generally influence the decision to develop or redevelop may include economic and market conditions. Further, no nexus is provided between the property owners in the project site area seeking to under take the development process and the Hollywood Gower project proponent's redevelopment of the Hollywood Gower project site with the government actions sought such as a zone change and height district change to permit the proposed development. It is not correct that any discretionary land use approval or combination of discretionary land use approvals sets a precedent. The City is not legally bound to grant to a subsequent application what was granted to a previous application.

The purpose of growth inducing impacts and its discussion found on page V-3 of the Draft EIR is to address the issue of the project's potential growth and its impact upon "community service facilities". Further, CEQA Guidelines Section 12156.2 (d) states that the EIR ". . . discuss some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively." The Draft EIR in sections IV Environmental Impact Analysis analyzes the projects individual and cumulative impacts on community service facilities found in the public services and utilities sections, which include project mitigation measures. Further, the Draft EIR analyzes the individual and cumulative impacts on aesthetics, air quality, cultural resources, geology, hazards, land use, noise, population and housing, public services (fire, police, schools, parks, libraries), transportation/traffic, and utilities (wastewater, water, solid waste, electricity and natural gas) and also include project mitigation measures, found in Section IV Environmental Impact Analysis.

CEQA Guidelines Section 15130 stipulate that an EIR must consider the significant environmental effects of a Proposed Project as well as its "cumulative impacts", as identified in Section III.B Environmental Setting, Related Projects, page III-7, of the Draft EIR. Further, "cumulative impacts" refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts (CEQAG Guidelines Section 15355), which was discussed on page III-7 of

the Draft EIR. Table III-1, pages III-7 through III-12, List of Related, provides a list of 139 related projects that is used for cumulative analysis throughout the Draft EIR. The Draft EIR analyzed 12 environmental topics that included aesthetics (aesthetics/views, shade/shadow and light/glare), air quality, cultural resources, geology, hazards, land use, noise, population and housing, public services (fire, police, schools, parks, libraries), transportation/traffic, and utilities (wastewater, water, solid waste, electricity and natural gas). Each environmental topic included a subtopic addressing cumulative analysis as part of the project impact discussion. Further, feasible mitigation measures for all identified potentially significant and significant project and cumulative project (Proposed Project and Related Projects) impacts have been provided in the Draft EIR.

Discussion of the requested zone change and lot line adjustment was provided in the Draft EIR, Section IV H. Land Use. Hardship discussion regarding zone change and lot line adjustment requests is appropriate in the findings portion of the application for zone change and lot line adjustments and not in the Draft EIR. The EIR is not the venue for justification of such requests, but rather independent analysis of environmental consequences due to project implementation.

Comment No. 2-29

Section 6. "Alternatives to the Proposed Project," lists Alternative 3, "Existing Zoning Alternative," as a 16-story, 165-foot-tall building. This assessment ignores the limitations on the site in the Hollywood Redevelopment Plan and Hollywood Boulevard District Urban Design Plan, which restrict Project height to 45 feet. The DEIR therefore avoids its legal obligation under CEQA to accurately present an existing zoning alternative.

Response to Comment No. 2-29

The comment asserts that an "existing zoning alternative" should analyze a project limited to 45 feet in height. This comment re-asserts the claims made in Comments 2-3 through 2-9 regarding the consistency with the HRP and UDP. As set forth in response 2-3, the commenter misconstrues the HRP and UDP as establishing a binding height limit substantially lower than the existing zoning and Community Plan designation. The HRP includes no language limiting height on the project site to 45 feet. Although Figure 7-13 of the Draft 1993 UDP does show a 45-foot height limit along Hollywood Boulevard on the project site, the 1993 draft UDP is merely a guideline, and is not a zoning condition, nor is it an enforceable height limit. Furthermore, the CRA is currently preparing a new draft UDP to replace the 1993 Draft UDP referenced by the commenter. Consequently, the 45-foot height limit set forth on Figure 7-13 of the 1993 Draft UDP is not appropriately characterized as the existing zoning, and the Alternative 3 in the Draft EIR correctly presents an existing zoning alternative.

Comment No. 2-30

The DEIR is inadequate to fairly and accurately present the impacts associated with the Project. Instead, the DEIR excels at a superficial "analysis" which for the most part simply assumes its conclusion. In its current form, the DEIR should not be approved.

Please note that I retain the right to submit additional comments regarding the Project at a future date.

Response to Comment No. 2-30

The comment asserts the opinion that the Draft EIR is inadequate, wrapping up previous comments but not making any new claims. Nevertheless, this comment opinion is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

November 30, 2009

VIA E-MAIL

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RE: Hollywood and Gower Project DEIR – ENV-2007-5750-EIR

Dear Adam:

This letter is to provide you with written comments for the Hollywood and Gower Project DEIR and environmental case ENV-2007-5750-EIR.

Summary

The Hollywood and Gower Project (Project) is a 197,503 square foot, 20 story, mixed-use residential and retail development project which proposes to provide 7,200 square feet of retail space and 176 residential units on a 1-acre parcel located at the intersection of Hollywood Boulevard and Gower Streets in Hollywood.

As it pertains to the CEQA impact analysis, the City has adopted a certain standard for neighborhood and community parkland (2 acres of Neighborhood Parks per 1,000 persons and 2 acres of Community Parks per 1,000 persons) and projects which do not meet this standard do not fully mitigate their impacts under CEQA.

That said, the analysis contained in the Environmental Impact Report prepared for the Project, ENV-2007-5750-EIR, (1) failed to properly identify and document the Project's impact on Park and Recreational Services, and (2) failed to identify adequate and sufficient mitigation measures to fully mitigate the Project's impacts. A detailed discussion of items (1) and (2) follows below:

(1) Failure of ENV-2007-5750-EIR to properly identify and document the Project's impact on Park and Recreational Services

Identifying Park and Recreational Service Impacts and Significance under CEQA

The City's CEQA Threshold Guild (Page K.4-2) indicates that projects shall be analyzed, and significance determined, based on:

The net population increase resulting from the project

The demand for recreation and park services anticipated at the time of project build out compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and

3-1

3-2

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3-4

Whether the project includes features that would reduce the demand for recreation and park services (e.g., on-site recreation facilities, land dedication or direct financial support to the Department of Recreation and Parks).

Therefore, in order to determine the significance and level impact the City must first identify what the park demand generated by the project is and if that demand can be met by project features, other improvements at the site, or existing parks. If the demand can be met, then the project's impacts are mitigated. If the demand cannot be met, then the project's impacts are not mitigated.

The City's CEQA Threshold Guild (Page K.4-1) indicates that *[t]he Public Recreation Plan, a portion of the Service Systems Element, includes service standards and goals for recreational facilities and operations.*

Using the Public Recreation Plan to Determine Demand for Parks

The City's Public Recreation Plan, a portion of the Public Facilities and Services Element of the General Plan, *"sets forth recreation standards intended to provide a basis for satisfying the need for neighborhood and community recreational sites"* (Page 1).

The Public Recreation Plan identifies clear parkland acreage standards for the City's public recreation system (Page 2) as well as standards for the development of those recreation sites (Page 3). Further, it contains Local Recreation Standards (short and long-range) for Neighborhood and Community Recreational Sites (Page 3). The Public Recreation Plan says that *"Neighborhood Recreational Sites should be provided at a minimum of 2 acres per 1,000 persons"* and that *"Community Recreational Sites should be provided at a minimum of 2 acres per 1,000 persons"* (Page 3).

It is clear that the City should use the long-range goals of the Public Recreation Plan when evaluating the potential environmental impacts of proposed developments. The Public Recreation Plan does acknowledge short- and intermediate-range standards of Park Acreage for Community Plan Standards, however it must be anticipated that every development will outlast the lifespan of the existing community plan, and consequently should be required to be analyzed according to the long-range goals of the Public Recreation Plan.

Therefore, through its identification of a long-range parkland acreage standard that meets resident's needs for neighborhood and community recreational sites, the standards identified in the Public Recreation Plan effectively measure the demand (need) for park and recreational sites.

Analysis of Significance under CEQA

Again, per the City's CEQA Threshold Guild (Page K.4-3), the Project's impacts are measured by evaluating how much demand the project is generating for recreational services and if that demand can be met by project features or existing parks. As the City has adopted a standard (2 acres of Neighborhood Parks per 1,000 persons and 2 acres of Community Parks per 1,000 persons) which meets residents needs for neighborhood and community recreational sites, all that remains to be determined is the net new residents the project will generate (and therefore the net new demand for park acreage). Effectively, each new person generated by the Project has a need for .002 acres of neighborhood parkland and a need for .002 acres of community parkland.

If the Project provides sufficient park acreage to meet the needs of each new resident, or if sufficient excess park acreage already exists, then the Project can fully mitigated its impact on park and

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recreational services. If the Project does not provide sufficient park acreage to meet its resident’s needs, or there is not sufficient excess park capacity, the Project will have an unmitigated impact on parks and recreational services as the projects new residents will be forced to use existing parks to meet their needs. If the existing level of park and recreational services is already insufficient to meet demand (as determined by the Public Recreation Plan), new residents would reduce current service ratios, increase the use of existing parks and accelerate their physical deterioration, and increase the need for the construction of new facilities at existing sites.

3-6

(2) Failure of ENV-2007-5750-EIR to identify adequate and sufficient mitigation measures to fully mitigate the Project’s impacts

Identifying required mitigation

The proposed Project will include 176 residential units and will generate a net increase of at least 405 new residents in the Hollywood community. Per the standards identified in the City’s Public Recreation Plan (2 acres of Neighborhood Parks per 1,000 persons and 2 acres of Community Parks per 1,000 persons), the Project would need to provide 0.81 acres of Neighborhood Parks and 0.81 acres of Community Parks in order to fully meet the needs of its new residents and fully mitigate its impact.

3-7

Analyzing project features that may reduce the demand for recreation and park services

Per the DEIR, the proposed Project will:

“[P]rovide approximately 19,275 square feet of open space which, meets the Los Angeles Municipal Code (LAMC) requirement. This open space include private balconies, the sky lounge, pool and spa, a BBQ area, and indoor residential amenities would include a fitness center, a club room complete with bar and kitchen, and a screening room.” [IV.K Public Service Page IV.K-32]

3-8

While these proposed amenities would provide some passive and active recreational space for Project residents, they would not necessarily reduce the demand for Neighborhood Parks and Community Parks.

The City’s Public Recreation Plan includes definitions of Neighborhood and Community Parks and identifies facilities and activities which are typically provided at each. Facilities which are typically provided at Neighborhood Parks include softball, soccer, basketball, football, lawn games, children’s play areas, etc. Facilities which are typically provided at Community Parks include baseball diamonds, football and soccer fields, tennis and handball courts, and swimming pools. As the Project does not provide the types of Neighborhood and Community Park facilities identified in the City’s Public Recreation Plan the common open space proposed by the Project should not be calculated as providing any reduced demand for recreation and park services.

3-9

Relationship of LAMC 17.12 to the Project’s CEQA Impact Analysis

Analysis of a project’s requirements under Los Angeles Municipal Code Section 12.33, Section 17.12, and/or Section 17.58 (colloquially referred to as the City’s “Quimby” Ordinance) is wholly and completely separate from the analysis of a project’s impacts under CEQA. Los Angeles Municipal Code The City’s “Quimby” Ordinance allows the City to require the dedication of land or impose a requirement of the payment of fees in lieu thereof, or a combination of both, for park and recreational purposes as a condition to the approval of a tentative map or parcel map. Compliance with the requirements of Los Angeles Municipal Code Sections 12.33, 17.12, and/or 17.58 does not equate to the mitigation of the Project’s impacts as identified in the environmental review / CEQA process.

3-10

Unless the dedication of land or payment Quimby in-lieu fees is sufficient to purchase the necessary park acreage required in the CEQA analysis, the satisfaction of Quimby would not eliminate the proposed project's impact on City parks and recreational facilities. The payment of any required Quimby fees, along with the provision of onsite amenities, could reduce a project's impact upon parks and recreational facilities, but not necessarily to a level below significance.

3-10

Identifying adequate and sufficient mitigation measures

The proposed Project would need to provide 0.81 acres of Neighborhood Parks and 0.81 acres of Community Parks in order to fully meet the needs of its new residents and fully mitigate its impacts.

3-11

Mitigation Measure K.4-2 should be revised to read: "The Project Applicant shall provide, or cause to be provided, 0.81 acres of Neighborhood Parks and 0.81 acres of Community Parks either on-site or within a reasonable distance from the Project."

If the Project cannot meet the identified parkland needs than the Project will have an unmitigated impact on parks and recreational services and a Statement of Overriding Considerations will need to be adopted.

3-12

Thank you for the opportunity to provide comments on this DEIR. I want to note that I fully support the creation of urban infill projects, such as the Project, in the Hollywood community; as long as the impacts of these types of projects are properly identified so they can be appropriately considered by decision makers. I hope these comments will be carefully considered and the Hollywood and Gower Project DEIR will be revised to properly note the impact this project will have on the community.

3-13

Darryl Ford

LETTER NO. 3

Darryl Ford

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November 30, 2009

Comment No. 3-1

This letter is to provide you with written comments for the Hollywood and Gower Project DEIR and environmental case ENV-2007-5750-EIR.

Summary

The Hollywood and Gower Project (Project) is a 197,503 square foot, 20 story, mixed-use residential and retail development project which proposes to provide 7,200 square feet of retail space and 176 residential units on a 1-acre parcel located at the intersection of Hollywood Boulevard and Gower Streets in Hollywood.

Response to Comment No. 3-1

This comment provides the commenter's understanding of the project characteristics, but does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. Nevertheless, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. 3-2

As it pertains to the CEQA impact analysis, the City has adopted a certain standard for neighborhood and community parkland (2 acres of Neighborhood Parks per 1,000 persons and 2 acres of Community Parks per 1,000 persons) and projects which do not meet this standard do not fully mitigate their impacts under CEQA.

Response to Comment No. 3-2

This comment identifies the City of Los Angeles local recreation standards for neighborhood recreational sites and community recreational sites pursuant to the Public Recreation Plan, a component of the Service Systems Element of the Los Angeles General Plan. It should be noted that these standards are Citywide goals and not intended to be imposed as requirements on individual development projects. The City's local recreation standards and its authority to require mitigation for impact to recreational facilities derive from a portion of the Subdivision Map Act, commonly known as the "Quimby Act." The Quimby Act mandates: "The park area per 1,000 members of a population of the City . . . shall be derived from the ratio that the amount of neighborhood and community park acreage bears to the **total population** of the city."

Currently, the Los Angeles Department of Recreation and Parks (LADRP) operates and maintains 15,710 acres of parkland with 390 parks, nine lakes, 176 recreation centers, 372 children's play areas, 13 golf courses, 287 tennis courts, 9 dog parks, 59 swimming pools, and 7 skate parks. (See Draft EIR on page IV.K-28.) Nearly 13,000 acres of parkland are located in "Regional Parks" (more than 50 acres in size). The City conservatively omits regional parks from its park-to-population ratio because they are not distributed evenly across all areas of the City; however, two regional parks serve the Hollywood area, Griffith Park (4,210 acres) and Runyon Canyon Park (186 acres). If regional parks were included in Citywide park-to-population ratio, the citywide goal of approximately 4 acres of park for every 1,000 persons in the City would be met. This calculation is especially relevant to Hollywood because two regional parks serve the Hollywood area. Furthermore, the City's Redevelopment Agency ("CRA") has moved forward with plans to build a Cap Park above the 101 Freeway at the corner of St. Andrews Place and Fountain Avenue. A Memorandum of Understanding was approved by the CRA in January 2007, a feasibility study was made public in November of 2008, and a July 15, 2009 CRA Staff Report states that the Cap Park would include a baseball field, playgrounds, plaza spaces, open fields, and picnic areas, if it were built. Although this park is currently in the speculative planning stages, significant steps have been taken toward its implementation.

This comment incorrectly asserts that the criteria for determining project impacts and the need for associated mitigation is based on meeting the Citywide standard at a project level. As shown above, even if this were the standard, the existence of two regional parks serving Hollywood would exceed the standard.

The appropriate methodology for determining significant impacts upon recreation and park facilities is based on the adopted City of Los Angeles CEQA Thresholds Guide. As set forth in the City of Los Angeles CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering the following factors:

- (a) The net population increase resulting from the Proposed Project;
- (b) The demand for recreation and park services anticipated at the time of project build-out compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (i.e., renovation, expansion, or addition) and the project's proportional contribution to the demand; and
- (c) Whether the project includes features that would reduce the demand for recreation and park services (e.g., onsite recreation facilities, land dedication or direct financial support to the Department of Recreation and Parks).

The project-level analysis disclosed in the Draft EIR for the Proposed Project was correctly based on the City of Los Angeles CEQA Thresholds Guide. Thus, the commenter's assertion that projects which do not meet the citywide neighborhood and community parkland standards of Public Recreation Plan do not fully mitigate their impacts under CEQA is incorrect.

Comment No. 3-3

That said, the analysis contained in the Environmental Impact Report prepared for the Project, ENV-2007-5750-EIR, (1) failed to properly identify and document the Project's impact on Park and Recreational Services, and (2) failed to identify adequate and sufficient mitigation measures to fully mitigate the Project's impacts. A detailed discussion of items (1) and (2) follows below:

Response to Comment No. 3-3

The Draft EIR addresses recreation and park issues in Section IV.K.4 beginning on page IV.K-28, and Project impacts are addressed on page IV.K-32, of the Draft EIR. As stated above in Response to Comment 3-2, the methodology for determining significant impacts upon recreation and park facilities is based on the adopted City of Los Angeles CEQA Thresholds Guide. Based on the analysis presented in Section IV.K.4, the Project's impacts were determined to be less than significant with implementation of the Code requirements.

Comment No. 3-4**(1) Failure of ENV-2007-5750-EIR to properly identify and document the Project's impact on Park and Recreational Services****Identifying Park and Recreational Service Impacts and Significance under CEQA**

The City's CEQA Threshold Guild (Page K.4-2) indicates that projects shall be analyzed, and significance determined, based on:

The net population increase resulting from the project;

The demand for recreation and park services anticipated at the time of project build out compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and

Whether the project includes features that would reduce the demand for recreation and park services (e.g., on-site recreation facilities, land dedication or direct financial support to the Department of Recreation and Parks).

Therefore, in order to determine the significance and level impact the City must first identify what the park demand generated by the project is and if that demand can be met by project features, other improvements at the site, or existing parks. If the demand can be met, then the project's impacts are mitigated. If the demand cannot be met, then the project's impacts are not mitigated.

The City's CEQA Threshold Guild (Page K.4-1) indicates that "*the Public Recreation Plan, a portion of the Service Systems Element, includes service standards and goals for recreational facilities and operations.*"

Response to Comment No. 3-4

This comment accurately restates the significance criteria established in the City of Los Angeles CEQA Thresholds Guide. These thresholds were accurately utilized in determining the Proposed Project's impacts upon recreation and park facilities. It should be noted that the commenter has quoted the City of Los Angeles CEQA Thresholds Guide with regard to the Public Recreation Plan. The City of Los Angeles CEQA Thresholds Guide does not state that the citywide goals of the Public Recreation Plan should be used to evaluate project specific impacts. Rather, in the introduction at page K.4-1 the City of Los Angeles CEQA Thresholds Guide simply refers to the Public Recreation Plan but goes on to disclose that the City is updating the 1980 plan as part of current long-range planning efforts.

In addition, although still in the Draft form, the Hollywood Community Plan Update, if approved in its current form, includes a mechanism that may be adopted in the future to identify the nexus between certain types of development and the need for park fees. This is noted for informational purposes only, as plans are not binding until approved.

Program LU.4.1.1: Conduct a nexus study to determine the impact of future commercial and multifamily residential development on the need for open space in Hollywood, and develop community-wide mitigations funded by impact fees.

Comment No. 3-5**Using the Public Recreation Plan to Determine Demand for Parks**

The City's Public Recreation Plan, a portion of the Public Facilities and Services Element of the General Plan, "*sets forth recreation standards intended to provide a basis for satisfying the need for neighborhood and community recreational sites*" (Page 1).

The Public Recreation Plan identifies clear parkland acreage standards for the City's public recreation system (Page 2) as well as standards for the development of those recreation sites (Page 3). Further, it contains Local Recreation Standards (short and long-range) for Neighborhood and Community Recreational Sites (Page 3). The Public Recreation Plan says that "*Neighborhood Recreational Sites should be provided at a minimum of 2 acres per 1,000 persons*" and that "*Community Recreational Sites should be provided at a minimum of 2 acres per 1,000 persons*" (Page 3).

It is clear that the City should use the long-range goals of the Public Recreation Plan when evaluating the potential environmental impacts of proposed developments. The Public Recreation Plan does acknowledge short- and intermediate-range standards of Park Acreage for Community Plan Standards, however it must be anticipated that every development will outlast the lifespan of the existing community plan, and consequently should be required to be analyzed according to the long-range goals of the Public Recreation Plan.

Therefore, through its identification of a long-range parkland acreage standard that meets resident's needs for neighborhood and community recreational sites, the standards identified in the Public Recreation Plan effectively measure the demand (need) for park and recreational sites.

Response to Comment No. 3-5

This comment restates the City of Los Angeles local recreation standards for neighborhood recreational sites and community recreational sites provided in the Public Recreation Plan (PRP), a component of the Service Systems Element of the Los Angeles General Plan. However, the commenter is inferring that the City should use the long-range goals of the Public Recreation Plan when evaluating the potential environmental impacts of proposed developments. The Public Recreation Plan was adopted in 1980. The PRP references a Background/Implementation Report which Council identified that the City can use as a guide for locating new facilities and reviewing proposed housing and community development recreation projects. At adoption it was stressed that the Background/Implementation report of the Public Recreation Plan would need to be updated as facilities were built and population patterns change. The Public Recreation Plan Background/Implementation report states on page IV-4 that "The number of acres of public recreation lands is not an adequate measure of how City recreation requirements are being fulfilled. Research to answer that question must be expanded to an examination of the specific types of recreation activities available at each site. In assessing recreational opportunities, facilities (and programs) are the major considerations, not acres of land."

The table provided below, and incorporated into the Additions and Corrections section of the Final EIR, identifies several of the recreation and parkland facilities within the project area, with a description of the facilities and amenities provided at each park. As shown below, the Project Site is adequately served by a wide variety of amenities and a diverse range of recreation opportunities at neighborhood and regional parks.

Summary of Recreation and Park Facilities Serving the Project Area

PARK NAME	ADDRESS	DRIVING DISTANCE FROM PROJECT SITE	FACILITIES	SIZE (ACRES)
Community Recreation Centers				
Hollywood Recreation Center	1122 Cole Ave.	1.1 miles	Class Park LAPD Stop-In Center Auditorium Basketball Courts (lighted/outdoor) Children's Play Area Community Room Kitchen Multipurpose Sports Field (with lighted ball diamond) Seasonal Pool (outdoor/unheated) Water Slide	3.21
Yucca Community	6671 Yucca St.	1.0 mile	Barbecue Pits	0.63

PARK NAME	ADDRESS	DRIVING DISTANCE FROM PROJECT SITE	FACILITIES	SIZE (ACRES)
Center & Park			Basketball Courts (lighted/outdoor) Children's Play Area Handball Courts (lighted) Picnic Tables Soccer Field (lighted)	
Lemon Grove Recreation Center	4959 Lemon Grove Ave.	1.9 miles	Auditorium Baseball Diamond (lighted) Basketball Courts (lighted/outdoor) Children's Play Area Picnic Tables Batting Cages Jogging Path Kitchen Stage TV Area Outdoor Exercise Equipment	2.62
Barnsdall Art Park Recreation Center	4800 Hollywood Blvd.	1.6 miles	Barnsdall Art Center Gallery Theatre Hollyhock House Junior Art Center Municipal Art Gallery	13.62
Poinsettia Recreation Center	7341 Willoughby Ave.	2.5 miles	Baseball Diamond (lighted) Basketball Courts (lighted/indoor) Basketball Courts (lighted/outdoor) Children's Play Area Handball Courts (lighted) Indoor Gym (without weights) Tennis Courts (lighted) Kitchen Stage	6.3
Griffith Park Recreation Center	3401 Riverside Dr.	3.5 miles to 3401 Riverside Dr. --- 1.8 miles to boundary of Griffith Park	Autry Museum of Western Heritage Los Angeles Zoo Bird Sanctuary Picnic Areas Soccer Fields (lighted) Tennis Courts (lighted & unlighted) Golf Course/Clubhouse Friendship Auditorium Greek Theatre Griffith Observatory Los Angeles Live Steamers Griffith Park Miniature Train Rides Merry-Go-Round Pony Rides Rangers Station Headquarters Travel Town Museum Children's Play Area Restrooms Hiking Trails Horseback Riding Trails	4,210

PARK NAME	ADDRESS	DRIVING DISTANCE FROM PROJECT SITE	FACILITIES	SIZE (ACRES)
			Refreshment Stands Restaurants	
Parks				
Lexington Pocket Park	5523 Lexington Ave.	1.1 miles	Children's Play Area Picnic Tables Benches	0.32
Selma Park	6567 Selma Ave.	0.7 mile	Children's Play Area Picnic Tables Benches	0.23
De Longpre Park	1350 N. Cherokee Ave.	1.0 mile	Children's Play Area Benches Rudolph Valentino Monument	1.37
Dorothy & Benjamin Smith Park	7020 Franklin Ave.	1.4 miles	Benches	0.49
Runyon Canyon Park (&Wattles Gardens Park)	2000 N. Fuller Ave.	2.2 miles	Children's Play Area Hiking Trail Off-Leash Dog Area	186
Bird Sanctuary	2900 N. Vermont Ave.	2.8 miles	Picnic Tables Hiking Trail Restrooms	1.6
Lake Hollywood Park	3160 Canyon Dr.	2.2 miles	Barbecue Pits Children's Play Area Picnic Tables View of Hollywood Sign Parking	216
Bronson Canyon	3200 Canyon Dr.	2.2 miles	Picnic Tables Hiking Trail Hollywood Sign Parking Tunnel/Cave	92.1
<i>Source: City of Los Angeles, Department of Recreation & Parks, Facility Locator Maps & Driving Directions, website: www.laparks.org/dept.htm, accessed December 3, 2009. Parcel sizes and distances from the Project Site were measured using ZIMAS website: http://zimas.lacity.org, accessed December 4, 2009. The size of Griffith Park was obtained on the City of Los Angeles Department of Recreation and Parks, Griffith Park, General Information, website: http://www.laparks.org/dos/parks/griffithPK/gp_info.htm, accessed December 4, 2009.</i>				

It should be noted that the park facilities identified in the table above include parks within 2 miles of the project site. As acknowledged in The Final Report for the Department of Recreation and Parks Needs Assessment (2009), since the time the Public Recreation Plan was adopted (in 1980), expectations have changed drastically as to how far people are willing to travel to recreation sites. Together with public transit it is now very easy for people to access parks further than half a mile from the Project Site. Further, the proposed project would include residential bike storage (for 44 bikes) and retail bike racks (accommodating 7 bikes) would be provided at the project site. As such, bicycles may be used from the project site for recreational purposes, as well as transportation to recreational facilities and services. The Needs Assessment also states that while City Parks might be lacking, people are not limited to recreation

within the limits of the City in which they reside. Thus, when considering recreational facilities and opportunities, the Proposed Project area is adequately served. As such, the Project's additional demands upon recreational facilities would result in a less than significant impact.

Comment No. 3-6

Analysis of Significance under CEQA

Again, per the City's CEQA Threshold Guide (Page K.4-3), the Project's impacts are measured by evaluating how much demand the project is generating for recreational services and if that demand can be met by project features or existing parks. As the City has adopted a standard (2 acres of Neighborhood Parks per 1,000 persons and 2 acres of Community Parks per 1,000 persons) which meets residents needs for neighborhood and community recreational sites, all that remains to be determined is the net new residents the project will generate (and therefore the net new demand for park acreage). Effectively, each new person generated by the Project has a need for .002 acres of neighborhood parkland and a need for .002 acres of community parkland.

If the Project provides sufficient park acreage to meet the needs of each new resident, or if sufficient excess park acreage already exists, then the Project can fully mitigated its impact on park and recreational services. If the Project does not provide sufficient park acreage to meet its resident's needs, or there is not sufficient excess park capacity, the Project will have an unmitigated impact on parks and recreational services as the projects new residents will be forced to use existing parks to meet their needs. If the existing level of park and recreational services is already insufficient to meet demand (as determined by the Public Recreation Plan), new residents would reduce current service ratios, increase the use of existing parks and accelerate their physical deterioration, and increase the need for the construction of new facilities at existing sites.

Response to Comment No. 3-6

As stated in Response to Comment 3-5, above, the City of Los Angeles CEQA Thresholds Guide does not require that projects must meet or provide the standards identified in the Public Recreation Plan. Rather, the analysis presented in the Draft EIR was correctly based on the adopted City of Los Angeles CEQA Thresholds Guide. The Draft EIR considered the following, as required: the net population increase resulting from the Proposed Project, the demand for recreation and park services anticipated at the time of project build-out compared to the expected level of service available, and whether the project includes features that would reduce the demand for recreation and park services. As provided on Draft EIR page IV.K-32, approximately 405 residents would be expected to occupy the proposed residential units who would place additional demand on parks and recreational facilities in the community. However, the Proposed Project would provide approximately 19,725 square feet of passive and active recreational space, which would serve to reduce the demand on public park and recreational facilities. The provision of onsite recreational space coupled with the payment of the Dwelling Unit Construction Tax and Quimby/Park Fees would ensure the Project's impacts remain less than significant. With respect to the

commenter's assertion that the Proposed Project does not mitigate its impact on parks and recreational services, see also Response to Comment 3-2.

Comment No. 3-7

(2) Failure of ENV-2007-5750-EIR to identify adequate and sufficient mitigation measures to fully mitigate the Project's impacts

Identifying required mitigation

The proposed Project will include 176 residential units and will generate a net increase of at least 405 new residents in the Hollywood community. Per the standards identified in the City's Public Recreation Plan (2 acres of Neighborhood Parks per 1,000 persons and 2 acres of Community Parks per 1,000 persons), the Project would need to provide 0.81 acres of Neighborhood Parks and 0.81 acres of Community Parks in order to fully meet the needs of its new residents and fully mitigate its impact.

Response to Comment No. 3-7

The commenter is correct that approximately 405 residents would be expected to occupy the Proposed Project units (see Draft EIR, page IV.J-5). However, as stated in Response to Comment 3-6, above, individual development projects are not required to meet the citywide standards identified in the Public Recreation Plan as this comment is asserting. Rather, project impacts are to be assessed using the methodology set forth in the City of Los Angeles CEQA Thresholds Guide. Section IV.K.4, Public Service of the Draft EIR, accurately concluded the Proposed Project's impacts on recreation and parks would be less than significant with implementation of Code requirements (including payment of the Dwelling Unit Construction Tax and Quimby/Park Fees). This conclusion was based on an assessment of the need for parks in the project area and in consideration of the on-site amenities that are proposed. Based on these factors the lead agency concluded that the proposed project's impacts upon recreation and park facilities would be less than significant.

Notwithstanding the above, the Proposed Project would include various features and amenities on-site to support on-site residents. As identified in Section II., Project Description, of the Draft EIR, these amenities would include on Level 5 outdoor recreational features such as a pool and spa, and a grilling area, and indoor residential amenities would include a fitness center, a club room complete with bar and kitchen, and a screening room. Level 20 of the proposed structure would include an approximately 2,310-square-foot "Sky Lounge," which would be a private lounge-type space and a 3,000-square-foot covered terrace with bar area. Total open space provided by the Proposed Project would be approximately 19,275 square feet, which meets the Los Angeles Municipal Code (LAMC) requirements.

Comment No. 3-8

Analyzing project features that may reduce the demand for recreation and park services

Per the DEIR, the proposed Project will:

“[P]rovide approximately 19,275 square feet of open space which, meets the Los Angeles Municipal Code (LAMC) requirement. This open space include private balconies, the sky lounge, pool and spa, a BBQ area, and indoor residential amenities would include a fitness center, a club room complete with bar and kitchen, and a screening room.” [IV.K Public Service Page IV.K-32]

While these proposed amenities would provide some passive and active recreational space for Project residents, they would not necessarily reduce the demand for Neighborhood Parks and Community Parks.

Response to Comment No. 3-8

This comment asserts that the proposed on-site amenities would not reduce demands upon neighborhood and community parks. However, the comment provides no evidence to support this assertion. The assertion is the commenter’s opinion and speculation. Based on the methodology set forth in the City of Los Angeles CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering among other factors whether the project includes features that would reduce the Project’s demand for public recreational and park services (e.g., on-site recreational facilities, land dedication or direct financial support to the Department of Recreation and Parks). Under this guidance, on-site recreational facilities are acknowledged as contributing factors to reduce a project’s demands for recreation and park facilities. Furthermore, as stated in the Draft EIR, the Proposed Project would include approximately 19,275 square feet of passive open space areas and active recreation amenities. In addition to common open space, passive gathering spaces, and assembly rooms, the Proposed Project would include a pool and spa, fitness center, screening room, and roof terrace for residents to relax and recreate on site. The activities associated with the project’s amenities are similar to some of the activities people use parks for, which would serve to reduce the Proposed Project’s demand on public parks and recreation facilities within the community.

Comment No. 3-9

The City’s Public Recreation Plan includes definitions of Neighborhood and Community Parks and identifies facilities and activities which are typically provided at each. Facilities which are typically provided at Neighborhood Parks include softball, soccer, basketball, football, lawn games, children’s play areas, etc. Facilities which are typically provided at Community Parks include baseball diamonds, football and soccer fields, tennis and handball courts, and swimming pools. As the Project does not provide the types of Neighborhood and Community Park facilities identified in the City’s Public Recreation Plan the common open space proposed by the Project should not be calculated as providing any reduced demand for recreation and park services.

Response to Comment No. 3-9

As stated in Response to Comment 3-5, above, the Public Recreation Plan is a component of the General Plan and identifies goals for long-range planning efforts. Further, neither CEQA nor the CEQA Guidelines require that an individual project provide playfields and individual team sport and group recreational activity facilities to avoid an impact to local parks. Such a rule would violate the nexus requirement that mitigation must be rationally related to project impacts. To suggest that a building

containing 176 residential units must be equipped with its own soccer field and baseball field to avoid a significant impact on local parks defies reason. The City has adopted the City of Los Angeles CEQA Thresholds Guide to determine project impact significance on a case-by-case basis. The Draft EIR analyzed the proposed project's impact on recreation and parks pursuant to the City of Los Angeles CEQA Thresholds Guide, and the proposed project is not required to provide the types of Neighborhood and Community Park facilities identified in the City's Public Recreation Plan. Section IV.K.4, Public Services, of the Draft EIR accurately concluded that the proposed project's impacts on recreation and parks would be less than significant with implementation of Code requirements.

Comment No. 3-10

Relationship of LAMC 17.12 to the Project's CEQA Impact Analysis

Analysis of a project's requirements under Los Angeles Municipal Code Section 12.33, Section 17.12, and/or Section 17.58 (colloquially referred to as the City's "Quimby" Ordinance) is wholly and completely separate from the analysis of a project's impacts under CEQA. Los Angeles Municipal Code The City's "Quimby" Ordinance allows the City to require the dedication of land or impose a requirement of the payment of fees in lieu thereof, or a combination of both, for park and recreational purposes as a condition to the approval of a tentative map or parcel map. Compliance with the requirements of Los Angeles Municipal Code Sections 12.33, 17.12, and/or 17.58 does not equate to the mitigation of the Project's impacts as identified in the environmental review / CEQA process.

Unless the dedication of land or payment Quimby in-lieu fees is sufficient to purchase the necessary park acreage required in the CEQA analysis, the satisfaction of Quimby would not eliminate the proposed project's impact on City parks and recreational facilities. The payment of any required Quimby fees, along with the provision of onsite amenities, could reduce a project's impact upon parks and recreational facilities, but not necessarily to a level below significance.

Response to Comment No. 3-10

The commenter incorrectly characterizes the impact analysis in the Draft EIR as Quimby Act analysis. The Proposed Project includes a discretionary request for a zone change/height district change from C4-2D-SN and C4-2D to C4-2D-SN and C4-2D with new "D" limitations, and is therefore subject to LAMC Section 12.33. Pursuant to LAMC Section 12.33, the land dedicated or the payment received shall be used for park or recreational purposes and shall be subject to the restrictions, conditions, exemptions, and credits of either Section 17.12 for 5 or more dwelling units, or Section 17.58 for 4 or fewer dwelling units, whichever is applicable. The Proposed Project would include 5 or more dwelling units and thus Section 17.12 would be applicable under this provision. As provided in Draft EIR Mitigation Measure K.4-2, which reflects the Code requirement, the applicant would be required to pay the Quimby/Park Fees pursuant to LAMC section 17.12. The lead agency made the determination that the payment of Quimby/Park Fees, combined with the provision of onsite recreational facilities, would in fact ensure that Project impacts with respect to parks and recreational facilities would be less than significant. This

conclusion was based on an assessment of the need for parks in the project area and in consideration of the on-site amenities that are proposed.

Comment No. 3-11

Identifying adequate and sufficient mitigation measures

The proposed Project would need to provide 0.81 acres of Neighborhood Parks and 0.81 acres of Community Parks in order to fully meet the needs of its new residents and fully mitigate its impacts.

Mitigation Measure K.4-2 should be revised to read: “The Project Applicant shall provide, or cause to be provided, 0.81 acres of Neighborhood Parks and 0.81 acres of Community Parks either on-site or within a reasonable distance from the Project.”

Response to Comment No. 3-11

The commenter’s assertion that the Proposed Project will generate a need to provide 0.81 acres of Neighborhood Parks and 0.81 acres of Community Parks is incorrectly based on imposing Citywide long-range planning goals on a specific development project and not the recommended methodology established in the City of Los Angeles CEQA Thresholds Guide. Furthermore, the comment fails to account for the existence of two large regional parks in the Hollywood area. Consequently, the proposed mitigation cannot be imposed because there is no evidence that the Proposed Project will have a potentially significant impact on park resources. Mitigation cannot be imposed without such evidence. As concluded in Section IV.K.4, Public Services, of the Draft EIR, the Proposed Project’s impacts on recreation and parks would be less than significant with implementation of Code requirements. Based on the information presented in the EIR, including Section IV.K.4 of the Draft EIR and the responses to comments contained in this Final EIR, the commenter’s recommended mitigation measure is unfounded.

Furthermore, individual development projects are not required to provide the types of Neighborhood and Community Park facilities identified in the City’s Public Recreation Plan. As set forth in the City of Los Angeles CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, in consideration of whether the project includes features that would reduce the demand for recreation and park services (e.g., onsite recreation facilities, land dedication or direct financial support to the Department of Recreation and Parks). Section IV.K.4, Public Services, of the Draft EIR accurately concluded the Proposed Project’s impacts on recreation and parks would be less than significant with implementation of the provided Code requirements. As discussed in greater detail in Response to Comment 3-7, the Proposed Project would provide approximately 19,275 square feet of active and passive open space amenities onsite. These onsite recreational amenities would serve to further reduce the Project’s demands upon public recreation facilities.

Comment No. 3-12

If the Project cannot meet the identified parkland needs than the Project will have an unmitigated impact on parks and recreational services and a Statement of Overriding Considerations will need to be adopted.

Response to Comment No. 3-12

The comment provides a conclusion based upon the commenter's speculation and opinion, and misapplying the Citywide standard as a threshold of significance. The comment has provided no substantial evidence of a potentially significant impact to park and recreation resources. As previously stated, no mitigation can be required in the absence of such evidence. Section IV.K.4, Public Services, of the Draft EIR accurately concluded the Proposed Project's impacts on recreation and parks would be less than significant with implementation of Code requirements. A Statement of Overriding Considerations for recreation and parks is not required because the lead agency has determined that the Proposed Project's impacts upon recreation and park facilities would be less than significant. See also Response to Comment 3-11.

Comment No. 3-13

Thank you for the opportunity to provide comments on this DEIR. I want to note that I fully support the creation of urban infill projects, such as the Project, in the Hollywood community; as long as the impacts of these types of projects are properly identified so they can be appropriately considered by decision makers. I hope these comments will be carefully considered and the Hollywood and Gower Project DEIR will be revised to properly note the impact this project will have on the community.

Response to Comment No. 3-13

The comment provides the commenter's opinion as well as general concluding statements, but does state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. Nevertheless, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

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DEPARTMENT OF TRANSPORTATION
 DISTRICT 7, OFFICE OF PUBLIC
 TRANSPORTATION AND REGIONAL PLANNING
 IGR/CEQA BRANCH
 100 SOUTH MAIN STREET
 LOS ANGELES, CA 90012
 PHONE (213) 897-6696
 FAX (213) 897-1337



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November 24, 2009

IGR/CEQA DEIR CS/091030
 City of Los Angeles
 Hollywood & Gower Project
 Vic. LA-101-6.52, SCH# 2008011113

Mr. Adam Villani
 City of Los Angeles
 Department of City Planning
 200 N. Spring Street, Room 750
 Los Angeles, CA 90012

Dear Mr. Villani:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report (DEIR) for the Hollywood Gower Project (ENV-2007-5750-EIR). The proposed project is a mixed-use project located at the southwest corner of Hollywood Boulevard and Gower Street. The proposed project involves demolition of the existing parking lot and construction of an approximately 197,503-sq. ft. mixed-use development. The proposed project would contain 7,200-sq. ft. of retail space and 176 residential units. Based on the information received, we have the following comments:

The project is expected to generate 1397 net new daily trips, 93 AM peak hour trips and 121 PM peak hour trips with 15% to the north and 20% to the south on the US-101 Freeway. Based on the trip distribution and assignment of trips, a maximum of 15 vehicles per hour would be added to the freeway in either direction.

It appears that the project traffic by itself will have a minimal impact on the US-101 Hollywood Freeway. It was noted that the level of peak period project trip did not meet the CMP criteria for detailed freeway analysis. According to Caltrans data, the level-of-service (LOS) at the vicinity of this project for US-101 is LOS:"F" in both directions during peak periods. Despite the CMP criteria, Caltrans request that the mainline freeway be analyzed to include existing freeway volumes and level-of-service (LOS) for AM and PM peak periods for existing and future year cumulative analysis. The related trip generation estimates for future project is 17,990 Am peak hour trips and 25,457 PM peak hour trips with a potential of 8,909 related PM peak hour project trips assigned to the US-101 Hollywood Freeway. Due to this magnitude of related project trips, we ask that the City work with Caltrans to identify critical highway improvements necessary to mitigate future impacts to the US-101 Hollywood Freeway.

Page 41, Table 7 shows the intersection at Argyle Avenue and Franklin Avenue/US-101 NB on-ramp is operating at LOS "E" during the AM peak hour and LOS "F" during the PM peak hour. On Page 72, Table 10 shows future 2011 without and with project traffic. The Argyle and Franklin/US-101 NB ramp Am peak hour LOS changes from "E" to "F" and the LOS for the Hollywood Boulevard ramps changes from LOS "B" to LOS E" during the PM peak hour.

4-1

4-2

Mr. Adam Villani
November 24, 2009
Page Two

On Page 80, the report states that freeway ramps were not specifically analyzed as a component of the freeway impact evaluation. No proposed traffic improvements were proposed to mitigate impacts at these ramp intersections.

The project Traffic Impact Analysis did not analyze the freeway interchanges (on/off-ramps). Analysis of freeway ramps should use the HCM methodology, which should include queue length analysis of affected freeway ramps. In particular the analysis should study the capacity of the freeway off-ramps to handle project and future traffic volumes to determine if the traffic on the off-ramps is backing up onto the mainline freeway.

We recommend that construction related truck trips on State highways be limited to off-peak commute periods. Transport of over-size or over-weight vehicles on State highways will need a Caltrans Transportation Permit. The contractor should avoid platooning of truck trips on mainline freeways, on freeway on/off-ramps and at freeway ramp intersections.

If you have any questions, you may reach me at (213) 897-6696 and please refer to our record number 091030/CS.

Sincerely,



ELMER ALVAREZ
IGR/CEQA Program Manager
Office of Regional Planning

cc: Scott Morgan, State Clearinghouse

4-2

4-3

LETTER NO. 4

Elmer Alvarez, IGR/CEQA Program Manager
Department of Transportation
100 South Main Street
Los Angeles, CA 90012
November 24, 2009

Comment No. 4-1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report (DEIR) for the Hollywood Gower Project (ENV-2007-5750-EIR). The proposed project is a mixed-use project located at the southwest corner of Hollywood Boulevard and Gower Street. The proposed project involves demolition of the existing parking lot and construction of an approximately 197,503-sq. ft. mixed-use development. The proposed project would contain 7,200-sq. ft. of retail space and 176 residential units. Based on the information received, we have the following comments:

The project is expected to generate 1397 net new daily trips, 93 AM peak hour trips and 121 PM peak hour trips with 15% to the north and 20% to the south on the US-101 Freeway. Based on the trip distribution and assignment of trips, a maximum of 15 vehicles per hour would be added to the freeway in either direction.

It appears that the project traffic by itself will have a minimal impact on the US-101 Hollywood Freeway. It was noted that the level of peak period project trip did not meet the CMP criteria for detailed freeway analysis. According to Caltrans data, the level-of-service (LOS) at the vicinity of this project for US-101 is LOS:"F" in both directions during peak periods. Despite the CMP criteria, Caltrans request that the mainline freeway be analyzed to include existing freeway volumes and level-of-service (LOS) for AM and PM peak periods for existing and future year cumulative analysis. The related trip generation estimates for future project is 17,990 Am peak hour trips and 25,457 PM peak hour trips with a potential of 8,909 related PM peak hour project trips assigned to the US-101 Hollywood Freeway. Due to this magnitude of related project trips, we ask that the City work with Caltrans to identify critical highway improvements necessary to mitigate future impacts to the US-101 Hollywood Freeway.

Response to Comment No. 4-1

The comment reiterates the project description and anticipated CMP and net daily and peak hour trip. As noted by the comment, the proposed Hollywood/Gower project is not anticipated to generate sufficient net new traffic to significantly impact any of the nearby US-101 Freeway segments, and as noted in the project traffic study and EIR, no project-specific freeway mainline mitigation measures are warranted, regardless of the existing or future forecast levels of service on the freeway. While the comment also requests coordination between the City of Los Angeles (the lead agency) and Caltrans regarding mitigation of cumulative traffic impacts to the freeway, such coordination, and identification of long-term

improvements to the regional transportation system are beyond the scope of analysis for any individual project, and as such are not within the control of the Hollywood/Gower project.

Comment No. 4-2

Page 41, Table 7 shows the intersection at Argyle Avenue and Franklin Avenue/US-101 NB on-ramp is operating at LOS "E" during the AM peak hour and LOS "F" during the PM peak hour. On Page 72, Table 10 shows future 2011 without and with project traffic. The Argyle and Franklin/US-101 NB ramp Am peak hour LOS changes from "E" to "F" and the LOS for the Hollywood Boulevard ramps changes from LOS "B" to LOS "E" during the PM peak hour.

On Page 80, the report states that freeway ramps were not specifically analyzed as a component of the freeway impact evaluation. No proposed traffic improvements were proposed to mitigate impacts at these ramp intersections.

The project Traffic Impact Analysis did not analyze the freeway interchanges (on/off-ramps). Analysis of freeway ramps should use the HCM methodology, which should include queue length analysis of affected freeway ramps. In particular the analysis should study the capacity of the freeway off-ramps to handle project and future traffic volumes to determine if the traffic on the off-ramps is backing up onto the mainline freeway.

Response to Comment No. 4-2

The comment notes impact analysis for the intersection of Argyle Avenue and the Franklin Avenue/US-101 NB on-ramp. The changes to the subject ramp terminus intersections noted by the comment are the result of anticipated cumulative traffic growth in the project study area, and are not the result of net new traffic generated by the proposed Hollywood/Gower project. As noted in referenced Table 10 and fully discussed in the project traffic analyses, the proposed project itself will not create any significant impacts to any of the freeway ramp terminus intersections, nor will the project result in a deterioration in forecast future levels of service.

The comment incorrectly notes that the freeway ramps were not specifically analyzed as a component of the freeway impact evaluation, and further states that no analysis of the ramps was conducted. As clearly discussed in the project traffic study, the freeway ramps were not analyzed as a component of the mainline freeway impact analyses, as is consistent with the City's policy of using the Los Angeles County CMP as a tool for evaluating freeway impacts. However, the traffic study also includes an analysis of the key freeway ramps in the project vicinity through detailed analyses of the ramp terminus intersections (with Hollywood Boulevard, Gower Street, and Franklin Avenue/Argyle Avenue as part of the evaluation of project impacts to the area intersections. Those analyses indicated that no significant impacts to these ramp-controlling intersections would result from the development of the proposed Hollywood/Gower project, and as such, neither project-specific mitigation measures nor additional analyses of the freeway ramps themselves are warranted.

Comment No. 4-3

We recommend that construction related truck trips on State highways be limited to off-peak commute periods. Transport of over-size or over-weight vehicles on State highways will need a Caltrans Transportation Permit. The contractor should avoid platooning of truck trips on mainline freeways, on freeway on/off-ramps and at freeway ramp intersections.

Response to Comment No. 4-3

The comment provides recommendation regarding construction related truck trips on the State highway. The project applicant shall limit construction truck traffic during peak traffic periods to the extent feasible. It should also be noted that construction traffic activities are limited to off-peak hours by the City of Los Angeles; such limits to construction hours will intrinsically reduce or eliminate construction truck traffic additions to the nearby freeways. Nevertheless, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for review and consideration.

III. CORRECTIONS AND ADDITIONS

The following corrections and additions are set forth to update the Hollywood Gower Project Draft Environmental Impact Report (Draft EIR) in response to the comments received during and after the public review period. Changes to the Draft EIR are listed by chapter and page number. Removed text is delineated by strike-through and new text is provided in bold and underline.

I. INTRODUCTION/SUMMARY

Summary Table, page I-8, discussion under Signage, has been revised as follows:

The project site is located within the boundaries of the adopted Hollywood Supplemental Use District (SUD). At this time, the applicant has not submitted to the Planning Department any application for signage. The project signage includes ~~Three signs including two supergraphic signs, one wall sign, and a projecting vertical sign. are included in the design of the proposed project.~~ **In addition to these signs, there will be individual tenant signs on the ground floor retail space.** The City has adopted a prohibition on supergraphic and off-site signage. As long as the local regulations prohibit without exception the type of signs proposed, the applicant will not seek approvals to implement the sign program. However, for CEQA purposes, all elements of the sign program and the tenant signs are environmentally evaluated. Although the proposed signs would increase the number of signs in the project vicinity, this increase would be less than significant with respect to visual character because several existing signs are located in the vicinity of the project site. With the signage in conformance with the Hollywood Signage Supplemental Use District standards, the potential impact on the visual character of the project site and surrounding area would be less than significant, as these standards ensure that signage does not cause significant impacts to surrounding community.

Summary Table, page I-12, discussion under AQMP Consistency, has been revised as follows:

AQMP CONSISTENCY

The project site is located in a highly urbanized area of the City of Los Angeles, which provides several modes of public transit service. The site is located within walking distance of the **Metro Red Line**~~Redline~~ station, employment and shopping sites for project residents. This type of infill development is consistent with the goals of the AQMP for reducing the emissions associated with new development. Based on this information, the proposed project would be consistent with the 2007 AQMP, and a less than significant impact would occur.

Summary Table, page I-12, first paragraph under Mitigation Measures for AQMP Consistency, and page IV.C-31 (Section IV.C Air Quality) has been revised as follows:

~~Although the proposed project would result in a less than significant impact with regards to daily significance thresholds during the site development phases, the following is a list of feasible control~~

~~measures that the SCAQMD recommends for construction emissions of PM₁₀. The analysis presented above assumes implementation of these measures as required under SCAQMD Rule 403.~~

The SCAQMD recommends the following measures, which are required by the City of Los Angeles:

Summary Table, page I-18, Mitigation Measures C-3, has been revised as follows:

- C-3: For the residential development, in accordance with LEED New Construction Energy and Atmosphere Credit 1, the project shall be constructed with materials that reduce thermal loss and energy demand that ~~exceeds~~**meet the 2008** Title 24 regulations ~~by 14% or greater~~, or LEED Homes by 10% or greater.

Summary Table, third paragraph on page I-34, discussion under Height/Floor-Area-Ratio, has been revised as follows:

Height/Floor-Area-Ratio

The site is currently zoned C4-2D-SN and C4-2D. By right, Height District 2 permits an FAR of 6:1; however, the “D” limitation further restricts the FAR to 2:1. The proposed project would exceed the currently permissible 2:1 FAR for the site. The applicant has requested a zone change from the existing C4-2D-SN and C4-2D to a new C4-2D-SN and C4-2D, replacing the existing “D” limitation pursuant to L.A.M.C. Sections 12.32F. L.A.M.C. Section 12.32B authorizes the owner of a property to apply for a change of zone to delete the existing “D” limitation. Without the “D” limitation, the applicable Height District 2 floor area ratio standard of 6:1 would apply to the project site. However, the Hollywood Community Plan footnote 9 limits the FAR on the project site to 4.5:1, or 197,503.55 square feet. **Also, although the Hollywood Community Plan Update is still in its draft phase, the project would be consistent with the Hollywood Community Plan Update FAR designation of 4.5:1 for the site, if approved in its current form. This is noted for informational purposes only as plans are not binding until approved.** Therefore, impacts with respect to floor area ratio would be less than significant with approval of the requested Zone Change.

Mitigation Measure I-8 on page I-39 has been revised to match Mitigation Measure I-8 contained on page IV.I-29:

- I-8 Construction times shall be limited to between ~~9:00~~ **7:00** A.M. and 6:00 P.M. so as to not interfere with evening performances at the Music Box Theater.

The following has been added to the Summary Table under mitigation measures for future traffic conditions:

In addition to the two potentially significant intersections identified (Hollywood Blvd. & Gower St.; Sunset Blvd. & Gower St.), a third potentially significant impact at Gower Street and Selma Avenue was identified in the Traffic Study; however, LADOT Policy Memo 09-01 notes that this

location, which is unsignalized, is not appropriate for identification as “significantly impacted”, and was therefore evaluated only with regard to potential installation of a new traffic signal. Therefore, based on LADOT’s current policy, no significant project impact will occur at this location). The project will be responsible for mitigating, to the extent feasible, the traffic-related impacts of its own development, and therefore, a number of preliminary roadway improvements were identified and presented to LADOT for consideration. Following their review, the recommended mitigation measures were deemed infeasible due to the potential for significant secondary impacts (primarily the removal of existing on-street parking within the study area).

Intersection Mitigation Measures

HOLLYWOOD BOULEVARD AND GOWER STREET

Due to right-of-way constraints, and the City’s desire to maintain sidewalk widths and preserve on-street parking, LADOT determined that no feasible improvements are available to offset the potential significant impact of the project at this location. Removal of on-street parking would likely cause secondary impacts to traffic and parking because Hollywood has less available public parking than current demand. Removing street parking would cause traffic congestion as vehicles search the neighborhood for street parking and may result in parking intrusion on residential streets.

GOWER STREET AND SUNSET BOULEVARD

LADOT has determined that no feasible mitigation improvements are available for this location to offset the potential significant impact of the project.

GOWER STREET AND SELMA AVENUE

This intersection is currently unsignalized, and controlled only by STOP signs on the Selma Avenue approaches. While the installation of a new traffic signal at this intersection would reduce the project’s impacts, LADOT does not recommend installation of a new traffic signal. In addition, although this intersection was selected as a study intersection for analysis in the traffic study, the traffic study was prepared prior to LADOT Policy Memo 09-01 (included in Appendix H to this Draft EIR), which became effective immediately on its release on March 18, 2009. Pursuant to this policy, unsignalized intersections shall not be included in the impact analysis. Although the traffic study identified a significant impact at this intersection, LADOT’s policy supersedes the analysis contained in the traffic study.

Other Operational Mitigation Measures

However, LADOT did recommend several alternative traffic mitigation measures, now required by the EIR, including traffic signal upgrades to improve area traffic conditions and/or provide

needed operational enhancements, as well as a project-specific transportation management program, as described below.

The following new mitigation measure has been added to the Summary Table, page I-56:

L-2 Should project construction activity temporarily affect the operations of the bus stop itself (including repair and/or replacement of existing broken curb or sidewalks), the project applicant shall contact Metro to coordinate temporary relocation of the bus stop or other applicable measures to maintain bus service to the project area throughout project construction.

Subsequent mitigation measures L-2, L-3, and L-4 will be renumbered as L-3, L-4, and L-5, respectively.

The first sentence of Mitigation Measure L-3 (formerly L-2) has been revised as follows:

L-3 The project ~~should~~ shall upgrade the traffic signal controllers to Type 2070 at the following intersections:

The first sentence of Mitigation Measure L-4 (formerly L-3) has been revised as follows:

L-4 Additionally, the project ~~should~~ shall install a new CCTV camera at:

Mitigation Measure L-5 (formerly L-4) has been revised as follows:

L-5 Since the project traffic study did not assume any type of project-related trip reduction strategy in the analysis of potential project impacts, ~~LADOT recommends that~~ the applicant shall implement trip-reduction measures designed to reduce the number of vehicle trips generated by the project, in addition to those that may already be required per the provisions of Ordinance No, 168,700. The applicant ~~should~~ shall be required to work with LADOT to develop a Transportation Demand Management (TDM) plan that includes trip reduction goals. A preliminary TDM program ~~should~~ shall be prepared and provided for LADOT review prior to issuance of the first building permit for the project, and a final TDM program be approved by LADOT prior to issuance of any temporary or final certificate of occupancy for the project.

First bullet item under Mitigation Measure M.2-3 on page I-59 has been revised as follows:

Unless otherwise required, and to the satisfaction of the Department of Building and Safety, the applicant shall install:

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

- Restroom faucets with a maximum flow rate of 1.5 gallons per minute.
- Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)

Mitigation Measure M.3-1 on page I-62 has been revised as follows:

M.3-1 The construction contractor shall ~~only~~ **make an effort to** contract for waste disposal services with a company that recycles construction related wastes.

II. PROJECT DESCRIPTION

The signage discussion on page II-5 is revised as follows: *Signage*

The project site is located ~~within the boundaries of the adopted~~ **within the boundaries of the adopted** in the Hollywood Signage Supplemental Use District (SUD). ~~The applicant has not submitted to the Planning Department any application for signage. However, since the applicant may apply for signage in the future, the EIR evaluated the environmental impacts of signage that the applicant may seek approval for in the future. The project's signage program consists of~~ **There are two proposed super-graphic signs, and a one wall sign included as part of the project offsite signage program and a projecting vertical sign. In addition to these signs, there will be individual tenant signs on the ground floor retail space.**

The two super-graphic signs included in the project are located at opposite ends of the building and are not visible simultaneously. The larger super-graphic measuring 4,028 square feet is inset into the western elevation, in a blank wall area. The second smaller super-graphic located on Gower Street at the corner of Hollywood Boulevard totals 2,100 square feet. Both proposed super-graphic signs are integrated with adjacent architectural features and ~~are of a~~ **the scale compatible** of their respective elevations.

The wall sign measuring 300 square feet would be placed facing Hollywood Boulevard (north elevation) and situated on the wall ~~else~~ **adjacent** to the Music Box Theater. ~~This wall sign is proposed to serve as a potential marquee gesture for the Theater.~~

The Projecting Sign would measure approximately 650 square feet and would be a vertical blade sign projecting from the Hollywood Boulevard façade (as shown in the Draft EIR, Figure II-17) and visible from both the east- and westbound traffic and pedestrians on Hollywood Boulevard. This sign is proposed to spell out "Hollywood+Gower".

Project signage would be complementary to and compatible with the building architecture, and responsive to the building's location at the Eastern gateway to the Hollywood Entertainment District, as well as the Hollywood Signage SUD.

The City has adopted a prohibition on supergraphic and off-site signage such as those studied in this Draft EIR. As long as the local regulations prohibit without exception the type of signage studied in the Draft EIR, the applicant will not seek approvals to implement the signage program. However, as noted in LAMC Sections 14.4.4.B.9 and 14.4.4.B.11, exceptions to these prohibitions will be permitted to the extent deemed constitutional in the resolution of a U.S. District Court case¹. These exceptions would be permitted pursuant to a legally-adopted specific plan, supplemental use district (such as the Hollywood Signage SUD), or an approved development agreement. If these exceptions become allowed following the resolution of the court case, then the applicant may submit an application to seek approvals to implement the signage program. Therefore, the prohibition will not result in a changed level of land use impacts (consistency with local regulations) because no supergraphic or off-site signage will be sought during any period of time which local regulations would prohibit such signage.

Figure II-17, Project Rendering Gower View and Figure II-18, Project Rendering Hollywood Boulevard View, have been modified to add the following disclaimer (revised figures are found at the end of this Final EIR section):

The search lights as shown in this figure are not proposed and would not be included as part of the actual project.

The following language has been added to Discretionary Actions discussion on page II-10 as the last item:

No discretionary approvals are currently being sought for any signage not already allowed by existing regulations. If future signage regulations allow the supergraphic sign program evaluated in this EIR, then approvals may be sought according to such future regulations.

¹ **World Wide Rush, LLC v. City of Los Angeles, United States District Court Case No. CV 07-238 ABC. This case was decided in the City's favor on May 26, 2010, but at the time of publication of this FEIR, the City had not yet received a written mandate directing how exactly to implement the ruling.**

III. ENVIRONMENTAL SETTING

Table III-1 has been revised as follows:

**Table III-1
Related Projects**

No.	Location	Land Use	Size
1	1934 Cahuenga Boulevard	Gas station and mini market	8 pumps
2	6142 Franklin Avenue	Apartment	130 du
3	SWC Franklin Avenue and Gower Street	Apartment <i>Apartment (removed)</i>	126 du -20 du
4	1800 Argyle Avenue	Apartment Office	87 du 23,000 sf
5	6735 Yucca Street	Condominium	54 du
6	6758 Yucca Street	Apartment Retail	270 du 8,500 sf
7	1714-1736 McCadden Place	Condominium	218 du
8	6904 Hollywood Boulevard	Retail Office	29,900 sf 16,700 sf
9	6757 Hollywood Boulevard	Restaurant	13,132 sf
10	6611 Hollywood Boulevard	Retail	60,200 sf
11	6608 Hollywood Boulevard	Quality Restaurant Hotel	8,100 sf 225 room
12	6531 Hollywood Boulevard	Jazz Club Quality Restaurant	5,390 sf 931 sf
13	6523 Hollywood Boulevard	Restaurant	15,161 sf
14	6506 Hollywood Boulevard	Night Club Restaurant	12,255 sf 745 sf
15	6385 Hollywood Boulevard	Restaurant Dance Club	11,517 sf 11, 518 sf
16	1717 Vine Street	Condominium Restaurant	57 du 5,489 sf
17	SEC Hollywood Boulevard/Vine Street	Apartment Condominium Hotel Restaurant Specialty Retail <i>Specialty Retail (removed)</i> <i>Office (removed)</i> <i>Drinking Place (removed)</i> <i>Juice Bar (removed)</i> <i>State Motor Vehicle Dept.</i>	375 du 150 du 300 room 49,500 sf 12,000 sf -5,699 sf -2,952 sf -3,260 sf -288 sf -13,680 sf
18	6263 Hollywood Boulevard	Restaurant Dance Club	6,375 sf 6,376 sf
19	1750 Argyle Avenue	Restaurant Theater	5,273 sf 5,273 sf
20	Vine Street, between Hollywood Boulevard and Selma Avenue	Apartment	104 du
21	1645 Vine Street	Condominium	96 du
22	Hollywood Boulevard, between Argyle Avenue and Gower Street	Apartment Retail	952 du 190,770 sf

No.	Location	Land Use	Size
		Retail (removed)	-900 sf
		Automotive (removed)	-25,400 sf
		Office (removed)	-6,820 sf
		Night Club (removed)	-5,920 sf
23	6107 Hollywood Boulevard	Hotel	86 rooms
		Specialty Retail	5,000 sf
24	6021 Hollywood Boulevard	Dance Hall	17,208 sf
25	6000 Hollywood Boulevard	Auto Sales (expansion)	31,000 sf
26	6001 Carlton Way	Condominium	42 du
27	5777 Hollywood Boulevard	Fast-food Restaurant	3,236 sf
		Specialty Retail	5,275 sf
28	Hollywood Boulevard, between Western Avenue and Garfield Place	Retail	30,000 sf
		Condominium	77 du
		Apartment	76 du
		Hotel (rehabilitation)	140 rooms
		Office	19,000 sf
		Retail	26,000 sf
		Apartment	220 du
29	5555 Hollywood Boulevard	Apartment	90 du
		Retail	6,000 sf
30	1611 La Brea Avenue	Condominium	180 du
		Retail	13,700 sf
31	6726 Sunset Boulevard	Pharmacy	16,000 sf
32	6600 Sunset Boulevard	Hotel	50 rooms
33	6417 Selma Avenue	Hotel	126 room
		Restaurant/Night Club	12,840 sf
34	1430 Hudson Avenue	Office	29,000 sf
35	1430 Cahuenga Boulevard	Restaurant	12,000 sf
36	1602 Ivar Avenue	Senior Housing	106 du
		Community Center	6,500 sf
		Retail	10,000 sf
		Doolittle Theater	5,000 sf
37	1600 Vine Street	Night Club	11,884 sf
38	1538 Vine Street	Apartment	306 du
		Retail	68,000 sf
39	NWC Sunset Boulevard/Vine Street	Entertainment/Retail	30,000 sf
40	6322 De Longpre Avenue	Restaurant	12,220 sf
		Night Club	12,221 sf
41	6121 Sunset Boulevard	Condominium	400 du
		Office	380,000 sf
		Hotel	125 rooms
		Restaurant	6,000 sf
		Restaurant	6,000 sf
		Bar/Lounge	3,500 sf
		Retail	12,000 sf
42	1438 N. Gower Street	Office	115,000 sf
43	6040 Sunset Boulevard	Office	120,000 sf
44	5800 Sunset Boulevard	Office	740, 987 sf
		Sound Stage	82,500 sf
		Office (removed)	-107, 594 sf
45	5935 Sunset Boulevard	Condominium	331 du
		Office	40,000 sf
		Retail	5,000 sf

No.	Location	Land Use	Size
		Restaurant Public Park <i>Restaurant (removed)</i>	8,500 sf 21,177 sf <i>-13,500 sf</i>
46	1260 N. Las Palmas Avenue	Day Care Center	75 students
47	1309 N. Wilton Place	Central LA New Area HS	1,875 students
48	1541 Western Avenue	Commercial	11,864 sf
49	1115 Tamarind Avenue	Santa Monica New Primary	380 students
50	6911 Santa Monica Boulevard	Condominium Retail	374 du 15,000 sf
51	6677 Santa Monica Boulevard	Apartment Retail Restaurant	787 du 12,700 sf 9,500 sf
52	959 Seward Street	Office Restaurant	240,000 sf 4,000 sf
53	955 N. Vine Street	Vine Elementary School	230 students
54	5920 Melrose Avenue	Apartment Retail	54 du 16,000 sf
55	5663 Melrose Avenue	Condominium Retail	96 du 3,350 sf
56	5473 Santa Monica Boulevard	Apartment <i>Apartments (removed)</i>	27 du <i>-48 du</i>
57	SWC Fountain Avenue and Serrano Avenue	Middle School	891 students
58	5200 W. Virginia Avenue	Elementary School	599 students
59	5165 Fountain Avenue	Apartment	110 du
60	4747 Sunset Boulevard	Hospital (expansion)	1,000,000 sf
61	5400 Hollywood Boulevard	Apartment Retail	42 du 6,778 sf
62	922 Western Avenue	Apartment Retail	63 du 13,500 sf
63	5555 W. Hollywood Boulevard	Apartment Retail	108 du 9,937 sf
64	5420 W. Sunset Boulevard	Gas Station	10 pumps
65	5601 Santa Monica Boulevard	Apartment Retail <i>Retail (removed)</i>	437 du 377,990 sf <i>-161,550 sf</i>
66	5550 W. Hollywood Boulevard	Condominium Retail	216 du 18,353 sf
67	5245 W. Santa Monica Boulevard	Apartment (assisted living) Retail	68 du 51,674 sf
68	Highland Avenue, between Hawthorn Avenue and Selma Avenue	Condominium Hotel Retail Office <i>Office (removed)</i> <i>Restaurant (removed)</i> <i>Apartment (removed)</i>	266 du 348 rooms 47,605 sf 350,000 sf <i>-55,549 sf</i> <i>-1,650 sf</i> <i>-20 du</i>
69	6837 Hawthorn Avenue	Theater	800 seats
70	1257 Detroit Street	Apartment	5 du
71	7046 Hollywood Boulevard	Apartment	42 du
72	1782 Orange Drive	Screening/Dining Facility	270 seats
73	6700 Hollywood Boulevard	Drinking Place	7,500 sf

No.	Location	Land Use	Size
74	6253-6261 W. Hollywood Boulevard	Apartment Office Condos	60 du 5 du
75	1601 and 1605 N. Vine Street	Office Restaurant Restaurant Bar <i>Retail (removed)</i>	121,450 sf 3,850 sf 2,300 sf 2,300 sf -800 sf
76	1462 N. Vine Street	Apartment Retail	63 du 8,500 sf
77	1830 Bronson Avenue	Apartment	45 du
78	SWC Larchmont Boulevard and Melrose Boulevard	Apartment <i>Gas Station (removed)</i>	24 du -8 pumps
79	6824 W. Lexington Avenue	Condominium	93 du
80	5700 W. Melrose Avenue	Condominium	21 du
81	5825 Sunset Boulevard	Condominium Apartment Office	20 du 54 du 2,000 sf
82	5831 Sunset Boulevard	Condominium	81 du
83	1538 N. Cahuenga Boulevard	Condominium Retail	32 du 7,000 sf
84	1427 N. Cole Place	Condominium	48 du
85	1417 N. Detroit Street	Condominium	23 du
86	803 N. Wilcox Avenue	Condominium	14 du
87	1633 N. La Brea Avenue	Condominium	186 du
88	1729 N. Las Palmas Avenue	Condominium	218 du
89	2020 N. Holly Drive	Condominium	16 du
90	5806 W. Waring Avenue	Condominium	15 du
91	7060 W. Hawthorn Avenue	Condominium	18 du
92	853 N. Wilcox Avenue	Condominium	16 du
93	6931-6935 Hollywood boulevard	Commercial	44,274 sf
94	1417-1433 Cole Avenue	Condominium	50 du
95	Sunset Boulevard and Vine Street (CIM)	Condominium Retail	90 du 15,000 sf
96	Sunset Boulevard and Van Ness Avenue	LAUSD High School	1,000 students
97	Gordon Street N/O Sunset Boulevard	Condominium	60 du
98	1635 Las Palmas Avenue	Restaurant	8,000 sf
99	7021 Hollywood Boulevard	Health Club Drug Store	53,000 sf 11,000 sf
100	1411 Highland Avenue	Apartment Retail	56 du 7,000 sf
101	7072 Hawthorn Avenue	Apartment	50 du
102	6360 Sunset Boulevard	Restaurant	14,000 sf
103	6922 Hollywood Boulevard	Retail	10,000 sf
104	1545 Wilcox Avenue	Condominium	40 du
105	2775 Cahuenga Boulevard	Town Homes Single Family Housing	75 du 6 du
106	7060 Hollywood Boulevard	Condominium Theater	130 du 99 seats
107	Sunset Boulevard and Vine Street	Condominium Retail	63 du 11,000 sf
108	1800 N. Whitley Avenue	Condominium	32 du

No.	Location	Land Use	Size
109	1313 N. Vine Street	Museum and Theater	75,000 200,000 sf
110	6200 Hollywood Boulevard	Retail Apartments	175,000 sf 1,042 du
111	6801 Hollywood Boulevard	Retail Restaurant	1,657 sf 1,587 sf
112	6215 Sunset Boulevard	Office Condominium Hotel	226,000 sf 330 du 350 rooms
113	Sunset Boulevard and Western Avenue	Target and Retail Center	NA 192,680 sf
114	1540 N. Vine Street	Market Apartments	69,000 sf 306 du
115	1921 Highland Avenue	Hotel	100 rooms
116	1750 N. Vine Street	Office	40,000 sf
117	5925 Sunset Boulevard	Office Condominium Retail	40,000 sf 300 du 12,000 sf
118	1800 Highland Avenue	Office (renovation)	84,000 sf
119	5936-5946 Sunset Boulevard	Restaurant and Bar	3,755 sf
120	6350 Hollywood Boulevard	Restaurant and Lounge	12,000 sf
121	1608 N. Cahuenga Boulevard	Restaurant	3,376 sf
122	1650 Schrader Boulevard	Nightclub and Lounge	NA
123	6683 Hollywood Boulevard	Restaurant	4,769 sf
124	7043 Hollywood Boulevard	Restaurant	NA
125	6669 Hollywood Boulevard	Dinner Theater	17,852 sf
126	6254 Sunset Boulevard	Apartments Retail	240 du 5,000 sf
127	1277 Wilcox Avenue	Townhomes	33 du
128	5500 Hollywood Boulevard	Apartments Condominiums Retail	16 du 226 du 15,000 sf
129	6200 Franklin Avenue	Condominiums	146 du
130	6683 Franklin Avenue	Condominiums	9 du
131	6230 Yucca Street	Condominiums Live/Work Office	85 du 10 du 14,000 sf
132	1320 Wilton Place	Condominiums Mixed-Use (retail/office)	150 du NA
133	Hawthorn Boulevard and Orange Drive	Mixed-Use (Hawthorn Block)	NA
134	1617 Cosmo Street	Condominiums	47 du
135	6290 Hollywood Boulevard	Condominiums	40 du
136	7100 Santa Monica Boulevard	Shopping Center	246,000 sf
137	6225 Hollywood Boulevard	Office	200,000 sf
138	7045 Lanewood Avenue	Condominiums Single Family Housing Apartments	43 du 1 du 8 du
139	1727-1737 McCadden Place	Affordable Housing Live/Work	27 du 8 du

Source: Hirsh/Green Transportation Consulting, Inc., September, 2008.

IV. ENVIRONMENTAL IMPACT ANALYSIS

A. IMPACTS FOUND LESS THAN SIGNIFICANT

No corrections or additions are provided.

B. AESTHETICS

The second paragraph on page IV.B-4 is revised as follows:

In the immediate vicinity west of the project site, the visual environment of Hollywood Boulevard is characterized by low ~~to mid-rise~~ **high-rise** urban development. To the east of the project site Hollywood Boulevard is characterized by low rise urban development including strip malls, car dealerships, and office buildings. The project site is located at the eastern end of the Hollywood Boulevard Commercial and Entertainment District ("Historic District"), a historic district listed in the National Register of Historic Places. The District is characterized by architecturally significant buildings such as the Pantages Theater, the Taft Building at the southeast corner of Hollywood and Vine, the Plaza Building at the northeast corner of Hollywood and Vine and the Broadway Building at the southwest corner of Hollywood and Vine. For most of its length, the Historic District is densely developed with two to four story buildings, with a street wall characterized by storefronts that extend to the sidewalk edge, retail uses on the ground floor and other uses or vacant space in the upper floors.

The discussion under "Signage" on pages IV.B-22 and B-23 is revised as follows:

Signage

The project site is located within the boundaries of the adopted~~in the~~ Hollywood Signage **Supplemental Use District (SUD). The applicant has not submitted to the Planning Department any application for signage. However, since the applicant may apply for signage in the future, all elements of the signage program are evaluated. The project's signage program consists of**~~There are two proposed super-graphic signs, and a one wall sign included as part of the project offsite signage program~~ **and a projecting vertical sign. In addition to these signs, there will be individual tenant signs on the ground floor retail space.**

The two super-graphic signs included in the project are located at opposite ends of the building and are not visible simultaneously. The larger super-graphic measuring 4,028 square feet is inset into the western elevation, in a blank wall area. The second smaller super-graphic located on Gower ~~s~~Street at the corner of Hollywood Boulevard totals 2,100 square feet. Both proposed super-graphic signs are integrated with adjacent architectural features and **are of a the scale compatible** of their respective elevations.

The wall sign measuring 300 square feet would be placed facing Hollywood Boulevard (north elevation) and situated on the wall ~~close~~**adjacent** to the Music Box Theater. ~~This wall sign is proposed to serve as a potential marquee gesture for the Theater.~~

The Projecting Sign would measure approximately 650 square feet and would be a vertical blade sign projecting from the Hollywood Boulevard façade (as shown in the Draft EIR, Figure II-17) and visible from both the east- and westbound traffic and pedestrians on Hollywood Boulevard. This sign is proposed to spell out “Hollywood+Gower”.

Although the proposed signs would increase the number of signs in the project vicinity, this increase would be less than significant with respect to visual character because the signs would be architecturally integrated into ~~to~~**the** proposed building. Moreover, the signage would be compatible with the existing visual character of the area in that several existing signs are located in the vicinity of the project site. Furthermore, the project site is within the Hollywood Signage Supplemental Use District (District), which recognizes the importance of signage in Hollywood. The District was established by the City Council via City of Los Angeles Ordinance Number 176,172 to acknowledge and promote the continuing contribution of signage to the distinctive aesthetic of Hollywood. Among other things, the Ordinance governs the size and type of signage permitted in Hollywood.

The City has adopted a prohibition on supergraphic and off-site signage such as those studied in this Draft EIR. As long as the local regulations prohibit without exception the type of signage studied in the Draft EIR, the applicant will not seek approvals to implement the signage program. However, as noted in LAMC Sections 14.4.4.B.9 and 14.4.4.B.11, exceptions to these prohibitions will be permitted to the extent deemed constitutional in the resolution of a U.S. District Court case². These exceptions would be permitted pursuant to a legally-adopted specific plan, supplemental use district (such as the Hollywood Signage SUD), or an approved development agreement. If these exceptions become allowed following the resolution of the court case, then the applicant may submit an application to seek approvals to implement the signage program. Therefore, the prohibition will not result in a changed level of land use impacts (consistency with local regulations) because no supergraphic or off-site signage will be sought during any period of time local regulations prohibit such signage.

As such, the ~~proposed~~**project** signs would be required to meet all applicable requirements and regulations under the established City of Los Angeles Ordinance No. 176,172. With the signage in conformance with the Hollywood Signage Supplemental Use District standards, the potential impact on the visual character of the project site and surrounding area would be less than

² **World Wide Rush, LLC v. City of Los Angeles, United States District Court Case No. CV 07-238 ABC. This case was decided in the City’s favor on May 26, 2010, but at the time of publication of this FEIR, the City had not yet received a written mandate directing how exactly to implement the ruling.**

significant, as these standards ensure that signage does not cause significant impacts to surrounding community.

C. AIR QUALITY

Page IV.C-31, first paragraph under Mitigation Measures for AQMP Consistency, has been revised as follows:

~~Although the proposed project would result in a less than significant impact with regards to daily significance thresholds during the site development phases, the following is a list of feasible control measures that the SCAQMD recommends for construction emissions of PM₁₀. The analysis presented above assumes implementation of these measures as required under SCAQMD Rule 403.~~

The SCAQMD recommends the following measures, which are required by the City of Los Angeles:

Page IV.C-33 (Section IV.C. Air Quality), Mitigation Measures C-3, has been revised as follows:

C-3: For the residential development, in accordance with LEED New Construction Energy and Atmosphere Credit 1, the project shall be constructed with materials that reduce thermal loss and energy demand that ~~exceeds~~ **meets the 2008** Title 24 regulations ~~by 14% or greater,~~ or LEED Homes by 10% or greater.

D. CULTURAL RESOURCES

No corrections or additions are provided.

E. GEOLOGY AND SOILS

No corrections or additions are provided.

F. HAZARDS AND HAZARDOUS MATERIALS

No corrections or additions are provided.

G. HYDROLOGY AND WATER QUALITY

No corrections or additions are provided.

H. LAND USE AND PLANNING

The following language is added to page IV.H-16 before “Other Actions Sought” discussion:

No discretionary approvals are currently being sought for any signage not already allowed by existing regulations. If future signage regulations allow the supergraphic sign program evaluated in this EIR, then approvals may be sought according to such future regulations.

The fourth paragraph on page IV.H-19 has been revised as follows:

The two supergraphic signs included in the project are located at opposite ends of the building and are not visible simultaneously. The larger supergraphic measuring approximately 30'x116' (4,028 square feet) is inset into the western elevation, in a blank wall area. The second smaller super-graphic located on Gower street at the corner of Hollywood Boulevard totals 2,100 square feet. Both proposed supergraphic signs are integrated with adjacent architectural features and the scale of their respective elevations.

The discussion under the Hollywood Signage Supplemental Use District on page IV.H-19 has been revised as follows:

Ordinance 176,172 established the Hollywood Signage Supplemental Use District (SUD) in 2004. This ordinance was enacted to acknowledge and promote the continuing contribution of signage to the distinctive aesthetic of Hollywood, as well as to control the blight created by poorly placed, badly designed signs throughout Hollywood. The project site is located within the Hollywood Signage SUD. The project applicant has not submitted to the Planning Department any application for signage. However, since the applicant may apply for signage in the future, this EIR evaluates the environmental impacts of signage that the applicant may seek approval for in the future. The project's signage program consists of ~~There are~~ two proposed supergraphic signs, ~~and~~ a wall sign and a projecting vertical sign ~~included as part of the project offsite signage program.~~ In addition to these signs, there will be individual tenant signs on the ground floor retail space.

The two supergraphic signs included in the project are located at opposite ends of the building and are not visible simultaneously. The larger supergraphic measuring approximately 30'x116' (4,028 square feet) is inset into the western elevation, in a blank wall area. The second smaller super-graphic located on Gower sStreet at the corner of Hollywood Boulevard totals 2,100 square feet. Both proposed super-graphic signs are integrated with adjacent architectural features and are of the-scale compatible of their respective elevations.

The wall sign measuring 300 square feet would be placed facing Hollywood Boulevard (north elevation) and situated on the wall ~~close~~ adjacent to the Music Box Theater. ~~This wall sign is proposed to serve as a potential marquee gesture for the Theater.~~

The Projecting Sign would measure approximately 650 square feet and would be a vertical blade sign projecting from the Hollywood Boulevard façade (as shown in the Draft EIR, Figure II-17) and visible from both the east- and westbound traffic and pedestrians on Hollywood Boulevard. This sign is proposed to spell out "Hollywood+Gower".

The City has adopted a prohibition on supergraphic and off-site signage such as those studied in this Draft EIR. As long as the local regulations prohibit without exception the type of signage studied in the Draft EIR, the applicant will not seek approvals to implement the signage program. However, as noted in LAMC Sections 14.4.4.B.9 and 14.4.4.B.11, exceptions

to these prohibitions will be permitted to the extent deemed constitutional in the resolution of a U.S. District Court case³. These exceptions would be permitted pursuant to a legally-adopted specific plan, supplemental use district (such as the Hollywood Signage SUD), or an approved development agreement. If these exceptions become allowed following the resolution of the court case, then the applicant may submit an application to seek approvals to implement the signage program. Therefore, the prohibition will not result in a changed level of land use impacts (consistency with local regulations) because no supergraphic or off-site signage will be sought during any period of time which local regulations would prohibit such signage.

Project signs would be required to meet all applicable requirements and regulations under the established City of Los Angeles Ordinance No. 176,172. Project signage would be complementary to and compatible with the building architecture, and responds to the building's location at the Eastern gateway to the Hollywood Entertainment District. The proposed signage would meet the requirements of the Hollywood Signage SUD. No exceptions from the standards of the Hollywood Signage SUD are being requested as part of the proposed project. A Project Permit Compliance approval would be obtained from the City to document this consistency. **Finally, no discretionary approvals are currently being sought for any signage not already allowed by existing regulations. If future signage regulations allow the supergraphic sign program evaluated in this EIR, then approvals may be sought according to such future regulations.**

The second paragraph on page IV.H-24 has been revised as follows:

The site is currently zoned C4-2D-SN and C4-2D. By right, Height District 2 permits an FAR of 6:1; however, the "D" limitation further restricts the FAR to 2:1. The proposed project would exceed the currently permissible 2:1 FAR for the site. The applicant has requested a zone change from the existing C4-2D-SN and C4-2D to a new C4-2D-SN and C4-2D, replacing the existing "D" limitation pursuant to L.A.M.C. Sections 12.32F. L.A.M.C. Section 12.32B authorizes the owner of a property to apply for a change of zone to delete the existing "D" limitation. Without the "D" limitation, the applicable Height District 2 floor area ratio standard of 6:1 would apply to the project site. However, the Hollywood Community Plan footnote 9 limits the FAR on the project site to 4.5:1, or 197,503.55 square feet. **Also, although the Hollywood Community Plan Update is still in its draft phase,** the project would be consistent with the Hollywood Community Plan Update FAR designation of 4.5:1 for the site, **if approved in its current form. This is noted for informational purposes only, as plans are not binding until approved.** Therefore, impacts with respect to floor area ratio would be less than significant with approval of the requested Zone Change.

³ **World Wide Rush, LLC v. City of Los Angeles, United States District Court Case No. CV 07-238 ABC. This case was decided in the City's favor on May 26, 2010, but at the time of publication of this FEIR, the City had not yet received a written mandate directing how exactly to implement the ruling.**

I. NOISE

No corrections or additions are provided.

J. POPULATION AND HOUSING

No corrections or additions are provided.

K. PUBLIC SERVICES

1. FIRE PROTECTION

No corrections or additions are provided.

2. POLICE PROTECTION

No corrections or additions are provided.

3. SCHOOLS

No corrections or additions are provided.

4. PARKS

The following table is added to page IV.K-29:

**Table IV.K-7.5
Summary of Recreation and Park Facilities Serving the Project Area**

<u>PARK NAME</u>	<u>ADDRESS</u>	<u>DRIVING DISTANCE FROM PROJECT SITE</u>	<u>FACILITIES</u>	<u>SIZE (ACRES)</u>
<u>Community Recreation Centers</u>				
<u>Hollywood Recreation Center</u>	<u>1122 Cole Ave.</u>	<u>1.1 miles</u>	<u>Class Park LAPD Stop-In Center Auditorium Basketball Courts (lighted/outdoor) Children's Play Area Community Room Kitchen Multipurpose Sports Field (with lighted ball diamond) Seasonal Pool (outdoor/unheated) Water Slide</u>	<u>3.21</u>

<u>PARK NAME</u>	<u>ADDRESS</u>	<u>DRIVING DISTANCE FROM PROJECT SITE</u>	<u>FACILITIES</u>	<u>SIZE (ACRES)</u>
<u>Yucca Community Center & Park</u>	<u>6671 Yucca St.</u>	<u>1.0 mile</u>	<u>Barbecue Pits</u> <u>Basketball Courts (lighted/outdoor)</u> <u>Children's Play Area</u> <u>Handball Courts (lighted)</u> <u>Picnic Tables</u> <u>Soccer Field (lighted)</u>	<u>0.63</u>
<u>Lemon Grove Recreation Center</u>	<u>4959 Lemon Grove Ave.</u>	<u>1.9 miles</u>	<u>Auditorium</u> <u>Baseball Diamond (lighted)</u> <u>Basketball Courts (lighted/outdoor)</u> <u>Children's Play Area</u> <u>Picnic Tables</u> <u>Batting Cages</u> <u>Jogging Path</u> <u>Kitchen</u> <u>Stage</u> <u>TV Area</u> <u>Outdoor Exercise Equipment</u>	<u>2.62</u>
<u>Barnsdall Art Park Recreation Center</u>	<u>4800 Hollywood Blvd.</u>	<u>1.6 miles</u>	<u>Barnsdall Art Center</u> <u>Gallery Theatre</u> <u>Hollyhock House</u> <u>Junior Art Center</u> <u>Municipal Art Gallery</u>	<u>13.62</u>
<u>Poinsettia Recreation Center</u>	<u>7341 Willoughby Ave.</u>	<u>2.5 miles</u>	<u>Baseball Diamond (lighted)</u> <u>Basketball Courts (lighted/indoor)</u> <u>Basketball Courts (lighted/outdoor)</u> <u>Children's Play Area</u> <u>Handball Courts (lighted)</u> <u>Indoor Gym (without weights)</u> <u>Tennis Courts (lighted)</u> <u>Kitchen</u> <u>Stage</u>	<u>6.3</u>
<u>Griffith Park Recreation Center</u>	<u>3401 Riverside Dr.</u>	<u>3.5 miles to 3401 Riverside Dr.</u> <u>---</u> <u>1.8 miles to boundary of Griffith Park</u>	<u>Autry Museum of Western Heritage</u> <u>Los Angeles Zoo</u> <u>Bird Sanctuary</u> <u>Picnic Areas</u> <u>Soccer Fields (lighted)</u> <u>Tennis Courts (lighted & unlighted)</u> <u>Golf Course/Clubhouse</u> <u>Friendship Auditorium</u> <u>Greek Theatre</u> <u>Griffith Observatory</u> <u>Los Angeles Live Steamers</u>	<u>4.210</u>

<u>PARK NAME</u>	<u>ADDRESS</u>	<u>DRIVING DISTANCE FROM PROJECT SITE</u>	<u>FACILITIES</u>	<u>SIZE (ACRES)</u>
			<u>Griffith Park Miniature Train Rides</u> <u>Merry-Go-Round</u> <u>Pony Rides</u> <u>Rangers Station Headquarters</u> <u>Travel Town Museum</u> <u>Children's Play Area</u> <u>Restrooms</u> <u>Hiking Trails</u> <u>Horseback Riding Trails</u> <u>Refreshment Stands</u> <u>Restaurants</u>	
<u>Parks</u>				
<u>Lexington Pocket Park</u>	<u>5523 Lexington Ave.</u>	<u>1.1 miles</u>	<u>Children's Play Area</u> <u>Picnic Tables</u> <u>Benches</u>	<u>0.32</u>
<u>Selma Park</u>	<u>6567 Selma Ave.</u>	<u>0.7 mile</u>	<u>Children's Play Area</u> <u>Picnic Tables</u> <u>Benches</u>	<u>0.23</u>
<u>De Longpre Park</u>	<u>1350 N. Cherokee Ave.</u>	<u>1.0 mile</u>	<u>Children's Play Area</u> <u>Benches</u> <u>Rudolph Valentino Monument</u>	<u>1.37</u>
<u>Dorothy & Benjamin Smith Park</u>	<u>7020 Franklin Ave.</u>	<u>1.4 miles</u>	<u>Benches</u>	<u>0.49</u>
<u>Runyon Canyon Park (& Wattles Gardens Park)</u>	<u>2000 N. Fuller Ave.</u>	<u>2.2 miles</u>	<u>Children's Play Area</u> <u>Hiking Trail</u> <u>Off-Leash Dog Area</u>	<u>186</u>
<u>Bird Sanctuary</u>	<u>2900 N. Vermont Ave.</u>	<u>2.8 miles</u>	<u>Picnic Tables</u> <u>Hiking Trail</u> <u>Restrooms</u>	<u>1.6</u>
<u>Lake Hollywood Park</u>	<u>3160 Canyon Dr.</u>	<u>2.2 miles</u>	<u>Barbecue Pits</u> <u>Children's Play Area</u> <u>Picnic Tables</u> <u>View of Hollywood Sign</u> <u>Parking</u>	<u>216</u>

<u>PARK NAME</u>	<u>ADDRESS</u>	<u>DRIVING DISTANCE FROM PROJECT SITE</u>	<u>FACILITIES</u>	<u>SIZE (ACRES)</u>
Bronson Canyon	3200 Canyon Dr.	2.2 miles	Picnic Tables Hiking Trail Hollywood Sign Parking Tunnel/Cave	92.1
<p><i>Source: City of Los Angeles, Department of Recreation & Parks, Facility Locator Maps & Driving Directions, website: www.laparks.org/dept.htm, accessed December 3, 2009. Parcel sizes and distances from the Project Site were measured using ZIMAS website: http://zimas.lacity.org, accessed December 4, 2009. The size of Griffith Park was obtained on the City of Los Angeles Department of Recreation and Parks, Griffith Park, General Information, website: http://www.laparks.org/dos/parks/griffithPK/gp_info.htm, accessed December 4, 2009.</i></p>				

5. LIBRARIES

No corrections or additions are provided.

L. TRANSPORTATION/TRAFFIC

The following new mitigation measure has been added to page IV.L-47:

L-2 Should project construction activity temporarily affect the operations of the bus stop itself (including repair and/or replacement of existing broken curb or sidewalks), the project applicant shall contact Metro to coordinate temporary relocation of the bus stop or other applicable measures to maintain bus service to the project area throughout project construction.

Subsequent mitigation measures L-2, L-3, and L-4 will be renumbered as L-3, L-4, and L-5, respectively.

The first sentence of Mitigation Measure L-3 (formerly L-2) has been revised as follows:

L-3 The project ~~should~~ shall upgrade the traffic signal controllers to Type 2070 at the following intersections:

The first sentence of Mitigation Measure L-4 (formerly L-3) has been revised as follows:

L-4 Additionally, the project ~~should~~ shall install a new CCTV camera at:

Mitigation Measure L-5 (formerly L-4) has been revised as follows:

- L-5** Since the project traffic study did not assume any type of project-related trip reduction strategy in the analysis of potential project impacts, ~~LADOT recommends that~~ the applicant shall implement trip-reduction measures designed to reduce the number of vehicle trips generated by the project, in addition to those that may already be required per the provisions of Ordinance No. 168,700. The applicant ~~should~~ shall be required to work with LADOT to develop a Transportation Demand Management (TDM) plan that includes trip reduction goals. A preliminary TDM program ~~should~~ shall be prepared and provided for LADOT review prior to issuance of the first building permit for the project, and a final TDM program be approved by LADOT prior to issuance of any temporary or final certificate of occupancy for the project.

M. UTILITIES

1. WASTEWATER

No corrections or additions are provided.

2. WATER

First bullet item under Mitigation Measure M.2-3 on page IV.M-24 has been revised as follows:

Unless otherwise required, and to the satisfaction of the Department of Building and Safety, the applicant shall install:

- High-efficiency toilets (maximum 1.28 gpf) (~~including~~ **for example**, dual-flush water closets), and high-efficiency urinals (maximum 0.5 gpf) (~~including~~ **for example**, no-flush or waterless urinals), in all restrooms as appropriate. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs of these installations.
- Restroom faucets with a maximum flow rate of 1.5 gallons per minute.
- Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)

3. SOLID WASTE

Mitigation Measure M.3-1 on page IV.M-38 has been revised as follows:

M.3-1 The construction contractor shall ~~only~~**make an effort to** contract for waste disposal services with a company that recycles construction related wastes.

V. GENERAL IMPACT CATEGORIES

No corrections or additions are provided.

VI. ALTERNATIVES TO THE PROPOSED PROJECT

No corrections or additions are provided.

VII. PREPARERS OF THE EIR AND PERSONS CONSULTED

No corrections or additions are provided.

VIII. LIST OF ACRONYMS AND ABBREVIATIONS

No corrections or additions are provided.



*Note: The searchlights as shown in this figure are not proposed and would not be included as part of the actual project.

Source: GMP Architects-LA, April 5, 2009.



*Note: The searchlights as shown in this figure are not proposed and would not be included as part of the actual project.

Source: GMP Architects-LA, April 5, 2009.

IV. MITIGATION MONITORING AND REPORTING PROGRAM

The Mitigation Monitoring and Reporting Program (MMRP) has been prepared in accordance with Public Resources Code Section 21081.6, which requires a Lead or Responsible Agency that approves or carries out a project where an EIR has identified significant environmental effects to adopt a “reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment.” The City of Los Angeles is the Lead Agency for the proposed project.

The MMRP is designed to monitor implementation of all feasible mitigation measures as identified in the Draft and Final EIRs for the proposed project. Mitigation measures are indicated below and are numbered consistent with the relevant section numbering provided in the Draft EIR. Each mitigation measure is listed and categorized by topic with an accompanying discussion of the following:

- The phase of the project during which the mitigation measure should be monitored (i.e., prior to issuance of building permit, pre-construction, construction, or occupancy);
- The enforcement agency (i.e., the agency with the authority to enforce the mitigation measure); and
- The monitoring agency (i.e., the agency which monitors compliance and implementation of the required mitigation measure).

The project applicant shall be obligated to provide certification prior to the issuance of site or building plans that compliance with the required mitigation measures has been achieved. All departments listed below are within the City of Los Angeles unless otherwise noted. The entity responsible for the implementation of all mitigation measures shall be the project applicant unless otherwise noted.

AIR QUALITY

C-1	<p>The project developer shall implement the following measures to reduce the emissions of pollutants generated by heavy-duty diesel-powered equipment operating at the project site throughout the project construction phases. The project developer shall include in construction contracts the control measures as may required under Rule 403, at the time of development, including the following:</p> <ul style="list-style-type: none">• Keep all construction equipment in proper tune in accordance with manufacturer’s specifications.• Use late model heavy-duty diesel-powered equipment at the project site to the extent that it is readily available in the South Coast Air Basin (meaning that it does not have to be imported from another air basin and that the procurement of the equipment would not cause a delay in construction activities of more than two weeks.• Use low-emission diesel fuel for all heavy-duty diesel-powered equipment operating and refueling at the project site to the extent that it is readily available and cost effective in the South Coast Air Basin (meaning that it does not have to be imported from another air basin, that the procurement of the equipment would not cause a delay in construction activities of more than two weeks, that the cost of the equipment use is not more than 20 percent greater than the cost of standard equipment. (This measure does not apply to diesel-powered trucks
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	<p>traveling to and from the site.)</p> <ul style="list-style-type: none"> • Utilize alternative fuel construction equipment (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent that the equipment is readily available and cost effective in the South Coast Air Basin (meaning that it does not have to be imported from another air basin, that the procurement of the equipment would not cause a delay in construction activities of more than two weeks, that the cost of the equipment use is not more than 20 percent greater than the cost of standard equipment. • Limit truck and equipment idling time to five minutes or less and post a sign at the site to inform drivers of this law. • Rely on the electricity infrastructure surrounding the construction sites rather than electrical generators powered by internal combustion engines to the extent feasible. • General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. <p>Monitoring Phase: Construction</p> <p>Enforcement Agency: South Coast Air Quality Management District/Department of Building and Safety</p> <p>Monitoring Agency: South Coast Air Quality Management District/Department of Building and Safety</p>
<p>C-2</p>	<p>The project developer shall implement fugitive dust control measures in accordance with SCAQMD Rule 403. The project developer shall include in construction contracts the control measures as may be required under Rule 403 at the time of development, including but not limited to the following:</p> <ul style="list-style-type: none"> • Use watering to control dust generation during demolition of structures or break-up of pavement. The construction area and vicinity (500-foot radius) must be swept (preferably with water sweepers) and watered at least twice daily. Site wetting must occur often enough to maintain a 10 percent surface soil moisture content throughout all earth moving activities. All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent. • Water active grading/excavation sites and unpaved surfaces at least three times daily. • All paved roads, parking and staging areas must be watered at least once every two hours of active operations. • Site access points must be swept/washed within thirty minutes of visible dirt deposition. • Sweep daily (preferably with water sweepers) all paved parking areas and staging areas. • Onsite stockpiles of debris, dirt or rusty material must be covered or watered at least twice daily. • Cover stockpiles with tarps or apply non-toxic chemical soil binders. • All haul trucks hauling soil, sand, and other loose materials must either be covered or maintain two feet of freeboard. • At least 80 percent of all inactive disturbed surface areas must be watered on a daily basis when there is evidence of wind drive fugitive dust. • Install wind breaks or green screens at the windward sides of construction areas.

	<ul style="list-style-type: none"> • Operations on any unpaved surfaces must be suspended when winds exceed 25 mph. • Suspend excavation and grading activity when winds (instantaneous gusts) exceed 15 miles per hour over a 30-minute period or more, so as to prevent excessive amounts of dust. • All haul trucks hauling soil, sand, and other loose materials must either be covered or maintain two feet of freeboard. • All haul trucks must have a capacity of no less than twelve and three-quarter (12.75) cubic yards. • All loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust. • Traffic speeds on unpaved roads must be limited to 15 miles per hour. • Provide daily clean-up of mud and dirt carried onto paved streets from the site. • Install wheel washers or rumble plates for all exiting trucks, or wash off the tires or tracks of all trucks and equipment leaving the site. • All materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust. • Operations on any unpaved surfaces must be suspended during first and second stage smog alerts. • An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive fugitive dust generation. Any reasonable complaints shall be rectified within 24 hours of their receipt. <p>Monitoring Phase: Construction</p> <p>Enforcement Agency: South Coast Air Quality Management District/Department of Building and Safety</p> <p>Monitoring Agency: South Coast Air Quality Management District/Department of Building and Safety</p>
C-3	<p>For the residential development, in accordance with LEED New Construction Energy and Atmosphere Credit 1, the project shall be constructed with materials that reduce thermal loss and energy demand that meets the Title 24 regulations, or LEED Homes by 10% or greater.</p> <p>Monitoring Phase: Prior to issuance of building permits</p> <p>Enforcement Agency: Department of Building and Safety</p> <p>Monitoring Agency: Department of Building and Safety</p>
C-4	<p>For the residential development, in accordance with LEED New Construction Indoor Environmental Quality Credit 6.1 or LEED Homes (Multi-family for California) Energy and Atmosphere Credit 8.2, the Applicant shall install lighting system controllability as well as</p>

	<p>energy-efficient lighting fixtures.</p> <p>Monitoring Phase: Prior to issuance of building permits</p> <p>Enforcement Agency: Department of Building and Safety</p> <p>Monitoring Agency: Department of Building and Safety</p>
C-5	<p>The Applicant shall provide informational packets to new residents within the development locating nearby public transportation options.</p> <p>Monitoring Phase: Operation</p> <p>Enforcement Agency: Department of Building and Safety</p> <p>Monitoring Agency: Department of Building and Safety</p>

CULTURAL RESOURCES

D-1	<p>The Project shall not remove or damage any portion of the Hollywood Walk of Fame located adjacent to the Project site, consistent with a Retention, Repair and Restoration Plan (the "Walk of Fame Plan") to be approved by the Cultural Heritage Commission and the Hollywood Chamber of Commerce. The Walk of Fame Plan shall describe methods to be used to protect the Walk of Fame from damage during construction. The Walk of Fame Plan shall include the following provisions:</p> <ul style="list-style-type: none"> ▪ The retention and protection of the Walk of Fame from damage during construction. ▪ Standards for the repair of the Walk of Fame to its original condition at the time of construction commencement when construction is completed if damage occurs. ▪ In situ protection with material such as plywood in the vicinity of construction activities. ▪ Identification of specific construction access points to the site for trucks and heavy equipment. To the maximum extent feasible, these access points shall not cross the Walk of Fame. If it is necessary for heavy equipment to cross the Walk of Fame, the applicant shall provide additional protection for the Walk that avoids damage. ▪ Repair or restoration of the Walk of Fame to its original condition at the time of construction commencement. ▪ New paving material next to the Walk of Fame shall be compatible with the charcoal terrazzo used in the Walk of Fame but shall not duplicate it. <p>Monitoring Phase: Construction</p> <p>Enforcement Agency: Department of Building and Safety</p> <p>Monitoring Agency: Cultural Heritage Commission and Hollywood Chamber of Commerce</p>
D-2	<p>The Project Applicant shall contact the Hollywood Chamber of Commerce to determine an appropriate relocation plan for the two easternmost impacted stars, west of Gower Street and Hollywood Boulevard along the project site frontage, and shall work with the City of Los</p>

	<p>Angeles Office of Historic Resources and the Board of Public Works to implement the relocation plan. All parties involved (Project Applicant, Hollywood Chamber, Office of Historic Resources, and Board of Public Works) must agree on the relocation plan prior to issuance of building permits for he Project. The physical relocation of the affected stars may take place concurrent with the construction of street improvements per implementation of Project Mitigation Measure L-1.</p> <p>Monitoring Phase: Prior to issuance of building permit</p> <p>Enforcement Agency: Department of Building and Safety</p> <p>Monitoring Agency: Hollywood Chamber of Commerce, Los Angeles Office of Historic Resources, and Board of Public Works</p>
D-3	<p>If any archaeological materials are encountered during the course of the project development, construction shall be halted. The services of an archaeologist shall be secured by contacting the Center for Public Archaeology - Cal State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist to assess the resources and evaluate the impact. Copies of the archaeological survey, study or report shall be submitted to the UCLA Archaeological Information Center. A covenant and agreement shall be recorded prior to obtaining a grading permit.</p> <p>Monitoring Phase: Grading, Excavation</p> <p>Enforcement Agency: Department of Building and Safety</p> <p>Monitoring Agency: Department of Building and Safety</p>
D-4	<p>If any paleontological materials are encountered during the course of the project development, construction shall be halted. The services of a paleontologist shall be secured by contacting the Center for Public Paleontology - USC, UCLA, Cal State Los Angeles, Cal State Long Beach, or the County Natural History Museum to assess the resources and evaluate the impact. Copies of the paleontological survey, study or report shall be submitted to the Los Angeles County Natural History Museum. A covenant and agreement shall be recorded prior to obtaining a grading permit.</p> <p>Monitoring Phase: Grading, Excavation</p> <p>Enforcement Agency: Department of Building and Safety</p> <p>Monitoring Agency: Department of Building and Safety</p>
D-5	<p>If human remains are discovered at the project site during construction, work at the specific construction site at which the remains have been uncovered shall be suspended, and the City of L.A. Public Works Department and County Coroner shall be immediately notified. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the</p>

	NAHC shall be adhered to in the treatment and disposition of the remains.
	Monitoring Phase: Grading, Excavation
	Enforcement Agency: Department of Building and Safety
	Monitoring Agency: Department of Building and Safety

GEOLOGY AND SOILS

E-1	The project shall comply with the recommendations listed on pages 10 through 18 in the Geotechnical Exploration Report, Proposed Multi-Level Development, SWC Hollywood Boulevard and Gower Street, Hollywood, California, prepared by Professional Service Industries, Inc., dated June 8, 2007 (herein incorporated by reference).
	Monitoring Phase: Grading, Construction
	Enforcement Agency: Department of Building and Safety
	Monitoring Agency: Department of Building and Safety

HAZARDS AND HAZARDOUS MATERIALS

F-1	The project applicant shall prepare a contingency plan and reserve funding in the event that a fugitive UST or area of impacted soil is encountered during site redevelopment. This plan shall include the closure or abandonment of an identified UST under the supervision and in general accordance with the procedures of all appropriate local agencies and the disposal of impacted soil in accordance with all state, local and federal disposal regulations.
	Monitoring Phase: Prior to issuance of grading permit
	Enforcement Agency: Department of Building and Safety
	Monitoring Agency: Department of Building and Safety
F-2	Sediment carries with it other work-site pollutants such as pesticides, cleaning solvents, cement wash, asphalt, and car fluids that are toxic to sea life. <ul style="list-style-type: none"> • All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete; wood, and vegetation. Non recyclable materials/wastes shall be taken to an appropriate landfill. Toxic waste shall be discarded at a licensed regulated disposal site. • Leaks, drips, and spills shall be cleaned up immediately to prevent contaminated soil on

	<p>paved surfaces that can be washed away into the storm drains.</p> <ul style="list-style-type: none"> • Workers shall not hose down pavement at material spills. Dry cleanup methods shall be used whenever possible. • Dumpsters shall be covered and maintained. Place uncovered dumpsters under a roof or cover with tarps or plastic sheeting. • Where truck traffic is frequent, gravel approaches shall be used to reduce soil compaction and limit the tracking of sediment into streets. • All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop cloths shall be used to catch drips and spills. <p>Monitoring Phase: Construction and Operation, where applicable</p> <p>Enforcement Agency: Department of Building and Safety</p> <p>Monitoring Agency: Department of Building and Safety</p>
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HYDROLOGY AND WATER QUALITY

G-1	<p>All grading activities require grading permits from the Department of Building and Safety which include requirements and standards designed to limit potential impacts to acceptable levels. Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. The application of BMPs shall include, but is not limited to, the following mitigation measures:</p> <ul style="list-style-type: none"> • Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity. • Appropriate erosion control and drainage devices shall be provided to the satisfaction of the Building and Safety Department. These measures include interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code, including planting fast-growing annual and perennial grasses in areas where construction is not immediately planned. • Stockpiles and excavated soil shall be covered with secured tarps or plastic sheeting. <p>Monitoring Phase: Grading</p> <p>Enforcement Agency: Department of Building and Safety and Bureau of Sanitation, Watershed Division</p> <p>Monitoring Agency: Department of Building and Safety</p>
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G-2	<p>To reduce the sediment that carries with it other work-site pollutants such as pesticides, cleaning solvents, cement wash, asphalt, and car fluids that are toxic to sea life the following mitigation measures shall be implemented:</p> <ul style="list-style-type: none"> • All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete; wood, and vegetation. Non recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes shall be discarded at a licensed regulated disposal site. • Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains. • Do not hose down pavement at material spills. Dry cleanup methods shall be used whenever possible. • Waste containers shall be covered and maintained. Place uncovered waste containers under a roof or cover with tarps or plastic sheeting. • Where truck traffic is frequent, gravel approaches shall be used to reduce soil compaction and limit the tracking of sediment into streets. • All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop cloths shall be used to catch drips and spills. <p>Monitoring Phase: Construction</p> <p>Enforcement Agency: Department of Building and Safety and Bureau of Sanitation, Watershed Division</p> <p>Monitoring Agency: Department of Building and Safety</p>
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NOISE

I-1	<p>The project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.</p> <p>Monitoring Phase: Construction</p> <p>Enforcement Agency: Department of Building and Safety</p> <p>Monitoring Agency: Department of Building and Safety</p>
I-2	<p>Noise-causing and groundborne vibration-causing construction activities whose specific location on the project site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses.</p>

	<p>Monitoring Phase: Construction</p> <p>Enforcement Agency: Department of Building and Safety</p> <p>Monitoring Agency: Department of Building and Safety</p>
I-3	<p>Construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.</p> <p>Monitoring Phase: Construction</p> <p>Enforcement Agency: Department of Building and Safety</p> <p>Monitoring Agency: Department of Building and Safety</p>
I-4	<p>The use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized. Examples include the use of drills, and jackhammers.</p> <p>Monitoring Phase: Construction</p> <p>Enforcement Agency: Department of Building and Safety</p> <p>Monitoring Agency: Department of Building and Safety</p>
I-5	<p>The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.</p> <p>Monitoring Phase: Construction</p> <p>Enforcement Agency: Department of Building and Safety</p> <p>Monitoring Agency: Department of Building and Safety</p>
I-6	<p>All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors to the extent feasible.</p> <p>Monitoring Phase: Construction</p> <p>Enforcement Agency: Department of Building and Safety</p> <p>Monitoring Agency: Department of Building and Safety</p>
I-7	<p>Two weeks prior to the commencement of construction at the project site, notification must be provided to the immediate surrounding off-site residential uses that discloses the construction schedule, including the various types of activities and equipment that would be occurring</p>

	<p>throughout the duration of the construction period.</p> <p>Monitoring Phase: Two weeks prior to Construction</p> <p>Enforcement Agency: Department of Building and Safety</p> <p>Monitoring Agency: Department of Building and Safety</p>
I-8	<p>Construction times shall be limited to between 7:00 A.M. and 6:00 P.M. so as to not interfere with evening performances at the Music Box Theater.</p> <p>Monitoring Phase: Construction</p> <p>Enforcement Agency: Department of Building and Safety</p> <p>Monitoring Agency: Department of Building and Safety</p>
I-9	<p>A construction liaison shall be provided to inform the nearby recording facility and Music Box Theater when peak noise and vibration activities are scheduled to occur.</p> <p>Monitoring Phase: Construction</p> <p>Enforcement Agency: Department of Building and Safety</p> <p>Monitoring Agency: Department of Building and Safety</p>
I-10	<p>The project developer shall provide ongoing monitoring during the construction phase of the proposed project to ensure that the operation of vibration-generating equipment at the project site would not result in any structural damage to the adjacent Music Box Theater.</p> <p>Monitoring Phase: Construction</p> <p>Enforcement Agency: Department of Building and Safety</p> <p>Monitoring Agency: Department of Building and Safety</p>
I-11	<p>All exterior windows associated with the proposed residential uses at the Project Site shall be constructed with double-pane glass and use exterior wall construction which provides a Sound Transmission Class of 50 or greater as defined in UBC No. 35-1, 1979 edition or any amendment thereto. The applicant, as an alternative, may retain an acoustical engineer to submit evidence, along with the application for a building permit, any alternative means of sound insulation sufficient to mitigate interior noise levels to below a CNEL of 45 dBA in any habitable room.</p> <p>Monitoring Phase: Construction</p>

	Enforcement Agency: Department of Building and Safety
	Monitoring Agency: Department of Building and Safety

PUBLIC SERVICES**Fire**

K.1-1	<p>Prior to recordation of a final map or the approval of a building permit, the applicant shall submit the plot plan for review and approval by the Fire Department.</p> <p>Monitoring Phase: Prior to issuance of building permit</p> <p>Enforcement Agency: Fire Department and Department of Building and Safety</p> <p>Monitoring Agency: Fire Department</p>
K.1-2	<p>Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.</p> <p>Monitoring Phase: Prior to issuance of building permit</p> <p>Enforcement Agency: Fire Department and Department of Building and Safety</p> <p>Monitoring Agency: Fire Department</p>
K.1-3	<p>No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant.</p> <p>Monitoring Phase: Prior to issuance of building permit</p> <p>Enforcement Agency: Fire Department and Department of Building and Safety</p> <p>Monitoring Agency: Fire Department</p>
K.1-4	<p>Access for Fire Department apparatus and personnel to and into all structures, including the parking facility, shall be provided.</p> <p>Monitoring Phase: Prior to issuance of building permits</p> <p>Enforcement Agency: Fire Department and Department of Building and Safety</p> <p>Monitoring Agency: Fire Department</p>

Police

K.2-1	<p>During construction activities, the project developer shall ensure that all onsite areas of active development, material and equipment storage, and vehicle staging, that are adjacent to existing public roadways, be secured to prevent trespass.</p> <p>Monitoring Phase: Construction</p> <p>Enforcement Agency: Police Department and Department of Building and Safety</p> <p>Monitoring Agency: Police Department</p>
K.2-2	<p>Prior to site plan approval, the building and layout design of the proposed project shall include crime prevention features, such as nighttime security lighting, building security systems, and secure parking facilities.</p> <p>Monitoring Phase: Prior to approval of site plan</p> <p>Enforcement Agency: Police Department and Department of Building and Safety</p> <p>Monitoring Agency: Police Department</p>
K.2-3	<p>Prior to the recordation of a final map or the approval of a building permit, the project developer shall submit a plot plan for the proposed development to the LAPD's Crime Prevention Section for review and comment. Security features subsequently recommended by the LAPD shall be implemented, to the extent feasible.</p> <p>Monitoring Phase: Prior to the recordation of a final map or issuance of building permit</p> <p>Enforcement Agency: Police Department and Department of Building and Safety</p> <p>Monitoring Agency: Police Department</p>

Schools

K.3-1	<p>The applicant will pay all applicable mandatory school impact fees to LAUSD to offset the impact of additional student enrollment at schools serving the project area.</p> <p>Monitoring Phase: Prior to certificate of occupancy</p> <p>Enforcement Agency: Los Angeles Unified School District and Department of Building and Safety</p> <p>Monitoring Agency: Los Angeles Unified School District</p>
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Parks

K.4-1	<p>The applicant shall pay the required \$200 per dwelling unit fee to the Department of Building and Safety in accordance to the Dwelling Unit Construction Tax required by the Los Angeles Municipal Code Section 21.10.3(b).</p> <p>Monitoring Phase: Prior to certificate of occupancy</p> <p>Enforcement Agency: Department of Building and Safety</p> <p>Monitoring Agency: Department of Building and Safety</p>
K.4-2	<p>The applicant shall comply with the obligation to pay Quimby/Park Fees as required by the Los Angeles Municipal Code Section 17.12.</p> <p>Monitoring Phase: Prior to certificate of occupancy</p> <p>Enforcement Agency: Department of Building and Safety and Department of Recreation and Parks</p> <p>Monitoring Agency: Department of Recreation and Parks</p>

TRANSPORTATION AND TRAFFIC

L-1	<p>Construction activities such as lane closures and haul truck routes shall not overlap or peak at the same time in the same area, or along the same routes. This coordination shall also extend to the approved locations of the haul truck staging and construction worker parking locations, to avoid secondary parking impacts in or near the project vicinity due to large trucks or numerous worker vehicles.</p> <p>Monitoring Phase: Construction</p> <p>Enforcement Agency: Department of Building and Safety and Los Angeles Department of Transportation</p> <p>Monitoring Agency: Los Angeles Department of Transportation</p>
L-2	<p>Should project construction activity temporarily affect the operations of the bus stop itself (including repair and/or replacement of existing broken curb or sidewalks), the project applicant shall contact Metro to coordinate temporary relocation of the bus stop or other applicable measures to maintain bus service to the project area throughout project construction.</p> <p>Monitoring Phase: Construction</p>

	<p>Enforcement Agency: Department of Building and Safety and Metro</p> <p>Monitoring Agency: Metro</p>
L-3	<p>The project shall upgrade the traffic signal controllers to Type 2070 at the following intersections:</p> <ul style="list-style-type: none"> • Bronson Avenue and Franklin Avenue • Gower Street and Sunset Boulevard • Gower Street and Franklin Avenue • Vine Street and Yucca Street <p>Monitoring Phase: Prior to issuance of building permit</p> <p>Enforcement Agency: Department of Building and Safety and Los Angeles Department of Transportation</p> <p>Monitoring Agency: Los Angeles Department of Transportation</p>
L-4	<p>Additionally, the project shall install a new CCTV camera at:</p> <ul style="list-style-type: none"> • Gower Street and Franklin Avenue • Sunset Boulevard and Vine Street <p>Monitoring Phase: Prior to issuance of building permit</p> <p>Enforcement Agency: Department of Building and Safety and Los Angeles Department of Transportation</p> <p>Monitoring Agency: Los Angeles Department of Transportation</p>
L-5	<p>Since the project traffic study did not assume any type of project-related trip reduction strategy in the analysis of potential project impacts, the applicant shall implement trip-reduction measures designed to reduce the number of vehicle trips generated by the project, in addition to those that may already be required per the provisions of Ordinance No, 168,700. The applicant shall be required to work with LADOT to develop a Transportation Demand Management (TDM) plan that includes trip reduction goals. A preliminary TDM program shall be prepared and provided for LADOT review prior to issuance of the first building permit for the project, and a final TDM program be approved by LADOT prior to issuance of any temporary or final certificate of occupancy for the project.</p> <p>Monitoring Phase: Prior to issuance of certificate of occupancy</p> <p>Enforcement Agency: Department of Building and Safety and Los Angeles Department of Transportation</p>

	Monitoring Agency: Los Angeles Department of Transportation
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UTILITIES

Wastewater

M.1-1	<p>Gauging of the current flow level (d/D) in the 8-inch lines on Hollywood Boulevard, Selma Avenue, and Sunset Boulevard, the 21-inch line on Sunset Boulevard, the 30-inch line on El Centro Avenue, and the 10-inch and 18-inch lines on El Centro Avenue shall be required before hook-up.</p> <p>Monitoring Phase: Prior to issuance of building permits</p> <p>Enforcement Agency: Department of Building and Safety</p> <p>Monitoring Agency: Bureau of Sanitation, Wastewater Division and Department of Building and Safety</p>
M.1-2	<p>The developer shall either have to increase the capacity of any lines that would not have sufficient capacity for the project discharge or retain discharge on-site for release during off-peak flow.</p> <p>Monitoring Phase: Prior to issuance of building permits</p> <p>Enforcement Agency: Department of Building and Safety</p> <p>Monitoring Agency: Bureau of Sanitation, Wastewater Division and Department of Building and Safety</p>

Water Supply

M.2-1	<p>The project shall comply with Ordinance No. 170,978 (Water Management Ordinance) which imposed numerous water conservation measures in landscape, installation, and maintenance (e.g. drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).</p> <p>Monitoring Phase: Prior to issuance of building permits</p> <p>Enforcement Agency: Department of Water and Power and Department of Building and Safety</p> <p>Monitoring Agency: Department of Water and Power and Department of Building and Safety</p>
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M.2-2	<p>If conditions dictate, the Department of Water and Power may postpone new water connections for this project until water supply capacity is adequate.</p> <p>Monitoring Phase: Prior to issuance of building permits</p> <p>Enforcement Agency: Department of Water and Power and Department of Building and Safety</p> <p>Monitoring Agency: Department of Water and Power and Department of Building and Safety</p>
M.2-3	<p>Unless otherwise required, and to the satisfaction of the Department of Building and Safety, the applicant shall install:</p> <ul style="list-style-type: none"> • High-efficiency toilets (maximum 1.28 gpf) (for example, dual-flush water closets), and high-efficiency urinals (maximum 0.5 gpf) (for example, no-flush or waterless urinals), in all restrooms as appropriate. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs of these installations. • Restroom faucets with a maximum flow rate of 1.5 gallons per minute. • Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system). <p>Monitoring Phase: Prior to issuance of certificate of occupancy</p> <p>Enforcement Agency: Department of Water and Power and Department of Building and Safety</p> <p>Monitoring Agency: Department of Water and Power and Department of Building and Safety</p>
M.2-4	<p>Unless otherwise required, all restroom faucets except those in residential units shall be of a self-closing design, to the satisfaction of the Department of Building and Safety.</p> <p>Monitoring Phase: Prior to issuance of building permits</p> <p>Enforcement Agency: Department of Water and Power and Department of Building and Safety</p> <p>Monitoring Agency: Department of Water and Power and Department of Building and Safety</p>
M.2-5	<p>Unless otherwise required, and to the satisfaction of the Department of Building and Safety, the applicant shall:</p>

	<ul style="list-style-type: none"> • Install no more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute. • Install and utilize only high-efficiency clothes washers (water factor of 6.0 or less) in the project, if proposed to be provided in either individual units and/or in a common laundry room(s). If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs of these installations. • Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance. <p>Monitoring Phase: Prior to issuance of building permits</p> <p>Enforcement Agency: Department of Water and Power and Department of Building and Safety</p> <p>Monitoring Agency: Department of Water and Power and Department of Building and Safety</p>
M.2-6	<p>The availability of recycled water should be investigated as a source to irrigate large landscaped areas.</p> <p>Monitoring Phase: Prior to issuance of building permits</p> <p>Enforcement Agency: Department of Water and Power and Department of Building and Safety</p> <p>Monitoring Agency: Department of Water and Power and Department of Building and Safety</p>
M.2-7	<p>Significant opportunities for water savings exist in air conditioning systems that utilize evaporative cooling (i.e., employ cooling towers). LADWP should be contacted for specific information on appropriate measures.</p> <p>Monitoring Phase: Prior to issuance of building permits</p> <p>Enforcement Agency: Department of Water and Power and Department of Building and Safety</p> <p>Monitoring Agency: Department of Water and Power and Department of Building and Safety</p>

Solid Waste

M.3-1	<p>The construction contractor shall make an effort to contract for waste disposal services with a company that recycles construction related wastes.</p> <p>Monitoring Phase: Construction</p> <p>Enforcement Agency: Bureau of Sanitation and Department of Building and Safety</p> <p>Monitoring Agency: Bureau of Sanitation and Department of Building and Safety</p>
M.3-2	<p>The project applicant shall separate onsite drywall materials from the construction trash debris and shall contract with a waste disposal company to sort and recycle remaining materials.</p> <p>Monitoring Phase: Construction</p> <p>Enforcement Agency: Bureau of Sanitation and Department of Building and Safety</p> <p>Monitoring Agency: Bureau of Sanitation and Department of Building and Safety</p>
M.3-3	<p>Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. The proposed project shall comply with all applicable adopted recycling and waste diversion policies of the City of Los Angeles.</p> <p>Monitoring Phase: Prior to issuance of certificate of occupancy</p> <p>Enforcement Agency: Bureau of Sanitation and Department of Building and Safety</p> <p>Monitoring Agency: Bureau of Sanitation and Department of Building and Safety</p>