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William Lamborn <william.lamborn@lacity.org>

Fwd: Appeal to case VTT-73568-1A

1 message

Heather Bleemers <Heather.Bleemers@lacity.org> Fri, Nov 9, 2018 at 1:35 PM
To: William Lamborn <william.lamborn@lacity.org>, "Casper, Kyndra" <Kyndra.Casper@dlapiper.com>

FYI

Heather Bleemers
Senior City Planner
Department of City Planning
T: (213) 847-3682
221 N. Figueroa Street, 13th Floor
Los Angeles, CA 90012

---------- Forwarded message ---------
From: **Sophie Gabel-Scheinbaum** <sophie.gabel-scheinbaum@lacity.org>
Date: Fri, Nov 9, 2018 at 1:33 PM
Subject: Appeal to case VTT-73568-1A
To: Rocky Wiles <Rocky.Wiles@lacity.org>, Charlie Rausch <charlie.rausch@lacity.org>, Heather Bleemers <Heather.Bleemers@lacity.org>

Hi all,

An appeal has been made as to the entire decision of case VTT-73568-1A. I've attached the Appeal Application, Appeal Findings, as well as Appeal Decision Report for your reference.

Thank you!

Best,

--

Sophie Gabel-Scheinbaum,
Planning Assistant
Department of City Planning
201 N. Figueroa St., 4th Floor DSC
Los Angeles, CA 90012

Please consider the environment before printing this email.

3 attachments

Appeal Application to VTT-73568-1A.pdf
116K

Appeal Findings to VTT-73568-1A.pdf
500K

Appeal Decision Report VTT-73568-1A.pdf
2273K

APPLICATIONS:

ORIGINAL

APPEAL APPLICATION

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

1. APPELLANT BODY/CASE INFORMATION

Appellant Body:

☐ Area Planning Commission ☐ City Planning Commission ☑ City Council ☐ Director of Planning

Regarding Case Number: VTT-73568-1A; ENV-2015-2026-EIR

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

Final Date to Appeal: 11/13/2018

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

2. APPELLANT INFORMATION

Appellant's name (print): Douglas P. Carstens

Company: Chatten-Brown & Carstens LLP

Mailing Address: 2200 Pacific Coast Highway #318

City: Hermosa Beach State: CA Zip: 90254

Telephone: (310) 798-2400 E-mail:

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

  ☐ Self ☑ Other: Livable LA

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

3. REPRESENTATIVE/AGENT INFORMATION

Representative/Agent name (if applicable):

Company:

Mailing Address:

City: State: Zip:

Telephone: E-mail:

4. JUSTIFICATION/REASON FOR APPEAL

Is the entire decision, or only parts of it being appealed? ☑ Entire ☐ Part

Are specific conditions of approval being appealed? ☐ Yes ☑ No

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

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

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

5. APPLICANT'S AFFIDAVIT

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

Appellant Signature: _____ Date: Nov 8, 2018

6. FILING REQUIREMENTS/ADDITIONAL INFORMATION

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

This Section for City Planning Staff Use Only		
Base Fee: 89.00	Reviewed & Accepted by (DSC Planner):	Date: 11/9/2018
Receipt No: 0103966992	Deemed Complete by (Project Planner):	Date:
☒ Determination authority notified	☐ Original receipt and BTC receipt (if original applicant)	

LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300
www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: OCT 31 2018

Case No. VTT-73568-1A Council District: 13 – O'Farrell
CEQA: ENV-2015-2026-EIR; SCH No. 2015101073
Plan Area: Hollywood
Related Case: CPC-2015-2025-DB-MCUP-CU-SPR

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

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

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

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

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

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

1. **Found**, pursuant to Sections 21082.1(c) and 21081.6 of the Public Resources Code, the City Planning Commission has reviewed and considered the information contained in the Environmental Impact Report prepared for this project, which includes the Draft EIR, No. ENV-2015-2026-EIR (SCH No. 2015101073), dated May 11, 2017, the Final EIR, dated May 4, 2018, and the Errata, dated August 2018 (Crossroads Hollywood Project EIR), as well as the whole of the administrative record;
   Certified the following:
   a. The Crossroads Hollywood Project EIR has been completed in compliance with the California Environmental Quality Act (CEQA);
   b. The Crossroads Hollywood Project EIR was presented to the City Planning Commission as a decision-making body of the lead agency; and
   c. The Crossroads Hollywood Project EIR reflects the independent judgment and analysis of the lead agency;
   Adopted the following:

a. The related and prepared Crossroads Hollywood Project Environmental Findings;
b. The Statement of Overriding Considerations;
c. The Mitigation Monitoring Program prepared for the Crossroads Hollywood Project EIR;

2. **Denied** the appeal, and **sustained** the decision of the Deputy Advisory Agency in approving Vesting Tentative Tract Map No. 73568 for the merger and resubdivision of a 6.86 net acre site into 5 ground lots and 30 airspace lots;
3. **Adopted** the Conditions of Approval; and
4. **Adopted** the Findings.

The vote proceeded as follows:

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

Vote: **9 - 0**

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

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

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

FINAL APPEAL DATE: NOV 13 2018

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

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

Attachments: Conditions of Approval and Findings

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

CONDITIONS OF APPROVAL

BUREAU OF ENGINEERING - SPECIFIC CONDITIONS

1. That any fee deficit under Work Order No. E1908005 be paid.

2. That five-foot wide strips of land be dedicated along Las Palmas Avenue adjoining the tract adjoining Ground Lots No. 1, 2 and 4 to complete 30-foot wide half public rights-of-ways including 15-foot radius property line returns at the intersections with Selma Avenue and a 20-foot radius property line return at the intersection with Sunset Boulevard. Above dedications shall be limited to depth of 10-foot below finished sidewalk surfaces and limited to 14-foot above finished sidewalk surfaces and all widths shall be limited to 4-foot measured from the new property lines.

3. That seven-foot wide strips of land be dedicated along McCadden Place adjoining the tract to complete a 60-foot wide public right-of-way including 15-foot radius property line returns at the intersection with Selma Avenue. Above dedications shall be limited to depth of 10-foot below finished sidewalk surfaces and limited to 14-foot above finished sidewalk surfaces and all widths shall be limited to 4-foot measured from the new property lines.

4. That a 20-foot radius property line return be dedicated at the intersection of Highland Avenue and Selma Avenue adjoining the tract.

5. That a revised Tentative Tract map shall be submitted showing the above limited dedications for review and approval only. No revised map fee or public hearing is necessary.

6. That the subdivider make a request to the Central District Office of the Bureau of Engineering to determine the capacity of existing sewers in this area.

7. That a set of drawings for airspace lots be submitted to the City Engineer showing the followings:

   a. Plan view at different elevations.
   b. Isometric views.
   c. Elevation views.
   d. Section cuts at all locations where air space lot boundaries change.

8. That the owners of the property record an agreement satisfactory to the City Engineer stating that they will grant the necessary private easements for ingress and egress purposes to serve proposed airspace lots to use upon the sale of the respective lots and they will maintain the private easements free and clear of obstructions and in safe conditions for use at all times.

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

DEPARTMENT OF BUILDING AND SAFETY, GRADING DIVISION

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

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

DEPARTMENT OF BUILDING AND SAFETY, ZONING DIVISION

10. Prior to recordation of the final map, the Department of Building and Safety, Zoning Division shall certify that no Building or Zoning Code violations exist on the subject site. In addition, the following items shall be satisfied:

    a. Provide copy of building records, plot plan, and certificate of occupancy of all existing structures to remain (Ground Lot 1) to verify the last legal use and the number of parking spaces required and provided on each site.

    b. Obtain permits for the demolition or removal of all existing structures on the site. Accessory structures and uses are not permitted to remain on lots without a main structure or use. Provide copies of the demolition permits and signed inspection cards to show completion of the demolition work.

    c. A portion of the existing boundary of Ground Lot 1 was cut after 7/29/1962. Any lot cut done after 7/29/1962 requires a Certificate of Compliance in order to be considered a legal lot cut. Provide a copy of the Certificate of Compliance for the lot cut prior to obtaining the Zoning clearance.

    d. Provide a copy of the Zone Change ordinance to remove the D condition prior to obtaining Zoning clearance.

    e. Provide a copy of affidavit AFF-6664 (for Ground Lot 1), AF-93-1832045-MB and AF-93-1832044-LT (for Ground Lot 3), and AFF-10120 (for Ground Lot 5). Show compliance with all the conditions/requirements of the above affidavit(s) as applicable. Termination of above affidavit(s) may be required after the Map has been recorded. Obtain approval from the Department, on the termination form, prior to recording.

    f. Provide a copy of CPC cases CPC cases CPC-2016-4927-DA, CPC-2016-1450-CPU, CPC-2015-2025-ZC-HD-MCUP-CU-ZV-SPR, and CPC-2014-669-CPU. Show compliance with all the conditions/requirements of the CPC cases as applicable.

    g. Show all street dedication as required by Bureau of Engineering and provide net lot area after all dedication. “Area” requirements shall be re-checked as per net lot area after street dedication. Front and side yard requirements shall be required to comply with current code as measured from new property lines after dedications.

    h. The submitted Map does not comply with the maximum density (200 s.f. of lot area/dwelling unit) requirement of the R5 Zone as allowed for the C Zone within the Regional Center Commercial Area. Revise the Map to show compliance with the above requirement for each Ground Lot or obtain approval from the Department of City Planning.

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

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

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

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

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

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

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

DEPARTMENT OF TRANSPORTATION

11. Prior to recordation of the final map, satisfactory arrangements shall be made with the Department of Transportation to assure:

a. A minimum of 20-foot reservoir space be provided between any security gate(s) and the property line when driveway is serving less than 100 parking spaces. Reservoir space will increase to 40-feet and 60-feet when driveway is serving more than 100 and 300 parking spaces respectively.

b. Parking stalls shall be designed so that a vehicle is not required to back into or out of any public street or sidewalk.

c. A parking area and driveway plan be submitted to the Citywide Planning Coordination Section of the Department of Transportation for approval prior to submittal of building permit plans for plan check by the Department of Building and Safety. Transportation approvals are conducted at 201 N. Figueroa Street, Room 550. For an appointment, call (213) 482-7024.

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

FIRE DEPARTMENT

12. Prior to the recordation of the final map, a suitable arrangement shall be made satisfactory to the Fire Department, binding the subdivider and all successors to the following:

a. Access for Fire Department apparatus and personnel to and into all structures shall be required.

b. The entrance to a Residence lobby must be within 50 feet of the desired street address curb face.

c. Where above ground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance of individual units.

d. The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

e. No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

f. The Fire Department may require additional vehicular access where buildings exceed 28 feet in height.

g. 2014 CITY OF LOS ANGELES FIRE CODE, SECTION 503.1.4 (EXCEPTION)

i. When this exception is applied to a fully fire sprinklered residential building equipped with a wet standpipe outlet inside an exit stairway with at least a 2 hour rating the distance from the wet standpipe outlet in the stairway to the entry door of any dwelling unit or guest room shall not exceed 150 feet of horizontal travel AND the distance from the edge of the roadway of an improved street or approved fire lane to the door into the same exit stairway directly from outside the building shall not exceed 150 feet of horizontal travel.

ii. It is the intent of this policy that in no case will the maximum travel distance exceed 150 feet inside the structure and 150 feet outside the structure. The term “horizontal travel” refers to the actual path

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

iii. This policy does not apply to single-family dwellings or to non-residential buildings.

h. Entrance to the main lobby shall be located off the address side of the building.

i. Any required Fire Annunciator panel or Fire Control Room shall be located within 50ft visual line of site of the main entrance stairwell or to the satisfaction of the Fire Department.

j. Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.

k. The width of private roadways for general access use and fire lanes shall not be less than 20 feet, and the fire lane must be clear to the sky.

l. Fire lanes, where required and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.

m. Submit plot plans indicating access road and turning area for Fire Department approval.

n. During demolition, the Fire Department access will remain clear and unobstructed.

o. Adequate public and private fire hydrants shall be required.

p. That in order to provide assurance that the proposed common fire lane and fire protection facilities, for the project, not maintained by the City, are properly and adequately maintained, the sub-divider shall record with the County Recorder, prior to the recordation of the final map, a covenant and agreement (Planning Department General Form CP-6770) to assure the following:

i. The establishment of a property owners association, which shall cause a yearly inspection to be, made by a registered civil engineer of all common fire lanes and fire protection facilities. The association will undertake any necessary maintenance and corrective measures. Each future property owner shall automatically become a member of the association or organization required above and is automatically subject to a proportionate share of the cost.

ii. The future owners of affected lots with common fire lanes and fire protection facilities shall be informed or their responsibility for the maintenance of the devices on their lots. The future owner and all successors will be presented

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

iii. In the event that the property owners association fails to maintain the common property and easements as required by the CC and R's, the individual property owners shall be responsible for their proportional share of the maintenance.

iv. Prior to any building permits being issued, the applicant shall improve, to the satisfaction of the Fire Department, all common fire lanes and install all private fire hydrants to be required.

v. That the Common Fire Lanes and Fire Protection facilities be shown on the Final Map.

q. Those plot plans be approved by the Fire Department showing fire hydrants and access for each phase of the project prior to the recording of the final map for that phase. Each phase shall comply independently with code requirements.

r. Standard cut-corners will be used on all turns.

s. The Fire Department may require additional roof access via parapet access roof ladders where buildings exceed 28 feet in height, and when overhead wires or other obstructions block aerial ladder access.

t. Site plans shall include all overhead utility lines adjacent to the site.

u. Any roof elevation changes in excess of 3 feet may require the installation of ships ladders.

v. All parking restrictions for fire lanes shall be posted and/or painted prior to any Temporary Certificate of Occupancy being issued.

w. Plans showing areas to be posted and/or painted, “FIRE LANE NO PARKING” shall be submitted and approved by the Fire Department prior to building permit application sign-off.

x. Electric Gates approved by the Fire Department shall be tested by the Fire Department prior to Building and Safety granting a Certificate of Occupancy.

y. 5101.1 Emergency responder radio coverage in new buildings. All new buildings shall have approved radio coverage for emergency responders within the building based upon the existing coverage levels of the public safety communication systems of the jurisdiction at the exterior of the building. This section shall not require improvement of the existing public safety communication systems.

z. City of Los Angeles Fire Department Hydrants and Access design requirements for the outdoor and indoor use of dependent access (attended parking) Mechanical Car Stackers – 2, 3, & 4 by levels high. The provisions of this document shall regulate the use of Mechanical Car Stackers by addressing the arrangement, location and size of areas, height, separations, housekeeping, and fire protection.

aa. Recently, the Los Angeles Fire Department (LAFD) modified Fire Prevention Bureau (FPB) Requirement 10. Helicopter landing facilities are still required on all High-Rise buildings in the City. However, FPB's Requirement 10 has been revised to provide two new alternatives to a full FAA-approved helicopter landing facilities. Each standpipe in a new high-rise building shall be provided with two remotely located FDC's for each zone in compliance with NFPA 14-2013, Section 7.12.2.

bb. The applicant is further advised that all subsequent contact regarding these conditions must be with the Hydrant and Access Unit. This would include clarification, verification of condition compliance and plans or building permit applications, etc., and shall be accomplished BY APPOINTMENT ONLY, in order to assure that you receive service with a minimum amount of waiting please call (213) 482-6509. You should advise any consultant representing you of this requirement as well.

BUREAU OF STREET LIGHTING

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

DEPARTMENT OF WATER AND POWER

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

BUREAU OF SANITATION

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

INFORMATION TECHNOLOGY AGENCY

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

DEPARTMENT OF RECREATION AND PARKS

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

URBAN FORESTRY DIVISION AND THE DEPARTMENT OF CITY PLANNING

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

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

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

DEPARTMENT OF CITY PLANNING-SITE SPECIFIC CONDITIONS

19. Prior to the recordation of the final map, the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department, binding the subdivider and all successors to the following:

    a. Limit the proposed development to 950 residential units, 308 hotel rooms, and approximately 190,000 square feet of commercial/retail space, for a total of approximately 1,381,000 square feet (including Crossroads of the World and the former Hollywood Reporter Building), consistent with the C4-2D-SN and C4-2D Zones.

    b. Off-street parking for residential and commercial uses shall comply with the requirements of Case No. CPC-2015-2025-DB-MCUP-CU-SPR. In the event that Case No. CPC-2015-2025-DB-MCUP-CU-SPR is not approved, the project shall comply with the following requirements:

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

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

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

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

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

c. The applicant shall install an air filters capable of achieving a Minimum Efficiency Rating Value (MERV) of at least 11 or better in order to reduce the effects of diminished air quality on the occupants of the project.

a. That a solar access report shall be submitted to the satisfaction of the Advisory Agency prior to obtaining a grading permit.

b. That the subdivider considers the use of natural gas and/or solar energy and consults with the Department of Water and Power and Southern California Gas Company regarding feasible energy conservation measures.

c. Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material.

d. The applicant shall install shielded lighting to reduce any potential illumination affecting adjacent properties.

20. Prior to the issuance of the building permit or the recordation of the final map, a copy of CPC-2015-2025-DB-MCUP-CU-SPR shall be submitted to the satisfaction of the Advisory Agency. In the event that CPC-2015-2025-DB-MCUP-CU-SPR is not approved, the subdivider shall submit a tract modification.

21. **Indemnification and Reimbursement of Litigation Costs.**

Applicant shall do all of the following:

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

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

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

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

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

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

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

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

For purposes of this condition, the following definitions apply:

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

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

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

DEPARTMENT OF CITY PLANNING-ENVIRONMENTAL MITIGATION MEASURES

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

23. Prior to the recordation of the final map, the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department, binding the subdivider and all successors to the following:

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

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

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

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

Enforcement Agency: The agency with the power to enforce the Mitigation Measure/Project Design Feature.
Monitoring Agency: The agency to which reports involving feasibility, compliance, implementation and development are made.
Monitoring Phase: The phase of the project during which the Mitigation Measure/Project Design Feature shall be monitored.
Monitoring Frequency: The frequency at which the Mitigation Measure/Project Design Feature shall be monitored.
Action Indicating Compliance: The action of which the Enforcement or Monitoring Agency indicates that compliance with the required Mitigation Measure/Project Design Feature has been implemented.

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

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

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

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

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

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

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

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

Aesthetics, Views, Light/Glare, and Shading

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

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

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

Monitoring Phase: Construction

Monitoring Frequency: Once during field inspection

Action Indicating Compliance: Field inspection sign-off

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

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

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

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

Monitoring Phase: Construction

Monitoring Frequency: During field inspection(s)

Action Indicating Compliance: Field inspection sign-offs

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

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

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

Monitoring Phase: Construction

Monitoring Frequency: Once during field inspection

Action Indicating Compliance: Field inspection sign-off

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

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

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

Monitoring Phase: Pre-construction; Construction

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

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

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

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

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

Monitoring Phase: Construction

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

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

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

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

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

Monitoring Phase: Construction

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

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

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

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

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

Monitoring Phase: Construction

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

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

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

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

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

Monitoring Phase: Construction

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

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

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

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

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

Monitoring Phase: Construction

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

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

Air Quality

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

Enforcement Agency: South Coast Air Quality Management District

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

Monitoring Phase: Construction

Monitoring Frequency: Once during field inspection

Action Indicating Compliance: Field inspection sign-off

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

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

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

Monitoring Phase: Construction

Monitoring Frequency: Periodically during construction

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

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

Enforcement Agency: South Coast Air Quality Management District

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

Monitoring Phase: Construction

Monitoring Frequency: Once during every second-stage smog alert

Action Indicating Compliance: Field inspection sign-off

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

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

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

Monitoring Phase: Construction

Monitoring Frequency: Periodically during construction

Action Indicating Compliance: Field inspection sign-off

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

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

Enforcement Agency: South Coast Air Quality Management District

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

Monitoring Phase: Pre-Construction; construction

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

Action Indicating Compliance: Field inspection sign-off

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

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

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

Monitoring Phase: Construction

Monitoring Frequency: Periodically during construction

Action Indicating Compliance: Field inspection sign-off

Greenhouse Gas Emissions

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

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

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

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

Monitoring Phase: Pre-construction; construction

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

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

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

Enforcement Agency: South Coast Air Quality Management District

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

Monitoring Phase: Pre-Construction; construction

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

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

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

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

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

Monitoring Phase: Pre-construction; construction

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

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

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

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

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

Monitoring Phase: Pre-construction; construction

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

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

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

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

Monitoring Agency: City of Los Angeles Department of City Planning

Monitoring Phase: Prior to occupancy

Monitoring Frequency: Once prior to occupancy

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

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

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

Monitoring Agency: City of Los Angeles Department of City Planning

Monitoring Phase: Prior to occupancy

Monitoring Frequency: Once prior to occupancy

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

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

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

Monitoring Agency: City of Los Angeles Department of City Planning

Monitoring Phase: Prior to occupancy

Monitoring Frequency: Once prior to occupancy

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

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

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

Monitoring Agency: City of Los Angeles Department of City Planning

Monitoring Phase: Prior to occupancy

Monitoring Frequency: Once prior to occupancy

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

Cultural Resources

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

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

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

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Project plan check

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

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

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

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

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

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Project plan check

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

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

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

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

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Project plan check

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

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

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

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

Monitoring Phase: Post-construction

Monitoring Frequency: Annually

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

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

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

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

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Project plan check

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

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

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

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

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

Monitoring Phase: Pre-construction

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

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

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

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

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

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Project plan check

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

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

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

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

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Project plan check

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

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

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

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

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Project plan check

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

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

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

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

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Project plan check

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

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

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

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

Monitoring Phase: Post-construction

Monitoring Frequency: Annually

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

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

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

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

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Project plan check

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

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

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

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

Monitoring Phase: Pre-construction

Monitoring Frequency: Once prior to demolition

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

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

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

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

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

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

Monitoring Phase: Pre-construction

Monitoring Frequency: Once prior to demolition

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

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

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

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

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

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

Monitoring Phase: Pre-construction

Monitoring Frequency: Once prior to demolition

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

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

Enforcement Agency: Los Angeles Department of Building and Safety

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

Monitoring Phase: Construction

Monitoring Frequency: To be determined by consultation with paleontologist

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

Hazards and Hazardous Materials

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

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

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

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

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

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

Noise

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

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

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

Monitoring Phase: Construction

Monitoring Frequency: Once during field inspection

Action Indicating Compliance: Field inspection sign-off

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

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

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

Monitoring Phase: Construction

Monitoring Frequency: Periodically during construction

Action Indicating Compliance: Field inspection sign-off

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

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

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

Monitoring Phase: Pre-construction; construction

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

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

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

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

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

Monitoring Phase: Post-construction

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

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

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

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

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

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

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

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

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

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

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

Monitoring Phase: Pre-construction; construction.

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

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

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

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

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

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

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

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

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

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

Monitoring Phase: Pre-construction; construction

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

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

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

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

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

Monitoring Phase: Pre-construction; construction

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

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

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

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

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

Monitoring Phase: Pre-construction; construction

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

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

Public Services—Police Protection

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

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

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

Monitoring Phase: Construction

Monitoring Frequency: Once during field inspection

Action Indicating Compliance: Field inspection sign-off

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

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

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

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

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

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

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

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

Monitoring Phase: Operation

Monitoring Frequency: Annually

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

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

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

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

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

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

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

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

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

Monitoring Agency: City of Los Angeles Department of City Planning

Monitoring Phase: Pre-construction

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

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

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

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

Monitoring Agency: City of Los Angeles Department of City Planning

Monitoring Phase: Post-construction

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

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

Public Services—Fire Protection

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

Enforcement Agency: Los Angeles Fire Department

Monitoring Agency: Los Angeles Fire Department

Monitoring Phase: Pre-construction; construction

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

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

Traffic, Access, and Parking

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

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

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

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

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

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

Enforcement Agency: City of Los Angeles Department of Transportation

Monitoring Agency: City of Los Angeles Department of Transportation

Monitoring Phase: Pre-construction; construction

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

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

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

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

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

Enforcement Agency: City of Los Angeles Department of Transportation

Monitoring Agency: City of Los Angeles Department of Transportation

Monitoring Phase: Construction

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

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

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

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

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

Monitoring Agency: City of Los Angeles Department of Transportation

Monitoring Phase: Construction

Monitoring Frequency: Once prior to issuance of Certificate of Occupancy

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

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

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

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

Monitoring Agency: City of Los Angeles Department of Transportation

Monitoring Phase: Construction

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

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

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

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

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

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

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

Monitoring Agency: City of Los Angeles Department of Transportation

Monitoring Phase: Construction

Monitoring Frequency: Once prior to issuance of Certificate of Occupancy

Action Indicating Compliance: Issuance of Certificate of Occupancy

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

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

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

Monitoring Agency: City of Los Angeles Department of Transportation

Monitoring Phase: Construction

Monitoring Frequency: Once prior to issuance of Certificate of Occupancy

Action Indicating Compliance: Issuance of Certificate of Occupancy

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

shall include the residential neighborhoods within the boundaries listed below:

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

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

Enforcement Agency: City of Los Angeles Department of Transportation

Monitoring Agency: City of Los Angeles Department of Transportation

Monitoring Phase: Pre-Construction

Monitoring Frequency: Once prior to issuance of building permit

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

Utilities and Service Systems—Water Supply and Infrastructure

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

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

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

Weather-based or soil moisture–based controller for irrigation

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

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

Monitoring Phase: Pre-construction; construction

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

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

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

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

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

Monitoring Phase: Pre-construction; Post-Construction

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

Action Indicating Compliance: Submittal of compliance report

Utilities and Service Systems—Solid Waste

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

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

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

Monitoring Phase: Operation

Monitoring Frequency: Annually

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

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

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

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

Monitoring Phase: Construction

Monitoring Frequency: Once during field inspection

Action Indicating Compliance: Field inspection sign-off

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

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

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

Monitoring Phase: Construction

Monitoring Frequency: Once during field inspection

Action Indicating Compliance: Field inspection sign-off

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

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

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

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

CM-2. All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.

CM-3. The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by construction and hauling, and at all times provide reasonable control of dust caused by wind.

CM-4. All loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.

CM-5. All materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.

CM-6. All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.

CM-7. General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.

CM-8. The project shall comply with the City of Los Angeles Noise Ordinance Nos. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

CM-9. Construction and demolition shall be restricted to the hours of 7:00 am to 9:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday.

CM-10. Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

CM-11. The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

CM-12. The project sponsor shall comply with the Noise Insulation Standards of Title 24 of the California Code Regulations, which insure an acceptable interior noise environment.

CM-13. Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), construct diversion dikes to channel runoff around the site. Line channels with grass or roughened pavement to reduce runoff velocity.

CM-14. Incorporate appropriate erosion control and drainage devices to the satisfaction of the Building and Safety Department shall be incorporated, such as interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code, including planting fast-growing annual and perennial grasses in areas where construction is not immediately planned. These will shield and bind the soil.

CM-15. Stockpiles and excavated soil shall be covered with secured tarps or plastic sheeting.

CM-16. All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, wood, and vegetation. Non-recyclable materials/wastes must be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed regulated disposal site.

CM-17. Clean up leaks, drips and spills immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.

CM-18. Do not hose down pavement at material spills. Use dry cleanup methods whenever possible.

CM-19. Cover and maintain dumpsters. Place uncovered dumpsters under a roof or cover with tarps or plastic sheeting.

CM-20. Use gravel approaches where truck traffic is frequent to reduce soil compaction and limit the tracking of sediment into streets.

CM-21. Conduct all vehicle/equipment maintenance, repair, and washing away from storm drains. All major repairs are to be conducted off-site. Use drip pans or drop cloths to catch drips and spills.

DEPARTMENT OF CITY PLANNING-STANDARD CONDOMINIUM CONDITIONS

C-1. That approval of this tract constitutes approval of model home uses, including a sales office and off-street parking. Where the existing zoning is (T) or (Q) for multiple residential use, no construction or use shall be permitted until the final map has recorded or the proper zone has been effectuated. If models are constructed under this tract approval, the following conditions shall apply:

1. Prior to recordation of the final map, the subdivider shall submit a plot plan for approval by the Division of Land Section of the Department of City Planning showing the location of the model dwellings, sales office and off-street parking. The sales office must be within one of the model buildings.

2. All other conditions applying to Model Dwellings under Section 12.22-A,10 and 11 and Section 17.05-O of the LAMC shall be fully complied with satisfactory to the Department of Building and Safety.

C-2. Prior to the recordation of the final map, the subdivider shall pay or guarantee the payment of a park and recreation fee based on the latest fee rate schedule applicable. The amount of said fee to be established by the Advisory Agency in accordance with LAMC Section 17.12 and is to be paid and deposited in the trust accounts of the Park and Recreation Fund.

C-3. Prior to obtaining any grading or building permits before the recordation of the final map, a landscape plan, prepared by a licensed landscape architect,

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

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

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

OR

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

BUREAU OF ENGINEERING - STANDARD CONDITIONS

S-1. (a) That the sewerage facilities charge be deposited prior to recordation of the final map over all of the tract in conformance with Section 64.11.2 of the LAMC.

(b) That survey boundary monuments be established in the field in a manner satisfactory to the City Engineer and located within the California Coordinate System prior to recordation of the final map. Any alternative measure approved by the City Engineer would require prior submission of complete field notes in support of the boundary survey.

(c) That satisfactory arrangements be made with both the Water System and the Power System of the Department of Water and Power with respect to water mains, fire hydrants, service connections and public utility easements.

(d) That any necessary sewer, street, drainage and street lighting easements be dedicated. In the event it is necessary to obtain off-site easements by separate instruments, records of the Bureau of Right-of-Way and Land shall verify that such easements have been obtained. The above requirements do not apply to easements of off-site sewers to be provided

by the City.

(e) That drainage matters be taken care of satisfactory to the City Engineer.

(f) That satisfactory street, sewer and drainage plans and profiles as required, together with a lot grading plan of the tract and any necessary topography of adjoining areas be submitted to the City Engineer.

(g) That any required slope easements be dedicated by the final map.

(h) That each lot in the tract complies with the width and area requirements of the Zoning Ordinance.

(i) That 1-foot future streets and/or alleys be shown along the outside of incomplete public dedications and across the termini of all dedications abutting unsubdivided property. The 1-foot dedications on the map shall include a restriction against their use of access purposes until such time as they are accepted for public use.

(j) That any 1-foot future street and/or alley adjoining the tract be dedicated for public use by the tract, or that a suitable resolution of acceptance be transmitted to the City Council with the final map.

(k) That no public street grade exceeds 15%.

(l) That any necessary additional street dedications be provided to comply with the Americans with Disabilities Act (ADA) of 1990.

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

(a) Survey monuments shall be placed and permanently referenced to the satisfaction of the City Engineer. A set of approved field notes shall be furnished, or such work shall be suitably guaranteed, except where the setting of boundary monuments requires that other procedures be followed.

(b) Make satisfactory arrangements with the Department of Transportation with respect to street name, warning, regulatory and guide signs.

(c) All grading done on private property outside the tract boundaries in connection with public improvements shall be performed within dedicated slope easements or by grants of satisfactory rights of entry by the affected property owners.

(d) All improvements within public streets, private street, alleys and easements shall be constructed under permit in conformity with plans and specifications approved by the Bureau of Engineering.

(e) Any required bonded sewer fees shall be paid prior to recordation of the final map.

S-3. That the following improvements be either constructed prior to recordation of the final map or that the construction be suitably guaranteed:

(a) Construct on-site sewers to serve the tract as determined by the City Engineer.

(b) Construct any necessary drainage facilities.

(c) Install street lighting facilities to serve the tract as required by the Bureau of Street Lighting.

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

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

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

(d) Plant street trees and remove any existing trees within dedicated streets or proposed dedicated streets as required by the Street Tree Division of the Bureau of Street Maintenance. All street tree plantings shall be brought up to current standards. When the City has previously been paid for tree planting, the subdivider or contractor shall notify the Street Tree Division (213-485-5675) upon completion of construction to expedite tree planting.

(e) Repair or replace any off-grade or broken curb, gutter and sidewalk satisfactory to the City Engineer.

(f) Construct access ramps for the handicapped as required by the City Engineer.

(g) Close any unused driveways satisfactory to the City Engineer.

(h) Construct any necessary additional street improvements to comply with the Americans with Disabilities Act (ADA) of 1990.

(i) That the following improvements be either constructed prior to recordation of the final map or that the construction be suitably guaranteed:

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

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

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

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

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

NOTES:

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

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

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

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

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

FINDINGS OF FACT (CEQA)

I. INTRODUCTION

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

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

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

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

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

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

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

II. ENVIRONMENTAL DOCUMENTATION BACKGROUND

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

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

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

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

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

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

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

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

1. UNITE HERE Local 11

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Response: Please see detailed responses below.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

3. AHF Comments

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

4. Public Comments at May 15, 2018 Hearing

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Draft EIR Availability

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

1) Los Angeles Central Library—630 West Fifth Street, Los Angeles, CA 90071

2) Francis Howard Goldwyn Hollywood Regional Library—1623 N. Ivar Ave., Los Angeles, CA 90028

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

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

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

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

A. The first possible finding is that "[c]hanges or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (PRC, section 21081(a)(1)); and

B. The second possible finding is that "[s]uch changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency." (PRC, section 21081(a)(2)); and

C. The third possible finding is that "[s]pecific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible, the mitigation measures or Project alternatives identified in the final EIR." (PRC, section 21081(a)(3)).

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

1. Description of Significant Effects – A specific description of the environmental effects identified in the EIR, including a judgment regarding the significance of the impact;

2. Project Design Features – Reference to the identified Project Design Features that are a part of the Project (the numbering of these features corresponds to the numbering in the Draft EIR);

3. Mitigation Measures – Reference to the identified mitigation measures or actions that are required as part of the Project (the numbering of these mitigation measures corresponds to numbering in the Mitigation Monitoring Program, which is included as Section IV of the Final EIR);

4. Finding – One or more of the three specific findings in direct response to CEQA Section 21081 and CEQA Guidelines Section 15091;

5. Rationale for Finding – A summary of the reasons for the finding(s);

6. Reference – A notation on the specific section in the Draft EIR which includes the evidence and discussion of the identified impact.

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

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

A. Agricultural and Forest Resources
1. Farmland
2. Existing Zoning for Agricultural Use or Williamson Act Contract
3. Forest Land or Timberland Zoning
4. Loss or Conversion of Forest Land
5. Cumulative Impacts

B. Air Quality
1. Objectionable Odors

C. Biological Resources
1. Sensitive Biological Species
2. Riparian Habitat and Wetlands
3. Movement of any Resident or Migratory Species
4. Local Policies and Ordinances

5. Habitat Conservation Plans

E. Geological Resources
1. Landslides
2. Soil Support for Septic Tanks

F. Hazards and Hazardous Materials
1. Airport Land Use Plans
2. Private Airstrips
3. Wildland Fires

G. Hydrology and Water Quality
1. 100-Year Flood Hazard Areas, 100-year Flood and Flooding
2. Seiche, Tsunami or Mudflow

H. Land Use and Planning
1. Habitat or Natural Community Conservation Plans

I. Mineral Resources
1. Loss of Availability of Known Mineral Resources
2. Loss of Mineral Resources Recovery Site
3. Cumulative Impacts

J. Noise
1. Airport Land Use Plans
2. Private Airstrips

K. Transportation/Circulation
1. Air Traffic Patterns

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

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

A. Aesthetics

Enacted in 2013, SB 743 adds CEQA (Pub. Res. Code) Section 21099, which provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center Project on an infill Site within a transit priority area shall not be considered significant impacts on the environment.” As set forth in Section IV.A.2, Light, Glare, and Shading, of the Draft EIR, the Project is a mixed-use development and is located less than 0.5 mile from several bus lines and a rail line, the majority of which provide a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. Therefore, the Project is located in a transit priority area as defined in CEQA Section 21099. In addition, the City’s Zone Information and Map Access System

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

B. Air Quality

1. Consistency with Applicable Air Quality Management Plan

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

2. Localized Impacts from Construction Activities

As presented in Section IV.B, Air Quality, of the Draft EIR, a conservative estimate of the Project's maximum localized construction emissions for off-Site sensitive receptors does not exceed the localized screening thresholds for CO, NO_X, PM_{10}, and $PM_{2.5}$. Therefore, impacts are less than significant.

3. Construction Odors

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

4. Construction Toxic Air Contaminants (TACs)

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

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

5. Localized Operational Impacts

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

6. Operational TACs

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

7. Operational Odors

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

8. Cumulative Impacts

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

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

C. Greenhouse Gas Emissions

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

forth in Section IV.C of the Draft EIR, with implementation of the applicable Project Design Features identified throughout this Draft EIR, including GHG-PDF-1 through GHG-PDF-8 and the requirements set forth in the City of Los Angeles Green Building Code and the full implementation of current state mandates, the Project's GHG emissions are approximately 315 metric tons of equivalent mass of CO_2 ($MTCO_2e$) per year during construction and 18,051 $MTCO_2e$ per year during operation, for a combined total of 18,365 $MTCO_2e$ per year. The Project's GHG emissions represent an approximate 38-percent reduction from the GHG emissions from the "no implementation of emission reduction measures" (NIERM) scenario, which is more commonly known as the "business-as-usual" or BAU scenario; this comparison is not used as a threshold of significance, but rather as a way to demonstrate the efficacy of the GHG reduction programs and measures applicable to or incorporated into the Project. In addition, the Project is designed in accordance with the regulatory requirements and includes Project Design Features that are consistent with the applicable City of Los Angeles goals provided in the Air Quality Element of the City of Los Angeles General Plan.

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

With regard to AB 900, the Project does not result in any net additional GHGs, including GHG emissions from employee transportation in accordance with PRC Section 21183(c) with the purchase of emission offset credits. Accordingly, the Project meets the GHG emissions requirements for streamlined environmental review under CEQA. In summary, the Project does not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs, and Project -specific impacts with regard to climate change are less than significant.

2. Cumulative Impacts: Although the Project is expected to emit GHGs, the emission of GHGs by a single Project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHG from more than one Project and many sources in the atmosphere that may result in global climate change. The resultant consequences of that climate change can cause adverse environmental effects. A Project's GHG emissions typically are very small in comparison to state or

global GHG emissions and, consequently, in isolation, they have no significant direct impact on climate change. The state has mandated a goal of reducing statewide emissions to 1990 levels by 2020, even though statewide population and commerce are predicted to continue to expand. In order to achieve this goal, CARB is in the process of establishing and implementing regulations to reduce statewide GHG emissions. Currently, there are no applicable CARB, SCAQMD, or City of Los Angeles significance thresholds or specific reduction targets, and no approved policy or guidance to assist in determining significance at the Project or cumulative levels. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific Project represents new emissions or existing, displaced emissions. Therefore, consistent with CEQA Guidelines Section 15064h(3), the City, as lead agency, has determined that the Project's contribution to cumulative GHG emissions and global climate change is less than significant if the Project is consistent with the applicable regulatory plans and policies to reduce GHG emissions: CARB's *Climate Change Scoping Plan*, AB 900, SCAG's RTP/SCS, and the LA Green Plan.

The Project is consistent with the applicable GHG reduction plans and policies. The NIERM comparison and SCAQMD's draft service population target demonstrate the efficacy of the measures contained in these policies. Moreover, while the Project is not directly subject to the Cap-and-Trade Program, that Program will indirectly reduce the Project's GHG emissions by regulating "covered entities" that affect the Project's GHG emissions, including energy, mobile, and construction emissions. More importantly, the Cap-and-Trade Program will backstop the GHG reduction plans and policies applicable to the Project in that the Cap-and-Trade Program will be responsible for relatively more emissions reductions if California's direct regulatory measures reduce GHG emissions less than expected. The Cap-and-Trade Program will ensure that the GHG reduction targets of AB 32 are met. Thus, given the Project's consistency with state, SCAG, and City of Los Angeles GHG emission reduction goals and objectives, the Project will not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project's impacts are not cumulatively considerable.

Project Design Features

The City finds that Project Design Features GHG-PDF-1, GHG-PDF-2, GHG-PDF-3, GHG-PDF-4, GHG-PDF-5, GHG-PDF-6, GHG-PDF-7 and GHG-PDF-8, which are incorporated into the Project and are incorporated into these Findings as though fully set forth herein, reduce the potential greenhouse gas emissions of the Project. These Project Design Features were taken into account in the analysis of potential impacts.

D. Cultural Resources

Potential Impacts to Archeological Resources

As the archaeological records search indicated, the Project Site contains no identified archaeological sites, and three archaeological sites are located within a 0.5-mile radius of the Project Site. The Project Site contains no isolates or within a 0.5-mile radius of the it. In addition, the Project Site has not been surveyed for the presence of archaeological resources. While this does not preclude the potential for an archaeological Site to be

identified during construction activities associated with the Project, it is unlikely to occur since the Project Site has previously experienced ground surface disturbance. The maximum depth of excavation for Project development is approximately 75 feet below the existing ground surface. If an archaeological resource were to be discovered during construction of the Project, work in the area will cease, and deposits will be treated in accordance with applicable regulatory requirements, including those set forth in Public Resources Code Section 21083.2 with respect to any unique archaeological resource. In addition, if human remains are discovered during construction of the Project, work in the immediate vicinity will be halted, the County Coroner, construction manager, and other entities will be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods will occur in accordance with Public Resources Code Sections 5097.91 and 5097.98, as amended. With the implementation of all applicable regulatory requirements, the Project's impacts related to archaeological resources are less than significant.

Project Design Features

The City finds that no specific Project Design Features are incorporated into the Project to reduce its potential impacts on historical resources.

Potential impacts to Tribal Cultural Resources

On January 4, 2016, the City of Los Angeles Department of City Planning (DCP), as lead agency for the Project, notified seven California Native American tribes pursuant to AB 52, including the following:

- Fernandeño Tataviam Band of Mission Indians
- Gabrieleño Band of Mission Indians—Kizh Nation
- Gabrielino/Tongva Nation
- Gabrielino/Tongva San Gabriel Band of Mission Indians
- Gabrielino-Tongva Tribe
- San Fernando Band of Mission Indians
- Soboba Band of Luiseño Indians

Two tribes—the Fernandeño Tataviam Band of Mission Indians (Tataviam) and the Soboba Band of Luiseño Indians—responded to DCP's notification. The Tataviam requested consultation with DCP. This consultation involved written communication, telephone communication, and e-mail correspondences, as documented in Appendix E of the Draft EIR. DCP also coordinated with Dudek, a cultural resources consultant, in reviewing all the materials and articles submitted by the Tataviam during consultation (as included in Appendix E.5 of the Draft EIR). The results of this review is also included in Appendix E.6 of the Draft EIR. At the conclusion of consultation, the Tataviam and DCP determined that there are no tribal cultural resources on the Project Site or in the immediate vicinity (i.e., within 0.5 mile).

The Soboba Band of Luiseño Indians also submitted a letter on November 20, 2015, stating that the tribe did not have any specific concerns regarding known cultural resources in the area and deferred to the Gabrieleño Tribal Consultants, who are closer to the Project Site area. However, pursuant to AB 52, there is no authority to defer a tribe's authority to a third party, and, notwithstanding, the Gabrieleño Tribal Consultants did not submit any evidence into the record of tribal cultural resources at the Project Site.

In addition, the cultural/archaeological resources records search was conducted by the SCCIC at California State University, Fullerton. It included a review of all recorded archaeological and built-environment resources, as well as a review of cultural resource reports on file. The SCCIC also reviewed the California Points of Historical Interest (SPHI), the California Historical Landmarks, the California Register, the National Register, the California State Historic Properties Directory, and the City of Los Angeles Historic-Cultural Monuments listings. As explained in the Draft EIR, tribal cultural resources include, but are not limited to, cultural resources included or determined to be eligible for inclusion in the California Register or those included in a local register of historical resources. Based on the SCCIC's review of the California Register, the National Register, and the City of Los Angeles Historic-Cultural Monuments, the SCCIC did not identify any previously recorded archeological resources, including recorded tribal cultural resources within the Project Site. A records search of the NAHC Sacred Lands File was also completed for the Project Site area in September 2016. The results of the records search did not identify any previously recorded sacred lands within the Project Site or its vicinity.

Accordingly, the results of the records searches (i.e., SCCIC and NAHC Sacred Lands File) conducted for the Project Site and the aforementioned independent analysis of correspondence and materials relative to potential tribal cultural resources on the Project Site by Dudek demonstrate that there is no record or evidence of tribal cultural resources on or near the Project Site. In addition, at the conclusion of the tribal consultation conducted under AB 52, DCP and the Tataviam mutually agreed that the Project does not significantly impact a tribal cultural resource (see Appendix E.7 of the Draft EIR). As such, impacts related to tribal cultural resources are less than significant.

Project Design Features

The City finds that no specific Project Design Features are incorporated into the Project to reduce its potential impacts on tribal cultural resources.

Potential Cumulative Impacts to Archeological and Paleontological Resources

The Project Site vicinity is located within an urbanized area that has been substantially disturbed and developed over time, a condition that renders it less likely that archeological or paleontological resources will be encountered. If archaeological resources are uncovered, each related Project will be required to comply with applicable regulatory requirements, such as CEQA Guidelines Section 15064.5, Public Resources Code Section 21083.2, Health and Safety Code Section 7050.5, and Public Resources Code Section 5097.9. In addition, as part of the environmental review processes for the related projects, it is expected that mitigation measures will be established as necessary to address the potential for uncovering paleontological resources. Therefore, the Project's impacts to archaeological and paleontological resources are not cumulatively considerable, and cumulative impacts are less than significant.

Project Design Features

The City finds that no specific Project Design Features are incorporated into the Project to reduce its potential impacts on historical resources.

Potential Cumulative Impacts to Tribal Cultural Resources

The Project Site vicinity is located within an urbanized area that has been substantially disturbed and developed over time, a condition that renders it less likely that tribal cultural resources will be encountered. If tribal cultural resources are uncovered, each of the related projects will be expected to comply with regulatory requirements, including required consultation with the California Native American Tribes. Therefore, the Project's impacts to tribal cultural resources are not cumulatively considerable, and cumulative impacts are less than significant.

Project Design Features

The City finds that no specific Project Design Features are incorporated into the Project to reduce its potential impacts on historical resources.

E. Geology and Soils

In 2015, the California Supreme Court, in *California Building Industry Association (CBIA) v. Bay Area Air Quality Management District (BAAQMD)*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the Project. Specifically, the decision held that an impact from the existing environment on the Project, including its future users and/or residents, is not an impact for purposes of CEQA. However, if the Project, including future users and residents, exacerbates existing conditions, that impact must be assessed, including how it might affect future users and/or residents of the Project.

1. Construction

Construction activities consist of the demolition of the existing surface parking lots and building structures, except for those located in Crossroads of the World, followed by grading and excavation for the subterranean parking garages. Building foundations will then be placed, followed by building construction and the installation of utilities, paving, concrete, and landscape. The maximum depth of excavation reaches to 78 feet below grade surface. All existing certified fill will be removed during grading and excavation. As such, Project construction is typical of construction in urban environments and does not involve mining operations, deep excavation into the earth, or boring of large areas creating unstable seismic conditions or stresses in the earth's crust. Furthermore, there are no active or potentially active faults that underlie the Project Site. Accordingly, construction of the Project will not exacerbate seismic conditions or other geologic conditions on the Project Site or in the vicinity, and, as such, construction impacts related to surface ground rupture, strong seismic ground shaking, liquefaction, and seismically induced settlement are less than significant. In addition, the Project construction will not cause, accelerate, or exacerbate in whole or in part geologic hazards, including instability from erosion, that result in substantial damage to structures, infrastructure, or other properties or expose people to substantial risk of injury.

2. Seismic Hazards

(a) Ground Surface Rupture

No known active or potentially active faults underlie the Project Site, and, according to the California Geological Survey (CGS) Earthquake Fault Zone map for the Hollywood 7.5-minute Quadrangle, which was released in 2014, the Project Site is not located within a state-designated Alquist-Priolo earthquake fault zone or Seismic Hazard Zone. The nearest fault to the Project Site is the Hollywood Fault, located approximately 1,500 feet (0.3 mile) to the north. Therefore, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site, and the potential for surface rupture due to faulting occurring beneath the Project Site is considered low. Thus, the Project does not exacerbate existing environmental conditions. Therefore, impacts associated with surface rupture from a known earthquake fault are less than significant, and no mitigation measures are required.

(b) Strong Seismic Ground Shaking

The Project Site is located within the seismically active region of Southern California and will potentially be subject to strong ground motion if a moderate to strong earthquake occurs on a local or regional fault. These seismic ground shaking effects at the Project Site will not be exacerbated by the Project because the Project will not involve mining operations, deep excavation into the earth, or boring of large areas creating unstable seismic conditions that will exacerbate ground shaking. Furthermore, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Therefore, impacts associated with seismic ground shaking are less than significant, and no mitigation measures are required.

Moreover, engineering design solutions reduce the substantial risk of exposing people or structures to loss or injury. State and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, the substantial risk that buildings will collapse is reduced. The Geotechnical Report contains preliminary recommendations for the type of engineering practices that will be used. Additionally, a final design-level geotechnical report will be prepared by the Project Applicant and reviewed to the satisfaction of the Department of Building and Safety before the issuance of grading permits. The final recommendations from that report will be enforced for the construction of the Project. Based on the Geotechnical Report, the Project Site is suitable for development, and the Project may be constructed using standard, accepted, and proven engineering practices considering the seismic shaking potential and geologic conditions at the Project Site. As with other development projects in the Southern California region, the Project will comply with the Los Angeles Building Code, which incorporates current seismic design provisions of the 2013 California Building Code with City amendments. The 2013 California Building Code incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety is responsible for implementing the provisions of the Los Angeles Building Code. The Project will also comply with the plan review and permitting requirements of the Los Angeles Department of Building and Safety, including the recommendations provided in a final, Site-specific geotechnical report. In addition, the

state and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the General Plan Safety Element, and the Los Angeles Building Code. Pursuant to those laws, the Project Site must demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction of the Project.

(c) Liquefaction

The City's Zoning Information and Map Access System indicates that the Project Site is not located in an area that has been identified by the State of California as being potentially susceptible to liquefaction. Furthermore, the Project Site is not located within a state-designated seismic hazard zone for liquefaction potential or within a City of Los Angeles Liquefaction Hazard Zone. Typically, liquefaction occurs in shallow groundwater areas where there are loose, cohesionless, fine grained soils. The historic high groundwater level in the Project Site area is approximately 70 to 80 feet below ground surface and groundwater was not encountered at the maximum depth of 70.5 feet during field exploration, according to the Geotechnical Report included in Appendix F of the Draft EIR. Furthermore, the Project Site is mostly underlain by very stiff to hard clay. Due to the depth of the historical highest groundwater level, the type of soils underlying the Project Site, and the liquefaction mapping by the CGS, the Project Site will not be capable of liquefaction during an earthquake event. Therefore, based on these considerations, the Project Site does not exacerbate existing environmental conditions or cause or accelerate geologic hazards related to liquefaction, which will result in substantial damage to structures or infrastructure, nor does it bring people into areas that are susceptible to substantial risk of injury. As such, impacts associated with liquefaction are less than significant, and no mitigation measures are required.

(d) Seismically Induced Settlement

The Project Site is underlain with uncertified fill consisting of silty sand. The uncertified fill is underlain by clay with sand and sandy clay, interbedded with medium dense silty sand. Although, based on the Geotechnical Report, seismically induced settlement of silty sand layers located above the water table could have occurred on the Project Site, these settlements are estimated to be on the order of 0.5 inch and have been taken into account in the structural design of the Project. In addition, the Project will comply with the Site plan review and permitting requirements of the Los Angeles Department of Building and Safety, including the recommendations provided in a final, Site-specific geotechnical report subject to review and approval by the Los Angeles Department of Building and Safety. Through compliance with regulatory requirements and Site-specific geotechnical recommendations, the Project des not exacerbate and cause or accelerate geologic hazards related to seismically induced settlement.

3. Sedimentation and Erosion

Project-related construction activities will comply with erosion control requirements, including grading and dust control measures, imposed by the City pursuant to grading permit regulations. Specifically, Project construction will comply with the Los Angeles Building Code, which requires necessary permits, plans, plan checks, and inspections to ensure that the Project reduces its sedimentation and erosion effects. In addition, the

Project is required to have an erosion control plan approved by the LADBS, as well as a Storm Water Pollution Prevention Plan (SWPPP) pursuant to the NPDES permit requirements. As part of the SWPPP, Best Management Practices (BMPs) are implemented during construction to reduce sedimentation and erosion levels to the maximum extent possible. In addition, Project construction contractors are required to comply with City grading permit regulations, which require necessary measures, plans, and inspections to reduce sedimentation and erosion. With regulatory compliance and the implementation of BMPs, impacts from soil erosion are less than significant, and no mitigation measures are required.

4. Soil Stability

According to the Geotechnical Report, the Project Site is underlain with uncertified fill and underlain by clay with sand and sandy clay, interbedded with medium dense silty sand. The existing fill was encountered on the Project Site ranging from one to seven feet below existing grade. The anticipated depth of excavation for Project development is approximately 36 to 78 feet below ground surface for the construction of the proposed subterranean garages. Based on the Geotechnical Report, the existing fill is considered to be uncertified and should not be used for support of new structures or pavement and will be removed during excavation of the basement levels and replaced with new compacted fill. Construction debris from previous Site development was also encountered in the existing fill. Thus, all excavated soil will be exported off-Site to the nearest landfill for proper disposal and recycling.

All required excavations will be sloped, or properly shored, in accordance with the provisions of the California Building Code and additional Los Angeles Building Code requirements, as applicable. All Project construction activities will adhere to the requirements of the Los Angeles Municipal Code and the California Building Code. The Project Applicant is also required to prepare and implement a final, Site-specific geotechnical report and incorporate the recommendations contained in the Geotechnical Report in the Project design. Therefore, through compliance with regulatory requirements and Site-specific geotechnical recommendations, impacts related to soil stability are not being exacerbated by the Project and, thus, will be less than significant, and no mitigation measures are required.

5. Subsidence

The Project Site is not located within an area of known ground subsidence and no large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or is planned at the Project Site. Historically high groundwater is reported to be at a depth of approximately 70 to 80 feet below grade, and no groundwater was encountered at a maximum depth of 70.5 feet during exploration. However, if groundwater is encountered during construction of the Project, temporary dewatering or other withdrawals of groundwater can be required within the Project Site. If dewatering is required, adherence to applicable NPDES Permit and industrial user sewer discharge permit requirements will ensure operation of the temporary dewatering system has a minimal effect on local groundwater recharge in the vicinity of the Project Site. In addition, a permanent dewatering system during Project operation will result in only minor impacts to the top of the groundwater table and will not affect the groundwater table. Thus, based on the level of groundwater and the absence of any large-scale extraction of groundwater, gas, oil, or

geothermal energy at the Project Site, the Project does not exacerbate, cause, or accelerate geologic hazards related to subsidence. Therefore, impacts related to subsidence are less than significant, and no mitigation measures are required.

6. Groundwater

The historic high groundwater level beneath the Project Site is at a depth of approximately 70 to 80 feet below the existing ground surface and no groundwater was encountered at the maximum explored depth of 70.5 feet. The maximum depth of excavation will range down to 78 feet below the existing ground surface. Consequently, in the event groundwater is encountered during construction of the Project, temporary dewatering or other withdrawals of groundwater can be required within the Project Site. However, as discussed in Section IV.G, Hydrology and Water Quality, of the Draft EIR, if dewatering is required, adherence to applicable National Pollutant Discharge Elimination System (NPDES) Permit and industrial user sewer discharge permit requirements will ensure operation of the temporary dewatering system has a minimal effect on local groundwater recharge in the vicinity of the Project Site. In addition, a permanent dewatering system during Project operation results in only minor impacts to the top of the groundwater table and does not affect any supply wells. Therefore, potential geologic hazards from groundwater are less than significant, and no mitigation measures are required.

7. Expansive and Corrosive Soils

Based on the Geotechnical Report, expansive soils were not observed in the near-surface soils. Therefore, expansive soils are not expected to affect structures and improvements at or near the current ground surface (e.g., building slabs, sidewalks, pavements at the current ground surface; and underground utilities). While potentially expansive soils known as fat clays were encountered at depths of approximately 25 to 30 feet below ground surface, proposed building foundations will not be affected as the extent of the excavation is deeper than these soils. If encountered, such soils will be removed during excavation. Furthermore, with the incorporation of Site-specific geotechnical recommendations, impacts related to expansive soils are not exacerbated by the Project and, thus, are less than significant.

The on-Site near-surface soils underlying the Project Site were found to have a corrosive potential for buried metal. Thus, the Geotechnical Report recommends that all underground metal pipes/clamps/structures should consider the corrosion potential. With the implementation of Site-specific geotechnical recommendations, which will require the consultation of a corrosion expert to evaluate options for underground metal protection, impacts related to corrosive soils will not be exacerbated by the Project and, thus, will be less than significant.

8. Other Geologic Conditions

There are no distinct and prominent geologic or topographic features (i.e., hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands) on the Project Site or in its vicinity. Therefore, the Project will not destroy, permanently cover, or materially and adversely modify any distinct and prominent geologic or topographic features. Impacts associated with landform alteration willnot occur, and no mitigation measures are required.

9. Cumulative Impacts

Due to the Site-specific nature of geological conditions (i.e., soils, geological features, subsurface features, seismic features, etc.), geology impacts are typically assessed on a Project-by-Project basis, rather than on a cumulative basis. Nonetheless, cumulative growth through 2022 in the Project area (inclusive of the 145 related projects identified in Section III, Environmental Setting, of the Draft EIR) will expose a greater number of people to seismic hazards. However, as with the Project, the related projects are subject to established guidelines and regulations pertaining to building design and seismic safety, including those set forth in the California Building Code and the Los Angeles Building Code. Therefore, with adherence to applicable regulations, Project impacts with regard to the exacerbation of geological and soils conditions will not be cumulatively considerable, and cumulative impacts with regard to geology and soils will be less than significant.

Project Design Features

The City finds that no specific Project Design Features are incorporated into the Project to reduce its potential impacts on geology and soils.

F. Hazards and Hazardous Materials

1. Construction Impacts

(a) Hazardous Materials Use and Storage

During demolition and building construction, fuel and oils associated with the operation of construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, could be used, handled, and stored on the Project Site. The use, handling, and storage of these materials could increase the opportunity for hazardous materials releases and, subsequently, the exposure of people, schools within 0.25 mile, and the environment to hazardous materials. The Project Site is in proximity to several sensitive uses, including Hollywood High School (across Highland Avenue and approximately 100 feet west of Development Parcel A), Selma Elementary School (approximately 175 feet east of Development Parcel D), Blessed Sacrament Catholic School (adjacent to the east of the Project Site), and residential uses, that will be affected by construction-related hazardous materials. However, the Project Site is not located on a Site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, shall not exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment. Additionally, all potentially hazardous materials will be used and stored in accordance with manufacturers' instructions. Applicable laws and regulations are aimed at establishing specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials. Therefore, compliance with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials shall effectively reduce the potential for Project construction activities to expose people or schools to a substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, impacts related to the use, storage, and

management of hazardous materials during construction shall be less than significant, and no mitigation measures are required.

(b) Hazardous Waste Generation, Handling, and Disposal

During demolition and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives could be used and, therefore, shall require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases and, subsequently, the exposure of people and the environment to hazardous materials. The Project Site is in proximity to several sensitive uses, including Hollywood High School, Selma Elementary School, Blessed Sacrament Catholic School (adjacent to the east of the Project Site), and residential uses, that could be affected by construction-related hazardous materials. Project construction shall occur in compliance with all applicable federal, state, and local requirements concerning the generation, handling, and disposal of hazardous waste.

In addition, although the Phases I and II ESA did not identify any significant environmental concerns on the Project Site, the PCE concentrations detected within Development Parcel C are above the acceptable threshold for residential properties. Accordingly, ground disturbance associated with Site clearance, excavation, and grading activities during construction shall be required to comply with relevant and applicable federal, state, and local regulations and requirements, including DTSC and RCRA requirements (e.g., 22 CCR Division 4.5 Sections 66250 through 69013 and 8 CCR Section 5192) for proper Site cleanup and disposal from the Site by licensed hazardous waste transporters. Compliance with these requirements shall prevent releases of hazardous waste and ensure that Project construction activities shall not expose people or schools to a substantial risk resulting from the release or explosion of a hazardous material. In addition, these regulatory requirements shall prevent exposure to a health hazard in excess of regulatory standards. Therefore, impacts associated with hazardous waste management during construction shall be less than significant, and no mitigation measures are required.

(c) Underground and Aboveground Storage Tanks

The parking garage for Development Parcel A provides six levels of subterranean parking. Development Parcels B and C provides five connected/shared levels of subterranean parking underneath the two development parcels, while the parking garage for Development Parcel D provides three levels of subterranean parking. The maximum depth of excavation ranges from 36 to 78 feet below the existing ground surface. No Underground Storage Tanks (USTs) or Above Ground Storage Tanks (ASTs) were observed or identified within the Project Site. Therefore, no USTs or ASTs shall be encountered or affected during Project construction, and there shall be no potential to encounter residual subsurface contamination. Thus, impacts related to USTs and ASTs during construction shall be less than significant, and no mitigation measures are required.

(d) Asbestos-Containing Materials

Any building, structure, surface asphalt driveway, or parking lot constructed prior to 1979 could contain asbestos or Asbestos-Containing Materials (ACMs). The properties within the Project Site were developed as early as 1921. Based on the age of several of building structures, asbestos or ACMs may be present. Furthermore, during the Site reconnaissance, suspect ACMs were observed in the form of floor tiles, ceiling tiles, joint compound, and wallboard. Thus, in accordance with SCAQMD Rule 1403, the Project applicant shall be required to conduct a comprehensive asbestos survey prior to demolition, subject to approval by the Department of Building and Safety. In the event that ACMs are found within areas proposed for demolition, suspect materials shall be removed by a certified asbestos abatement contractor in accordance with applicable regulations. With compliance with relevant regulations and requirements, Project construction activities shall not expose people or schools to a substantial risk resulting from the release of asbestos fibers in the environment. Therefore, impacts related to ACMs shall be less than significant, and no mitigation measures are required.

(e) Lead-Based Paint

The existing building structures were constructed as early as the early 1920s. Thus, based on the age of the on-Site buildings, it is possible that lead-based paint (LBP) was used on-Site and could be present. During the Site reconnaissance, the paint coating of the building structures ranged from fair to good condition. In the event that LBP is found within areas proposed for demolition, suspect materials shall be removed in accordance with procedural requirements and regulations, including those established by the Toxic Substances Control Act (TSCA), 29 Code of Federal Regulations (CFR) Sections 1910 and 1926 et seq., and Titles 8 and 17 of the California Code of Regulations (CCR), for the proper removal and disposal of LBP prior to demolition activities. Example procedural requirements include the use of respiratory protection devices while handling lead-containing materials, containment of lead or materials containing lead on the Site or location at which construction activities are performed, and certification of all consultants and contractors conducting activities involving LBP or lead hazards. With compliance with relevant regulations and requirements, Project construction activities shall not expose people or schools to a substantial risk resulting from the release of LBP into the environment. Therefore, impacts related to LBP shall be less than significant, and no mitigation measures are required.

(f) Polychlorinated Biphenyls

Based on the age of the existing on-Site structures, and the observation of fluorescent light fixtures during the Site reconnaissance, on-Site ballasts containing Polychlorinated Biphenyls (PCB) concentrations above the federal account limit may be present. Therefore, in the event that PCBs are found within areas proposed for demolition, suspect materials shall be removed in accordance with all applicable local, state and federal regulations prior to demolition activities, including but not limited to 40 CFR 761.30: “Fire Rule.” Specifically, the disposal of PCB wastes is regulated by 40 CFR 761 to ensure the safe handling of these materials. With compliance with relevant regulations and requirements, Project construction activities shall not expose people or schools to a substantial risk resulting from the release of PCBs in the environment. Therefore, impacts related to PCBs shall be less than significant, and no mitigation measures are required.

(g) Oil Wells and Methane Gas

There are no oil wells on the Project Site, and the Project Site is not located within an oil field. Furthermore, the Project Site is not within a designated Methane Zone or Methane Buffer Zone. Therefore, the potential for construction of the Project to result in the accidental release or upset of subsurface methane or oil is negligible. No impacts related to oil wells and methane gas during construction shall occur during Project construction, and no mitigation measures are required.

(h) Subsurface Conditions

The current and past land uses within the Project Site were identified to assess their potential to present concerns relative to the presence of hazards and/or the handling of hazardous materials. These concerns are classified as Recognized Environmental Conditions (RECs). The maximum depth of excavation ranges from 36 to 78 feet below the existing ground surface. The RECs identified during the Phase I ESA, which are related to historical uses on the Project Site, were evaluated through Phase II subsurface sampling for volatile organic compounds (VOCs) and total petroleum hydrocarbon (TPH). The results of this assessment revealed no evidence of substantial soil contamination beneath the subject property. In addition, the Project Site is not located on a Site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, shall not exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment. Accordingly, ground disturbance associated with Site clearance, excavation, and grading activities during construction is not anticipated to encounter hazardous subsurface conditions. Nonetheless, as set forth in Project Design Feature HAZ-PDF-1, a future sub-slab soil gas sample shall be obtained from beneath the footprint of the 6693 Sunset Boulevard property within Development Parcel C to ensure that the concentration of PCE is below the standard for the specific use to be developed at this location. Thus, construction impacts related to potential subsurface contamination shall be less than significant, and no mitigation measures are required.

(i) Emergency Response

According to the Safety Element of the City of Los Angeles General Plan, Highland Avenue, which borders the Project Site to the west, is a selected disaster route.2 A Construction Management Plan shall be implemented during construction of the Project that includes street closure information, a detour plan, and a staging plan and ensures that adequate and safe access remains available within and near the Project Site during construction activities. The Construction Management Plan requires that Project construction be confined to the Project Site along Highland Avenue and, therefore, will not interfere with this route or have a significant impact on the City's emergency evacuation plan. However, although construction activities shall be short-term and temporary, Project construction activities could temporarily increase response times for emergency vehicles along Sunset Boulevard, Highland Avenue, and other main connectors due to travel time delays caused by traffic and temporary roadway closures. As part of the proposed Construction Management Plan, the Project will employ temporary traffic control measures, such as flag persons, to manage traffic movement during temporary traffic flow disruptions. Traffic management personnel will be trained to

2 Los Angeles General Plan Safety Element, Exhibit H, *Critical Facilities and Lifeline Systems,* November 1996, p. 61.

assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) shall also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow are maintained on adjacent rights-of-way. Therefore, with implementation of a Construction Management Plan, construction of the Project shall not significantly impair implementation of, or physically interfere with, any adopted or on-Site emergency response or evacuation plans. Impacts related to emergency response and evacuation during construction shall be less than significant, and no mitigation measures are required.

2. Operation Impacts

(a) Hazardous Materials Use and Storage

Operation of the Project shall involve the limited use of potentially hazardous materials typical of those used in residential, commercial, and hotel developments, including cleaning agents, paints, pesticides, and other materials used for landscaping. All potentially hazardous materials shall be used, stored, and disposed of in accordance with manufacturers' specifications and handled in compliance with applicable standards and regulations. Any risks associated with these materials shall be adequately reduced to a less-than-significant level through compliance with these standards and regulations. Therefore, as the Project shall comply with applicable regulations and shall not expose persons or schools to substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards, impacts associated with the use and storage of these hazardous substances during operation of the Project shall be less than significant, and no mitigation measures are required.

(b) Hazardous Waste Generation, Handling, and Disposal

Development of the Project will involve the use of hazardous materials typically associated with residential, office, hotel, entertainment and retail use. Since the Project does not propose any industrial uses, these materials present a low risk for hazards exposure. Notwithstanding, as is the case under existing conditions, activities involving the handling and disposal of hazardous wastes on-Site shall occur in compliance with all applicable federal, state, and local requirements concerning the handling and disposal of hazardous waste. Furthermore, hazardous wastes shall continue to be properly stored and conveyed to licensed waste treatment, disposal, or recycling facilities. Therefore, with compliance with relevant regulations and requirements, operational activities shall not expose people or schools to a substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard associated with hazardous waste in excess of regulatory standards. Thus, impacts associated with hazardous waste generation, handling, and disposal during operation of the Project shall be less than significant, and no mitigation measures are required.

(c) Underground and Aboveground Storage Tanks

Fuel storage tanks will be used to power the generators for the Project. Although the type and quantity of storage tanks are unknown at this time, their use will be subject to the applicable requirements of the CCR, CFR, and HSC for regulating the storage of hazardous substances in USTs and ASTs, including but not limited to regulations found

in 40 CFR 280, California HSC, Division 20, Chapter 6.7, 23 CCR Section 2610, 40 CFR Part 112 of the Clean Water Act, and HSC Section 25270.8, as identified above in the Regulatory Framework. With compliance with relevant regulations and requirements, Project use of storage tanks shall not expose people or schools to a substantial risk resulting from the release of VOCs, including benzene, toluene, and PCE, and other chemicals associated with the use of fuel storage tanks. Thus, impacts associated with USTs and ASTs shall be less than significant, and no mitigation measures are required.

(d) Asbestos-Containing Materials

Development of the Project shall include the use of commercially-sold construction materials that shall not include asbestos or ACMs. Project development is, therefore, not anticipated to increase the occurrence of friable asbestos or ACMs at the Project Site. Therefore, operation of the new development at the Project Site shall not expose persons or schools in the immediate vicinity to any risk resulting from the release of friable asbestos in the environment. Thus, no impacts associated with asbestos or ACMs during operation of the Project shall occur, and no mitigation measures are required.

(e) Lead-Based Paint

Development of the Project includes the use of commercially sold construction materials that do not include lead-based paint. Project development is therefore not anticipated to increase the occurrence of lead-based paint at the Project Site. Operation of the new development proposed at the Project Site shall not expose persons or schools in the immediate vicinity to lead-based paint, as no lead-based paints shall be used. As such, the Project does not expose people to substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Thus, impacts associated with lead-based paint during operation of the Project shall be less than significant, and no mitigation measures are required.

(f) Polychlorinated Biphenyls

In accordance with existing regulations, the new electrical systems to be installed as part of the Project do not contain PCBs. Therefore, during operation of the Project, maintenance of such electrical systems shall not expose people or schools in the immediate vicinity to PCBs. In addition, the Project applicant shall comply with applicable laws regulating PCBs, including but not limited to 40 CFR 761, in addition to federal, state, and local regulations. As such, operation of the Project shall not expose people or schools to any risk resulting from the release of PCBs in the environment. Therefore, no impacts related to PCBs during Project operation shall occur, and no mitigation measures are required.

(g) Oil Wells and Methane Gas

The Project Site is not within a designated Methane Zone or Methane Buffer Zone. There are no oil wells on the Project Site, and the Project Site is not located within an oil field. Therefore, the Project does not expose people or schools to any risk resulting from the release or explosion of oil or methane gas, or from exposure to a health hazard associated with oil or methane gas. Thus, no impacts associated with oil and methane gas during operation of the Project shall occur, and no mitigation measures are required.

(h) Subsurface Conditions

The subsurface Site assessment of the identified RECs related to historical uses on-Site did not yield evidence of substantial soil contamination beneath the Project Site as detected levels of hazardous materials were below threshold levels under the California Human Health Screening Levels (CHHSL) adopted by the state of California in 2005. As such, the Phases I and II ESA determined that no further action regarding the RECs is required. The historical dry cleaning facility (6693 Sunset Boulevard) located within Development Parcel C detected a PCE concentration of 0.24 µg/l, which is below the CHHSL for commercial properties but is above the acceptable concentration for residential properties. This portion of the Project Site shall be developed with entertainment and retail/restaurant uses and shall not include residential uses. In addition, the Project Site is not located on a Site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, shall not exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment. Nonetheless, as set forth in Project Design Feature HAZ-PDF-1, an additional soil gas sample shall be obtained from beneath the footprint of this portion of Development Parcel C to ensure that the concentration of PCE is below the standard for the specific use to be developed at this location, and the Project shall not exacerbate existing conditions. Therefore, impacts related to hazards from subsurface conditions shall be less than significant.

(i) Emergency Response

During operation, the Project shall not involve any activities that impede public access or travel along the public right-of-way or interfere with an adopted emergency response or evacuation plan. Emergency vehicles shall continue to access the Project Site directly from the surrounding roadways, including Selma Avenue, McCadden Place, N. Las Palmas Avenue, Sunset Boulevard, and Highland Avenue. In addition, the increase in traffic generated by the Project shall not significantly impact emergency vehicle response to the Project Site and surrounding uses, including along City-designated disaster routes (e.g., Highland Avenue along the western boundary of the Project Site), because the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Accordingly, Project operation, including traffic generated by the Project, shall not cause a substantial effect on emergency response as a result of increased traffic congestion. As such, impacts associated with emergency response and emergency evacuation plans shall be less than significant.

3. Cumulative Impacts

The related projects in the vicinity of the Project Site include retail, restaurant, residential, commercial and office uses. Each of the related projects shall require evaluation for potential threats, including those associated with the use, storage, and/or disposal of hazardous materials, ACMs, LBP, PCBs, and oil and gas, to public safety and schools in the Project vicinity and shall be required to comply with all applicable local, state, and federal laws, rules and regulations. Because environmental safety issues related to hazardous materials are largely Site-specific, this evaluation shall occur on a case-by-case basis for each individual Project affected, in conjunction with development proposals on these properties.

According to the Safety Element of the City of Los Angeles General Plan, Highland Avenue and Santa Monica Boulevard are selected disaster routes.3 Although some related projects may have the potential to result in physical modifications to these streets, both Project construction and operation does not require or result in any modifications to either roadway. In addition, the Project shall not impede the implementation of any emergency response plan. Therefore, with full compliance with all applicable local, state, and federal laws, rules, and regulations and the implementation of Project Design Feature HAZ-PDF-1, the Project shall not have a cumulatively considerable contribution to impacts related to hazards and hazardous materials or selected disaster routes and emergency response plans. As such, the Project's impacts with regard to these issues shall be less than significant.

Project Design Features

The City finds that Project Design Feature HAZ-PDF-1, which is incorporated into the Project and are incorporated into these Findings as though fully set forth herein, reduce the potential impacts of the Project related to hazards and hazardous material. This Project Design Feature was taken into account in the analysis of potential impacts.

G. Hydrology and Water Quality

1. Surface Water Quality, Groundwater, Surface Water Flood Hazards, Hydrology/Drainage

(a) Construction

(1) Surface Water Hydrology

Project construction activities for the demolition of existing uses and construction of new buildings require grading and excavation that could have had the potential to temporarily alter the existing surface drainage patterns and flows within the Project Site. During the process, exposing underlying soils will divert existing surface flows and make the Project Site temporarily more permeable. However, the Project will comply with all applicable City grading permit regulations, including, but not limited to, the Los Angeles Green Building Code, LAMC, and Low Impact Development (LID) requirements, that require necessary measures, plans, and inspections to reduce flooding, sedimentation, and erosion. Thus, through implementation of BMPs and compliance with applicable City grading regulations, the Project is not substantially altering the Project Site drainage patterns in a manner that results in substantial erosion, siltation, and flooding on- or off-Site. Similarly, adherence to standard compliance measures, such as preparation and implementation of a SWPPP, during construction activities ensures that the Project does not cause flooding that has the potential to harm people or damage property or sensitive biological resources; substantially reduce or increase the amount of surface water flow from the Project Site into a water body; or result in a permanent, adverse change to the movement of surface water to produce a substantial change in the current or direction of water flow during construction.

3 Los Angeles General Plan Safety Element, Exhibit H, *Critical Facilities and Lifeline Systems,* November 1996, p. 61.

During construction, soils will be exposed and runoff will be decreased due to the ability of stormwater to infiltrate the ground. However, the Project will adhere to requirements of LAMC Sections 91.7013 and 91.7014, which pertain to erosion control, drainage, and general construction requirements, including flood and mudflow protection. On-Site stormwater flows will be managed and directed off-Site to not overwhelm the existing stormwater drainage infrastructure, and post-construction runoff flow rate is not expected to change significantly. Therefore, with adherence to all applicable regulations, construction-related impacts to surface water hydrology are less than significant, and no mitigation measures are required.

(2) Surface Water Quality

Due to its location and size, the Project has been designated under Risk Level 2 monitoring and subject to the NPDES Construction General Permit. Through compliance with NPDES requirements, including preparation and implementation of a SWPPP and City grading regulations of Sections 91.7013 and 91.7014 of the LAMC, Project construction will not result in discharges that will create: (1) pollution that will alter the quality of the water of the state (i.e., Santa Monica Bay) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the water of the state by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) a nuisance that will be injurious to health, affect an entire community or neighborhood or any considerable number of persons, and occurs during or as a result of the treatment or disposal of wastes. The SWPPP will provide for the use of BMPs, such as sandbags to direct flows, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management. Furthermore, Project construction will not result in discharges that will cause violations of regulatory standards within Santa Monica Bay. Therefore, construction-related impacts to surface water quality are less than significant, and no mitigation measures are required

(3) Groundwater Hydrology

The Project Site currently consists of 90 percent impervious surfaces. As such, no appreciable recharge occurs at the Project Site. In addition, since the closest groundwater production wells or public water supply wells are located in the City of Beverly Hills, over one mile southwest of the Project Site, construction activities are not anticipated to affect existing wells. Therefore, construction of the Project will not change potable water levels sufficiently to reduce the ability of a water utility to use the groundwater basin for public water supplies, reduce yields in adjacent wells, or result in a demonstrable and sustained reduction of groundwater recharge capacity.

Since the Project's development of subterranean parking structures may extend up to 78 feet below existing grade, construction may encounter groundwater, which has been historically found at approximately 70 to 80 feet below existing grade at the Project Site. In this event, temporary dewatering or withdrawal of groundwater may be required. Dewatering systems will extract, treat, and discharge the water into the public storm drain or sewer system, as determined by the City. If dewatering is required, compliance with applicable NPDES permitting and industrial user sewer discharge requirements ensures that the operation of a temporary dewatering system has a minimal effect on local groundwater recharge within the Project Site's vicinity. Therefore, the Project does not adversely impact the flow rate or direction of groundwater and does not have an adverse

effect on any water supply wells. Impacts are less than significant, and no mitigation measures are required.

(4) Groundwater Quality

While a search of state records showed that the Project Site does not have a history of known hazardous material spills or contaminated soil, a subsurface assessment detected PCE in multiple soil borings, specifically in excess for residential properties under Development Parcel C, as discussed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR. As a result, ground disturbance associated with construction Site clearance, excavation, and grading activities is required to comply with applicable federal, state, and local regulations and requirements, including DTSC and RCRA requirements (e.g., CCR Titles 8 and 22 and 42 USC Section 6901-6992k, respectively), for proper Site cleanup and disposal from the Site by licensed hazardous waste transporters. As identified in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, compliance with these requirements and the Project's incorporation of Project Design Feature HAZ-PDF-1 prevent releases of PCE and ensure that construction activities do not affect the rate or change direction of movement of existing contaminants, expand the area affected by contaminants, result in increased groundwater contamination, or cause regulatory water quality standards at an existing production well to be violated.

In addition, since surface contaminants have the potential to adversely impact groundwater quality, hazardous materials used during on-Site grading and construction (e.g., fuels, paints, solvents, concrete additives, etc.) require proper management and disposal to prevent hazardous material releases into groundwater. Compliance with all applicable federal, state, and local requirements (including DTSC and RCRA requirements) concerning the handling, storage and disposal of hazardous waste, as identified in Section IV.F, Hazards and Hazardous materials, of the Draft EIR, reduces the potential for Project construction to release contaminants that could affect the rate or direction of movement of existing contaminants, expand the area or increase the level of groundwater contamination, or violate regulatory water quality standards at an existing production well. In addition, as there are no groundwater production wells or public water supply wells within 1 mile of the Project Site, construction activities are not anticipated to affect existing wells. Accordingly, Project impacts on groundwater quality are less than significant, and no mitigation measures are required.

(b) Operation

(1) Surface Water Hydrology

Since post-construction land uses will be similar to those currently on the Project Site, Project implementation will also result in the existing 90 percent of impervious and 10 percent of pervious surfaces. There will be virtually no increase or decrease in imperviousness that will substantially increase runoff volumes into the existing storm drain system.

The Project slightly alters on-Site drainage patterns. Under existing conditions, the Project Site was comprised of 18 drainage subareas that drain to existing off-Site basins and adjacent storm drains, whereas under post-development conditions, the Project Site is comprised of 11 drainage areas that drain to both existing and proposed off-Site basins

and adjacent storm drains. While the Project slightly alters flow distribution, the total drainage area does not change. Under existing conditions, most stormwater sheet flows drain from the Project Site without filtration or capture devices. The Project allows for stormwater collection through a first flush filtration system of rain gardens, permeable pavement, and stormwater filtration plants to collect roof water. The Project's stormwater treatment reduces pollution from roof drainage, area drains, and surface runoff and reduces the volume discharged to the public storm drain system. In the Project condition, there is an overall reduction in stormwater runoff as compared to existing conditions. In addition, with the implementation of a LID plan, the Project provides post-construction BMPs to control runoff and pollutants associated with storm events per the City's Stormwater Program. Adhering to the LID requirements, the Project's BMPs controls and does not increase runoff from the Project Site.

Based on the above, the Project does not result in any incremental impact on either on-Site or off-Site flooding during a 50-year storm event, substantially reduce or increase the amount of surface water in a water body, or result in a permanent adverse change to the movement of surface water that results in an incremental effect on the capacity of the existing storm drain system. As such, operation of the Project results in a less-than-significant impact on surface water hydrology, and no mitigation measures are required.

(2) Surface Water Quality

As the Project is subject to the requirements for "All Other Development" in the City of Los Angeles LID Manual, Section 3.1.2, the Project will comply with requirements to ensure that the impacts of increased runoff and stormwater pollution are mitigated as close to its source as possible. The Project is designed to have drainage systems that intercept and convey all on-Site rainfall runoff and implement infiltration BMPs, which can provide for percolation, benefit pollutant removal, control peak flow, recharge groundwater, and control flooding. While infiltration should be feasible at the Project Site, if needed, a stormwater capture and reuse system will be implemented instead to supplement irrigation demand and reduce stormwater runoff.

The Project will maintain approximately the same percentage of impervious surface area as under existing conditions. Under existing conditions, most runoff from the Project Site was discharged without any controls. In order to comply with LID requirements, the Project will implement BMPs to reduce the quantity and improve the quality of rainfall runoff from the Project Site. The infiltration system is designed in accordance with the City of Los Angeles infiltration guidelines and the Project-specific infiltration recommendations prepared by the designated geotechnical engineer. While infiltration should be feasible at the Project Site, if needed, a stormwater capture and reuse system will be implemented instead to supplement irrigation demand and reduce stormwater runoff.

Due to the incorporation of infiltration BMPs and for the reasons discussed above, operation of the Project does not result in discharges that cause: (1) pollution which alters the quality of the waters of the state (i.e., Santa Monica Bay) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the waters of the state by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that is injurious to health; affects an entire community or neighborhood, or any considerable number of

persons; and occurs during or as a result of the treatment or disposal of wastes. Furthermore, operation of the Project does not result in discharges that violate regulatory standards. Therefore, impacts to surface water quality are less than significant, and no mitigation measures are required.

(3 Groundwater Hydrology

With implementation of the Project, there will be virtually no incremental increase or decrease in the imperviousness of the Project Site that could affect groundwater recharge rates on-Site. Due to the high percentage of impervious surface at the Project Site (i.e., 90 percent imperviousness), no appreciable groundwater recharge currently occurs. However, at the depths of excavation during construction, groundwater may be encountered and will prompt the consideration of two possible alternative structural design methods—a permanent dewatering system, or a system that withstands hydrostatic groundwater pressures, as discussed in Section IV.G, Hydrology and Water Quality, of the Draft EIR. Either system will result in only minor impacts to the top of the groundwater table and will not affect any supply wells. Additionally, no water supply wells exist on-Site or within 1 mile of the Project Site, and the Project does not include the construction of water supply wells. Therefore, operation of the Project does not change potable water levels sufficiently to reduce the ability of a water utility to use the groundwater basin for public water supplies, reduce yields in adjacent wells, or result in a demonstrable and sustained reduction of groundwater recharge capacity. Impacts are less than significant, and no mitigation measures are required.

(4) Groundwater Quality

Leaking underground storage tanks have a potential to affect groundwater. As discussed in greater detail in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, there are no open Leaking Underground Storage Tank (LUST) cleanup sites within 1,000 feet of the Project Site. There were four closed LUST cleanup sites within 1,000 feet of the Project Site, but since these cases are cleaned up and closed, there is a minimal chance that there will be any impact from the infiltration of stormwater occurring on the Project Site. Therefore, underground storage tanks will not have an impact on the Project Site or contribute to the spreading of underground contamination from adjacent cleanup sites.

The Project also includes the use of fuel storage tanks to power the emergency generators to be used for the Project. Although the tanks could be either above or below ground, their use is subject to the applicable federal, state, and local requirements related to the storage of hazardous substances in aboveground and underground tanks. With compliance with relevant regulations and requirements, Project use of fuel storage tanks does not have an impact on or contribute to the spreading of underground contamination from leaking underground storage tanks.

Surface contaminants also have the potential to adversely impact groundwater quality. The Project involves the limited use of potentially hazardous materials typical of those used in residential and commercial developments, including cleaning agents, paints, pesticides, and other landscaping materials. While the management of any resultant hazardous wastes can increase the potential of hazardous releases into the groundwater, all potentially hazardous materials will be used, stored, and disposed of in accordance with manufacturers' specifications and handled in compliance with applicable standards

and regulations, which are discussed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR. Compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste reduces the potential for operation of the Project to release contaminants into the groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. Accordingly, Project impacts on groundwater quality are less than significant, and no mitigation measures are required.

(c) Cumulative Impacts:

Cumulative growth in the Project Site area through 2022 includes specific known development projects, as well as general ambient growth projected to occur, as described in Section III, Environmental Setting, of the Draft EIR. These related projects comprise a variety of uses, including apartments, condominiums, restaurants, and retail uses, as well as mixed-use developments incorporating some or all of these elements.

(1) Surface Water Hydrology

The geographic context for the cumulative impact analysis on surface water quality is the Santa Monica Bay Watershed. The Project, in conjunction with forecasted growth in the Santa Monica Bay Watershed, could cumulatively increase stormwater runoff flows. However, the Project has no net impact on stormwater flows. Also, in accordance with City requirements, related projects and other future development projects will be required to implement BMPs to manage stormwater in accordance with LID guidelines. Furthermore, the City of Los Angeles Department of Public Works reviews each future development Project on a case-by-case basis to ensure sufficient local and regional infrastructure is available to accommodate stormwater runoff. Therefore, the Project's contribution to cumulative impacts to surface water hydrology is not cumulatively considerable, and cumulative impacts are less than significant.

(2) Surface Water Quality

Future growth in the Santa Monica Bay Watershed is subject to NPDES requirements relating to water quality for both construction and operation. In addition, since the Project Site is located in a highly developed urban area, future land use changes or development are not likely to cause substantial changes in regional surface water quality. The Project does not have an adverse impact on water quality and improves the quality of on-Site flows due to the introduction of new BMPs that collect, treat, and discharge runoff from the Project Site. Also, it is anticipated that the Project and other future development projects will be subject to LID Standard Urban Stormwater Mitigation Plan (SUSMP) and/or SWPPP requirements and implementation of measures to comply with total maximum daily loads (TMDL) requirements. Increases in regional controls associated with other elements of the NPDES permit will improve regional water quality over time. Therefore, because the Project does not have an adverse impact, and given the Project's and the related projects' compliance with all applicable laws, rules, and regulations pertaining to stormwater runoff, the Project's contribution to cumulative impacts to surface water quality is not cumulatively considerable. As such, cumulative impacts are less than significant.

(3) Groundwater Hydrology

Cumulative groundwater hydrology impacts could result from the overall utilization of groundwater basins that encompass or that are located in proximity to the Project Site and related projects. In addition, interruptions to existing hydrology flow by dewatering operations of underground water will have the potential to affect groundwater levels. However, no water supply wells, spreading grounds, or injection wells are located within a 1-mile radius of the Project Site, and any calculation of the extent to which the related projects will extract or otherwise directly use groundwater will be speculative. As with the Project, any related Project will be required to evaluate its individual impacts to groundwater hydrology due to temporary or permanent dewatering operations.

Other proposed projects within the groundwater basin will incorporate structural designs for subterranean levels that are able to withstand hydrostatic forces and incorporate comprehensive waterproofing systems in accordance with current industry standards and construction methods. If any of the related projects require permanent dewatering systems or extend excavation beneath groundwater levels, such systems will be regulated by State Water Resources Control Board (SWRCB) permit requirements. Project operation does not incrementally increase or reduce the imperviousness of the Project Site in a manner that could affect groundwater recharge rates on-Site. As a result, the Project will not change potable water levels sufficiently to reduce the ability of the water utility to use the groundwater basin for public water supplies, reduce yields in adjacent wells, or result in a demonstrable and sustained reduction of groundwater recharge capacity. Therefore, the Project's contribution to cumulative impacts to groundwater hydrology is not cumulatively considerable. As such, cumulative impacts are less than significant.

(4) Groundwater Quality

Compliance with all applicable existing regulations at the Project Site prevents the Project from affecting or expanding any potential areas affected by contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the CCR Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. As with the Project, the related projects are unlikely to cause or increase groundwater contamination because compliance with existing statutes and regulations will similarly prevent the related projects from affecting or expanding any potential areas affected by contamination, or increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated. Therefore, the Project's contribution to cumulative impacts to groundwater quality is not cumulatively considerable. As such, cumulative impacts are less than significant.

Project Design Features

The City finds that no specific Project Design Features are incorporated into the Project to reduce its potential impacts on hydrology and water quality.

H. Land Use and Planning

Consistency with Local Plans and Applicable Policies

(a) Los Angeles General Plan

The General Plan of the City of Los Angeles serves as a comprehensive, long-term plan for future development of the City to guide land use policies and meet the existing and future needs of the community. The General Plan consists of a series of documents that include the seven state-mandated elements: Land Use, Circulation, Noise, Safety, Housing, Open Space, and Conservation. In addition, the City's General Plan includes elements addressing Air Quality, Historic Preservation and Cultural Resources, Infrastructure Systems, Public Facilities and Services, and Health and Wellness, as well as the Citywide General Plan Framework Element (General Plan Framework Element). The Land Use Element is comprised of 35 local area plans known as Community Plans that guide land use at the local level. The Project Site is located within the boundaries of the Hollywood Community Plan area.

(1) Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element, adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the City and defines citywide policies regarding land use that influence the Community Plans and most of the City's General Plan Elements. Specifically, the General Plan Framework Element defines Citywide policies for land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, and infrastructure and public services.

Land Use Chapter. As detailed in Table IV.H-2 on page IV.H-33 of the Draft EIR, the Project will support and be generally consistent with the General Plan Framework Element's Land Use Chapter. The Project will contribute to the achievement of many of the applicable goals, objectives, and policies regarding the provision of a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors through the development of new residential, hotel, office, and commercial/retail uses and through the rehabilitation of the Crossroads of the World complex and the Hollywood Reporter Building and the Bullinger Building. The Project will be located in an area well-served by Metro and LADOT public transportation options with convenient access to public transit and opportunities for walking and biking that will promote an improved quality of life by facilitating a reduction of vehicle trips and miles traveled and air pollution, while supporting the City's objective to encourage new hotel, multi-family residential, retail, commercial, and office development along primary transit corridors/boulevards. The Project will accommodate land uses that serve a regional market in areas designated as "Regional Center" in accordance with Tables 3-1 and 3-6 of the General Plan Framework's Land Use Chapter. With approval of the requested discretionary actions, the Project will comply with the Framework Element Long-Range Land Use Diagram, which envisions the Project area as a regional center and a focal point of regional commerce, identity, and activity and containing a diversity of uses with floor area ration (FAR) from 1.5:1 to 6.0:1. The Framework Element recognizes regional centers to be characterized by 6- to 20-stories (or higher) and usually major transportation hubs.

The Project is consistent with the General Plan Framework Element's Land Use Chapter because it consists of a mixed-use development that will create a new urban district, while retaining the historic setting of the Crossroads of the World complex. The Project will integrate Crossroads of the World into a new, mixed-use development that will include

eight new mixed-use buildings with residential, hotel, commercial/retail, office, entertainment, and restaurant uses, and a new stand-alone one-story commercial/retail building in the Crossroads of the World complex. The Project will include a new hotel, multi-family residential, and retail/commercial development along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods. These uses are consistent with the General Plan Framework's Regional Center designation for the Project Site. Thus, the Project will comply with the General Plan Framework Element's Land Use Chapter.

Housing Chapter. The Project will be consistent with the relevant objectives that support the goals of the General Plan Framework's Housing Chapter. The Project will support the City's objective to plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types through the development of 950 residential units. Of the residential units, 105 units shall be dedicated as affordable housing units (i.e., Very Low Income household dwelling units) to replace the existing 84 rent-stabilized units that the Project removes. The residential units will include a mix of studio, one-, and two-bedroom units. In addition, the Project will encourage the location of new multi-family housing to occur in proximity to transit corridors, including Metro and LADOT bus stops along Sunset Boulevard and Highland Avenue and proximity to the Metro Red Line Hollywood/Highland Station. Therefore, the Project will be generally consistent with the applicable objectives and policies that support the goals set forth in the General Plan Framework's Housing Chapter.

Urban Form and Neighborhood Design Chapter. As set forth in Table IV.H-2 on pages IV.H-40 through 41 of the Draft EIR, the Project will also be consistent with the relevant objectives and policies that support the goals of the General Plan Framework's Urban Form and Neighborhood Design Chapter. The Project will specifically support the City's goal to provide a livable City for existing and future residents by introducing a new mixed-use development with new residential, office, hotel, and commercial/retail uses. In addition, the Project will be consistent and compatible with the mix of neighborhood-serving commercial/retail uses, tourist and entertainment-related commercial/retail uses, offices, hotels, and institutional land uses surrounding the Project Site and will serve the surrounding community and future businesses. The new mixed-use development is designed to create a vibrant transit oriented development that connects with the urban fabric of Hollywood and also retains the historical identity of the Crossroads of the World complex and the Hollywood Reporter Building and the Bullinger Building. The Project will include building design features in a contemporary architectural style. The Project consists of landscaped public walkways that will promote access and connectivity to and through the Project Site from Sunset Boulevard, Highland Avenue, Las Palmas Avenue, Selma Avenue, and McCadden Place. Furthermore, Project lighting will incorporate low-level exterior lights adjacent to buildings and along pathways for security and wayfinding purposes and to accent signage, architectural features, and landscaping elements. Therefore, the Project will be consistent with the applicable objectives and policies that support the goals set forth in the General Plan Framework's Urban Form and Neighborhood Design Chapter.

Open Space and Conservation Chapter. The Project is also consistent with the relevant objectives and policies that support the goals of the General Plan Framework's Open Space and Conservation Chapter. Through private development, the Project enhances the open space resources of the surrounding neighborhoods, by providing a total of

approximately 101,075 square feet of open space, consisting of approximately 22,200 square feet of interior amenity space, 51,225 square feet of common open space, and approximately 27,650 square feet of private open space (i.e., balconies), in accordance with the open space provisions for new residential projects set forth in LAMC Section 12.21-G. Furthermore, the existing Crossroads of the World courtyards and the continuation of the plaza between Buildings C1 and C2 provide an additional 41,800 square feet of open space, as well as approximately 23,500 square feet of additional pedestrian paseo. When including the pedestrian paseo and the existing courtyards that are accessible to both the Project residents and the general public, the open space provided within the Project Site totals approximately 166,375 square feet. The Project also promotes the development of public open space that is visible and safe by providing sufficient lighting along the walkways and courtyards, as well as a closed circuit camera system.

Rooftop amenities will include a pool and pool terrace, club room, lounge, entertainment terrace, and artificial turf game lawn. Landscaped courtyards will be located on the podium level and roof level; private patios and balconies will be provided within the residential units; and a private gym is proposed along the Las Palmas Avenue frontage. Landscaped planters and hardscape features will be distributed throughout the podium and rooftop levels, and perimeter landscaping will be installed at the ground level. Due to the amount, variety, and availability of the Project's proposed open space and recreational amenities, Project residents and employees will utilize on-Site open space to meet their recreational needs and reduce the Project's demand on public parks and recreational facilities. Therefore, the Project will be consistent with the applicable objectives and policies that support the goals set forth in the General Plan Framework's Open Space and Conservation Chapter.

Economic Development Chapter. The Project will be consistent with the relevant objectives and policies that support the goals of the General Plan Framework's Economic Development Chapter. As provided on Table IV.H-2 on page IV.H-33 of the Draft EIR, the Project will support the City's objective to establish a balance of land uses through the development of a mixed-use Project with residential, hotel, office, commercial/retail, and entertainment uses in an area well-served by public transit. The proposed neighborhood-serving retail and restaurant uses will complement the employment base (e.g., existing office and hotel uses, entertainment venues, and tourist attractions) of the Community Plan area, meet the needs of local residents, and foster continued economic investment. The Project will promote and encourage the development of retail facilities appropriate to serve the shopping needs of the local population by providing approximately 185,000 square feet of commercial/retail and entertainment uses, including a supermarket, that will serve the surrounding neighborhood. In addition, the Project will concentrate its commercial development in regional mixed-use centers, around transit stations, and within community centers by developing approximately 190,000 square feet of commercial uses in proximity to public transit. Thus, the Project will be consistent with the applicable objectives and policies that support the goals set forth in the General Plan Framework's Economic Development Chapter.

Transportation Chapter/Mobility Plan 2035. The Project will also be consistent with the relevant objectives and policies that support the goals of the General Plan Framework's Transportation Chapter and Mobility Plan 2035. Specifically, the Project will support the City's objective to mitigate the impacts of traffic growth through the implementation of a

Transportation Demand Management Plan that will include strategies to promote non-auto travel and reduce the use of single-occupant vehicle trips. The Project will also promote the City's policy to include bicycle storage and parking facilities (e.g., bike racks for residents and Project patrons/employees and showers for employees) by providing approximately 1,241 bicycle parking spaces. With respect to Mobility Plan 2035, the Project will support the City's policy to provide for safe passage of all modes of travel during construction by preparing and implementing a Construction Management Plan that will incorporate safety measures around the construction Site to reduce the risk to pedestrian traffic near the work area; minimize the potential conflicts between construction activities, street traffic, transit stops, and pedestrians; and reduce the use of residential streets and congestion to public streets and highways. The Project will ensure high quality pedestrian access in all Site planning and public right-of-way modifications to provide a safe and comfortable walking environment. The Project recognizes all modes of travel by providing adequate vehicular access, improving pedestrian access, and providing bicycle facilities. Additionally, given the location of the Project Site along and in proximity to major transit corridors, the Project will provide all residents, guests, employees, and visitors with convenient access to transit services. Therefore, the Project will be generally consistent with the applicable policies that support the goals and objectives set forth in Mobility Plan 2035 and the General Plan Framework's Transportation Chapter.

Infrastructure and Public Services Chapter. The Project will be consistent with the relevant objectives and policies that support the goals of the General Plan Framework's Infrastructure and Public Services Chapter. Specifically, the Project will support the City's policy and objective to reduce the amount of hazardous substances and the total amount of flow entering the stormwater system, as well as pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality by implementing a Stormwater Pollution Prevention Plan during construction that will include best management practices (BMPs) and other erosion control measures to minimize the discharge of pollutants in stormwater runoff. During operation, the Project will include BMPs to collect, detain, treat, and discharge runoff on-Site before discharging into the municipal storm drain system as part of the Standard Urban Stormwater Mitigation Plan. Implementation of Project BMPs will result in an improvement in surface water quality runoff from the Project Site. Furthermore, as discussed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR, the Los Angeles Department of Water and Power will be able to meet the water demand for the Project, as well as existing and planned water demands of its future service area. Therefore, the Project will be generally consistent with the applicable objectives and policies that support the goals set forth in the General Plan Framework's Infrastructure and Public Services Chapter.

Based on the analysis above, the Project will be consistent with the relevant goals, objectives, and policies of the General Plan Framework.

(2) Los Angeles General Plan Conservation Element

The Conservation Element established an objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes and a corresponding policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or

property modification activities. The Project's consistency with this objective and this policy is analyzed below.

Specifically, the Project will retain, rehabilitate, and revitalize Crossroads of the World, a designated City Cultural-Historic Monument (Monument #134) that is also listed on the National Register of Historic Places and the California Register of Historical Resources. The Project will also retain, rehabilitate and revitalize the former Hollywood Reporter Building, a City Cultural-Historic Monument designated after the release of the Draft EIR, and the Bullinger Building, a building found eligible for listing in the California Register in the 2010 Hollywood Redevelopment Project Area Historic Resources Survey and concluded to be an historical resource in the EIR. The Project proposes to redevelop the Project Site with a cohesive, mixed-use development that retains Crossroads of the World within a collection of new buildings of modern design and creates an open-air pedestrian district with a mix of shopping, dining, and entertainment uses. However, to accommodate the new mixed-use development, the Project will demolish four properties that have been determined to be eligible for listing on the California Register through survey evaluation. With implementation of Mitigation Measure CUL-MM-14, these four properties will be documented in accordance with Historic American Buildings Survey (HABS) guidelines and standards. However, the historic impact associated with the demolition of these properties cannot be mitigated to a less-than-significant level and will, therefore, be significant and unavoidable. Consequently, the demolition of these four properties will not be consistent with the objective and policy for the conservation of cultural and historic resources set forth in the Conservation Element.

(3) Los Angeles General Plan Housing Element

The Project will be consistent with the applicable policies set forth in the Housing Element of the General Plan. The Project will provide a variety of housing types in an area that is pedestrian-friendly and served by public transit; expand affordable rental housing for all income groups; facilitate new construction of a range of different housing types; expand opportunities for residential development, particularly in designated Centers; and preserve quality rental and ownership housing for households of all income levels. Specifically, the Project will develop a total of 950 residential units, 105 of which shall be Low Income Household rental units to replace the existing 84 rent-stabilized units located in Development Parcel B. Therefore, although THE Project removes 84 existing multi-family dwelling units on-Site, it replaces these units to maintain quality rental housing for households of all income levels. The Project will also promote the construction of green buildings by incorporating sustainable design features, including energy conservation, water conservation, alternative transportation programs, noise management, a pedestrian- and bicycle-friendly Site design and waste reduction measures. Therefore, the Project will be consistent with the applicable policies set forth in the Housing Element.

(4) Los Angeles General Plan Health and Wellness Element—Plan for a Healthy Los Angeles

The Project will support the applicable goals and objectives of the Health and Wellness Element by implementing a mixed-use development and incorporating a variety of open space areas within the Project Site that promote walkability and biking to contribute to the creation of a healthy community. The Project will include active and passive recreational spaces, including roof decks and pools, community rooms and

recreational facilities, courtyards, landscaped gardens, terraces, and common open space with gathering and seating areas. The Project will provide a total of approximately 101,075 square feet of open space, consisting of approximately 22,200 square feet of interior amenity space, 51,225 square feet of common open space, and approximately 27,650 square feet of private open space (i.e., balconies) in accordance with the open space provisions for new residential projects set forth in LAMC Section 12.21-G. Furthermore, the existing Crossroads of the World courtyards and the continuation of the plaza between Buildings C1 and C2 will provide an additional 41,800 square feet of open space, as well as approximately 23,500 square feet of additional pedestrian paseo. When including the proposed pedestrian paseo and the existing courtyards that are accessible to both the Project residents and the general public, the open space provided within the Project Site will total approximately 166,375 square feet. The Project will also provide approximately 239 new trees, including roof deck trees, trees along the paseo, and street trees along Highland Avenue, Selma Avenue, Las Palmas Avenue and Sunset Boulevard.

The Project will promote pedestrian activity and promote walkability in the vicinity of the Project Site by locating all of the proposed retail and restaurant uses on the ground floor of the proposed buildings, primarily along the street frontages and along the pedestrian paseo. In addition, the Project will create multimodal transit options for Project users by providing ample bicycle parking.

The Project will also incorporate elements that will promote individual and community safety. Specifically, as provided in Section IV.K.1, Public Services—Police Protection, of the Draft EIR, the Project will incorporate design strategies established in the City's initiative, "Design Out Crime," which includes the techniques of Crime Prevention Through Environmental Design (CPTED). These design strategies within the Project design include, but are not limited to: (1) limiting and locating secure access points to areas of high visibility; (2) designing hallways and corridors to be straight forward with no dark corners, as possible; (3) providing clear transitional zones between public, semi-public, and private spaces; and (4) properly lighting and providing proper signage to interior and exterior spaces to direct flow of people and reduce opportunities for crime. Also refer to Project Design Feature K.1-2 in Section IV.K.1, Public Services—Police Protection, of the Draft EIR. Therefore, the Project will be generally consistent with the applicable goals (i.e., A City Built for Health, Bountiful Parks and Open Spaces, and Safe and Just Neighborhoods) set forth in the Health and Wellness Element.

(5) Hollywood Community Plan

The Project will be consistent with the objectives and policies set forth in the Community Plan. Specifically, the Project will support the City's objective to make provision for the housing required to satisfy the varying needs and desires of all economic segments of the Community. Although the Project will result in significant and unavoidable impacts at five study intersections, the Project will partially support the City's objective to make provision for a circulation system coordinated with land uses and densities through the development of a mixed-use development. The Project will consist of new residential, hotel, office, entertainment and commercial/retail uses in a highly urbanized area that is well-served by public transit to promote better interactions between existing and new uses and among on-Site uses. In addition, the Project will enhance the overall connectivity of the Project Site to the Hollywood community and promote opportunities for the use of alternative modes of transportation, including use of public transportation and bicycling.

The Project will also support the City's objective related to service systems to provide a balance between land use and service facilities at all times. As discussed in Section IV.K, Public Services, and Section IV.M, Utilities and Service Systems, of the Draft EIR, the agencies that provide services and utilities to the Project Site will have capacity to serve the Project. The Project will also support the City's objective to locate a mixed-use development in an area well-served by public transit and promote the use of alternative modes of transportation through the provision of bicycle parking spaces. Therefore, the Project shall be consistent with the general intent of the Community Plan.

(b) Community Redevelopment Agency (CRA/LA) Hollywood Redevelopment Plan

The Project Site is designated for Regional Center Commercial within the Redevelopment Plan Area, and Development Parcel D is located within the Hollywood Boulevard District of the Redevelopment Plan Area. According to the Redevelopment Plan, Regional Center Commercial uses generally provide goods and services that are designed in a manner that appeals to regional and local markets. Regional Center Commercial uses generally include theaters, restaurants, hotels, offices, and retail or service businesses. Section 506.3 of the Redevelopment Plan also encourages the development of new and rehabilitated residential uses in the Regional Center Commercial Land Use designation. The Project will develop new residential, hotel, office, entertainment and commercial/retail uses as encouraged by the Redevelopment Plan. As such, the types of land uses proposed by the Project will be consistent with the Regional Center Commercial land use designation.

Development in the Regional Center Commercial designation is limited to an FAR of 4.5:1. However, new development may exceed the 4.5:1 FAR limitation to a maximum of 6:1 FAR if the development meets specific objectives set forth in Section 506.2.3 of the Redevelopment Plan, or as allowed by future amendments to the Community Plan. Specifically, Section 506.2.3 permits the increased FAR provided that the proposed development further the goals and intent of this Plan and the Community Plan and meets objective "a" below and at least one of the other objectives:

a) to concentrate high intensity and/or density development in areas with reasonable proximity or direct access to high capacity transportation facilities or which effectively utilize transportation demand management programs;

b) to provide for new development which compliments [sic] the existing buildings in areas having architecturally and/or historically significant structures or to encourage appropriate development in areas that do not have architecturally and/or historically significant buildings;

c) to provide focal points of entertainment, tourist or pedestrian oriented uses in order to create a quality urban environment;

d) to encourage the development of appropriately designed housing to provide a balance in the community;

e) to provide for substantial, well designed, public open space in the Project area; and

f) to provide social services or facilities for social services which address the community's needs.

The Project meets Objectives (a), (c), (d) and (e) and, therefore, is consistent with Section 506.2.3 of the Redevelopment Plan. Specifically, the Project is located within 1,000 feet southeast of the Metro Red Line Hollywood/Highland Station and along major transit lines along Highland Avenue, Sunset Boulevard, and Hollywood Boulevard to meet Objective (a). Furthermore, the Project's proximity to Hollywood Boulevard and Sunset Boulevard will provide Project residents and tourists convenient access to entertainment uses along these two commercial corridors and encourage and promote walkability in the surrounding pedestrian-friendly environment to meet Objective (c). Under the Project, Development Parcel D will include 76 residential units to meet Objective (d). The Project will also include substantial, well-designed public open space to meet Objective (e).

The FAR averaged across the Project Site is 3.81:1. By meeting the objectives identified above and with the approved zone and height district change to replace the "D" Limitation to reflect the Project, the Project is consistent with the allowable FAR for the Regional Center Commercial land use designation on these parcels.

The Project is consistent with the goals set forth in the Redevelopment Plan. The Project meets the needs of the residential, commercial, arts, and entertainment sectors. In addition, the Project provides new housing opportunities, including affordable housing units, and office, hotel, entertainment and commercial/retail uses. The Project promotes the development of sound residential neighborhoods through mechanisms, such as land use, density and design standards, public improvements, property rehabilitation, sensitive in-fill housing, development of open spaces and other support services necessary to enable residents to live and work in Hollywood. Although the Project results in significant and unavoidable impacts at five study intersections, the Project supports and encourages a circulation system that will improve the quality of life in Hollywood, including pedestrian, automobile, parking, and mass transit systems, by concentrating new development within 1,000 feet of the Metro Red Line Hollywood/Highland Station and other transit stops along Hollywood Boulevard, Highland Avenue, and Sunset Boulevard to reduce vehicle miles traveled by Project residents.

Based on the analysis above, the Project is consistent with the Hollywood Redevelopment Plan.

(c) Los Angeles Municipal Code (LAMC)

The Project consists of eight mixed-use buildings with heights ranging from 2 to 32 stories (i.e., 42 feet to approximately 402 feet above grade) and a small stand-alone one-story commercial/retail-only building (up to 19 feet in height). The Project Site is currently designated as Regional Center Commercial and zoned C4-2D (Commercial, Height District 2 with Development Limitation) and C4-2D-SN (Commercial, Height District 2 with Development Limitation, Signage Supplemental Use District) by the LAMC. The Commercial zones allow for a wide array of land uses, such as retail stores, restaurants, offices, hotels, schools, parks, and theaters. With some limitations (as

identified in the LAMC), the C4 zone allows for any land use permitted in the C2 zone, which, in turn, allows for any land use permitted in the C1.5, C1, and CR zones. The C4 zone also allows for any land use permitted in the R4 (Multiple Residential) zone, which includes one-family dwellings, two-family dwellings, apartment houses, multiple dwellings, and home occupations at a maximum density of 108 dwelling units per acre. In addition, pursuant to LAMC Section 12.22-A,18(a), developments combining residential and commercial uses are also allowed to develop any land use permitted in the R5 zone, which allows density for a maximum density of 217 dwelling units per acre based on a minimum lot area of 200 square feet per dwelling unit.

Height District 2 within the C4 zone does not impose a height limitation and has a maximum FAR of 6:1. However, the Development "D" Limitation in the zoning prefix indicates that development shall not exceed a FAR of 2:1 and 3:1 unless certain approvals are received. The Project will include approximately 1,381,000 square feet of developed floor area (including existing uses to be retained) with a total FAR of approximately 3.81:1 averaged across the Project Site. Thus, the Project will be developed within the allowable density of the underlying zone but, because of the Development "D" Limitation, will exceed the FAR specified for the C4-2D and C4-2D-SN zones. However, with approval of the requested discretionary actions, including a zone change to replace the "D" Limitation to reflect the Project, the Project will comply with the requirements of the LAMC.

Under the existing C4-2D and C4-2D-SN zoning, the Project is not required by the LAMC to provide front, rear, or side yard setbacks. Thus, proposed setbacks will be consistent with surrounding buildings and will be consistent with the LAMC.

As discussed in Section IV.L, Traffic, Access, and Parking, of the Draft EIR, based on the parking requirements set forth in Sections 12.21-A,4 and 12.22-A,25 of the LAMC, the Project requires a total of 2,186 parking spaces. The Project provides a total of 2,258 parking spaces. Therefore, the Project includes parking that exceeds the minimum applicable parking requirements of the LAMC. In addition, in accordance with Section 12.21-A,16(a) of the LAMC, the Project is required to provide 1,239 bicycle parking spaces. The Project provides the required number of spaces, including 1,048 long-term spaces and 193 short-term spaces, to comply with the bicycle parking requirements of the LAMC.

The Project also meets the requirements set forth in Section 12.21 of the LAMC concerning the provision of on-Site open space. The Project provides approximately 101,075 square feet of open space, consisting of approximately 22,200 square feet of interior amenity space, 51,225 square feet of common open space, and approximately 27,650 square feet of private open space (i.e., balconies), in accordance with the open space provisions for new residential projects set forth in LAMC Section 12.21-G. Furthermore, the existing Crossroads of the World courtyards and the continuation of the plaza between Buildings C1 and C2 will provide an additional 41,800 square feet of open space, as well as approximately 23,500 square feet of additional pedestrian paseo. When including the proposed pedestrian paseo and the existing courtyards that are accessible to both the Project residents and the general public, the open space provided within the Project Site will total approximately 166,375 square feet.

In accordance with the LAMC Section 12.24-W.1, the Project is seeking a Master Conditional Use a to permit the on-Site and off-Site sale, dispensing and consumption of

a full line of alcoholic beverages in connection with a total of 22 establishments associated with the Project's proposed hotel and commercial uses. The service and sale of alcoholic beverages will be incidental to the commercial and restaurant operations. Several restaurant/bar and entertainment uses with permits to serve alcohol are already located near the Project Site

In summary, with approval of the requested discretionary actions, the Project shall be consistent with all applicable provisions of the LAMC.

(d) Hollywood Signage Supplemental Use District

The parcels along the western boundary of the Project Site fronting Highland Avenue in Development Parcel A and the parcels along the southern boundary of the Project Site fronting Sunset Boulevard in Development Parcel B are located within the boundaries of the Hollywood Signage Supplemental Use District (HSSUD). These parcels do not include any of the types of signs that are prohibited in the HSSUD, including, but not limited to billboards, can signs, captive balloon signs, high rise signs, illuminated architectural canopy signs, pole signs, sandwich board signs, and solid panel roof signs, pursuant to Ordinance No. 181,340. Furthermore, development of the Project in these parcels complies with the design standards for specific types of signs set forth in Ordinance No. 181,340, including, but not limited to, standards related to location, dimensions, area, height, spacing, and materials, for each of the types of signs. Signage includes monument or mounted Project identity signage, building and commercial tenant signage, and general ground-level and wayfinding pedestrian signage, as permitted by the HSSUD. Wayfinding signs are located at parking garage entrances, elevator lobbies, vestibules, and residential corridors. Illuminated signage includes identification signs, digital message boards, and tenant retail signs. Therefore, the Project is consistent with the applicable signage requirements in the HSSUD.

Consistency with Regional Plans

The Southern California Association of Governments (SCAG) is mandated to create the regional plans that address transportation, growth management, hazardous waste management, and air quality. SCAG prepares several plans including the Regional Comprehensive Plan/Sustainable Communities Strategy (RTP/SCS), the Regional Comprehensive Plan (RCP) and the Compass Growth Vision Report.

As detailed in Section IV.H, Land Use, of the Draft EIR, the Project is consistent with the applicable goals and principles set forth in the 2012–2035 RTP/SCS, the Compass Growth Vision Report, and the RCP. Given the Project's location in proximity to a variety of transportation options, the Project maximizes mobility and accessibility by providing a mixed-use development that will take advantage of these opportunities for use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking. Furthermore, the Project is located along Sunset Boulevard and two blocks south of Hollywood Boulevard, two commercial corridors that are characterized by a high degree of pedestrian activity and "people-scaled" uses, consistent with the vision of the RCP. The Project also includes a pedestrian paseo, which feature areas (e.g., interactive water features, seating, planting, fire places, and/or movie screens), and include the revitalized historic Crossroads of the World complex. Therefore, by focusing new housing opportunities and mixed-use development that

contribute to a walkable and “people-scaled” community in a High-Quality Transit Area (HQTA) and a Transit Priority Area (TPA), the Project is consistent with primary goals of the applicable regional plans identified above.

Conclusion Regarding Impacts Relative to Land Use Consistency

Based on the analysis provided above, the Project is substantially consistent with the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site. Therefore, the Project is substantially consistent with the General Plan, Community Plan, Redevelopment Plan, or the whole of relevant environmental policies in other applicable plans, including regional plans. As such, impacts related to land use consistency are less than significant.

4. Land Use Compatibility

The Project proposes a mix of residential, hotel, office, entertainment and commercial/retail uses that will be compatible with the surrounding area and will complement existing and future development in the Project area and within the Hollywood community. As shown by the number and type of related projects listed in Section III, Environmental Setting, of the Draft EIR, the Hollywood Community Plan continues to transform this portion of the city into a pedestrian-oriented community as demonstrated by the mixed-use developments, new residential, hotel, office, and commercial/retail uses. Similar to the Project, many of the recent developments provide new multi-family residential units with ground-floor commercial and retail amenities in addition to new offices and hotel uses. Thus, the Project represents a continuation of those types of projects and a reflection of the surrounding urban environment.

In addition, despite its increased density, scale, and height of development over existing uses at the Project Site, the Project is consistent with the character of the surrounding area, which is highly urbanized and contains a varied mix of land uses at various scales of development, including low- to high-rise buildings occupied by neighborhood-serving commercial/retail uses, tourist and entertainment-related commercial/retail uses, offices, hotels, educational institutions, and single-family and multi-family residences. In the immediate vicinity of the Project Site are the Blessed Sacrament Church and School, the First Baptist Church, a plant nursery, commercial/retail strip malls, a Rite-Aid pharmacy, a Panavision office, multi-family apartment buildings, Hollywood High School, Selma Avenue Elementary School and its co-located Larchmont Charter School West, the Los Angeles Recording School, a multi-story office building, and surface parking lots. On the southern boundary of the Project Site, fronting Sunset Boulevard, are a mix of commercial/retail and restaurant uses, entertainment-related uses, and nightclubs. The Hollywood & Highland Center and entertainment complex is located approximately 1,000 feet northwest of the Project Site at the corner of Hollywood Boulevard and Highland Avenue.

The Project does not create any division of land or divide an established community. The Project improves and enhances the existing streetscape in the Project area to promote pedestrian activity within a regional center, particularly between the Metro Red Line Hollywood/Highland Station and the Hollywood & Highland Center and the Project Site. The Project itself is linked by a pedestrian paseo that meanders through the Project Site from the hotel at the northwestern portion of the Project Site to the historic Crossroads of

the World along the eastern end of the Project Site to promote and enhance pedestrian activity. Additional landscaped public walkways connect the entire Project Site, while promoting access from Sunset Boulevard, Las Palmas Avenue, Selma Avenue, and McCadden Place.

Based on the analysis above, the Project does not substantially or adversely change the existing land use relationships between the Project Site and existing off-Site uses, or have a long-term effect of adversely altering a neighborhood or community through on-going disruption, division, or isolation of these uses. Impacts related to land use compatibility are less than significant.

5. Cumulative Impacts

As indicated in Section III, Environmental Setting, of the Draft EIR, there are 145 related projects in the vicinity of the Project Site. The related projects generally consist of infill development and redevelopment of existing uses, including mixed-use, residential, commercial, office, hotel, institution, and motion picture uses. Specifically, the related projects located within Project Site vicinity are shown in Figure III-1 in Section III, Environmental Setting, of the Draft EIR. The proposed developments comprise a variety of uses, including apartments, condominiums, office, restaurants, and retail uses, as well as mixed-use developments that incorporate some or all of these elements. The nearest proposed development projects located within a 0.25-mile radius of the Project Site include Related Project Nos. 17, 30, 37, 39 45, 50, 65, 80, 94, 134, 137, and 139, which involve development of mixed-use, commercial retail, residential uses, office, and hotels. As with the Project, the related projects will be required to comply with relevant land use policies and regulations. Such related projects are also not expected to fundamentally alter the existing land use relationships in the community but, rather, will concentrate development on particular sites and promote a synergy between existing and new uses and overall connectivity of the Hollywood community. Therefore, the Project and the related projects do not have cumulatively significant land use impacts. The balance of the related projects will not cause cumulative land use impacts due to their similar characteristics (i.e., mixed-use residential and commercial projects) and because of their distance from the Project Site buffered by existing intervening development. Finally, the Project itself is consistent with applicable land use plans and zoning standards. Based on the mix of uses and buildings that currently comprise the Hollywood community, as well as the proposed uses, as detailed in Table III-1 in Section III, Environmental Setting, of the Draft EIR, the Project is compatible with the uses of various existing and proposed developments in the immediate vicinity of the Project Site, as well as with the existing and proposed uses planned throughout the surrounding vicinity. Therefore, cumulative land use impacts are less than significant.

Project Design Features

The City finds that no specific Project Design Features are incorporated into the Project to reduce its potential impacts regarding the Project's consistency with applicable local and regional land use plans and policies.

I. Noise

1. Construction Vibration – Building Damage Impacts from Off-Site Construction

Construction delivery/haul trucks will travel between the Project Site and the Hollywood Freeway via one or more of the following routes: Sunset Boulevard, Highland Avenue, and Santa Monica Boulevard. Heavy-duty construction trucks will generate ground-borne vibration as they travel along the Project's anticipated haul route(s). Thus, an analysis of potential vibration impacts using the building damage and human annoyance thresholds for ground-borne vibration along the anticipated local haul routes was conducted.

Based on Federal Transit Administration (FTA) data, the vibration generated by a typical heavy-duty truck is approximately 63 VdB (0.00566 PPV) at a distance of 50 feet from the truck. According to the FTA "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." Nonetheless, there are existing buildings along the Project's anticipated haul route(s) that are situated approximately 20 feet from the right-of-way and will be exposed to ground-borne vibration levels of approximately 0.022 PPV, as provided in the noise calculation worksheets included in Appendix I of the Draft EIR. This estimated vibration generated by construction trucks traveling along the anticipated haul route(s) will be below the most stringent building damage threshold of 0.12 PPV for buildings extremely susceptible to vibration. Therefore, vibration impacts (pursuant to the threshold of significance for building damage) from off-Site construction activities (i.e., construction trucks traveling on public roadways) will be less than significant.

2. Operational Noise

(a) On-Site Stationary Noise Sources

(1) Mechanical Equipment

As part of the Project, new rooftop mechanical equipment (i.e., HVAC condenser units) will be located at the roof level. Although operation of this equipment generates noise, regulatory compliance ensures that all on-Site mechanical equipment comply with the regulations under Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. In addition, as required by Project Design Feature NOI-PDF-3, all outdoor mounted mechanical equipment will be enclosed or screened from off-Site noise-sensitive receptors. The estimated noise levels from the Project's mechanical equipment will range from 43.0 dBA (L_{eq}) at receptor location R11 to 56.0 dBA (L_{eq}) at receptor location R10, which will result in a maximum increase of 3.8 dBA (L_{eq}) at receptor location R4. Accordingly, the estimated noise levels at all off-Site receptor locations will be below the significance thresholds of 3 dBA (L_{eq}) above ambient noise levels applicable to the LAUSD schools at receptors R11 and R16, and 5 dBA (L_{eq}) above ambient noise levels applicable to the remaining receptors. Therefore, noise impacts from mechanical equipment are less than significant.

(2) Loading Dock/Trash Collection Areas

As discussed in Section II, Project Description, of this Draft EIR, the Project is serviced through three loading areas. Noise sources associated with the loading dock and trash collection area include delivery/trash collection trucks and trash compactor operation. Based on measured noise levels from typical loading dock facilities and trash compactors,

delivery/trash collection trucks and trash compactors could generate noise levels of approximately 71 dBA (L_{eq}) and 66 dBA (L_{eq}), respectively, at a distance of 50 feet. As set forth in Project Design Feature AES-PDF-6 in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft EIR, trash collector areas will be fully enclosed during Project operation. Since the loading dock and trash collection area will be fully enclosed, noise generated within the loading dock and trash collection area are shielded from the off-Site sensitive receptors. The estimated noise from the loading dock and trash compactor range from 19.5 dBA (L_{eq}) at receptor location R16 to 46.4 dBA (L_{eq}) at receptor location R10. The estimated noise levels from the loading dock and trash compactor at all off-Site receptor locations are below the significance thresholds of 3 dBA (L_{eq}) applicable to receptors R11 and R16 and 5 dBA (L_{eq}) applicable to the remaining receptors. Therefore, noise impacts from loading dock and trash compactor operations are less than significant.

(b) Off-Site Traffic (Mobile Sources)

(1) Future plus Project

For the Draft EIR, future roadway noise levels were calculated along 83 roadway segments in the vicinity of the Project Site. The roadway noise levels were calculated using the traffic data provided in the Traffic Study prepared for the Draft EIR, which is included in Appendix O of the Draft EIR. As the Project was then expected to generate a net increase of 15,005 daily weekday trips, Project –related traffic was expected to increase the existing traffic volumes along the roadway segments in the study area when compared with Future Without Project conditions. This increase in roadway traffic was analyzed to determine if any traffic-related noise impacts will result from operation of the Project.

The calculated Community Noise Equivalent Levels (CNEL), which is used by the City and State to describe noise impacts, are conservatively calculated along the roadways and do not account for the presence of any physical sound barriers or intervening structures. The Project will have resulted in an increase of up to 2.6 dBA (CNEL) in traffic-related noise levels along McCadden Place between Selma Avenue and Sunset Boulevard. At all other analyzed roadway segments, the increase in traffic-related noise levels will have been 2.2 dBA or lower. The increase in traffic noise levels will have been below the 3-dBA CNEL significance threshold increase at the property line of affected noise-sensitive uses and along roadway segments with LAUSD schools (i.e., Highland Avenue between Hollywood Boulevard and Sunset Boulevard, Las Palmas Avenue between Santa Monica Boulevard and Melrose Avenue, Vine Street between Santa Monica Boulevard and Melrose Avenue, Bronson Avenue between Sunset Boulevard and Santa Monica Boulevard, Franklin Avenue between Cahuenga Boulevard and Western Avenue, Sunset Boulevard between La Brea Avenue and Western Avenue, and Selma Avenue between Las Palmas Avenue and Wilcox Avenue). Therefore, traffic noise impacts under Future Plus Project conditions as analyzed in the Draft EIR will have been less than significant.

Once modified as described in the Final EIR, however, the Project results in a reduction in daily trips compared to the analysis prepared for the Draft EIR. Consequently, noise impacts associated with off-Site traffic are less than significant, and less than the impacts identified in the Draft EIR.

(2) Existing plus Project

The analysis of off-Site traffic noise impacts above was based on the incremental increase in traffic noise levels attributable to Future with Project conditions as compared to Future without the Project conditions. Additional analysis was made to determine the potential noise impacts based on the increase in noise levels due to Project-related traffic compared with the existing baseline traffic noise conditions.

When compared with existing conditions, the Project as analyzed in the Draft EIR will have resulted in a maximum 2.8 dBA (CNEL) increase in traffic noise along McCadden Place between Selma Avenue and Sunset Boulevard. At all other analyzed roadway segments, the increase in traffic-related noise levels will have been 2.4 dBA or lower. In addition, the Existing Plus Project traffic noise analysis done for the Draft EIR was conservative, as baseline ambient mobile noise levels are expected to increase by the time the Project is completed (i.e., the traffic volumes and associated noise in 2022, which is the Project's buildout year, will increase without the Project due to ambient growth, as well as other related projects that will be completed by that year). Nevertheless, the estimated increase in traffic noise levels as compared to existing conditions will have been below the 3-dBA CNEL significance threshold increase at the property line of affected noise-sensitive uses to or within the "normally unacceptable" or "clearly unacceptable land use category and along roadway segments with LAUSD schools (i.e., Highland Avenue between Hollywood Boulevard and Sunset Boulevard, Las Palmas Avenue between Santa Monica Boulevard and Melrose Avenue, Vine Street between Santa Monica Boulevard and Melrose Avenue, Bronson Avenue between Sunset Boulevard and Santa Monica Boulevard, Sunset Boulevard between La Brea Avenue and Western Avenue, and Selma Avenue between Las Palmas Avenue and Wilcox Avenue). Therefore, traffic noise impacts under Existing Plus Project conditions as analyzed in the Draft EIR will have been less than significant.

Once modified as described in the Final EIR, however, the Project results in a reduction in daily trips compared to the analysis prepared for the Draft EIR. Consequently, noise impacts associated with off-Site traffic are less than significant, and less than the impacts identified in the Draft EIR.

3. Cumulative Impacts

(a) Construction

(1) Building Damage due to On-Site Vibration

As ground-borne vibration decreases rapidly with distance, potential vibration impacts due to construction activities are generally limited to buildings/structures that are located in proximity to the construction Site (i.e., within 20 feet as related to building damage and 80 feet as related to human annoyance at residential uses). With Related Project No. 45 immediately north of and nearest to the Project Site, the use of heavy construction equipment will be a minimum of 55 feet between the Project Site and the Related Project No. 45. Due to the rapid attenuation characteristics of ground-borne vibration and given the distance of the nearest related Project to the Project Site, there is no potential for a cumulative construction vibration impact with respect to building damage associated with ground-borne vibration from on-Site sources.

(2) Building Damage Due to Off-Site Vibration

Based on Federal Transit Administration (FTA) data, the vibration generated by a typical heavy truck will be approximately 63 VdB (0.00566 PPV) at a distance of 50 feet from the truck. According to the FTA, "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." Existing buildings that are approximately 20 feet from the right-of-way of the Project's anticipated haul route(s) (i.e., Sunset Boulevard, Highland Avenue, and Santa Monica Boulevard) are anticipated to be exposed to ground-borne vibration levels of approximately 0.022 PPV. Trucks from the related projects are expected to generate similar ground-borne vibration levels. Therefore, the vibration levels generated from off-Site construction trucks associated with the Project and other related projects along the anticipated haul route(s) will be well below the most stringent building damage threshold of 0.12 PPV for buildings extremely susceptible to vibration. Therefore, potential cumulative vibration impacts with respect to building damage from off-Site construction will be less than significant.

(b) Operational Noise

The Project Site and surrounding area have been developed with uses that have previously generated, and will continue to generate, noise from a number of community noise sources, including vehicle travel, mechanical equipment (e.g., HVAC systems), outdoor activity areas, and intermittent landscaping maintenance activities. Each of the related projects that have been identified within the general Project Site vicinity also generate stationary-source and mobile-source noise due to ongoing day-to-day operations. All related projects are of a residential, retail, commercial, or institutional nature, and these uses are not typically associated with excessive exterior noise levels. However, each Project produces traffic volumes that are capable of generating roadway noise impacts.

(1) On-Site Stationary Noise Sources

Due to provisions set forth in the LAMC that limit stationary source noise from items such as rooftop mechanical equipment, noise levels must be less than significant at the property line for each related Project. In addition, with regulatory compliance and implementation of the Project's Project Design Features, noise impacts associated with operations within the Project Site are less than significant. With regulatory compliance and based on the distance of the related projects from the Project Site and the noise levels associated with the Project after implementation of the Project Design Features, cumulative stationary source noise impacts associated with operation of the Project and related projects are less than significant.

(2) Off-Site Mobile Noise Sources

The Project and related projects in the area will produce traffic volumes (off-Site mobile sources) that will generate roadway noise. Cumulative noise impacts due to off-Site traffic were analyzed in the Draft EIR by comparing the projected increase in traffic noise levels

from “Existing” conditions to “Future Plus Project” conditions to the applicable significance criteria. Future Plus Project conditions include traffic volumes from future ambient growth, related projects, and the Project. As shown therein, cumulative traffic volumes will result in a maximum increase of 2.9 dBA (CNEL) along the roadway segment of McCadden Place between Selma Avenue and Sunset Boulevard, which will be below the 5 dBA significance threshold (applicable when noise levels fall within the conditionally acceptable category). At all other analyzed roadway segments, the increase in cumulative traffic noise will be less than 2.9 dBA (CNEL). Therefore, cumulative noise impacts due to off-Site mobile noise sources associated with the Project, future growth, and related projects will be less than significant. Moreover, as described in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, the Project modifications made since the analysis in the Draft EIR have reduced the Project’s traffic. Therefore, the Project’s contribution to cumulative traffic noise are even less than reported in the Draft EIR.

1. Project Design Features:

The City finds that Project Design Features NOI-PDF-2, NOI-PDF-3 and NOI-PDF-4 and AES-PDF-6, which are incorporated into the Project and are incorporated into these Findings as though fully set forth herein, reduce the potential construction vibration operational noise impacts of the Project. These Project Design Features were taken into account in the analysis of potential impacts.

J.1. Employment

1. Construction-Related Employment Impacts

Project development will generate the employment of construction workers on-Site during the demolition, grading and excavation, and building construction and finishing phases. However, individual construction projects generally do not generate new employment within the region. Rather, there is a pool of construction workers who move from Project to Project as work is available. The Project, therefore, supports the regional pool of construction workers and also contributes additional indirect jobs in a wide range of industries throughout the region resulting from the purchase of construction-related supplies, goods and services, and household expenditures by direct and indirect employees. Overall, since construction employment related to the Project shall be temporary and shall not exceed expected growth, construction-related employment impacts shall be less than significant.

2. Operational Employment Impacts

The employment impacts of the Project are based on the number of direct jobs that are associated with the Project’s new commercial and office uses, which are calculated using current LAUSD employment generation rates for comparable land uses. The projected scale of Project employment is then compared with applicable local and regional employment growth forecasts, including the jobs/housing ratio. In addition, the scale and character of Project employment is compared with applicable local and regional economic development and employment policies.

(a) Direct Project Employment Impacts

As shown in Table III-6 on page III-72 of the Revisions, Clarifications, and Corrections to the Draft EIR, based on LAUSD employment generation rates, development of the Project will result in approximately 955 employment positions on the Project Site. When accounting for the removal of existing uses, the Project creates a net increase of approximately 502 on-Site jobs.

(b) Project Employment Consistency With SCAG's Adopted Employment Growth Forecast

The Southern California Association of Governments (SCAG) is the federally designated Metropolitan Planning Organization for six Southern California counties (Ventura, Orange, San Bernardino, Riverside, Imperial, and Los Angeles). It is responsible for developing plans for transportation, growth management, and hazardous waste management, and a regional growth forecast that is a foundation for these plans. SCAG's 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (2012–2035 RTP/SCS) provides growth forecasts for the City of Los Angeles and the SCAG Region. The forecast projects a total of 8,550,933 jobs within the SCAG Region in 2022, which amounts to 418,600 jobs (5.15 percent) being added to the SCAG Region between 2015 and 2022. In April 2016, SCAG adopted the 2016–2040 RTP/SCS; as a point of comparison, the growth forecasts in this document Project a total of 8,528,480 jobs within the SCAG Region in 2022, which amounts to 522,480 jobs (6.53 percent) being added to the SCAG Region between 2015 and 2022.

The 502 net new employees generated under the Project account for only a small portion (approximately 1.09 percent) of the employment forecasted for 2022 and the employment growth forecasted between 2015 and 2022 in the City of Los Angeles, as well as the SCAG Region (approximately 0.12 percent). Therefore, Project-related employment generation is within and, thus, consistent with SCAG's employment forecasts for the SCAG Region and the City of Los Angeles.

(c) Jobs/Housing Ratio

When the jobs/housing ratio occurs equally throughout the region, the opportunity is the greatest for people to live close to where they work, thus reducing vehicle miles traveled. Based on SCAG's 2012–2035 RTP/SCS projections, there will be approximately 8,550,933 employees in the SCAG Region and 1,829,580 employees in the City of Los Angeles in 2022. The household data presented in Table IV.J.2-3 in Section VI.J.2, Housing, of the Draft EIR, show 6,573,600 households in the SCAG Region and 1,478,487 households in the City of Los Angeles in 2022. Therefore, based on SCAG's 2012–2035 RTP/SCS, the 2022 jobs/housing ratios for the SCAG Region and the City of Los Angeles are 1.30 jobs per household and 1.24 jobs per household, respectively. Based on SCAG's 2016–2040 RTP/SCS projections, there will be approximately 8,528,480 employees in the SCAG Region and 1,865,221 employees in the City of Los Angeles in 2022. The household data presented in Table IV.J.2-3 in Section VI.J.2, Housing, of the Draft EIR, show 6,357,200 households in the SCAG Region and 1,455,786 households in the City of Los Angeles in 2022. Therefore, based on SCAG's 2016–2040 RTP/SCS, the 2022 jobs/housing ratios for the SCAG Region and the City of Los Angeles are 1.34 jobs per household and 1.28 jobs per household, respectively. For the SCAG Region, the jobs/housing ratio is forecast to slightly improve from 1.31 in 2015 to 1.30 in 2022 based on SCAG's 2012–2035 RTP/SCS and from 1.35 in 2015 to 1.34 in

2022 based on SCAG's 2016–2040 RTP/SCS. For the City of Los Angeles, the jobs/housing ratio is forecast to slightly improve from 1.28 in 2015 to 1.24 by 2022 based on SCAG's 2012–2035 RTP/SCS; however, the jobs/housing ratio is forecast to be the same (i.e., 1.28) in 2015 and 2022 based on SCAG's 2016–2040 RTP/SCS. Since the Project represents only a small percent of the 2022 employment positions for the SCAG Region and the City of Los Angeles, impacts on the jobs/housing ratio shall be less than significant.

Based on the above, the Project does not cause growth (i.e., new employment) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Project buildout. In addition, since the Project develops a mix of residential, commercial, and office uses, it provides opportunities for jobs and housing to co-exist on-Site. Therefore, impacts related to employment consistency with SCAG's forecast for the SCAG region and the City of Los Angeles are less than significant, and no mitigation measures are required.

3. Consistency with Adopted Plans and Policies

In addition to Project consistency with City of Los Angeles employment growth forecasts, the Project is also consistent with City and SCAG economic development and employment policies.

(a) Consistency With the Los Angeles General Plan Framework Element

As described in Table IV.H-2 of the Draft EIR, the Project: (1) concentrates growth in one of the City's most urbanized areas; (2) supports the creation of new jobs; (3) includes a mix of diverse uses including commercial/retail, entertainment, and residential uses, all in the same development (i.e., mixed-use); (4) provides on-Site retail, consisting of additional restaurant space, alongside other convenience goods retailers; and (5) encourages bicycle and pedestrian activity. Thus, the Project is consistent with the applicable policies relevant to employment in the General Plan Framework Element.

(b) Consistency With the Hollywood Community Plan

As described in Table IV.H-4 on page IV.H-59 of the Draft EIR, the Project: (1) creates a variety of employment opportunities for City residents; (2) provides housing for a range of economic segments of the community; and (3) accommodates the shopping needs of the Project's residents, employees, and guests. Therefore, the Project is consistent with the applicable commercial land use goals, policies, and objectives relevant to employment in the Hollywood Community Plan.

(c) SCAG's Compass Growth Vision

SCAG prepares several plans to address regional growth, including the Southern California Compass Growth Vision that presents a comprehensive growth vision for the six-county SCAG region. The fundamental goal of the Compass Growth Vision is to make the SCAG region a better place to live, work, and play for all residents regardless of race, ethnicity, or income class. is shall be consistent with the relevant employment-related policies of the Growth Vision Report. Specifically, the Project places jobs in an area that is easily accessible by public transit. The Project's mix of uses and proposed density are

consistent with the land use and growth patterns envisioned in SCAG's Compass Growth Vision. Specifically, as discussed in in Table IV.H-6 on page IV.H-70 of Section IV.H, Land Use, of the Draft EIR, the Project creates an open-air pedestrian-oriented infill development with a mix of shopping, housing, dining and entertainment uses that serves residents and revitalizes the existing surrounding communities. Therefore, the Project is consistent with the principles of the Growth Vision related to locating new housing near existing jobs and new jobs near existing housing and promotes development that provides a mix of uses.

(d) Other Growth Inducement Issues

While the Project's addition of new employment is consistent with regional employment forecasts, it does not, in and of itself, foster new growth in the area by removing impediments to growth. As described in Section IV.H, Land Use, of the Draft EIR, the area surrounding the Project Site is already developed with a mix of commercial, office, and residential uses. All roadway improvements planned for the Project are tailored to improve circulation flows and safety throughout the area, consistent with the Project's impacts and objectives. Utility and other infrastructure upgrades are intended primarily to meet Project-related demand. The Project employees' demand for convenient commercial goods and services will be met by new retail, service, and other resources included as part of the Project or already located within close proximity to the Project Site. No new development specifically to meet the Project's scale of commercial demand is needed.

4. Conclusion

The Project is consistent with applicable employment growth plans and policies of SCAG and the City. The Project: (1) concentrates growth in one of the City's most urbanized areas, proximate to numerous regional and local transit lines; (2) supports the creation of new jobs; and (3) includes a mix of commercial/retail, entertainment, and residential uses, all in the same development, thereby advancing the goal of providing mixed-use facilities within the urbanized areas of the City of Los Angeles.

The Project results in a substantial number of net new jobs and economic activity. The additional 502 jobs associated with the Project are within SCAG's employment growth forecast for the SCAG region and the City of Los Angeles from 2015 to 2022. As such, Project impacts with respect to employment are less than significant.

5. Cumulative Impacts

As identified in Section III, Environmental Setting, of the Draft EIR, 145 related projects in the surrounding area are expected to be constructed and/or operational during the same time period as the Project. These related projects will generate approximately 37,195 jobs in the City of Los Angeles and 2,446 jobs in the City of West Hollywood. Based on forecasts in 2012–2035 RTP/SCS: (1) the Project's cumulative employment for the SCAG Region (i.e., total Project employment plus "related projects" employment for the City of Los Angeles and the City of West Hollywood) accounts for about 0.48 percent of the employment forecasted in the SCAG Region in 2022 and approximately 9.71 percent of the forecasted growth in employment between 2015 and 2022; (2) the Project's cumulative employment for City of Los Angeles (i.e., total Project employment

plus “related projects” population for the City of Los Angeles) represents approximately 2.09 percent of 2022 employment in the City of Los Angeles; and 3) the cumulative employment impact accounts for approximately 82.58 percent of the 2015–2022 employment growth forecast in the City of Los Angeles. However, of the 82.58 percent, the Project’s incremental contribution is only approximately 2.16 percent. Therefore, the Project’s incremental employment impact is not “cumulatively considerable” per CEQA, and, as such, its cumulative employment impact is less than significant.

1. Project Design Features

The City finds that no specific Project Design Features are incorporated into the Project to reduce its potential impacts regarding employment related to the Project.

J.2. Housing

1. Construction-Related Housing Impacts

Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are unlikely, to any notable degree, to relocate their households as a consequence of the construction job opportunities presented by the Project. The construction industry differs from most other industry sectors in several important ways that are relevant to potential impacts on housing: There is no regular place of work. Construction workers commute to job sites that change many times in the course of a year. These often lengthy daily commutes are made possible by the off-peak starting and ending times of the typical construction work day. Many construction workers are highly specialized (e.g., crane operators, steel workers, masons), and move from job Site to job Site as dictated by the demand for their skills. The work requirements of most construction projects are also highly specialized and workers are employed on a job Site only as long as their skills are needed to complete a particular phase of the construction process.

Therefore, based on these factors, it is unlikely that Project-related construction workers will relocate their households’ places of residence as a direct consequence of working on the Project. Thus, there are no significant housing impacts on household growth in the City of Los Angeles due to Project construction. Accordingly, construction-related impacts related to housing are less than significant.

2. Operational Housing Impacts

(a) Direct Project Housing Impacts

The Project removes the existing 82 dwelling units on-Site and constructs 950 rental apartments, including 105 affordable units. Therefore, implementation of the Project results in a net increase of 868 housing units on-Site.

SCAG prepares several plans to address regional growth, including the Regional Comprehensive Plan/Sustainable Communities Strategy (RTP/SCS), which is a long-range visioning plan that considers transportation and housing needs with economic, environmental and public health goals. In comparison with applicable regional and local housing growth forecasts from SCAG, the Project’s residential units represent approximately 0.23 percent and 0.21 percent of SCAG’s forecasted housing growth for

the SCAG Region between 2015 and 2022, based on 2012–2035 RTP/SCS and 2016–2040 RTP/SCS, respectively. Further, the Project's residential units represent approximately 1.04 percent and 0.95 percent of SCAG's forecasted housing growth for the City of Los Angeles between 2015 and 2022, based on 2012–2035 RTP/SCS and 2016–2040 RTP/SCS, respectively.

As stated in many adopted regional and local planning documents, including the 2014–2021 Housing Element, the City remains in need of new dwelling units to serve both current and projected populations. While the Project does not eliminate the housing shortage in the City, it incrementally advances the City's goal of generating more housing for the region.

In addition to 950 new dwelling units, the Project includes a 308-room hotel, approximately 190,000 square feet of commercial/retail and entertainment uses. The retail, hotel, and entertainment uses include a range of permanent and part-time positions that are typically filled by persons already residing in the vicinity of the workplace and who generally do not relocate their households due to such employment opportunities. Any indirect demand for housing will be fulfilled by a combination of the Project's 950 dwelling units, vacancies in the surrounding housing market, and from other new units in the vicinity of the Project.

Based on the above analysis, the Project does not cause housing growth to exceed projected/planned levels for the Project's buildout year. As such, development of the Project does not result in an adverse physical change in the environment. Accordingly, impacts relating to housing growth are less than significant, and no mitigation measures are required.

3. Cumulative Impacts

As noted above, the Project generates 868 net new housing units. The related projects will generate approximately 14,950 housing units within the SCAG Region, of which 13,678 housing units will be within the City of Los Angeles. Based on forecasts in 2012–2035 RTP/SCS, (1) the Project's cumulative households for the SCAG Region (i.e., Project households plus "related projects" households for the City of Los Angeles and the City of West Hollywood, which is located to the southwest of the Project Site) accounts for approximately 0.23 percent of the households forecasted in the SCAG Region in 2022 and approximately 3.89 percent of the forecasted growth in households between 2015 and 2022; (2) the Project's cumulative households for City of Los Angeles (i.e., total Project households plus "related projects" households for the City of Los Angeles) represents approximately 0.93 percent of 2022 households in the City of Los Angeles; and (3) the cumulative households impact accounts for 16.37 percent of the 2015–2022 household growth forecast in the City of Los Angeles. However, of the 16.37 percent, the Project's incremental contribution is only about 1.04 percent. Therefore, the Project's incremental households impact is not cumulatively considerable per the CEQA Guidelines, and its cumulative household impact shall be less than significant.

1. Project Design Features

The City finds that no specific Project Design Features are incorporated into the Project to reduce its potential impacts regarding housing related to the Project.

J.3. Population

1. Construction-Related Population Impacts

Due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not likely, to any notable degree, to relocate their households as a consequence of the construction job opportunities presented by the Project. The construction industry differs from most other industry sectors in several important ways that are relevant to potential impacts on population:

- There is no regular place of work. Construction workers commute to job sites that change many times in the course of a year. These often lengthy daily commutes are made possible by the off-peak starting and ending times of the typical construction work day.

- Many construction workers are highly specialized (e.g., crane operators, steel workers, masons), and move from job Site to job Site as dictated by the demand for their skills.

- The work requirements of most construction projects are also highly specialized and workers are employed on a job Site only as long as their skills are needed to complete a particular phase of the construction process.

Therefore, it is unlikely that Project-related construction workers will relocate their households' places of residence as a direct consequence of working on the Project. Thus, there will not be any significant population impacts related to household growth in the SCAG Region or the City of Los Angeles due to Project construction. Accordingly, construction-related impacts related to population are less than significant, and no mitigation measures are required.

2. Operational-Related Population Impacts

(a) Direct Project Population Impacts

The Project includes 868 net new multi-family residential units and, thus, introduces new residential population into the area. Based on a household size factor of 2.44 persons per household for multi-family housing units, the Project generates a net new residential population of 2,118 persons at full buildout.

The 868 net new housing units associated with the Project account for only 1.04 percent of the household growth forecasted by SCAG between 2015 and 2022 in the City of Los Angeles, and approximately 0.23 percent of the household growth in the SCAG Region during the same period. Further, the 2,118 persons associated with the Project account for only 1.55 percent of the population growth forecasted between 2015 and 2022 in the City of Los Angeles, and only 0.20 percent of the population growth in the SCAG Region during the same period. As such, the Project does not create substantial population

growth in an area by proposing new homes. Therefore, Project impacts related to population growth are less than significant, and no mitigation measures are required.

(b) Indirect Project Population Impacts

As discussed in Section IV.J.2, Housing, of the Draft EIR, jobs associated with the Project's commercial and retail uses will be filled to some extent by employees already residing in the vicinity of the Project. As such, the Project does not induce substantial population growth or exceed SCAG's population forecast for the City of Los Angeles or the SCAG Region.

As discussed in Section IV.J.1, Employment; Section IV.J.2, Housing; and Section IV.H, Land Use, of the Draft EIR, the Project is consistent with all applicable City and regional population policies, including jobs/housing balance, as set forth in the City's General Plan and SCAG's SCS/RTP and Compass Growth Vision. Therefore, the Project does not result in any significant adverse impacts in terms of compatibility with adopted local and regional population growth policies, as set forth in the City's General Plan and SCAG's SCS/RTP and Compass Growth Vision.

With regard to infrastructure, all circulation improvements planned for the Project are intended to improve circulation flows and safety throughout the affected area. Utility and other infrastructure upgrades planned for the Project are intended to meet Project-related demand. Therefore, the Project does not result in any significant adverse impacts in terms of the introduction of unplanned infrastructure that was not previously evaluated in the Community Plan and the General Plan.

Further, the Project Site is located in an area of Los Angeles that is already developed with single-family and multi-family homes, and commercial, residential, and industrial uses. Future growth is planned for and expected, pursuant to the Community Plan and other Elements of the City's General Plan. Therefore, the Project does not result in a substantial amount of growth and does not result in any significant adverse impacts in terms of this significance threshold. In conclusion, indirect impacts related to population are less than significant, and no mitigation measures are required.

3. Cumulative Impacts

A population growth of 2,118 persons is associated with the Project's residential uses. Table IV.J.3 5 on page IV.J.3-10 of the Draft EIR compares the Project's cumulative population impact and the forecasted population growth for the SCAG Region and Los Angeles between 2015 and 2022. The table shows, based on forecasts in 2012–2035 RTP/SCS, that: (1) the Project's cumulative population for the SCAG Region (i.e., total Project population plus "related projects" population for Los Angeles and West Hollywood, which is located to the southwest of the Project Site) accounts for approximately 0.18 percent of the population forecasted in the SCAG Region in 2022 and approximately 3.44 percent of the forecasted growth in population between 2015 and 2022; (2) the Project's cumulative population for Los Angeles (i.e., total Project population plus "related projects" population for Los Angeles) represents roughly 0.83 percent of the 2022 population in Los Angeles; and (3) the cumulative population impact accounts for approximately 24.54 percent of the 2015–2022 population growth forecast in Los Angeles. However, of the approximate 24.54 percent, the Project's incremental contribution is only approximately

1.55 percent. Therefore, the Project's incremental population impact is not "cumulatively considerable" under CEQA, and, as such, its cumulative population impact is less than significant.

Table IV.J.3-5 on page IV.J 3-10 of the Draft EIR also shows that, based on forecasts in 2016–2040 RTP/SCS: (1) the Project's cumulative population for the SCAG Region (i.e., total Project population plus "related projects" population for Los Angeles and West Hollywood, which is located to the southwest of the Project Site) accounts for approximately 0.18 percent of the population forecasted in the SCAG Region in 2022 and approximately 3.88 percent of the forecasted growth in population between 2015 and 2022; (2) the Project's cumulative population for Los Angeles (i.e., total Project population plus "related projects" population for Los Angeles) represents approximately 0.81 percent of 2022 population in Los Angeles; and (3) the cumulative population impact accounts for approximately 17.48 percent of the 2015–2022 population growth forecast in Los Angeles. However, of the 17.48 percent, the Project's incremental contribution is only approximately 1.11 percent. Therefore, the Project's incremental population impact is also not cumulatively considerable, and, as such, its cumulative population impact is less than significant.

As shown in Table IV.J.3-5 on page IV.J.3-10 of the Draft EIR, the Project's cumulative population share based on growth projections in the 2016–2040 RTP/SCS is slightly higher than the Project's cumulative population share based on growth projections in the 2012–2035 RTP/SCS for the SCAG Region; and the Project's cumulative population share based on growth projections in the 2016–2040 RTP/SCS is moderately lower than the Project's cumulative population share based on growth projections in the 2012–2035 RTP/SCS for Los Angeles. Nonetheless, in either case (i.e., 2012–2035 RTP/SCS or 2016–2040 RTP/SCS), Project impacts related to population growth are not cumulatively considerable and are less than significant. Therefore, no mitigation measures are required.

1. Project Design Features

The City finds that no specific Project Design Features are incorporated into the Project to reduce its potential impacts regarding population related to the Project.

K. Public Services and Recreation

1. Police Protection

(a) Construction

Pursuant to Project Design Feature PS-PDF-1, the Project applicant shall implement temporary security measures, including security fencing and barriers, lighting, locked entry and security patrols to secure the Project Site, during construction. With implementation of these measures, potential impacts associated with theft and vandalism during construction activities are less than significant.

Project construction activities could also potentially impact the surrounding roadways and Los Angeles Police Department (LAPD) protection services and police response times in the Project. As discussed in Section IV.L, Traffic, Access, and Parking, of the Draft EIR,

access to the Project Site and the surrounding vicinity could be impacted by Project-related construction activities, such as temporary lane closures, roadway/access improvements, utility line construction, and the generation of traffic as a result of construction equipment movement, hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Although construction activities are short-term and temporary for the area, Project construction activities could increase response time for police vehicles along Sunset Boulevard and Highland Avenue, in addition to other main connectors, due to travel time delays caused by traffic during the construction phase. However, as discussed in Section IV.J, Traffic, Access, and Parking, of the Draft EIR, most, if not all, of the construction worker and haul truck trips occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. In addition, a construction management plan will be implemented during Project construction pursuant to Project Design Feature TRA-PDF-1 in Section IV.L, Traffic, Access, and Parking of the Draft EIR, to ensure that adequate and safe access is available within and near the Project Site during construction activities. Features of the construction management plan will be developed in consultation with LADOT and may include limiting potential lane closures to off-peak travel periods, to the extent feasible, and scheduling the receipt of construction materials during non-peak travel periods. Appropriate construction traffic control measures (e.g., signs, delineators, etc.) will also be implemented to ensure emergency access to the Project Site and traffic flow is maintained on adjacent right-of-ways. In addition, construction-related traffic generated by the Project does not significantly impact LAPD response times within the Project Site vicinity as emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic.

While Project Design Feature TRA-PDF-1 ensures that construction activities do not interfere with LAPD's ability to serve the Project Site, construction of the Project will not result in the need for new of physically altered police stations, the construction of which could cause significant environmental impacts. Therefore, impacts on police protection services during Project construction are less than significant.

(b) Operation

The Project, which will be served by the Hollywood Community Police Station, will introduce additional residential, employment, and visitor population to the Project Site and increase the service population of the Hollywood Community Police Station service area. The Project Site currently generates demand for police protection services from the residential, commercial/retail, and office uses that exist on the Project Site. Accordingly, the Project's estimated net police service population will increase the existing service population of the Hollywood Community Police Station service area. With the increase of residents and visitors to the Project Site, the officer-to-resident ratio will decrease from 2.13 officers per 1,000 residents to approximately 2.09 officers per 1,000 residents within the Hollywood Community Police Station service area, as determined in Section IV.K.1, Public Services – Police, of the Draft EIR. This will have represented a net change of approximately 2 percent, which will be considered minimal. The Hollywood Community Police Station service area officer-to-resident ratio will still have been lower than the Citywide ratio of 2.61 officers per 1,000 residents. The modifications to the Project since the release of the Draft EIR described in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, have resulted in reducing the Project's

population, which in turn reduces its demand on police services. Therefore, the Project does not significantly change the officer-to-resident ratio of the Hollywood Community Police Station service area.

Assuming that the annual crime rate remains constant at 0.032 crime per capita, the net service population of the Project could potentially generate approximately 94 crimes per year (as compared to the 115 crimes per year reported in the Draft EIR). The total annual number of reported crimes in the service area of the Hollywood Community Police Station could, therefore, could increase from 5,352 crimes to approximately 5,446 crimes, an increase of approximately 1.76 percent. However, the Project incorporates several design features that deter certain types of crime and enhance safety within and immediately surrounding the Project Site, as shown in Project Design Features PS-PDF-2 through PS-PDF-4. As described below, the design features are incorporated into the Project in consideration of the City's "Design Out Crime" and are consistent with the strategies from Crime Prevention Through Environmental Design (CPTED). Specifically, Project Design Feature PS-PDF-2 ensures the Project incorporates a security program that is implemented 24 hours a day/seven days a week to ensure the safety of Project residents, employees, and visitors. In addition, the Project provides sufficient lighting of building entries, walkways, parking structures, elevators, and lobbies to reduce areas of concealment and to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings. The Project also includes entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways designed to be open and in view of surrounding sites. The Project's design features help offset the Project-related increase in demand for police services. In addition to the implementation of the Project Design Features, the Project will generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could potentially be applied toward the provision of new police facilities and related staffing in the Hollywood Community, as deemed appropriate.

As is the case under existing conditions, emergency vehicles will access the Project Site directly from the surrounding roadways, including Selma Avenue, McCadden Place, Las Palmas Avenue, Sunset Boulevard, and Highland Avenue. Operation of the Project will not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle access within and in the vicinity of the Project Site. As such, emergency access to the Project Site and surrounding uses will be maintained at all times, and the increase in traffic generated by the Project will not significantly impact emergency vehicle response to the Project Site and surrounding uses, including along designated disaster routes. In addition, Section 21806 of the CVC allows drivers of police emergency vehicles to have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Accordingly, Project operation, including traffic generated by the Project, does not cause a substantial effect on emergency response as a result of increased traffic congestion.

Therefore, the Project does not generate a demand for additional police protection services that could exceed the LAPD's capacity to serve the Project Site. Project operation will not necessitate the provision of new or physically altered facilities in order to maintain the LAPD's capability to serve the Project Site; accordingly, the Project does

not result in adverse physical impacts associated with the construction of new or altered facilities. Thus, impacts to police protection services are less than significant.

(c) Cumulative

Each related Project is subject to the City of Los Angeles' routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. In accordance with the police protection-related goals, objectives, and policies set forth in the General Plan Framework, as listed in the regulatory framework above, the LAPD will also continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs will be identified and monies allocated according to the priorities at the time. In addition, it is anticipated that the related projects will implement Project design features similar to the Project, which will reduce cumulative impacts to police protection services.

With regard to emergency response, the Project and related projects will introduce new uses to the Project Site and the related projects' sites that will generate additional traffic in the vicinity of the Project Site. Traffic from the Project and related projects will have the potential to affect emergency vehicle response to the Project Site and surrounding properties due to travel time delays caused by the additional traffic. The Project does not substantially affect existing emergency response in the service areas of the Hollywood Community Police Station, and the Project does not contribute to a cumulative impact regarding emergency response. As is the case under existing conditions, emergency vehicles access the Project Site and each of the related projects directly from the surrounding roadways. As such, emergency access to the Project Site vicinity will be maintained at all times, and the increase in cumulative traffic generated by the Project and related projects will not significantly impact emergency vehicle response to the Project Site vicinity, including along designated disaster routes. Also, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic.

2. Fire Protection:

(a) Construction

Construction activities have the potential to result in accidental on-Site fires from such sources as the operation of mechanical equipment and the use of flammable construction materials. However, in compliance with Occupational Safety and Health Administration (OSHA) and Fire and Building Code requirements, construction managers and personnel are trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities. Additionally, fire suppression equipment (e.g., fire extinguishers) specific to construction will be maintained on-Site. Furthermore, Project construction will occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous waste. Thus, compliance with regulatory requirements

effectively reduces the potential for Project construction activities to expose people to the risk of fire or explosion related to hazardous materials.

Construction of the Project could require temporary lane closures along the Project Site's frontages to construct trenching associated with utility installation. Construction activities also generate traffic associated with the movement of construction equipment, the hauling of materials by construction trucks, and construction worker traffic. As such, construction activities could increase response times for emergency vehicles due to travel time delays caused by traffic. However, construction worker and haul truck trips are expected to occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. In addition, as discussed in Section IV.L, Traffic, Access, and Parking, of the Draft EIR, a construction management plan will be implemented during Project construction pursuant to Project Design Feature TRA-PDF-1 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Features of the construction management plan, which will be developed in consultation with the LADOT, may include limiting potential lane closures to off-peak travel periods, to the extent feasible, and using flag persons to control traffic movement during temporary traffic flow disruptions. In addition, designated truck queuing, equipment staging, and construction worker parking areas shall be provided. Since emergency access to the Project Site will remain clear and unobstructed during construction of the Project, impacts related to LAFD emergency access are less than significant.

Thus, Project construction does not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service. Therefore, Project-level impacts with regard to fire protection and emergency medical services during construction are less than significant, and no mitigation measures are required.

(b) Operation

(1) Facilities

The following analysis considers exiting fire facilities and other factors to consider in determining whether the LAFD will need new or physically altered facilities, the construction of which could cause significant environmental impacts.

The Project Site is currently and will continue to be served by Fire Station No. 27, which is the "first-in" station for the Project Site, located approximately 0.5 mile southeast of the Project Site. In addition, Fire Stations No. 41 and No. 82, located approximately 1.0 mile west and 1.2 miles east of the Project Site, respectively, will continue to be available to serve the Project Site in the event of an emergency.

Upon buildout, the Project will include approximately 950 residential units, 308 hotel rooms, approximately 190,000 square feet of commercial/retail uses, totaling approximately 1,381,000 square feet of floor area (including existing uses to be retained). The Project will result in a net increase of approximately 2,113 residents on the Project Site. Because it will increase the residential service population, and the amount and scale of structural development on Site, the Project will increase the Project Site's demand for LAFD fire protection. However, the Project implements Los Angeles Building and Fire

Code requirements regarding Project components, including, but not limited to, structural design, building materials, Site access, clearances, hydrants, fire flow, storage and management of hazardous materials, alarm and communications systems, and building sprinkler systems. Compliance with these requirements is demonstrated as part of a plot plan that is submitted to LAFD for review and approval prior to the issuance of a building permit in accordance with City regulations. In addition, as set forth in Project Design Feature PS-PDF-5 and as required by existing regulations, automatic fire sprinkler systems are installed in all new buildings. Compliance with applicable regulatory requirements that are enforced through the City's building permitting process ensures that adequate fire prevention features are provided that reduce the demand on LAFD facilities and equipment. The LAFD has no current plans to construct a new fire station or physically alter an existing facility in the Project vicinity.

(2) Response Distance and Emergency Access

Response distance and emergency access are factors to consider in determining whether the LAFD will need new or physically altered facilities, the construction of which could cause significant environmental impacts. Pursuant to Section 57.507.3.3 of the LAMC, the required response distance for the Project Site is 1.0 mile to a fire station with an engine company and 1.5 miles to a fire station with a truck company. Fire Station No. 27, located at 1327 North Cole Avenue, is approximately 0.5 mile away and is equipped with two engines, one truck, and two ambulances. Therefore, the Project falls within the LAFD's maximum prescribed response distances. Additionally, as set forth in Project Design Feature PS-PDF-5, automatic fire sprinkler systems are installed in all new non-high-rise buildings beyond code requirements to improve safety.

As is the case under existing conditions, emergency vehicles, including those from Fire Station Nos. 27, 41, and 82 in the Project Site vicinity, can access the Project Site directly from the surrounding roadways, including Selma Avenue, McCadden Place, Las Palmas Avenue, Sunset Boulevard, and Highland Avenue. Operation of the Project does not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle access within and in the vicinity of the Project Site. As such, emergency access to the Project Site and surrounding uses will be maintained at all times, and the increase in traffic generated by the Project Site does not significantly impact emergency vehicle response to the Project Site or surrounding uses, including along City-designated disaster routes. In addition, the Project Site is located within the maximum response distances from all three fire stations, whose emergency responders have multiple available routes to access the Project Site. Similarly, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic.

(3) Fire Flow

Fire flow is a factor to consider in determining whether the LAFD will need new or physically altered facilities, the construction of which could cause significant environmental impacts. Domestic and water service to the Project Site will continue to be

supplied by the Los Angeles Department of Water and Power (LADWP). Fire flow to the Project Site will be required to meet City of Los Angeles fire flow requirements, as determined by the LAFD. Section 57.507.3.1 of the LAMC establishes fire flow standards by development type. The Project falls within the Industrial and Commercial land use category, which has a required fire flow of 6,000–9,000 gallons per minute (gpm) from four to six adjacent fire hydrants flowing simultaneously. Five of the six fire hydrants closest to the Project Site have the capacity to provide 2,500 gpm each, with localized residual pressures ranging from 35 to 51 psi. The sixth proposed fire hydrant has a capacity for 600 gpm with a residual pressure of 47 pounds per square inch (psi). All fire hydrants exceed the 20 psi requirement, and the combined capacity exceeds the 6,000 to 9,000 gpm fire flow requirement. In conclusion, the Project is within the acceptable response distance to fire stations, and has acceptable emergency access and fire flow. As stated above, LAFD has no current plans to construct a new facility or physically alter an existing one in the Project vicinity. Therefore, the Project will have a less-than-significant impact.

(c) Cumulative

The increase in development and residential service populations from the Project and related projects will result in a cumulative increase in the demand for LAFD services. However, similar to the Project, the related projects will be reviewed on a Project-by-Project basis by the LAFD to ensure that sufficient fire safety and hazards measures are implemented to reduce potential impacts to fire protection. Furthermore, each related Project will be required to comply with regulatory requirements related to fire protection. Each of the related projects identified in the area will likewise be developed within urbanized locations that fall within an acceptable distance from one or more existing fire stations. Similarly, each of the related projects will be subject to the City of Los Angeles' routine construction permitting process, which includes a review by LAFD for compliance with building and Site design standards related to fire life safety, as well as coordinating with LADWP to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved. Furthermore, over time, LAFD will continue to monitor population growth and land development throughout Los Angeles and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. In addition, LAFD will continue to provide services in response to cumulative growth. As a result, the Project's contribution to cumulative impacts to fire protection is not cumulatively considerable. As such, cumulative impacts on fire protection are less than significant.

3. Schools

(a) Construction

The Project generates part-time and full-time construction jobs between the start of construction and Project buildout. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. Therefore, the construction employment generated by the Project does not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. Impacts on school facilities during Project construction are less than significant.

(b) Operation

Taking into consideration the existing uses that will be removed, the Project's residential and non-residential components will generate a total net increase of 743 net new students within LAUSD schools, consisting of 425 net new elementary school students, approximately 106 net new middle school students, and approximately 212 net new high school students.

Based on existing enrollment and capacity data from LAUSD, Bancroft Middle School and Hollywood High School will have adequate capacity to accommodate the new students generated by the Project under existing conditions. However, Selma Elementary School will not have adequate existing capacity to serve the Project under existing conditions. Specifically, based on the total of net new Project-generated students, Selma Elementary will have a seating shortage of 443 students, while Bancroft Middle School and Hollywood High School will have a seating overage of 58 students and 436 students, respectively.

With regard to the projected future capacity during the 2018–2019 academic year (the closest year to the Project build-out year for which projected enrollment and capacity data are available), Selma Elementary School will continue to have a projected seating shortage, while Bancroft Middle School and Hollywood High School will be operating within capacity. Specifically, Selma Elementary School will have a seating shortage of 160 students, Bancroft Middle School will have a seating overage of 427 students, and Hollywood High School will have a seating overage of 1,003 students with the addition of Project-generated students (projected seating overages reported from LAUSD minus Project-generated students).

The number of Project-generated students who could attend LAUSD schools serving the Project Site will likely be less than the above estimate because this analysis does not include LAUSD options that will allow students generated by the Project to enroll at other LAUSD schools (i.e., Magnet Schools, Charter Schools, and Pilot Schools) located away from their home attendance area, or students who may enroll in private schools or participate in home-schooling. In addition, this analysis does not account for Project residents who may already reside in the school attendance boundaries and will move to the Project Site.

Pursuant to Senate Bill 50, the applicant is required to pay development fees for schools to the LAUSD prior to the issuance of the Project's building permit. The payment of these fees is considered full and complete mitigation of Project-related school impacts. Therefore, the applicable development fees for schools to the LAUSD offset the impact of additional student enrollment at schools serving the Project area. With payment of the

applicable school fees per SB 50, impacts on schools are less than significant, and mitigation measures are not required.

(c) Cumulative

There are 145 related projects located in the Project Site vicinity. Of the 145 related projects, 96 are located within the attendance boundaries of Selma Elementary School, Bancroft Middle School, and/or Hollywood High School. As such, these related projects have the potential to combine with the Project and cumulatively generate new students who will attend Selma Elementary School, Bancroft Middle School, or Hollywood High School. These related projects will generate a total of 5,919 students, consisting of 1,277 elementary school students, 1,046 middle school students, and 3,596 high school students, within the school attendance boundaries identified for this Project. The Project generates a net total of approximately 743 new students, consisting of 425 net new elementary school students, approximately 106 net new middle school students, and approximately 212 net new high school students. Therefore, the Project, in combination with the 96 applicable related projects, has the potential to generate a cumulative total of 6,662 new school-aged students. Based on existing 2013–2014 enrollment and capacity data from LAUSD, the schools serving the Project and the 96 applicable related projects will not have adequate capacity to serve the cumulative demand. With the addition of students generated by the Project, in combination with the 96 applicable related projects, Selma Elementary School, Bancroft Middle School, and Hollywood High School will all have seating shortages. These schools will also have seating shortages during the 2018–2019 academic year. Therefore, the students generated by the Project, in combination with the related projects located within the school attendance boundaries, will cause shortages when compared to existing conditions and projected school capacities at Selma Elementary School, Bancroft Middle School, and Hollywood High School.

This degree of cumulative growth substantially increases the demand for LAUSD services in the Project Site area. The Project comprises approximately 13 percent of the total estimated cumulative growth in students. However, as with the Project, future development, including the related projects, will be required to pay development fees for schools to LAUSD prior to the issuance of building permits pursuant to SB 50. Pursuant to Government Code Section 65995, the payment of these fees is considered full and complete mitigation of school impacts generated by the related projects. Therefore, the Project's incremental contribution towards school impacts is not cumulatively considerable, and cumulative impacts are less than significant.

4. Parks and Recreation

(a) Construction

Construction of the Project results in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, the likelihood that construction workers will relocate their households as a consequence of working on the Project is negligible. Therefore, the construction workers associated with the Project do not result in a notable increase in the residential population of the Project Site area, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

During Project construction, the use of public parks and recreational facilities by construction workers is expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. Construction workers may spend their lunch breaks at the parks and recreational facilities near the Project Site, specifically Selma Park, at 6567 Selma Avenue, approximately 1,000 feet (0.17 mile) northeast of the Project Site, and De Longpre Park, at 1350 N. Cherokee Avenue, also approximately 1,000 feet (0.19 mile) south of the Project Site. However, any resulting increase in the use of such parks and recreational facilities will be temporary and will be expected to occur during off-peak park usage hours (i.e., when most potential park patrons are at work or school). Furthermore, it is unlikely that workers will utilize parks and recreational facilities beyond a 0.5-mile radius from the Project Site, as lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes).

Project construction will not expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site or interfere with existing park usage. The Project's proposed haul route options to/from the US-101 from the Project Site include use of Sunset Boulevard and potentially also Highland Avenue and/or Santa Monica Boulevard. If Santa Monica Boulevard is not utilized, Project-related construction trucks will not travel adjacent to any City park or recreational facility. If Santa Monica Boulevard is used, Project-related construction trucks will pass the Hollywood Recreation Center located at 1122 Cole Avenue. However, such use will be temporary and intermittent throughout construction. In addition, construction trucks will only drive by the recreational facility and will not stage adjacent to the recreational facility. Therefore, use of this haul route is not expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site or substantially reduce their service quality.

As such, Project construction does not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or interfere with existing park usage. Accordingly, impacts on parks and recreational facilities during Project construction is less than significant, and mitigation measures are not required.

(b) Operation

While the Project's estimated 2,318 net new residents are expected to utilize off-Site public parks and recreational facilities to some degree, the Project provides on-Site public and private open space. The Project provides a variety of open space and recreational amenities, including open space and green space, consisting of a series of integrated walkways that connect the mixed-use district created by the Project with the Hollywood neighborhood. The additional landscaped public walkways and the pedestrian paseo that traverse diagonally through the Project Site also promote access and connectivity to and through the Project Site from Sunset Boulevard, Las Palmas Avenue, Selma Avenue, and McCadden Place. The Project also provides a variety of active and passive open space and recreational amenities to serve the needs of Project residents, visitors, and employees, including roof decks and pools, rooftop gardens, community rooms, fitness and recreational facilities, courtyards, landscaped gardens, and common open space with gathering and seating areas.

Furthermore, the Project will pay in-lieu fees in accordance with Section 17.12 of the LAMC, the City's parkland dedication ordinance enacted under the Quimby Act. Therefore, the Project's residential component will not cause or accelerate substantial physical deterioration of off-Site public parks or recreational facilities.

Similarly, the Project's commercial component, which generates approximately 502 net new employees, could result in a demand for parks and recreational facilities. Project employees may spend their lunch breaks at the parks and recreational facilities near the Project Site, specifically Selma Park, at 6567 Selma Avenue, approximately 1,000 feet (0.17 mile) northeast of the Project Site, and De Longpre Park, at 1350 N. Cherokee Avenue, also approximately 1,000 feet (0.19 mile) south of the Project Site. However, employees are not expected to utilize parks and recreational facilities beyond a 0.5-mile radius from the Project Site, as lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes). Instead, it is anticipated that Project employees will utilize on-Site open space, resulting in a negligible demand for surrounding parks and recreational facilities. Furthermore, the Project will pay in-lieu fees in accordance with Section 17.12 of the LAMC. Therefore, the Project does not substantially increase the demand for off-Site public parks and recreational facilities.

In addition, in determining the Project's potential impacts to parks and recreational facilities, the potential demand of Project residents for public parks and recreational facilities was also evaluated, as well as the Project's consistency with applicable plans, policies, and regulations related to parks and recreational facilities. As discussed above, due to the amount, variety, and availability of the Project's proposed open space and recreational amenities, it is anticipated that Project residents and employees will generally utilize on-Site open space to meet their recreational needs. Furthermore, the Project meets the applicable requirements set forth in Section 12.21, Section 17.12, and Section 12.33 of the LAMC. However, as an individual Project, the Project by itself does not meet the parkland provision goals set forth in the Public Recreation Plan; however, because these goals are Citywide goals, they are not requirements for, and do not apply to, individual development projects. Additionally, implementation of existing regulatory requirements ensures that the intent of the Public Recreation Plan's parkland standards are met through compliance with state law as enforced through applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces. Such requirements include the provision of on-Site open space, payment of the Dwelling Unit Construction Tax, and compliance with the City's Quimby Ordinance requirements. Therefore, impacts to parks and recreational facilities are less than significant, and no mitigation measures are required.

(c) Cumulative

Cumulative growth in the greater Project Site area includes specific known development projects, as well as general ambient growth projected to occur. The related projects include retail/commercial, residential, office, and hotel uses, among others. The related projects also include the proposed 38-acre Hollywood Central Park, which will create a 38-acre park that spans above the Hollywood Freeway between Santa Monica Boulevard and Hollywood Boulevard, approximately 1.2 miles east of the Project Site. If constructed, this park will contribute towards meeting the demand for park and recreational space in

the Project Site vicinity. The Hollywood Central Park Project is currently undergoing environmental review.

Approximately 108 of the 145 identified related projects and ambient growth projections fall within a 2-mile radius of the Project Site, the geographic area analyzed for purposes of assessing impacts to parks and recreational facilities. As the population continues to grow in the Project Site area, increased demand will lower the existing parkland to population ratio if new facilities, such as the Hollywood Central Park, are not constructed.

While it is anticipated that the Project's provision of on-Site open space will meet the recreational needs of Project residents, the Project by itself will not, and is not expected to, meet all of the Citywide parkland provision goals set forth in the Public Recreation Plan. Development of the related projects could exacerbate the Community Plan Area's deficiency in parkland per the Public Recreation Plan's standards, with the exception of the Hollywood Central Park related Project, which will make a substantial positive contribution toward meeting these goals. However, it is unknown whether the Hollywood Central Park will be approved and constructed. Notwithstanding, as previously indicated, the standards set forth in the Public Recreation Plan are Citywide goals and are not intended to be requirements for individual development projects, or groups of individual projects. Furthermore, as with the Project, the related projects will undergo discretionary review on a case-by-case basis and will be expected to coordinate with the City of Los Angeles Department of Recreation and Parks. Future development projects will also be required to comply with the park and recreation requirements of Sections 12.21, 17.12, 12.33, and 21.10.3(a)(1) of the LAMC, as applicable.

As such, cumulative impacts on parks and recreation facilities are less than significant. Furthermore, based on the above, the Project's contribution to cumulative impacts to parks and recreational facilities is not cumulatively considerable.

5. Libraries

(a) Construction

The Project results in a temporary increase of construction workers on the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, though, construction workers are not likely to relocate their households as a consequence of Project construction. Therefore, Project-related construction workers do not result in a notable increase in resident population or a corresponding demand for library services in the vicinity of the Project Site.

In addition, it is unlikely that construction workers will visit Project Site area libraries on their way to/from work or during their lunch hours. Construction workers are more likely to use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers will utilize library facilities on their way to work since the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible.

As such, impacts to library facilities during Project construction are less than significant, and no mitigation measures are required.

(b) Operation

Based on information provided by the Los Angeles Public Library (LAPL), the primary library serving the Project Site is the Hollywood Regional Branch Library, located approximately 0.6 mile east of the Project Site at 1623 North Ivar Avenue. The Will and Ariel Durant Branch Library, at 7140 West Sunset Boulevard, and the John C. Fremont Branch Library, at 6121 Melrose Avenue, are also within a 2-mile radius of the Project Site, the distance that is generally considered to comprise the service area of a library. Therefore, these libraries also provide library services to the Project.

The net increase in residential units as a result of Project development generates a net increase of approximately 2,113 residents on the Project Site, which increases the Project Site's demand for library services. With the addition of the Project's 2,113 estimated net new residents, the service population of the Hollywood Regional Branch Library will increase to 81,057 persons, and the 19,000-square-foot Hollywood Regional Branch Library will continue to meet the building size recommendations set forth in the 2007 Branch Facilities Plan (i.e., 14,500 square feet for a service population over 45,000 or up to 20,000 square feet for a regional branch library) as it does under existing conditions. At the same time, the service population of the Hollywood Regional Branch Library will be below 90,000 persons and will not require the need to consider adding a second branch to the area.

With regard to future library services, the population of the City of Los Angeles Subregion is projected to grow between 2015 (the Project's baseline year) and 2022 (the Project's buildout year) by a rate of approximately 3.49 percent, according to SCAG's 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (2012–2035 RTP/SCS). Applying this same growth rate to the service area of the Hollywood Regional Branch Library, the estimated service population in 2022 will be 81,699 persons. Thus, with the addition of the Project's 2,113 estimated residents, the service population of the 19,000-square-foot Hollywood Regional Branch Library will be 83,812 persons, and the library will continue to meet the building size recommendations set forth in the 2007 Branch Facilities Plan (i.e., 14,500 square feet for a service population over 45,000 or up to 20,000 square feet for a regional branch library) under future conditions. In addition, the service population of the Hollywood Regional Branch Library will be below 90,000 persons and will not require the need to consider adding a second branch to the area. Furthermore, the LAPL has not indicated that the Hollywood Regional Branch Library is currently experiencing service deficiencies. Thus, even with the addition of Project residents, the Hollywood Regional Branch Library will continue to meet the library sizing standards recommended in the 2007 Branch Facilities Plan under existing and future conditions.

In addition, the Will and Ariel Durant Branch Library and the John C. Fremont Branch Library, which are within two miles of the Project Site, will alleviate the demand placed on the Hollywood Regional Branch Library from Project residents. The Project's residential units are also equipped to receive individual internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations. As such, the Project does not conflict with or impede implementation of the

applicable policies and goals related to libraries in the General Plan Framework or Hollywood Community Plan. In addition, the Project will generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could potentially be applied toward the provision of new library facilities and related staffing in the Hollywood Community, as deemed appropriate.

The Project's commercial/retail and hotel uses will generate approximately 502 net new employees on the Project Site. These new uses include a range of permanent and part-time positions that are typically filled by persons already residing in the vicinity of the workplace, and who already generate a demand for the libraries in the vicinity of the Project Site. Thus, any indirect or direct new demand for library services generated by employees of the proposed commercial/retail, office, and hotel uses have already been taken into account in library services provisions.

Therefore, operation of the Project does not exceed the capacity of local libraries to adequately serve the existing residential population based on target service populations or as defined by the LAPL, or substantially increase the demand for library services. As such, the Project does not result in the need for new or altered library facilities. Impacts on library facilities during Project operation are less than significant, and no mitigation measures are required.

(c) Cumulative

Of the 145 related projects, 111 are located within Los Angeles and are served by the City of Los Angeles Public Library system, and 62 of the 111 projects are residential in nature or have residential components. Development of these 62 related projects will result in the development of 12,812 new residential units, which will generate a library service population of approximately 31,261 residents. Therefore, these related projects and the Project's net generation of 2,113 residents will add a total of 33,374 residents to the Hollywood Regional Branch Library's future 2022 service population of 81,699 residents, for a total future service population of 115,073 residents. This future service population of 115,073 residents will warrant the addition of a new branch library pursuant to the library sizing standards recommended in the 2007 Branch Facilities Plan. However, this estimate is conservative considering that all three libraries will provide library services to the 33,374 service population generated by the Project together with the related projects, and not all of the 33,374 new residents will utilize the three libraries equally. In addition, this estimate is likely overstated as it does not consider that much of the growth associated with the Project and related projects has already been accounted for in the service population projections based on SCAG 2022 projections.

Additionally, residents from 14 of the related projects will reside closer to the Will and Ariel Durant Branch Library than the Hollywood Regional Branch Library. Similarly, residents of 18 of the related projects will reside closer to the John C. Fremont Branch Library. Therefore, these residents will be more likely to utilize the Will and Ariel Durant and John C. Fremont Branch Libraries as their primary libraries. Furthermore, the estimate of the cumulative service population is largely driven by the number of related projects in the Project Site area. Similar to the Project, each related Project will also generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that can potentially be applied toward the provision of new library facilities and related staffing in the Hollywood Community, as

deemed appropriate. For all of these reasons, therefore, the Project's contribution to cumulative impacts on libraries is not cumulatively considerable, and cumulative impacts on libraries are less than significant.

Project Design Features

The City finds that Project Design Features PS-PDF-1 and TRA-PDF-1, which are incorporated into the Project and are incorporated into these Findings as though fully set forth herein, reduce the potential construction police protection services impacts of the Project.

The City finds that Project Design Features PS-PDF-2, PS-PDF-3 and PS-PDF-4, which are incorporated into the Project and are incorporated into these Findings as though fully set forth herein, reduce the potential police protection services impacts of the Project during operation.

The City finds that Project Design Feature PS-PDF-5, which is incorporated into the Project and is incorporated into these Findings as though fully set forth herein, reduces the potential fire protection services impacts of the Project.

These Project Design Features were taken into account in the analysis of potential impacts.

L. Transportation/Circulation

1. Construction:

(a) Access and Safety Impacts

The curb lanes on Highland Avenue and Sunset Boulevard adjacent to the Project Site will be used intermittently during the construction period for equipment staging, concrete pumping, etc. In addition, construction fences could encroach into the public right-of-way (e.g., sidewalk and roadways) adjacent to the Project Site. Since the sidewalks fronting the Project Site will be closed intermittently during the construction period, pedestrian access to other parcels fronting adjacent streets may be temporarily blocked. Consequently, the use of the public right-of-way along Highland Avenue, McCadden Place, Las Palmas Avenue, Selma Avenue, and Sunset Boulevard will require temporary rerouting of pedestrian traffic. As set forth in Project Design Feature TRA-PDF-1, the Project is implementing a Construction Management Plan that includes measures to ensure pedestrian safety along the affected sidewalks and temporary walkways (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead covering). Thus, access and safety impacts during Project construction are less than significant.

Construction activities associated with the Project may also potentially impact the provision of services by the Los Angeles Fire Department and the Los Angeles Police Department in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. In particular, Highland Avenue is a designated disaster/emergency route by the City's Safety Element and County of Los Angeles Department of Public Works. Construction activities also will generate traffic associated with the movement of construction equipment, the hauling of soil and construction

materials to and from the Project Site, and construction worker traffic. These short-term and temporary construction activities can temporarily increase response times for emergency vehicles along Sunset Boulevard, Highland Avenue, and other main connectors due to travel time delays caused by traffic during the Project's construction phase. However, under Project Design Feature TRA-PDF-1, most of the construction worker trips will occur outside the weekday peak traffic periods, thereby reducing the potential for traffic-related conflicts. These temporary and short-term construction activities have a less-than-significant impact on emergency response times because appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) will also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow are maintained on adjacent rights-of-way. Furthermore, Section 21806 of the California Vehicle Code allows drivers of emergency vehicles to avoid traffic through the use of sirens and flashing lights to clear a path of travel. In addition, the Project Applicant will prepare and submit the Construction Management Plan to LADOT prior to the start of construction pursuant to Project Design Feature TRA-PDF-1 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) will also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent right-of-ways.

Based on the above, the Project will not require substantial roadway and/or sidewalk closures to the extent that a hazard to roadway travelers and/or pedestrians will occur. Similarly, implementation of appropriate construction traffic control measures ensures that emergency access to the Project Site and traffic flow, including emergency vehicles, are maintained on adjacent rights-of-way. Therefore, access, including emergency routes (e.g., Highland Avenue), and safety impacts during construction of the Project are less than significant.

(b) Bus/Transit Impacts

There are no bus stops immediately adjacent to the Project Site along Highland Avenue or Sunset Boulevard, where construction activities will occur. The nearest bus stop to the Project Site is located on Sunset Boulevard in front of the Blessed Sacrament Church approximately 250 feet from construction activities in Development Parcel C. Therefore, construction of the Project will not require rerouting of bus stops or bus lines. As such, impacts to transit during construction of the Project will be less than significant.

(c) On-Street Parking Impacts

Parking is permitted adjacent to the Project Site on Highland Avenue, McCadden Place, Las Palmas Avenue, Selma Avenue, and Sunset Boulevard. Therefore, installation of construction fences could result in the temporary loss of up to four metered parking spaces on Highland Avenue; eight on-street parking spaces on McCadden Place; 32 on-street parking spaces on Las Palmas Avenue, including 18 metered spaces; 20 on-street parking spaces on Selma Avenue, including three metered spaces; and seven on-street metered parking spaces on Sunset Boulevard. However, as described in Project Design Feature TRA-PDF-1, the Project is implementing a Construction Management Plan that includes providing advanced notification of temporary parking removals and duration of

removals. In addition, per the provisions of SB 743 and Public Resources Code Section 21099, which supersede the *L.A. CEQA Thresholds Guide*, this impact to on-street parking during the construction of the Project is less than significant.

Project Design Features

The City finds that Project Design Feature TRA-PDF-1, which is incorporated into the Project and is incorporated into these Findings as though fully set forth herein, reduces the potential construction traffic, access and parking impacts of the Project. This Project Design Feature was taken into account in the analysis of potential impacts.

2. Operation:

(a) Regional Transportation System Impacts

(1) CMP Freeway Segment Analysis

The closest mainline freeway monitoring location to the Project Site is on US-101 south of Santa Monica Boulevard, approximately two miles southeast of the Project Site. Based on the Project trip generation and trip distribution pattern, at the freeway monitoring location nearest to the Project Site, the Project is projected to add a total of 66 southbound trips and 52 northbound trips during the a.m. peak hour and 58 southbound trips and 73 northbound trips during the p.m. peak hour. As such, as analyzed in the Draft EIR and prior to being modified, the Project will not have added 150 trips in either direction during either the a.m. or p.m. peak hour. Therefore, impacts to a Congestion Management Program (CMP) mainline freeway monitoring location will be less than significant.

Although 150 trips will not be added in either direction during either peak hour to the CMP mainline freeway monitoring location, the monitoring location was evaluated for potential impacts. The freeway mainline segment will operate at LOS F in the southbound direction under both Existing with Project and Future with Project Conditions. However, the addition of Project traffic will not cause the D/C ratio to increase by 0.02 at this monitoring location. Therefore, based on this CMP criterion, the Project before being modified will not result in a significant impact on the CMP mainline freeway monitoring location at US 101 south of Santa Monica Boulevard. Given that the Modified Project is estimated to generate fewer trips than forecast in the Draft EIR (see Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR) , the Project also will not result in a significant impact on the CMP mainline freeway monitoring location at US-101 south of Santa Monica Boulevard, and no new impacts will occur.

(2) Public Transit

As discussed in the Errata, the Project will generate approximately 704 net new weekday a.m. peak-hour trips and 1,088 net new weekday p.m. peak-hour trips, which are less than the 879 a.m. peak-hour trips and 1,283 p.m. peak-hour trips, respectively, reported in the Draft EIR. Assuming an average vehicle occupancy of 1.4, the Project's vehicle trips result in an estimated increase of 986 person trips during the a.m. peak hour and 1,523 person trips during the p.m. peak hour. The CMP guidelines estimate that approximately 7 percent of total Project person trips use public transit to travel to and from the Project Site. Accordingly, the Project will generate approximately 69 net new

transit riders during the a.m. peak hour and 107 net new transit riders during the p.m. peak hour. As discussed in Section IV.L, Traffic, Access, and Parking, of the Draft EIR, 28 transit lines operate adjacent to or in close proximity of the Project Site. The total rider-capacity of the 28 transit lines serving the Project Site vicinity is approximately 11,112 riders during the a.m. peak hour and approximately 11,003 riders during the p.m. peak hour. The total residual transit capacity can accommodate transit trips generated under the Project. In addition, pedestrian and bicycle trips will contribute to a reduction in vehicle and transit use. Therefore, impacts to the existing transit system in the Study Area under the Project are less than significant.

(b) Access and Circulation Impacts

The Project provides for on-Site parking within the subterranean parking garages and within Building E1 on Development Parcel E. Primary vehicular access to the subterranean garages is provided via driveways along Selma Avenue, McCadden Place, and Las Palmas Avenue, and primary vehicular access to Building E1 is provided along Selma Avenue; there are no driveways proposed on Sunset Boulevard. These full access driveways include right- and left-turn ingress and egress movements to and from the Project Site. A secondary driveway on Highland Avenue provides for right-turn only egress movements from the hotel use. In addition, a driveway along Las Palmas Avenue for the commercial uses and a driveway on McCadden Place for the hotel uses provide access to the truck loading area. All the above driveways are designed in accordance with LADOT standards. Therefore, the Project does not result in inadequate access for emergency vehicles, pedestrians, and bicyclists.

The Traffic Study also evaluated the operating conditions of the following intersections located adjacent to the Project Site and that provide access to the Project driveways:

- Unsignalized Intersection 7, McCadden Place and Selma Avenue
- Unsignalized Intersection 8, Las Palmas Avenue and Selma Avenue
- Unsignalized Intersection 9, McCadden Place and Sunset Boulevard
- Signalized Intersection 54, Highland Avenue and Selma Avenue
- Signalized Intersection 66, Las Palmas Avenue and Sunset Boulevard

The unsignalized intersections at McCadden Place and Selma Avenue and McCadden Place and Sunset Boulevard are anticipated to operate at a LOS D or better during both the A.M. and P.M. peak hours under Existing with Project and Future with Project Conditions. The intersection at Las Palmas Avenue and Selma Avenue is anticipated to operate at LOS D and E during the A.M. and P.M. peak hours, respectively, under Existing with Project Conditions, and LOS E and F during the A.M. and P.M. peak hours, respectively, under Future with Project Conditions. This intersection meets the minimum thresholds for the installation of a traffic signal under Existing with Project and Future with Project Conditions. As noted earlier, the satisfaction of a traffic signal warrant does not in itself require the installation of a traffic control signal. Per LADOT guidelines, unsignalized intersections operating at LOS E or F only need to be evaluated for potential signalization.

As presented in Table 6 of the supplemental traffic impact analysis in Appendix FEIR-4 of the Final EIR, the signalized intersection of Highland Avenue and Selma Avenue (Intersection 54) is anticipated to operate at LOS A during both the a.m. and p.m. peak hours, and the signalized intersection of Las Palmas Avenue and Sunset Boulevard (Intersection 66) is anticipated to operate at LOS A and LOS C during the a.m. and p.m. peak hours, respectively, under Future with Modified Project with mitigation conditions. Therefore, as these intersections provide direct access to the Project Site, the Project does not result in significant access and circulation impacts in the Study Area. As such, impacts related to access and circulation are less than significant.

(c) Bicycle, Pedestrian and Vehicular Safety Impacts

Vehicular access to the Project Site is provided primarily via driveways along Selma Avenue, McCadden Place, and Las Palmas Avenue, and a secondary driveway will be located along Highland Avenue. The Project's access locations conform to City standards and are designed to provide adequate sight distance, sidewalks, and/or pedestrian movement controls that meet the City's requirements to protect pedestrian safety. In addition, the driveways are designed to limit potential impediments to visibility and incorporate pedestrian warning systems, as required by City standards.

The Project also includes highly visible and properly marked/signed pedestrian entrances designed for safety that provide access from adjacent streets (Highland Avenue, Selma Avenue, McCadden Place, Las Palmas Avenue, and Sunset Boulevard) and subterranean parking garages to facilitate pedestrian movement. The Project maintains existing sidewalks and provides a direct and safe path of travel with minimal obstructions to pedestrian movement within and around the Project Site.

The Project establishes a new pedestrian paseo that meanders through the Project Site from Crossroads of the World to the intersection of McCadden Place and Selma Avenue and along the northern boundary of the hotel building to Highland Avenue. The paseo is linked through landscaped public walkways and connects the entire Project Site, while promoting pedestrian access to and from Sunset Boulevard, Las Palmas Avenue, Selma Avenue, and McCadden Place.

In the vicinity of the Project Site, dedicated bicycle lanes exist along Cahuenga Boulevard, Fairfax Avenue, and Bronson Avenue. In addition, bicycle routes exist along Selma Avenue, Orange Drive, Wilcox Avenue, Vine Street, Argyle Avenue, Van Ness Avenue, Odin Street, Franklin Avenue, Yucca Street, and Fountain Avenue. Based on the City of Los Angeles 2010 Bicycle Plan, the bicycle system in the Study Area will be expanded to include dedicated bicycle lanes along Highland Avenue, Sunset Boulevard, Hollywood Boulevard, Fairfax Avenue, La Brea Avenue, Wilcox Avenue, Cahuenga Boulevard, Cole Avenue, Vine Street, Bronson Avenue, Van Ness Avenue, Wilton Place, Western Avenue, Pilgrimage Bridge, Los Feliz Boulevard, Yucca Street, Fountain Avenue, Santa Monica Boulevard, and Beverly Boulevard, to create a more integrated network. However, the proposed dedicated bicycle lanes are not scheduled for implementation. Nevertheless, as the Project maintains the existing sidewalks and circulation system, Project operation does not disrupt bicycle flow along those streets. In addition, visitors, patrons, and employees arriving by bicycle have the same access options as pedestrian visitors and, in addition, to facilitate bicycle use, bicycle parking spaces and amenities (e.g., bicycle racks and showers) will be provided within the Project Site. Therefore, the Project does

not substantially increase hazards to bicyclists, pedestrians, or vehicles, and potential impacts related to bicycle, pedestrian and vehicular safety are less than significant.

(d) Parking Impacts

Based on the parking requirements for residential, hotel, retail, and restaurant uses set forth in LAMC Sections 12.21-A,4 and 12.21-A,25 and the Advisory Agency Residential Parking Policy, the Project is required to provide a total of 2,186 parking spaces but actually provides 2,258 parking spaces, thereby exceeding the requirement as described at page III-89 in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR. Therefore, the Project complies with the applicable parking requirements of the LAMC, and impacts related to parking are less than significant. Furthermore, as discussed on page IV.L-1 in Section IV.L, Traffic, Access, and Parking, of the Draft EIR, in accordance with SB 743, this impact is not considered significant.

Bicycle parking requirements per Section 12.21-A,16(a)(2) of the LAMC include short-term and long-term parking. Short-term bicycle parking is characterized by bicycle racks that support the bicycle frame at two points. Long-term bicycle parking is characterized by an enclosure protecting all sides from inclement weather and secured from the general public. As described in Section IV.L, Traffic, Access, and Parking, of the Draft EIR and in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, the Project complies with the short-term and long-term bicycle parking requirements. Therefore, the Project complies with the applicable bicycle parking requirements of the LAMC, and bicycle parking impacts are less than significant. In addition, in accordance with SB 743, this impact also is a less than significant impact.

3. Cumulative Impacts

(a) Construction

(1) Access and Safety/Transit Impacts

The Project does not require substantial roadway and/or sidewalk closures to the extent that a hazard to roadway travelers, including emergency service providers (e.g., police and fire department responders), and/or pedestrians will occur. Furthermore, no transit stops are located in or adjacent to the Project Site, where construction activities occur. The nearest bus stop to the Project Site is located on Sunset Boulevard in front of the Blessed Sacrament Church, approximately 250 feet from construction activities in Development Parcel C. Therefore, the Project's impact to access and safety and to transit during construction is not cumulatively considerable and is less than significant.

(2) On-Street Parking Impacts

Installation of construction fences during Project construction could result in the temporary loss of metered parking spaces on Highland Avenue, McCadden Place, Las Palmas Avenue, Selma Avenue, and Sunset Boulevard. However, the Project is implementing a Construction Management Plan that includes providing advanced notification of temporary parking removals and duration of removals. Therefore, the Project's impact to on-street parking is not cumulatively considerable and is less than significant.

(b) Operation

(1) Regional Transportation Analysis

(a) CMP Freeway Segment Analysis

The CMP analysis accounted for forecasted traffic increases due to ambient growth, as well as the related projects through the year 2022. Each of the related projects is required to conduct its own CMP analysis and identify mitigation measures to ensure that impacts to CMP freeway mainline segments are reduced to a less-than-significant level, as much as feasible. Although the Project does not add 150 trips in either direction during the a.m. or p.m. peak hour to the CMP mainline freeway monitoring location on US-101 south of Santa Monica Boulevard, particularly with the modifications described in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, this monitoring location was further evaluated for significant impacts. The freeway mainline segment will operate at LOS F in the southbound direction under both Existing with Project and Future with Project Conditions. However, the addition of Project traffic to future conditions, which include traffic volumes associated with ambient growth and the related projects, does not cause the D/C ratio to increase by 0.02 at this monitoring location. Therefore, the Project's impacts with regard to the CMP mainline freeway monitoring locations are less than significant and are not cumulatively considerable.

(b) CMP Arterial Monitoring Station Analysis

Similar to the CMP freeway segment analysis above, the CMP analysis of arterial monitoring stations accounted for forecasted traffic increases due to ambient growth, as well as the related projects through the year 2022. Each of the related projects is required to conduct its own CMP analysis and identify mitigation measures to ensure that impacts to CMP arterial monitoring intersections are reduced to a less-than-significant level, as much as feasible. The addition of Project traffic at the intersection of Highland Avenue and Santa Monica Boulevard results in an increase in V/C ratio of 0.02 or more during the a.m. peak hour, resulting in a significant impact at this CMP arterial monitoring intersection under Future with Project Conditions. However, with the implementation of Mitigation Measures TRA-MM-1 through TRA-MM-3 and TRA-MM-6, which include the TDM program, additional transit service on Santa Monica Boulevard and Hollywood Boulevard, and TSM improvements, the significant impact at the CMP arterial monitoring intersection of Highland Avenue and Santa Monica Boulevard during the a.m. peak period will be reduced to a less-than-significant level. Therefore, the Project impact at this location is not cumulatively considerable.

(2) Public Transit

Approximately 28 transit lines operate adjacent to or in proximity to the Project Site. These transit lines provide a total capacity approximately 11,112 riders during the a.m. peak hour and approximately 11,003 riders during the p.m. peak hour, as shown in Table 4 of the Traffic Study. The total residual transit capacity of the numerous bus lines and Metro lines can accommodate approximately 274 net new transit trips during the a.m. peak hour and 426 net new transit trips during the p.m. peak hour generated by the Project. Therefore, Project impacts to the existing transit system in the Study Area are less than significant. Furthermore, public transit providers add additional service when

required in order to accommodate cumulative demand in the region. Given this assumption and the current additional available capacity of transit in the vicinity of the Project Site, the Project's impacts with regard to transit are not cumulatively considerable. Therefore, cumulative impacts on public transit are less than significant.

(3) Access and Circulation

The Project results in less-than-significant impacts related to vehicular access and circulation. Therefore, the Project's impacts to access and circulation are not cumulatively considerable and are less than significant.

(4) Bicycle, Pedestrian, and Vehicular Safety

For purposes of analyzing cumulative impacts on bicycle, pedestrian and vehicular safety, potential Project impacts in combination with related Project impacts adjacent to the Project Site could result in a cumulative impact. However, of the related projects, the closest ones to the Project Site are Related Project Nos. 37 (Selma Community Housing—Affordable Apartments) and 45 (Mixed-Use Development), which are located immediately to the east of Development Parcel D and immediately north of Development Parcels A and B (across Selma Avenue), respectively. Related Project No. 37 is already completed and operating and, thus, does not result in a cumulative impact to bicyclists, pedestrians, and vehicles during Project construction. The driveways for this related Project are on Selma Avenue and Cherokee Avenue, which do not conflict with the driveway on Las Palmas Avenue for Development Parcel D. Related Project No. 45 is separated from the Project Site by Selma Avenue. This related Project and any future related projects are subject to City review to ensure that related projects are designed with adequate access/circulation, including standards for sight distance for minimizing blind spots, sidewalks, crosswalks, and pedestrian movement controls. The impact of the Project in and of itself related to bicycle, pedestrian, and vehicular safety is less than significant. Thus, the Project does not significantly contribute to a cumulative impact with regard to bicycle, pedestrian, and vehicular safety.

(5) Parking

The automobile and bicycle parking demand associated with the Project will not contribute to the cumulative demand for parking in the vicinity of the Project Site as a result of development of the Project and related projects. Cumulative impacts on parking could occur in the Project Site vicinity if the Project Site in combination with the related projects in the Project Site vicinity will result in a significant loss of parking. The Project in and of itself does not result in a significant impact on parking. Specifically, the Project exceeds the automobile parking requirements set forth in the LAMC for its uses. In addition, in accordance with SB 743, this impact will not be considered significant. The Project also meets the bicycle parking requirements. In addition, related projects are subject to City review to ensure that adequate parking be provided for each of the related projects. In conclusion, the Project does not result in a significant contribution with regard to automobile and bicycle parking impacts, and cumulative impacts are less than significant.

1. Project Design Features

The City finds that no Project Design Features are incorporated into the Project to reduce its potential cumulative impacts.

L.2 Traffic, Access and Parking—Caltrans Analysis

The Draft EIR's analysis of the Project's potential effects on Caltrans facilities was conducted in accordance with the requirements of the *Agreement Between City of Los Angeles and Caltrans District 7 on Freeway Impact Analysis Procedures* (the City/Caltrans Agreement, October 2013). This agreement identifies four screening criteria to determine whether a Project must complete a full impact analysis on Caltrans facilities. These four screening criteria are based on the current traffic volumes and capacities of nearby freeway mainline segments and freeway off-ramps, and the amount of Project traffic expected to be added to those facilities.

As set forth in the Memorandum of Understanding (MOU) (Appendix A to the Traffic Study), Project traffic exceeds the screening thresholds identified in the Caltrans Agreement at freeway off-ramps. Thus, further consultation was conducted with Caltrans, and analyses of Caltrans facilities was conducted following the guidelines contained in the Caltrans Traffic Impact Study (TIS) Guide.

1. Freeway Mainline Segments

The following eight freeway mainline segments on US-101 were analyzed using the Highway Capacity Manual (HCM) methodology:

- US 101 between Barham Boulevard and Highland Avenue
- US 101 between Highland Avenue and Cahuenga Boulevard
- US 101 between Cahuenga Boulevard and Gower Street/Argyle Avenue
- US 101 between Gower Street/Argyle Avenue and Hollywood Boulevard
- US 101 between Hollywood Boulevard and Sunset Boulevard
- US 101 between Sunset Boulevard and Western Avenue
- US 101 between Western Avenue and Santa Monica Boulevard
- US 101 between Santa Monica Boulevard and Melrose Avenue

(a) 2015 Conditions

Existing conditions are based on traffic volumes at the time the Project's Notice of Preparation was issued (i.e., October 2015). Based conservatively on CMP significance criterion, the Project does not increase the V/C ratio by 0.020 or more that worsens an LOS F condition. Therefore, the Project does not significantly impact any of the freeway mainline segments under both Existing and Existing with Project Conditions.

(b) 2022 Conditions

Based conservatively on CMP significance criteria, the Project will not increase the V/C ratio by 0.020 or more that worsens an LOS F condition. Therefore, the Project does not significantly impact any of the freeway mainline segments, under both Future and Future with Project Conditions in year 2022.

(c) 2035 Conditions and Proportionate Share of the Project

Based conservatively on CMP significance criteria, the Project will not increase the V/C ratio by 0.020 or more that worsens an LOS F condition. Therefore, the Project does not significantly impact any of the freeway mainline segments, under both Future and Future with Project Conditions in year 2035.

The proportionate share is calculated as the Project's percentage of the total projected growth on the mainline segments over the next 20 years until year 2035. Since the Project's proportionate share of future traffic growth on the freeway mainline is further reduced with implementation of Mitigation Measures TRA-MM-1 through TRA-MM-3 and TRA-MM-5, this analysis is conservative. Moreover, the Project was modified following the release of the Draft EIR, as described in Section III, Revisions, Clarifications and Corrections, and the Errata to the Final EIR, and these modifications reduced the traffic impacts of the Project as compared to the analyses presented in the Draft EIR. Therefore, the Project as now constituted has even less of an effect than as described above.

2. Intersections

Project impacts were analyzed for the Study Area intersections located along US-101, which is under the jurisdiction of Caltrans, and Santa Monica Boulevard within the City of Los Angeles, which is partially under the jurisdiction of Caltrans. Ten signalized freeway ramp intersections and eight unsignalized freeway ramp intersections associated with US- 101, in addition to the 10 signalized intersections located along Santa Monica Boulevard, were included in the Caltrans facility analysis. As such, a total of 20 signalized intersections and eight unsignalized intersections were considered in the analysis.

(a) 2015 Conditions

With respect to Existing Conditions and Existing with Project Conditions, 17 of the 20 signalized intersections under the jurisdiction of Caltrans are projected to operate at LOS D or better during both the weekday A.M. and P.M. peak hours. The remaining three intersections are projected to operate at LOS E or F during at least one of the peak hours under both Existing and Existing with Project Conditions. Seven of the eight unsignalized intersections under the jurisdiction of Caltrans are projected to operate at LOS D or better during both the weekday A.M. and P.M. peak hours. The remaining one intersection is projected to operate at LOS F during the A.M. peak hour, under both Existing and Existing with Project Conditions.

(b) 2022 Conditions

The HCM analysis for Future Without and Future With Project Conditions for the year 2022 for the signalized and unsignalized intersections found that 13 of the 20 signalized intersections under the jurisdiction of Caltrans are projected to operate at LOS D or better during both the weekday A.M. and P.M. peak hours. The remaining seven intersections

are projected to operate at LOS E or F during at least one of the peak hours under both Future Without and Future With Project Conditions. In addition, five of the eight unsignalized intersections under the jurisdiction of Caltrans are projected to operate at LOS D or better during both the weekday A.M. and P.M. peak hours. The remaining three intersections are projected to operate at LOS E or F during at least one of the peak hours under both Future Without and Future With Project Conditions for the year 2022.

(c) 2035 Conditions

The HCM analysis for Future Without and Future With Project Conditions for the year 2035 for the signalized and unsignalized intersections shows that five of the 20 signalized intersections under the jurisdiction of Caltrans are projected to operate at LOS D or better during both the weekday A.M. and P.M. peak hours. The remaining 15 intersections are projected to operate at LOS E or F during at least one of the peak hours under both Future Without and Future With Project Conditions for the year 2035. In addition, three of the eight unsignalized intersections under the jurisdiction of Caltrans are projected to operate at LOS D or better during both the weekday A.M. and P.M. peak hours. The remaining five intersections are projected to operate at LOS E or F during at least one of the peak hours under both Future Without and Future With Project Conditions for the year 2035.

3. Off-Ramp Queues

The following nine freeway off-ramps from US 101 were considered for the queuing analysis.

Q-1. US 101 Northbound Off-Ramp at Cahuenga Boulevard

Q-2. US 101 Southbound Off-Ramp at Vine Street/Franklin Avenue

Q-3. US 101 Southbound Off-Ramps at Hollywood Boulevard

Q-4. US 101 Northbound Off-Ramps at Hollywood Boulevard

Q-5. US 101 Southbound Off-Ramp at Cahuenga Boulevard

Q-6. US 101 Northbound Off-Ramp at Gower Street

Q-7. US 101 Southbound Off-Ramp at Gower Street

Q-8. US 101 Southbound Off-Ramp at Van Ness/Harold Way

Q-9. US 101 Northbound Off-Ramp at Wilton Place/Harold Way

(a) 2015 Conditions

The queuing analysis for Existing Conditions and Existing with Project Conditions for year 2015 finds that the US 101 Southbound Off-Ramp at Cahuenga Boulevard will have queues exceeding the available storage on the ramp during the A.M. peak hour without and with Project traffic. The queue lengths at the remaining eight off-ramps will not exceed the capacity of the approach lanes or the ramps.

(b) 2022 Conditions

The queuing analysis for Future without Project Conditions and Future with Project Conditions for the year 2022 finds the US 101 Southbound Off-Ramp at Cahuenga Boulevard will have queues exceeding the available storage capacity during the A.M. peak hour without and with Project traffic; therefore, a significant cumulative impact will occur. The Project will contribute to the significant cumulative impact by further extending the queue with the addition of Project traffic. The queue lengths at the remaining eight off-ramps will not exceed the capacity of the approach lanes or the ramps. Furthermore, Project traffic at these off ramps will be further reduced with implementation of the mitigation measures described further below.

(c) 2035 Conditions

The queuing analysis for Future without Project Conditions and Future with Project Conditions for the year 2035 finds the following off-ramp locations will have queues that exceed the available storage on the ramp without and with Project traffic:

Q-3. US 101 Southbound Off-Ramp at Hollywood Boulevard (A.M. and P.M. peak period)

Q-5. US 101 Southbound Off-Ramp at Cahuenga Boulevard (A.M. peak period)

Q-7. US 101 Southbound Off-Ramp at Gower Street (A.M. peak period)

As the queue will exceed the available storage capacity without and with the addition of Project traffic, a significant cumulative impact will be identified at the three freeway off ramps. The Project will contribute to the significant cumulative impacts by further extending the queues with the addition of Project traffic. The queue lengths at the remaining six off-ramps will not exceed the capacity of the approach lanes or the ramps. Furthermore, Project traffic on the off-ramps will be further reduced with implementation of the mitigation measures described further below. Moreover, since the Project was modified following the release of the Draft EIR, as described in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR and the Errata to the Final EIR, which modifications reduced the traffic impacts of the Project as compared to the analyses presented in the Draft EIR, Project traffic contributes less to the cumulative impacts described above.

4. On-Ramp Capacity

The following six on-ramps were analyzed to determine the existing or projected volumes as compared to the ramp capacity:

O-1. US 101 Northbound On-Ramp at Cahuenga Boulevard East

O-2. US 101 Northbound On-Ramp at Cahuenga Boulevard West/Highland Avenue

O-3. US 101 Northbound On-Ramp at Argyle Avenue/Franklin Avenue

O-4. US 101 Southbound On-Ramp at Hollywood Boulevard

O-5. US 101 Southbound On-Ramp at Sunset Boulevard

O-6. US 101 Southbound On-Ramp at Santa Monica Boulevard

(a) 2015 Conditions

The on-ramp analysis for Existing Conditions and Existing with Project Conditions for year 2015 shows the Project does not substantially increase the on-ramp volumes at any of the six analyzed on-ramps during either the A.M. or P.M. peak hours.

(b) 2022 Conditions

The on-ramp analysis for Future without Project Conditions and Future with Project Conditions for year 2022 shows the Project will not substantially increase the on-ramp volumes at any of the six analyzed on-ramps during either the A.M. or P.M. peak hours. Furthermore, Project traffic on the on-ramps is further reduced with implementation of Mitigation Measures TRA-MM-1 through TRA-MM-3 and TRA-MM-5.

(c) 2035 Conditions

The on-ramp analysis for Future without Project Conditions and Future with Project Conditions for year 2035 shows the Project will not substantially increase the on-ramp volumes at any of the six analyzed on-ramps during either the A.M. or P.M. peak hours. Furthermore, Project traffic on the on-ramps is further reduced with implementation of Mitigation Measures TRA-MM-1 through TRA-MM-3 and TRA-MM-5.

5. Freeway Ramp Sections

The following 13 freeway ramp sections were analyzed to determine the existing or projected volumes as compared to the ramp capacity:

R-1. US 101 Southbound On-Ramp at Highland Avenue

R-2. US 101 Southbound On-Ramp at Cahuenga Boulevard

R-3. US 101 Northbound Off-Ramp at Cahuenga Boulevard

R-4. US 101 Northbound On-Ramp at Argyle Avenue

R-5. US 101 Northbound Off-Ramp at Hollywood Boulevard

R-6. US 101 Southbound On-Ramp at Hollywood Boulevard

R-7. US 101 Southbound On-Ramp at Sunset Boulevard

R-8. US 101 Northbound Off-Ramp at Sunset Boulevard/Wilton Place

R-9. US 101 Northbound On-Ramp at Western Avenue

R-10. US 101 Southbound Off-Ramp at Santa Monica Boulevard/Lexington Avenue

R-11. US 101 Southbound On-Ramp at Santa Monica Boulevard

R-12. US 101 Northbound Off-Ramp at Santa Monica Boulevard

R-13. US 101 Northbound On-Ramp at Melrose Avenue/Normandie Avenue

(a) 2015 Conditions

Ten of the 13 freeway ramps' merge, diverge, and weaving sections are projected to operate at LOS E or F during at least one of the analyzed peak hours under Existing Conditions without and with Project traffic. The remaining three freeway ramps' merge and diverge sections are projected to operate at LOS D or better during the analyzed peak hours under both Existing and Existing With Project Traffic Conditions.

(b) 2022 Conditions

Eleven of the 13 freeway ramps' merge, diverge, and weaving sections are projected to operate at LOS E or F during at least one of the analyzed peak hours under Future Conditions without and with Project traffic in year 2022. The remaining two freeway ramps' diverge sections are projected to operate at LOS D or better during the analyzed peak hours under both Future Without and Future With Project Traffic Conditions in year 2022. Furthermore, Project traffic on the freeway is further reduced with implementation of Mitigation Measures TRA-MM-1 through TRA-MM-3 and TRA-MM-5.

(c) 2035 Conditions

Eleven of the 13 freeway ramps' merge, diverge, and weaving sections are projected to operate at LOS E or F during at least one of the analyzed peak hours under Future Conditions without and with Project traffic in year 2035. The remaining two freeway ramps' diverge sections are projected to operate at LOS D or better during the analyzed peak hours under both Future Without and Future With Project Conditions in year 2035. Furthermore, Project traffic on the freeway is further reduced with implementation of Mitigation Measures TRA-MM-1 through TRA-MM-3 and TRA-MM-5.

Project Design Features

The City finds that no Project Design Features are incorporated into the Project to reduce the Project's potential impacts on Caltrans facilities.

M. Utilities and Service Systems—Water Supply and Infrastructure

1. Water Supply

(a) Construction

Construction activities for the Project result in a temporary demand for water associated with soil compaction and earthwork, dust control, mixing and placement of concrete, equipment and Site cleanup, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. However, given the temporary nature of construction activities, water use during construction of the Project is short-term and intermittent. Water for construction activities will be conveyed

using the existing water infrastructure at the Project Site. No infrastructure improvements are needed to provide water during the construction of the Project.

The Los Angeles Department of Water and Power published its 2015 Urban Water Management Plan (UWMP), which is a long-term water resources management strategy through 2040. As concluded in the UWMP, projected water demand for the City can be met by the available supplies during an average year, single-dry year, and multiple-dry year in each year from 2015 through 2040. Project construction will occur over approximately 48 months and will be completed in 2022. Therefore, the Project's temporary and intermittent demand for water during construction can be met by the City's available supplies during each year of Project construction. The Project does not require or result in the construction of new water facilities or expansion of existing facilities. As such, construction-related impacts to water supply and infrastructure are less than significant.

(b) Operation

The Project generates an average daily water demand of approximately 423,362 gallons per day (gpd). The Project implements existing water conservation practices to reduce water usage and also implement water conservation measures. Specifically, the Project incorporates Project Design Feature UTL-PDF-1, which includes implementation of additional water conservation measures beyond those required by the LAMC, as amended by Ordinance No. 184,248. The Project also incorporates water conservation measures to comply with the City's Green Building Ordinance, as applicable.

Domestic and fire water service to the Project Site is supplied by LADWP. It is anticipated that LADWP will be able to meet the water demand of the Project. As concluded in LADWP's 2015 UWMP, projected water demands in the City through the year 2040 will be met by the available supplies for normal, single-dry and multiple-dry years. LADWP determined that the Project falls within the available and projected water supplies for normal, single-dry and multiple-dry years through the year 2040 and that it will be able to meet proposed water demand of the Project together with the existing and planned future water demands of the City. Furthermore, as outlined in the 2015 UWMP, LADWP is committed to providing a reliable water supply for the City. The 2015 UWMP takes into account the realities of climate change and the concerns of drought and dry weather and notes that the City of Los Angeles will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. Therefore, the Project's operation-related impacts on water supply are less than significant.

2. <u>Water Infrastructure</u>

(a) Construction

The existing LADWP water infrastructure will be adequate to provide for the water flow necessary to serve the Project during operation. Thus, no upgrades to the mainlines that serve the Project Site are required. However, the Project requires new service connections to connect to the existing water mainlines adjacent to the Project Site, specifically to the 8-inch mainline in Selma Avenue, the 4-inch mainline in McCadden Place, the 8-inch mainline on the north side of Sunset Boulevard, and the 8-inch mainline

on the east side of Las Palmas Avenue. The design and installation of new service connections are required to meet applicable City standards. Installation of the new water distribution lines primarily involves on-Site trenching to place the lines below the surface, and minor off-Site work to connect to the existing public water mains. The limited off-Site connection activities could temporarily affect access in adjacent right-of-ways. As discussed in Section IV.L, Traffic, Access, and Parking, of the Draft EIR, a Construction Management Plan is being implemented during construction pursuant to Project Design Feature TRA-PDF-1, to ensure that adequate and safe access remains available within and near the Project Site during construction. In addition, prior to conducting any ground disturbing activities, Project contractors will coordinate with LADWP to identify the locations and depths of existing water lines in the Project pite vicinity to avoid disruption of water service.

Overall, construction activities associated with the Project do not require or result in the construction of new water facilities or expansion of existing facilities that could have a significant impact on the environment. In addition, the water distribution capacity will be adequate to serve the Project. As such, construction-related impacts to water infrastructure are less than significant.

(b) Operation

Water service to the Project Site will continue to be supplied by LADWP for domestic and fire protection uses. Fire flow to the proposed buildings of the Project is required to meet City fire flow requirements. Specifically, the Project will comply with the Industrial and Commercial land use requirement in Section 57.507.3.1 of the LAMC, which establishes fire flow standards by development type. As discussed in Section IV.K.2, Public Services—Fire Protection, of the Draft EIR, all six fire hydrants adjacent to the Project Site exceed fire flow requirements of 20 psi and combined capacity of 6,000 to 9,000 gpm.

Furthermore, as provided in Project Design Feature PS-PDF-5, the Project includes the installation of automatic fire sprinklers in all proposed non-high-rise buildings (i.e., Buildings B2, B4, C1, C2, C3, and D1) in addition to the requirement to install such systems in high-rise structures (i.e., Buildings A1, B1, and B3), which will help reduce the public hydrant demands. Installation of the proposed automatic fire sprinklers is subject to LAFD review and approval during LAFD's fire/life safety plan review and safety inspection for the Project, as set forth in LAMC Section 57.118. Based on pressure flow reports obtained from LADWP, the existing public infrastructure has a combined capacity that exceeds fire flow requirement and residual pressure. Therefore, LADWP will be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for the Project. Based on the results of the Service Advisory Request of the Water Report included in Appendix P of the Draft EIR, the LADWP water infrastructure has adequate capacity to serve the Project's fire flow demand and its domestic water demand.

The Project provides new metered service connections to existing water mainlines, which have the capacity to serve the Project's water demand. These connections meet all applicable City requirements, and the Project does not exceed the available capacity within the distribution infrastructure that serves the Project Site. Therefore, the Project's impacts on water infrastructure during operation are less than significant.

3. Cumulative Impacts

(a) Water Supply

The 145 related projects located in the Project Site vicinity will generate a total average water demand of approximately 4,970,044 gpd, which is a conservative estimate that does not account for water conservation measures implemented beyond Code requirements.

Based on water demand projections in LADWP's 2015 UWMP, LADWP determined that it will be able to reliably provide water to its customers through 2040, as well as intervening years (i.e., 2022, the Project buildout year) based on growth projections in SCAG's 2012–2035 RTP/SCS. The 2015 UWMP specifically outlined the creation of sustainable sources of water for Los Angeles to reduce dependence on imported supplies and incorporated the goals of Executive Directive 5 and the City's Sustainability pLAn. In addition, the Project's Water Supply Assessment concluded that LADWP will be able to meet the Project's proposed water demand with the City's existing and planned future water demands. Compliance of the Project and other future development projects with regulatory requirements that promote water conservation, such as the City's Green Building Code, will also reduce water demand on a cumulative basis.

Therefore, no cumulative significant impacts with respect to water supply are anticipated from the development of the Project and the related projects. Project impacts on water supply are not cumulatively considerable, and cumulative impacts on water supply are less than significant.

(b) Water Infrastructure

The geographic context for the cumulative impact analysis on water infrastructure is the water infrastructure that will serve both the Project and specific related projects. Development of the Project and future new development in the vicinity of the Project Site will cumulatively increase demands on the existing water infrastructure system. However, as with the Project, other new development projects are subject to LADWP review to assure that the existing public infrastructure adequately meets the domestic and fire water demands of each Project, and individual projects are subject to LADWP and City requirements regarding infrastructure improvements needed to meet respective water demands, flow and pressure requirements, etc. All six fire hydrants that serve the Project exceed LAMC requirements, and LADWP will be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for the Project. Furthermore, LADWP, Los Angeles Department of Public Works, and the Los Angeles Fire Department will conduct on-going evaluations of its infrastructure to ensure facilities are adequate. Therefore, Project impacts on water infrastructure are not cumulatively considerable, and cumulative impacts on the water infrastructure system are less than significant.

Project Design Features

The City finds that Project Design Features UTL-PDF-1, UTL-PDF-2, TRA-PDF-1, and PS-PDF-5, which are incorporated into the Project and incorporated into these Findings as fully set forth herein, reduce the potential utilities impacts of the Project related to water

and water infrastructure. These Project design features were taken into account in the analysis of the potential impacts.

M Utilities and Service Systems—Wastewater

1. Construction-Related Impacts

Construction activities result in negligible and temporary wastewater generation and do not have any adverse impact on wastewater conveyance or treatment infrastructure. Construction activities for the Project result in a temporary increase in wastewater generation as a result of on-Site construction workers. Wastewater generation occurs incrementally throughout the construction duration of the Project (i.e., up to 2022). However, such use will be temporary and nominal. In addition, construction workers typically utilize portable restrooms, which do not contribute to wastewater flows to the City's wastewater conveyance system. As such, wastewater generation from Project construction activities does not cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that will cause a sewer's capacity to become constrained.

In addition, Project development includes several subterranean parking structures that may extend up to 78 feet below existing grade (particularly in Development Parcel A). As noted in Section IV.G, Hydrology and Water Quality, of the Draft EIR, the historic high groundwater elevation at the Project Site was found to be approximately 70 to 80 feet below the existing grade. Consequently, in the event groundwater is encountered during construction of the Project, temporary dewatering or other withdrawals of groundwater could be required within the Project Site. In the event dewatering is required during Project construction, a temporary dewatering system will be installed. Typically, dewatering systems extract groundwater, treat it, and discharge it to the public storm drain or sewer system, as determined by the City. Temporary dewatering will only occur until the waterproofing is installed up to the groundwater table level. Therefore, if dewatering is required, adherence to applicable NPDES Permit and industrial user sewer discharge permit requirements will ensure operation of the temporary dewatering system will have a minimal effect on on-Site wastewater conveyance infrastructure and treatment plant capacity. For these same reasons, construction of the Project is not anticipated to generate wastewater flows that will substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the City of Los Angeles Integrated Resources Plan, which addresses the facility needs of the City's wastewater program, recycled water, and urban runoff/stormwater management through the year 2020.

Moreover, construction activities associated with the installation of new or relocated sewer line connections, are confined to trenching in order to place the sewer lines below surface. Such activities are limited to the on-Site wastewater conveyance infrastructure and minor off-Site work associated with connections to the City's sewer lines in the streets adjacent to the Project Site. In addition, activities related to the installation of any required wastewater infrastructure are coordinated through the City of Los Angeles Bureau of Sanitation (BOS) so as not to interrupt existing service to other users.

Based on the above, construction activities result in a negligible and temporary wastewater generation and will not have any adverse impact on wastewater conveyance

or treatment infrastructure. In addition, most construction impacts associated with the installation of on-Site wastewater facilities and off-Site connections are confined to trenching and are temporary in nature. Therefore, Project construction impacts to the wastewater conveyance or treatment system are less than significant.

2. Operation

(a) Wastewater Generation

Development of the Project results in a net increase in wastewater flows from the Project Site. Wastewater generated by the Project was estimated using wastewater generation factors provided by the BOS for each of the proposed uses. As shown in Table IV.M.2-2 on page IV.M.2-18 of the Draft EIR, the Project generates a net increase in the average daily wastewater flow from the Project Site of approximately 232,105 gallons per day (gpd).

In accordance with the wastewater reduction requirements for new non-residential and high-rise residential construction set forth in the Los Angeles Municipal Code (LAMC) (Chapter IX, Article 9, Section 99.05.303.4 of the LAMC), the Project is required to demonstrate a 20-percent reduction in potable water to comply with the City of Los Angeles Green Building Code. To provide a conservative analysis, the estimate of the Project's wastewater flow does not account for this required reduction. Thus, the analysis below likely overstates the Project's potential impacts on wastewater treatment and conveyance facilities.

(b) Wastewater Treatment

Wastewater generated by the Project is conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Treatment Plant. As described above, the Hyperion Treatment Plant has a capacity of 450 million gallons per day (mgd), and current wastewater flow levels are at 275 mgd. Accordingly, the remaining available capacity at the Hyperion Treatment Plant is 175 mgd. As shown in Table IV.M.2-2 on page IV.M.2-18 of the Draft EIR, the Project generates a net increase in wastewater flow from the Project Site of approximately 232,105 gpd, or approximately 0.23 mgd. The Project's increase in average daily wastewater flow of 0.23 mgd represents less than 0.15 percent of the current 175 mgd remaining available capacity of the Hyperion Treatment Plant. Accordingly, the Project-generated wastewater can be accommodated by the existing capacity of the Hyperion Treatment Plant. Therefore, impacts associated with Project-generated wastewater are less than significant.

Various factors, including future development of new treatment plants, upgrades and improvements to existing treatment capacity, development of new technologies, etc., will ultimately determine the available capacity of the Hyperion Service Area in 2022, the year by which construction of the Project is expected to be completed. While it is anticipated that future updates to the Integrated Resources Plan will provide for improvements beyond 2020 to serve future population needs, it is conservatively assumed that no new improvements to the wastewater treatment plants will occur prior to 2022. Thus, based on this conservative assumption, the 2022 effective capacity of the Hyperion Service Area will continue to be approximately 550 mgd. Similarly, the capacity of the Hyperion Treatment Plant in 2022 will continue to be 450 mgd.

Even with this conservative assumption, the Project's net increase in average daily wastewater generation of 0.23 mgd represents less than Hyperion Service Area's assumed future capacity of 550 mgd and approximately 0.06 percent of the Hyperion Treatment Plant's design capacity of 450 mgd. The Project's net increase in average daily wastewater generation of 0.23 mgd plus the current flows of approximately 275 mgd to the Hyperion Treatment Plant represents less than 61.2 percent of the Hyperion Treatment Plant's assumed future capacity of 450 mgd. In addition, the Project's net increase in average daily wastewater generation of 0.23 mgd plus the current flows of approximately 338.2 mgd to the Hyperion Service Area represents less than 62 percent of the Hyperion Service Area's assumed future capacity of 550 million gallons per day. Thus, the Project's additional wastewater flows do not substantially or incrementally exceed the future scheduled capacity of any treatment plant. Impacts with respect to wastewater treatment capacity are less than significant, and no mitigation measures are required.

(c) Wastewater Infrastructure

The Project includes on-Site and off-Site improvements to the existing sanitary sewer system to serve the Project's demand for wastewater conveyance. Based on the response to the Wastewater Service Information (WWSI) request by the City of Los Angeles BOS (see Appendix Q of the Draft EIR), the system will be able to handle the increased flow from the Project. Further detailed gauging and evaluation, as required by LAMC Section 64.14, shall be conducted to obtain final approval of sewer capacity and connection permit for the Project during the Project's permitting process. All Project-related sanitary sewer connections and on-Site infrastructure are designed and constructed in accordance with applicable City of Los Angeles BOS and California Plumbing Code standards.

A Sewer Capacity Availability Request, included in Appendix D of the Utility Infrastructure Report (see Appendix Q of the Draft EIR), was obtained from the City of Los Angeles BOS to evaluate the capability of the existing wastewater system to serve the Project's estimated wastewater flow. Based on the current approximate flow levels and design capacities in the sewer system, and the Project's estimated wastewater flow, the City determined that the existing capacity of the 12-inch line on Highland Avenue, the 8-inch line on Selma Avenue, the 8-inch line on Sunset Boulevard, and the 8-inch sewer main on McCadden Place will adequately accommodate the additional wastewater infrastructure demand created by the Project. Therefore, the Project does not cause a measurable increase in wastewater flows that will constrain a sewer's capacity. Thus, impacts with regards to wastewater generation and infrastructure capacity are less than significant.

3. Cumulative Impacts

The geographic context for the cumulative impact analysis on the wastewater conveyance system is the area that includes the Project Site and the related projects that will potentially utilize the same infrastructure as the Project. The geographic context for the cumulative impact analysis on wastewater treatment facilities is the Hyperion Service Area. Cumulative growth in the greater Project area through 2022 includes specific known development projects, as well as general ambient growth projected to occur.

(a) Wastewater Generation

Development of the Project, in conjunction with the related projects, will result in an increase in the demand for sanitary sewer service in the BOS' Hyperion Service Area. As identified in Section III, Environmental Setting, of the Draft EIR, there are 145 related projects located in the Project vicinity. Assuming that each of these related projects will connect to some or all of the City sewers serving the Project Site, forecasted growth from the related projects will generate an average daily wastewater flow of approximately 4,867,728 gpd or approximately 4.87 mgd, as shown in Table IV.M.2-3 on page IV.M.2-21 of the Draft EIR. Combined with the Project's net increase in wastewater generation of 261,805 gpd (0.26 mgd), this equates to a cumulative increase in average daily wastewater flow of approximately 5,129,533 gpd, or 5.13 mgd.

(b) Wastewater Treatment

Based on the City of Los Angeles BOS' average flow projections for the Hyperion Service Area, it is anticipated that the average flow in 2022 will be approximately 362.9 mgd. In addition, the Hyperion Service Area's total treatment capacity will be approximately 550 mgd in 2022, which is the same as its existing capacity.

The Project wastewater flow of approximately 0.23 mgd combined with the specific related projects flow of approximately 4.87 mgd and the forecasted 2022 wastewater flow of 362.9 mgd for the Hyperion Service Area results in a total cumulative wastewater flow of approximately 367.8 mgd. Based on the Hyperion Service Area's estimated future capacity of 550 mgd, the Hyperion Service Area is expected to have adequate capacity to accommodate the cumulative wastewater flow of approximately 367.8 mgd from the Project and related projects, and forecasted growth by 2022. The 5.13 mgd of cumulative wastewater represents approximately 0.93 percent of the Hyperion Service Area's existing design capacity of 550 mgd or 2.74 percent of its remaining design capacity. Therefore, Project impacts on the wastewater treatment systems are not cumulatively considerable, and cumulative impacts are less than significant.

(c) Wastewater Infrastructure

As with the Project, new development projects occurring in the Project vicinity will be required to coordinate with the BOS and request a sewer capacity availability report to determine adequate sewer capacity. In addition, new development projects will be subject to LAMC Sections 64.11 and 64.12, which require approval of a sewer permit prior to connection to the sewer system. These projects will also be subject to payment of the City's Sewerage Facilities Charge, which offset the costs associated with infrastructure improvements that are needed to accommodate wastewater generated by overall future growth. If system upgrades are required as a result of a given Project's additional flow, arrangements will be made and coordinated between the related Project and the BOS. Furthermore, similar to the Project, each related Project will be required to comply with applicable water conservation programs, including the City of Los Angeles Green Building Code. Therefore, Project impacts on the City's wastewater infrastructure are be cumulatively considerable, and cumulative impacts are less than significant.

Project Design Feature

The City finds that Project Design Features UTL-PDF-1 and UTL-PDF-2, which are incorporated into the Project and are incorporated into these Findings as though fully set forth herein, minimize water use as set forth in Section IV.M.1 of the Draft EIR, and also applies to the wastewater analysis. These Project design features were taken into account in the analysis of potential impacts.

M Utilities and Service Systems— Solid Waste

1. Construction Impacts

(a) Solid Waste

(1) Collection Routes and Facilities

Project construction will involve demolition and building construction activities that will generate waste (e.g., wood, concrete, asphalt, cardboard, brick, glass, plastic, and metal). The waste shall be recycled or collected by private waste haulers contracted by the Project applicant and taken to a City-certified waste processing facility for sorting and final distribution, including disposal at the County's unclassified landfill. Since construction and demolition waste will be hauled by a private construction contractor permitted by the City, the Project does not result in the need for an additional solid waste collection route.

Based on construction and debris rates established by the United States Environmental Protection Agency (USEPA), the amount of solid waste generated during construction of the Project will be approximately 4,980 tons, while the amount of demolition waste will be approximately 19,177 tons for the Project. The Project will be required to implement a construction waste management plan to achieve a minimum 75 percent diversion from landfills. Furthermore, pursuant to Sections 66.32–66.32.5 of the LAMC (Ordinance No. 181,519), the construction contractor will be required to deliver all remaining construction and demolition waste generated by the Project to a Certified Construction and Demolition Waste Processing Facility. Therefore, the total demolition and construction waste for the Project, after 75 percent recycling, will be approximately 6,039 tons. This amount of construction and debris waste represents approximately 0.01 percent of the Azusa Land Reclamation landfill's existing remaining disposal capacity of 59.83 million tons. The Azusa Land Reclamation Landfill will be able to accommodate the demolition and construction waste from the Project. Furthermore, construction of Project does not conflict with solid waste policies and objectives in the City of Los Angeles Source Reduction and Recycling Element or its updates, City of Los Angeles Solid Waste Management Policy Plan, and the City of Los Angeles General Plan Framework Element. As such, solid waste impacts during construction under the Project are less than significant, and no mitigation measures are required.

(2) Consistency with Applicable Regulations

The Project provides recycling containers on-Site in accordance with City Ordinance No. 171,687, and the Project's construction contractor will deliver all construction and demolition waste generated by the Project to a Certified Construction and Demolition Waste Processing Facility in accordance with City Ordinance No. 181,519. Furthermore, the Project implements the waste reduction measures outlined in Project Design Features

UTL-PDF-3, UTL-PDF-4, and UTL-PDF-5. These include reducing construction-related solid waste generation through the recycling of construction and demolition debris, and using recycled building materials for new construction. Thus, the Project promotes source reduction and recycling, consistent with the California Integrated Waste Management Act of 1989 (AB 939), the City's Solid Waste Integrated Resources Plan, Source Reduction and Recycling Element, Solid Waste Management Policy Plan, General Plan Framework Element, RENEW LA Plan, and Green LA Plan. Therefore, construction of the Project does not conflict with applicable solid waste policies and objectives of the City or state.

(b) Hazardous Waste

As discussed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, based on the age of several of the building structures on-Site, asbestos or ACM, LBP, and PCBs may be present. In the event that these hazardous materials are found in the buildings proposed for demolition, suspect materials shall be removed in accordance with applicable local, state, and federal regulations prior to demolition. In addition, soils with PCE concentrations above acceptable levels may be present, which will require proper handling and disposal. These materials will be taken to the Kettleman Hills Facility for disposal.

In addition, construction activities require the use of fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners. Hazardous materials that are not consumed during the construction process require proper disposal at a licensed hazardous waste disposal facility, such as the Kettleman Hills Facility, in accordance with the requirements of regulatory agencies (e.g., LAFD, City of Los Angeles Department of Public Works, Los Angeles Regional Water Quality Control Board (LARWQCB), DTSC, etc.). Compliance, as outlined in detail in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, reduces the potential for a Project impact associated with disposal of construction-related hazardous waste to a less-than-significant level.

2. <u>Operational Impacts</u>

(a) Solid Waste

(1) Solid Waste Collection Routes and Facilities

Operation of the Project generates municipal solid waste typically associated with residential and commercial developments. This solid waste will be recycled or collected by private waste haulers contracted by the Project applicant and permitted by the City and taken for disposal at one of the County's Class III landfills open to the City. The transport of Project-generated solid waste to waste management/disposal facilities will continue to occur along existing solid waste routes of travel. As such, the Project does not result in the need for additional solid waste collection routes to adequately handle Project-generated waste.

During operation, the new uses constructed under the Project will generate an annual net increase of approximately 1,644 tons of solid waste from the Project Site, assuming a diversion rate of approximately 50 percent pursuant to the City's Los Angeles Solid Waste Management Policy Plan. The net increase in solid waste disposal associated with the

Project will represent an approximate 0.053 percent increase in the City's annual solid waste disposal quantity based on the 2014 disposal rate of approximately 3.11 million tons. Solid waste will be collected by a private solid waste hauler and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles. The annual net increase in solid waste under the Project will represent approximately 0.0018 percent of the estimated remaining Class III landfill capacity available to the City of Los Angeles as of 2010 (i.e., 93.47 million tons). Therefore, existing landfills serving the Project Site have adequate capacity to accommodate the disposal needs of the Project.

The County of Los Angeles Countywide Integrated Waste Management Plan 2014 Annual Report (2014 Annual Report) concluded that with no new landfills, no expansions of existing landfills, and no additional capacity from alternative technologies, a shortage of permitted solid waste disposal capacity at in-County Class III landfills was projected in 2029. The 2014 Annual Report determined that future disposal needs can be adequately met through 2029 through a multi-pronged approach that included successfully permitting and developing proposed in-County landfill expansions, utilizing available or planned out-of-County disposal capacity, developing necessary infrastructure to facilitate exportation of waste to out-of-County landfills, and developing conversion and alternative technologies. Solid waste disposal is an essential public service that must be provided without interruption in order to protect public health and safety, as well as the environment. Jurisdictions in the County continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning directives. The Project is consistent with and furthers City policies that reduce landfill waste streams. Therefore, given the Project's net solid waste generation of 1,644 tons per year, the Project does not result in the need for an additional recycling or disposal facility to adequately handle Project-generated waste.

(2) Consistency with Applicable Regulations

In addition to complying with the City's Green Building Ordinance, as applicable, the Project provides recycling containers and associated storage areas on-Site in accordance with City Ordinance No. 171,687. With the City's Exclusive Franchise System expected to be in operation in 2017 before the Project's buildout year of 2022, operational waste from the Project will likely be diverted at a rate greater than the current diversion rate of 76 percent. Therefore, the Project does not conflict with solid waste policies and objectives in the City of Los Angeles Source Reduction and Recycling Element or its updates, City of Los Angeles Solid Waste Management Policy Plan, the City of Los Angeles General Plan Framework Element or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume IV of the City of Los Angeles Source Reduction and Recycling Element. The Project is consistent with and will further City policies that reduce landfill waste streams. Such policies and programs serve to implement the strategies outlined in the 2014 Annual Report to adequately meet countywide disposal needs through 2029 without capacity shortages. Therefore, the Project does not conflict with solid waste policies and objectives in the County Integrated Waste Management Plan.

Accordingly, solid waste impacts during operation under Project are less than significant, and no mitigation measures are required.

3. Cumulative Impacts

(a) Construction

The geographic context for the cumulative impact analysis for solid waste is the entire County of Los Angeles because the landfills open to the City of Los Angeles serve the entire County. County planning for future landfill capacity addresses cumulative demand over 15-year planning increments. The County Integrated Waste Management Plan 2014 Annual Report anticipates a 9-percent increase in population growth with the County by 2029 and increase of 13 percent in employment.

(1) Solid Waste and Facilities

Construction of the Project, in combination with the related projects described in Section III, Environmental Setting, of the Draft EIR, involves demolition and building construction activities. These activities generate construction and demolition wastes that will be recycled or collected by private waste haulers contracted by the Project applicant and taken to a City-certified waste processing facility for sorting and final distribution, including disposal at the County's unclassified landfill. Since construction and demolition waste will be hauled by a private construction contractor permitted by the City, the Project and each of the related projects will not result in the need for an additional solid waste collection route. Therefore, cumulative impacts on solid waste collection routes are less than significant.

Construction of the Project, in conjunction with forecasted growth in the County through 2029 (inclusive of the related projects), will generate construction and demolition waste, resulting in a cumulative increase in the demand for unclassified landfill capacity. The Project will dispose of approximately 6,039 tons of construction and demolition waste in the County's unclassified landfill after accounting for recycling pursuant to Project Design Feature UTL-PDF-5. Given the requirements of the Citywide Construction and Demolition Debris Recycling Ordinance (Ordinance No. 181,519), which requires all mixed construction and demolition waste generated within City limits be taken to a City certified construction and demolition waste processor, it is anticipated that future cumulative development will also implement similar measures to divert construction and demolition waste from landfills. Furthermore, the County's unclassified landfill does not face capacity issues given the remaining permitted capacity will be exhausted in 189 years based on the current average disposal rate of 1,215 tons per day. Accordingly, the unclassified landfill is expected to have sufficient capacity to accommodate cumulative demand. Therefore, cumulative impacts on the unclassified landfill are less than significant, and no mitigation measures are required.

(2) Consistency with Applicable Regulations

The Project and related projects in the vicinity will provide recycling containers on-Site in accordance with City Ordinance No. 171,687. Additionally, the construction contractor for the Project and each related Project will deliver all construction and demolition waste generated to a Certified Construction and Demolition Waste Processing Facility in accordance with City Ordinance No. 181,519. Furthermore, the Project, along with each related Project, will implement waste reduction measures, including reducing construction-related solid waste generation through the recycling of construction and demolition debris and using recycled building materials for new construction. Thus, the Project and each of the related projects will promote source reduction and recycling,

consistent with AB 939, the City's Solid Waste Integrated Resources Plan, General Plan Framework Element, RENEW LA Plan, and Green LA Plan. Therefore, construction of the Project and each of the related projects will not conflict with solid waste policies and objectives in the City of Los Angeles Source Reduction and Recycling Element or its updates, City of Los Angeles Solid Waste Management Policy Plan, and the City of Los Angeles General Plan Framework Element.

(3) Hazardous Waste

As discussed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, development of the Project and the related projects will have the potential to increase the risk for accidental releases of hazardous materials. Based on the age of buildings in the Project area, asbestos or ACMs, LBP, PCBs, and other ground/soil contamination may be present. In the event that these hazardous materials are found in the buildings that wo;; be demolished to accommodate Site redevelopment, suspect materials shall be removed prior to demolition activities, in accordance with all applicable local, state, and federal regulations discussed in Section IV.F, Hazards and Hazardous Materials of the Draft EIR. In addition, soils with concentrations of hazardous substances above acceptable levels may be present, which will need to be properly handled and disposed. These materials shall be taken to the Kettleman Hills Facility for disposal, with a projected remaining life of 30-plus years.

Construction activities will also require the use of fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners involved in the construction of the new or rehabilitated structures. Hazardous materials not utilized during the construction process will require proper disposal at a licensed hazardous waste disposal facility, such as the Kettleman Hills Facility, in accordance with regulations from agencies, such as the LAFD, City Department of Public Works, LARWQCB, and/or the DTSC. The Project, therefore, has less-than-significant impacts from hazardous waste. Since the use of hazardous materials is largely Site-specific, compliance of each individual Project with such requirements reduces the potential for cumulative impacts associated with disposal of construction-related hazardous waste to a less-than-significant level.

(b) Operation

(1) Solid Waste Collection Routes

Operation of the Project and each of the related projects in the vicinity will generate municipal solid waste typical of residential and commercial developments. Solid waste generated by cumulative development in the area shall be recycled or collected by private waste haulers contracted by the Project Applicant and permitted by the City and taken for disposal at one of the County's Class III landfills open to the City. The transport of solid waste generated by cumulative development to waste management/disposal facilities will continue to occur along existing solid waste routes of travel. As such, the Project and each of the related projects will not result in the need for additional solid waste collection routes to adequately handle new solid waste generated by cumulative development. Therefore, cumulative impacts on solid waste collection routes are less than significant.

(2) Solid Waste Recycling and Disposal Facilities

Operation of the Project, in conjunction with forecasted growth in the County through 2029 (inclusive of the related projects), will generate municipal solid waste and result in a cumulative increase in the demand for waste disposal capacity at Class III landfills. The countywide demand for landfill capacity is continually evaluated by the County through preparation of the County Integrated Waste Management Plan Annual Reports, each of which assesses future landfill disposal needs over a 15-year planning horizon. As such, the 2014 Annual Report projects waste generation and available landfill capacity through 2029 and forecasts that the County's 2029 waste generation volume for the County is approximately 26.2 million tons. The estimated Project generation net increase of approximately 1,644 tons of waste per year represents less than 0.008 percent of the County waste generation of 26.2 million tons. Thus, the Project's contribution to the County's estimated cumulative waste stream is not cumulatively considerable.

(3) Consistency with Applicable Regulations

The 2014 Annual Report determined that future disposal needs can be adequately met through 2029 via a multi-pronged approach that includes successfully permitting and developing proposed in-County landfill expansions, utilizing available or planned out-of-County disposal capacity, developing necessary infrastructure to facilitate exportation of waste to out-of-County landfills, and developing conversion and other alternative technologies. Jurisdictions in the County continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning directives. These efforts, along with countywide and regional programs implemented by the County and cities, acting in concert or independently, have achieved significant, measurable results, as documented in the 2014 Annual Report. Based on this trend and because solid waste disposal is an essential public service that must be provided without interruption to protect public health and safety and the environment, concerted actions will continue to be taken by jurisdictions towards expanding and enhancing waste reduction and recycling programs, and implementing prudent solid waste management strategies in response to the strategies identified in the Annual Report.

In addition, these actions will be consistent with AB 939, the County Integrated Waste Management Plan, and the City's Solid Waste Integrated Resources Plan, Source Reduction and Recycling Element, Solid Waste Management Policy Plan, General Plan Framework Element, RENEW LA Plan, and Green LA Plan. Similarly, the related projects will not conflict with these regulations but will be consistent with the policies and plans identified above in promoting source reduction and recycling. Thus, cumulative impacts with regard to solid waste are less than significant, and no mitigation measures are required.

Project Design Features

The City finds that Project Design Features UTL-PDF-3, UTL-PDF-4, and UTL-PDF-5, which are incorporated into the Project and incorporated into these Findings as fully set forth herein, reduce the potential utilities impacts of the Project related to water and water

infrastructure. These Project design features were taken into account in the analysis of the potential impacts.

M Utilities and Service Systems—Energy

1. Construction

During Project construction, energy is consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. As discussed below, construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Project construction also consumes energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-Site reuse and disposal facilities).

A total of 17,900 kWh of electricity, 290,300 gallons of gasoline, and 494,100 gallons of diesel is estimated to be consumed during Project construction. Project construction is expected to be completed by 2022.

(a) Electricity

As discussed in the Energy Systems Infrastructure Study (Energy Study), included as Appendix R of the Draft EIR, electricity is supplied to the Project Site by LADWP and may be obtained from the overhead distribution lines along the northern section of Las Palmas Avenue and on the north side of Selma Avenue. This is consistent with suggested measures in the L.A. CEQA Thresholds Guide to use electricity from power poles rather than temporary gasoline or diesel powered generators.

A total of approximately 17,900 kWh of electricity will be consumed during Project construction. The electricity demand will vary at any given time, will vary throughout the construction period based on the construction activities being performed, and will cease upon completion of construction. When not in use, electric equipment will be powered off so as to avoid unnecessary energy consumption. Therefore, the use of electricity during Project construction will not be wasteful, inefficient, or unnecessary.

Construction of the Project's electrical infrastructure will primarily occur within the Project Site although some off-Site construction activities to connect the Project's electrical infrastructure with primary electrical distribution lines could occur. The Project applicant is required to coordinate electrical infrastructure removals or relocations with LADWP and comply with Site-specific requirements set forth by LADWP, which ensures that service disruptions and potential impacts associated with grading, construction, and development within LADWP easements are minimized. As such, construction of the Project's electrical infrastructure does not adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity.

The estimated construction electricity usage represents approximately 0.14 percent of the estimated net operational demand which, as discussed below, is within the supply and infrastructure service capabilities of LADWP. Moreover, construction electricity usage

replaces the existing electricity usage at the Project Site during construction. Therefore, construction of the Project does not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Therefore, based on the above, construction-related impacts to electricity supply and infrastructure are less than significant.

(b) Natural Gas

Construction activities for new buildings and facilities typically do not involve the consumption of natural gas. Accordingly, Project construction generates no demand for natural gas. Therefore, construction of the Project does not result in an increase in demand for natural gas so as to affect available supply or distribution infrastructure capabilities and does not result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

However, the Project does involve installation of new natural gas connections to serve the Project Site. Since the Project Site is located in an area already served by existing natural gas infrastructure, the Project does not require extensive off-Site infrastructure improvements to serve the Project Site. Construction impacts associated with the installation of natural gas connections are confined to trenching in order to place the lines below surface. However, prior to ground disturbance, Project contractors will notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties. Construction-related impacts to natural gas supply and infrastructure are less than significant.

(c) Transportation Energy

During Project construction, on- and off-road vehicles used for transportation will consume an estimated 290,300 gallons of gasoline and approximately 494,100 gallons of diesel fuel. For comparison purposes, the fuel usage during Project construction will represent approximately 0.007 percent of the 2015 annual on-road gasoline-related energy consumption and 0.07 percent of the 2015 annual diesel fuel-related energy consumption in Los Angeles County, as shown in Appendix R of the Draft EIR.

The City has adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. These regulations include the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986). These solid waste reduction programs and ordinances help to reduce the number of trips to haul solid waste, thereby reducing the amount of petroleum-based fuel consumed. Furthermore, recycling efforts indirectly reduce the energy necessary to create new products made of raw material. Design features such as Project Design Feature UTL-PDF-4 require building materials with a minimum of 10 percent recycled-content to be used for Project construction, while Project Design Feature UTL-PDF-5 requires the Project to implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous construction debris or minimize the generation of construction waste to 2.5 pounds per square foot of building floor area. Thus, through

compliance with the City's construction-related solid waste recycling programs and design features, the Project reduces fuel-related energy consumption. Project construction does not result in the wasteful, inefficient, and unnecessary consumption of transportation-related energy resources.

2. Operation

During operation of the Project, energy is consumed for multiple purposes, including, but not limited to, heating/ventilating/air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy is also consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. The Project's net new energy demand will be approximately 12,800 MWh of electricity per year, 27,301,000 cf of natural gas per year, 1,221,000 gallons of gasoline per year, and 219,000 gallons of diesel fuel per year.

(a) Electricity

In complying with compliance with 2013 CalGreen requirements and implementing Project Design Features, buildout of the Project will result in a projected net increase in the on-Site demand for electricity totaling approximately 12,800 MWh/year. To reduce the Project's energy demand, the Project applicant is implementing Project Design Features, as further described below. Specifically, these will include Project Design Feature GHG-PDF-1, Project Design Feature GHG-PDF-3, Project Design Feature UTL-PDF-1, and Project Design Feature UTL-PDF-2.

In addition, LADWP is required to procure at least 33 percent of their energy portfolio from renewable sources by 2020. The current sources procured by LADWP include wind, solar, and geothermal sources, which account for a total of approximately 20 percent of LADWP's overall energy mix in 2014, the most recent year for which data are available. This represents the available off-Site renewable sources of energy that will meet the Project's energy demand. Furthermore, the Project complies with state energy standards Section 110.10 of Title 24, which includes mandatory requirements for solar-ready buildings, and, as such, does not preclude the potential use of alternate fuels. Therefore, the Project does not cause wasteful, inefficient, and unnecessary consumption of electricity during operation.

Based on LADWP's 2015 Power Integrated Resource Plan, LADWP forecasts that its total energy sales in the 2022–2023 fiscal year (the Project's buildout year) will be 24,403 gigawatt-hours (GWh) of electricity. As such, the Project-related net increase in annual electricity consumption of 12,800 MWh/year will represent approximately 0.05 percent of LADWP's projected sales in 2022. In addition, LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area. Furthermore, the Project will incorporate a variety of energy conservation measures to reduce energy usage and implement any necessary connections and upgrades required by LADWP to ensure that LADWP will be able to adequately serve the Project. Therefore, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies will be sufficient to support the Project's electricity demand. Accordingly, operation of the Project does not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of

which could cause significant environmental effects. Therefore, operational impacts to electricity supply and infrastructure are less than significant.

(b) Natural Gas

In compliance with applicable 2013 CALGreen requirements, buildout of the Project generates a net increase in the on-Site demand for natural gas totaling approximately 26,671,600 cf/year. In addition to complying with applicable regulatory requirements regarding energy conservation (e.g., California Building Energy Efficiency Standards and CALGreen), the Project implements Project Design Features to further reduce energy use. Specifically, the Project applicant implement Project Design Feature GHG-PDF-1, which entails building features for LEED® Silver status and, thus, conservation features to reduce natural gas usage. Therefore, the Project does not cause wasteful, inefficient, and unnecessary consumption of natural gas during operation.

The Project's estimated net increase in demand for natural gas is 27,301,000 cf/year, or approximately 74,798 cf/day. Based on the 2014 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas' planning area will be approximately 2.65 billion cf/day in 2022 (the Project's buildout year). The Project accounts for approximately 0.003 percent of the 2022 forecasted consumption in SoCalGas' planning area. In addition, SoCalGas has confirmed that the Project's natural gas demand can be served by the facilities in the Project area. Furthermore, the Project shall incorporate a variety of energy conservation measures to reduce energy usage and will implement any necessary connections and upgrades required by SoCalGas to ensure that SoCalGas will be able to adequate serve the Project. Therefore, it is anticipated that SoCalGas' existing and planned natural gas supplies will be sufficient to support the Project's net increase in demand for natural gas.

Based on the above, operation of the Project does not result in an increase in demand for natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Impacts from Project operation on natural gas supply and infrastructure are less than significant.

(c) Transportation Energy

During operation, Project-related traffic results in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. The Project Site is located approximately 0.13 mile from the Metro Red Line Station at Hollywood Boulevard and Highland Avenue. In addition, 22 bus lines serve within the Project vicinity and provide employees, residents, and guests with various public transportation opportunities. Pursuant to Mitigation Measure TRA-MM-1 in Section IV., Mitigation Monitoring Program, of the Final EIR, the Project includes vehicular trip reduction measures as part of a TDM Program. The TDM Program promotes the use of public transportation to reduce vehicle miles traveled (VMT) and results in a corresponding reduction in the consumption of petroleum-based fuels. Bicycle amenities, such as racks and personal lockers, are installed at various locations within and around the Project Site. The Project Site is also located in a Transit Priority Area (as an area within 0.5 mile of a major transit stop) and is a SCAG-designated High Quality Transit Area (HQTA), which indicates that the Project Site is an appropriate Site for increased density and employment opportunities from a

"smart growth," regional planning perspective. Furthermore, as discussed in Section IV.C, Greenhouse Gas Emissions, of the Draft EIR, Project characteristics are consistent with the California Air Pollution Control Officers Association (CAPCOA) guidance document, Quantifying Greenhouse Gas Mitigation Measures, which provides quantified emission reduction values for recommended mitigation measures, and will reduce VMT and vehicle trips to the Project Site. As a result, the Project results in an approximate 45 percent reduction in VMT and related transportation fuel consumption. Therefore, the Project does not cause wasteful, inefficient, and unnecessary consumption of petroleum-based fuel during operation. Impacts associated with operational transportation-related energy use are less than significant.

3. Regulatory Consistency

The Project complies with applicable regulatory requirements for the design of new buildings, including the provisions from the 2013 CALGreen Code and California's Building Energy Efficiency Standards, which are incorporated into the City of Los Angeles Green Building Code.

Furthermore, the Project is consistent with regional planning strategies that address energy conservation, such as those discussed in SCAG's 2012–2035 RTP/SCS. As discussed in Section IV.H, Land Use, of the Draft EIR, SCAG's 2012–2035 RTP/SCS focuses on reducing fossil fuel use by reducing VMT and building energy use and increasing use of renewable sources. As a mixed-use development located along Sunset Boulevard and two blocks south of Hollywood Boulevard, the Project offers a mixed-use development along two commercial corridors characterized by a high degree of pedestrian activity. Located in a designated HQTA, the Project also provides greater proximity to neighborhood services, jobs, and residences and will be well-served by existing public transportation, including Metro and LADOT bus lines and rail line. The Project's introduction of new housing and job opportunities near transit is also consistent with the 2012–2035 RTP/SCS. All of these features serve to reduce the consumption of electricity, natural gas, and transportation fuel associated with VMT. In addition, the Project complies with state energy efficiency requirements, will achieving at least Silver certification under LEED®, and uses electricity from LADWP. LADWP has a current renewable energy mix of 20 percent. Furthermore, the Project is consistent with the 2016–2040 RTP/SCS, as the energy efficiency policies of the 2016–2040 RTP/SCS are unchanged from the 2012–2035 RTP/SCS. Therefore, impacts associated with regulatory consistency are less than significant.

4. Cumulative Impacts

(a) Electricity

Buildout of the Project, related projects, and additional forecasted growth in LADWP's service area will cumulatively increase the demand for electricity supplies and infrastructure capacity. LADWP forecasts that its total energy sales in the 2022–2023 fiscal year (the Project buildout year) will be 24,403 gigawatt-hours (GWh) of electricity.

Based on the Project's estimated net new electrical consumption of 12,800 MWh/year, the Project will account for approximately 0.05 percent of LADWP's projected sales for the Project's buildout year. Thus, although Project development results in the use of renewable and non-renewable electricity resources during construction and operation, which could limit future availability, the use of such resources is on a relatively small scale, is reduced by measures rendering the Project more energy-efficient, and is consistent with growth expectations for LADWP's service area. Accordingly, the Project's contribution to cumulative impacts related to electricity consumption is not cumulatively considerable and, thus, is less than significant. Furthermore, other future development projects will be expected to incorporate construction and operation energy conservation features, comply with applicable regulations including CALGreen and state energy standards under Title 24, and incorporate mitigation measures, as necessary.

Electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. As described in LADWP's 2015 Power Integrated Resource Plan, delivery capacity will be expanded as needed and at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. Development projects within the LADWP service area will also be reviewed by LADWP on an individual basis and expected to incorporate necessary Site-specific infrastructure improvements, thereby contributing to the electrical infrastructure in the Project area. As such, the Project's contribution to cumulative impacts with respect to electricity infrastructure is not cumulatively considerable and is less than significant.

(b) Natural Gas

Buildout of the Project, related projects, and additional forecasted growth in SoCalGas' service area will cumulatively increase the demand for natural gas supplies and infrastructure capacity. Based on the 2014 California Gas Report, the California Energy Commission (CEC) estimates natural gas consumption within SoCalGas' planning area will be approximately 2.65 billion cf/day in 2022 (the Project's buildout year). The Project accounts for approximately 0.003 percent of the SoCalGas' 2022 forecasted consumption, which accounts for projected population growth and development based on local and regional plans. The Project development's use of natural gas resources could limit future availability, but such use is relatively small-scaled and reduced by measures rendering the Project more energy-efficient. As the Project is consistent with regional and local growth expectations for SoCalGas' service area, future development projects will also be expected to incorporate energy conservation, comply with regulations including CALGreen and state energy standards under Title 24, and incorporate mitigation measures. Thus, the Project's contribution to cumulative impacts related to natural gas consumption is not cumulatively considerable and is less than significant.

In response to increasing demand, SoCalGas is expected respond with natural gas infrastructure expansion and improvements. Development, including the Project and related projects, served by the SoCalGas will also be anticipated to incorporate Site-specific infrastructure improvements. As such, the Project's contribution to cumulative impacts with respect to natural gas infrastructure is not cumulatively considerable and, thus, is less than significant.

(c) Transportation Energy

Buildout of the Project, related projects, and additional forecasted growth will cumulatively increase the demand for transportation-related fuel in the state and region. At buildout, the Project will consume a total of 1,221,000 gallons of gasoline and 219,000 gallons of diesel per year, or a total of 1,440,000 gallons of petroleum-based fuels per year. The Project's transportation-related fuel usage will represent approximately 0.03 percent of the 2015 annual on-road gasoline- and diesel-related energy consumption in Los Angeles County, as shown in Appendix R of the Draft EIR.

Although petroleum currently accounts for 90 percent of California's transportation energy sources, the state has implemented several policies, rules, and regulations to improve vehicle efficiency, increase development and use of alternative fuels, reduce air pollutants and GHGs from transportation, and reduce reliance on petroleum fuels by reducing VMTs. As gasoline consumption has declined by 6 percent since 2008, demand is predicted to continue declining over the next 10 years while alternative fuel usage increases for natural gas, biofuels, and electricity. As with the Project, other future development projects will be expected to reduce VMT by implementing design features and encouraging the use of alternative modes of transportation.

Furthermore, the Project is consistent with the energy efficiency policies emphasized by the 2012–2035 RTP/SCS and the 2016–2040 RTP/SCS, which includes various policies from the 2012–2035 RTP/SCS. As a mixed-use development along Sunset Boulevard and two blocks south of Hollywood Boulevard, the Project is located with two commercial corridors that are characterized by a high degree of pedestrian activity and greater proximity to neighborhood services, jobs, and residences. The Project introduces new housing and job opportunities within a HQTA, which is consistent with policy of the 2012–2035 RTP/SCS related to locating new jobs near transit options, which, in the Project's case, include Metro and LADOT bus lines and rail line.

The Project's features serve to reduce VMT and associated transportation fuel consumption. Therefore, the Project's contribution to cumulative impacts related to transportation energy consumption is not cumulatively considerable and, thus, is less than significant.

Project Design Features

The City finds that Project Design Features GHG-PDF-1, UTL-PDF-1, UTL-PDF-2, UTL-PDF-3, UTL-PDF-4, and UTL-PDF-5, and which are incorporated into the Project and are incorporated into these Findings as though fully set forth herein, improve energy efficiency. These Project design features were taken into account in the analysis of potential impacts.

VII. ENVIRONMENTAL IMPACTS FOUND TO BE LESS THAN SIGNIFICANT AFTER MITIGATION

The following impact areas were concluded by the Draft EIR to be less than significant with the implementation of mitigation measures described in the Final EIR. Based on those analyses and other evidence in the administrative record relating to the Project, the City finds and determines that the mitigation measures described in the Final EIR reduce the potentially significant impacts identified for the following environmental impact categories to below the level of significance.

A. Cultural Resources

1. Alteration of Significant Historical Resources:

The Project may alter three existing buildings within Development Parcel C, the Bullinger Building, located at 6683 Sunset Boulevard, and the Early American Building and the French Building, which are integral parts of the Crossroads of the World complex.

(a) Early America Building and the French Building

The Crossroads of the World complex is composed of nine buildings and their related circulation and Site features. Together, these elements create a single historical resource. The Project may alter two of the nine buildings. One is a small building located at the southwestern portion of the complex that is referred to as the "Early American Building," and designed in an American Colonial Revival style. Located just east of Las Palmas Avenue, the building consists of a linear configuration of individual store spaces. The Early American Building is oriented east-west and located between Las Palmas Avenue and the northwestern corner of the Crossroads of the World "French Building," and may be attached to the north façade of Building C1. The other is a larger building also located at the southwester portion of the complex that is referred to as the "French Building," and designed in a "French Eclectic" style. Located just east of the Bullinger Building and the new C1 Building, it is oriented north-south with its entrance facing east, and may be attached to the east façade of Building C1.

Building C1, consisting of two floors of commercial uses, is located immediately north of the Bullinger Building, immediately west of the French Building and immediately south of the Early American Building. Construction of Building C1 may involve attaching Building C1 to the northern façade of the Bullinger Building, to the western façade of the French Building and to the southern façade of the Early American Building, which would alter all three historical resources. Attaching the first floor of Building C1 to the south façade of the Early American Building requires removal of historic fabric from the rear façade of the Early American Building. The existing south façade of the Early American Building was constructed as the back of the Early American Building, facing a neighboring property line, and its features are simple and largely utilitarian. The rear façade does not contain the expressive design features that are prominent on the front and side façades, that give the Early American Building its distinctive appearance, and that are defining characteristics of the Crossroads of the World complex. Removal of historic fabric from the rear façade of the Early American Building is not a substantial loss of integrity to Crossroads of the World because the majority of the original fabric and character-defining features of the Early American Building, and all of the existing original fabric and character-defining features of the eight additional component buildings, remain intact. With incorporation and implementation of Mitigation Measure CUL-MM-3, which ensures the Building C1 is designed in a manner that is compatible with the historic materials and features of Crossroads of the World, and that connecting Building C1 to the Early American Building does not destroy historic materials and features that characterize the

Crossroads of the World complex, alteration of the Early American Building does not significantly impact Crossroads of the World.

Building C1 would attach to the existing west façade of the French Building, the rear façade currently facing the back ends of the existing buildings at 1510 and 1512 Las Palmas that the Project removes. Similar to the Early American Building, the west façade of the French Building does not contain the expressive design features prominent on the east and north façades that give the French Building its distinctive appearance and are defining characteristics of the Crossroads of the World property. Removal of historic fabric from the rear façade of the French Building does not result in a substantial loss of integrity to Crossroads of the World because the majority of the original fabric and character-defining features of the French Building, and all of the existing original fabric and character-defining features of the eight additional component buildings remain intact. With incorporation and implementation of Mitigation Measure CUL-MM-3, which ensures the Building C1 is designed in a manner that is compatible with the historic materials and features of Crossroads of the World, and that connecting Building C1 to the French Building does not destroy historic materials and features that characterize the Crossroads of the World complex, alteration of the French Building does not significantly impact Crossroads of the World.

(b) Bullinger Building

The Project may alter the Bullinger Building located at 6683 Sunset Boulevard, which was found eligible for listing in the California Register in the 2010 Hollywood Redevelopment Project Area Historic Resources Survey. Located at the southwest corner of Sunset Boulevard and Las Palmas Avenue, just east of Las Palmas Avenue, the building is a two-story, brick clad building that is rectangular in plan with a chamfered corner entry facing the intersection of Sunset Boulevard and Las Palmas Avenue. Storefronts line the first floor facing Sunset Boulevard with offices on the second floor. It is oriented east-west and is located between Las Palmas Avenue and the southwestern corner of the Crossroads of the World complex. It may be attached to proposed Building C1.

The Project's potential to attach Building C1 to the north façade of the Bullinger Building does not significantly impact that building. Attaching the first floor of Building C1 to the Bullinger Building requires removal of historic fabric from the rear façade of the Bullinger Building. This façade (the north façade) was constructed as the back of the Bullinger Building, facing a neighboring property line, and its features are simple and utilitarian. The rear façade does not contain the expressive design features that are prominent on the front and side façades that give the Bullinger Building its distinctive appearance as a commercial building from the 1920s. Removal of historic fabric from the rear façade of the Bullinger Building is not a substantial loss of integrity to the Bullinger Building because the majority of its original fabric and character-defining features located on its primary façade remains intact. With incorporation and implementation of Mitigation Measure CUL-MM-3, which ensures the Building C1 is designed in a manner that is compatible with the historic materials and features of the Bullinger Building, and that connecting Building C1 to the Bullinger Building does not destroy historic materials and features that characterize the Bullinger Building, alteration of the Bullinger Building does not significantly impact it.

Project Design Features

The City finds that no specific Project Design Features are incorporated into the Project to reduce the impacts related to alteration of significant historical resources.

Mitigation Measures

The City finds that Mitigation Measures CUL-MM-1, CUL-MM-2, CUL-MM-3, CUL-MM-4, CUL-MM-5, CUL-MM-6, CUL-MM-7 and CUL-MM-8, which are incorporated into the Project and incorporated into these Findings as though set forth herein, reduce the impacts related to alteration of significant historical resources to less than significant. These mitigation measures were taken into account in the analysis of Project impacts.

Finding

Pursuant to Public Resources Code, section 21081(a)(1) the City finds that changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid the significant effects on the environment.

Rationale for Finding

The Project's incorporation and implementation of the mitigation measures provided above reduces its potential impacts associated with partial alteration of Crossroads of the World and the Bullinger Building to less than significant. Thus, the Project creates no significant impacts to Crossroads of the World and the Bullinger Building.

Reference

For a complete discussion of impacts associated with Cultural Resources, please see Section IV.D of the Draft EIR, pages IV.D-16 through IV.D-18, IV.D-29 through IV.D-54; Section III, Revisions, Clarifications and Corrections of the Final EIR, pages III-15 through III-22 and III-56 through 58; and the Errata.

2. Potential Impacts to Significant Historical Resources from Rehabilitation or from Adjacent New Construction, or from Permanent Location of Adjacent New Buildings:

Guidance provided by the National Park Service for reviewing proposed new construction that may affect a historical resource, as stated in the Project's Historic Report, be it an addition to an existing building or an infill building within a historic district, strives for the same outcome: a balance between compatibility and differentiation, and the retention of integrity. Specific standards that are applicable to the Project include Standards 9 and 10, as follows:

- Standard 9 in part states: "New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment."

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

(a) Development on Development Parcel A

The Project includes construction of a single building, Building A1, on Development Parcel A. Building A1 includes 26 floors of hotel with ancillary commercial uses over a below grade parking garage. Because the Project demolishes the 1907 vernacular house at 1547 McCadden Place to make room for Building A1, no historical resources are immediately adjacent to Building A1. Two historical resources have been identified in the immediate vicinity of Development Parcel A—the 1928 apartment building at 1523 McCadden Place south of Development Parcel A and the Hollywood High School Historic District located west of Development Parcel A across Highland Avenue.

(1) Construction of New Building A1

The 1928 five-story apartment building at 1523 McCadden Place is located several parcels south of Development Parcel A, and placing Building A1 on Parcel A does not result in any physical impact to 1523 McCadden Place. In addition, the setting of the apartment building at 1523 McCadden Place has previously been altered by successive demolition and construction on neighboring parcels since its construction in 1928. Therefore, the existing setting is not critical to understanding the building's historic significance. Rather, the historic significance of 1523 McCadden Place is conveyed primarily through the plan, massing, spatial configuration, architecture and design features of the apartment building. It is through the experience of the building that its historic significance as a property type and its association with 1920s development in Hollywood is understood. The building at 1523 McCadden Place will continue to convey its historic significance with Building A1 on Parcel A.

The Hollywood High School Historic District is located across Highland Avenue from Development Parcel A outside the Project Site boundaries and will not be physically altered by locating Building A1 on Parcel A. Hollywood High School is significant as the first school serving Hollywood that has been in continuous use as an educational facility since its inception, and it has played an important role in the civic and social development of Hollywood. It is also significant as an example of Public Works Administration (PWA) Moderne architecture as applied to a high school campus and as a signature work by the Los Angeles architectural firm of Marsh, Smith and Powell. The historic significance of the Hollywood High School Historic District is conveyed primarily through the plan, massing, spatial relationships, architecture and design of its contributing buildings and features. The Hollywood High School Historic District remains intact even with Building A1 on Parcel A, and its plan, spatial relationships, massing, architecture and design features will continue to convey its historic significance.

Building A1 is located two blocks west of the First Baptist Church at 6684 Selma Avenue, Crossroads of the World at 6671 Sunset Boulevard, the Art Deco office building at 1618 Las Palmas Avenue, and the Blessed Sacrament Church and School at 6641–6657 Sunset Boulevard. Building A1 is also located substantially north and west of the Queen

Anne house at 6720–6722 Sunset Boulevard. Because it is located a substantial distance from these resources, Building A1 does not demolish or physically alter any of these resources or their immediate surroundings. Building A1 does not materially impact the integrity of the First Baptist Church, Crossroads of the World, the Art Deco office building at 1618 Las Palmas Avenue, or the Queen Anne house at 6720–6722 Sunset Boulevard, and all four will continue to convey their historic significance even with Building A1 on Parcel A.

Construction of Building A1 will include substantial foundation work and the construction of a five-level subterranean parking garage. Without mitigation to ensure the protection of historic resources from damage due to underground excavation and general construction procedures and to reduce the possibility of damage from vibration and settlement due to the removal of adjacent soil, this new construction on Development Parcel A could have destabilized the adjacent historic buildings, resulting in significant impacts to historic resources. However, with incorporation and implementation of Mitigation Measure CUL-MM-7, which entails a shoring plan to ensure the protection of adjacent historic resources during construction from damage due to underground excavation, vibration, and general construction procedures and to reduce the possibility of damage from vibration and settlement due to the removal of adjacent soil, construction of Building A1 shall have a less-than-significant impact to historical resources.

(2) Development on Development Parcel B

The Project includes construction of four new buildings on Development Parcel B, consisting of Buildings B1, B2, B3, and B4. Specifically, Building B1 consists of 30 floors, reaching a maximum height of 402 feet above grade. Building B2 consists of 6 floors in addition to a mezzanine floor, reaching a maximum height of 86.5 feet above grade. Building 3 consists of 31 floors and will reach a maximum height of 386 feet above grade. Building B4 consists of 6 floors in addition to a mezzanine floor, reaching a maximum height of approximately 95 feet above grade. The Project demolishes all of the existing historical buildings on Development Parcel B other than the former Hollywood Reporter Building. Therefore, the former Hollywood Reporter Building is the only existing historical resource that is located immediately adjacent to any of the four new buildings to be constructed on Development Parcel B, and it is located adjacent to new building B3.

Two historical resources are located in the immediate vicinity of Development Parcel B, including the First Baptist Church, located east of Development Parcel B at the southeastern corner of Las Palmas Avenue and Selma Avenue, and the Queen Anne House, located south of Development Parcel B on the south side of Sunset Boulevard. Both buildings are located on opposite sides of the street from Development Parcel B, and the Project’s new buildings do not demolish or physically alter either resource, as explained below.

Building B1 is located on the west side of Las Palmas Avenue, across the street from the First Baptist Church at 6684 Selma Avenue. The First Baptist Church remains intact and physically unchanged even with Building B1 on Parcel B, and the church building’s massing, form, and architectural detailing will continue to be viewable and understandable by the public. Building B1 does not materially impact the integrity of the First Baptist

Church, and the church will continue to convey its historic significance with Building B1 in place.

Building B3 is located on the northwestern corner of Sunset Boulevard and Las Palmas Avenue across Sunset Boulevard from the Queen Anne house located on the Hollywood Center Motel property. As the Queen Anne house is set back from Sunset Boulevard, there is a substantial distance between the house and Building B3. Therefore, the Queen Anne house remains intact and in its original location with Building B3 on Parcel B, and its setting within the Hollywood Center Motel property will remain unchanged.

The Project's new buildings on Development Parcel B are separated by Las Palmas Avenue from the Bullinger Building, located at 6683 Sunset Boulevard, and are separated by Las Palmas Avenue, the Bullinger Building and the Project's new buildings on Development Parcel C from Crossroads of the World at 6671 Sunset Boulevard and the Blessed Sacrament Church and School at 6641–6657 Sunset Boulevard. Development Parcel B is also located south and west of the Art Deco office building at 1618 Las Palmas Avenue. Because the Project's new buildings on Development Parcel B are located a substantial distance from these resources, construction of these buildings does not demolish or physically alter any of these resources or their immediate surroundings. As such, the Project's new buildings on Development Parcel B do not materially impact the integrity of Crossroads of the World, the Blessed Sacrament Church and School, or the Art Deco office building at 1618 Las Palmas Avenue, and all three will continue to convey their historic significance after the new construction on Development Parcel B.

(b) Construction of New Buildings on Parcel B

Construction of the new buildings on Development Parcel B includes substantial foundation work and the construction of subterranean parking. Without mitigation to ensure the protection of nearby historic buildings (i.e., former Hollywood Reporter Building, Bullinger Building, Crossroads of the World, and First Baptist Church) from damage due to underground excavation and general construction procedures, and without mitigation to reduce the possibility of damage from vibration and settlement due to the removal of adjacent soil, new construction on Development Parcel B could destabilize nearby historic buildings, resulting in significant impacts to historic resources. However, with implementation of Mitigation Measure CUL-MM-7, which entails a shoring plan to ensure the protection of adjacent historic resources during construction from damage due to underground excavation, vibration, and general construction procedures and to reduce the possibility of damage from vibration and settlement due to the removal of adjacent soil, construction on Development Parcel B does not significantly impact historical resources.

(1) Rehabilitation and Adaptive Reuse of the Former Hollywood Reporter Building

The Project's rehabilitation and adaptive reuse of the former Hollywood Reporter Building as additional commercial space has the potential to remove important historic fabric and reduce the integrity of the building. However, with the incorporation and implementation of Mitigation Measures CUL-MM-9 through CUL-MM-13, inclusive, including documentation of the existing building, which is being retained; i.e., the Hollywood Reporter Building, and requirements for the rehabilitation of that building in accordance

with the Secretary of the Interior's Standards and Guidelines for Rehabilitation to ensure that the rehabilitation and adaptive reuse of the former Hollywood Reporter Building are done properly, the rehabilitation and adaptive reuse activities shall have a less than significant impact on the Hollywood Reporter Building.

(2) Placement of New Buildings on Parcel B

Building B3 will be placed immediately east of the former Hollywood Reporter Building with an approximately 40-foot space maintained between the two buildings. However, since the construction of Building B3 does not involve any alteration or demolition of the former Hollywood Reporter Building, the Project does not affect its integrity of location, design, materials, workmanship, feeling or association. All of the existing physical elements of the former Hollywood Reporter Building remain intact and continue to convey its historic significance with Building B3 in place. Ultimately, the historic significance of the former Hollywood Reporter Building is conveyed primarily through the design detailing of its Moderne façade, and the plan, massing, cladding and fenestration pattern of the building, which was constructed in three parts over time. It is through the direct experience of the building that its historic significance as an example of 1930s architectural style and its long association with Hollywood Reporter is conveyed. The general configuration and orientation of the building remains discernible with Building B3 in place, and the primary south-facing façade remains intact and unobstructed. Accordingly, the former Hollywood Reporter Building continues to convey its historic significance with Building B3 in place, and, as such, construction of Building B3 does not result in a significant impact to the former Hollywood Reporter Building.

The placement of Building B3 also does not significantly impact the Bullinger Building or Crossroads of the World. Building B3 is separated from the Bullinger Building by Las Palmas Avenue and from Crossroads of the World by Las Palmas Avenue and the existing Bullinger Building. Since the construction of Building B3 does not involve any alteration or demolition of either the Bullinger Building or Crossroads of the World, the Project does not affect the integrity of location, design, materials, workmanship, feeling or association of either resource. All of the existing physical elements of both resources remain intact and continue to convey their historic significance with Building B3 in place. Ultimately, the historic significance of both the Bullinger Building and Crossroads of the World is conveyed primarily through their respective unique design, detailing and façades, and in the case of Crossroads of the World, its unique plan. It is through the direct experience of these resources that their historic significance and long association with Hollywood are conveyed. The general configuration and orientation of these resources remain discernible with Building B3 in place, and their primary façades remain intact and unobstructed. Accordingly, these resources continue to convey their historic significance with Building B3 in place, and, as such, the construction of Building B3 does not result in a significant impact to either resource.

(c) Development on Development Parcel C – Impacts on Crossroads of the World and the Bullinger Building

The Project includes three new buildings on Parcel C. Building C1 is located just west of Crossroads of the World on a Site just north of the Bullinger Building at 6683 Sunset Boulevard and south of the Crossroads of the World Early American Building. Building C2 is located on the surface parking lot west of Crossroads of the World. Building C3 is

located on the east side of the Crossroads property between the Moorish influenced "Moroccan Building" and east "Central European Building." Because the buildings and Site features comprising the Crossroads of the World complex have been identified and listed collectively as a single historic resource, the impacts of the Project's adjacent new buildings were evaluated on the Crossroads of the World property as a whole.

(1) Construction

Construction of the new buildings on Development Parcel C includes substantial foundation work and the construction of subterranean parking underneath Buliding C2. Without mitigation to ensure the protection of historical resources from damage due to underground excavation and general construction procedures and to reduce the possibility of settlement due to the removal of adjacent soil, new construction on Development Parcel C has the potential to destabilize the Crossroads of the World historical buildings and the Bullinger Building, resulting in significant impacts to historical resources. However, with incorporation and implementation of Mitigation Measure CUL-MM-7 reduces the related potentially significant impacts to less than significant.

Building C1, consisting of a 42-foot tall, two-story building planned for commercial uses, is located immediately north of the Bullinger Building and immediately south of the Early American Building. Construction of Building C1 may involve attaching the first floor of Building C1 to the north elevation of the Bullinger Building and to the south elevation of the Early American Building. Attachment of Building C1 to the Early American Building requires removal of historic fabric from the rear of the Early American Building. This façade (the existing south façade) was constructed as the back of the Early American Building, facing a neighboring property line, and its features are simple and utilitarian. The rear façade does not contain the expressive design features that are prominent on the front and side façades, that give the Early American Building its distinctive appearance, and that are defining characteristics of the Crossroads of the World complex. Removal of historic fabric from the rear façade of the Early American Building is not a substantial loss of integrity to Crossroads of the World because the majority of the original fabric and character-defining features of the Early American Building, and all of the existing original fabric and character-defining features of the eight additional component buildings, remain intact. With incorporation and implementation of Mitigation Measure CUL-MM-3, which ensures the Building C1 is designed in a manner that is compatible with the historic materials and features of Crossroads of the World, and that connecting Building C1 to the Early American Building does not destroy historic materials and features that characterize the Crossroads of the World complex, alteration of the Early American Building does not significantly impact Crossroads of the World.

The Project's potential to attach the first floor of Building C1 to the north façade of the Bullinger Building also does not significantly impact that building. Attachment of Building C1 to the Bullinger Building requires removal of historic fabric from the rear façade of the Bullinger Building. This façade (the north façade) was constructed as the back of the Bullinger Building, facing a neighboring property line, and its features are simple and utilitarian. The rear façade does not contain the expressive design features that are prominent on the front and side façades that give the Bullinger Building its distinctive appearance as a commercial building from the 1920's. Removal of historic fabric from

the rear façade of the Bullinger Building is not a substantial loss of integrity to the Bullinger Building because the majority of its original fabric and character-defining features located on its primary façade remains intact. With incorporation and implementation of Mitigation Measure CUL-MM-3, which ensures the Building C1 is designed in a manner that is compatible with the historic materials and features of the Bullinger Building, and that connecting Building C1 to the Bullinger Building does not destroy historic materials and features that characterize the Bullinger Building, alteration of the Bullinger Building does not significantly impact it.

Building C2, consisting of a 42-foot, two-story building with subterranean parking planned for commercial uses, is located on a portion of the surface parking lot west of the Crossroads of the World and north of the Bullinger Building. Building C2 does not destroy historic materials and features that characterize the Bullinger Building because it is separated from the Bullinger Building by new Building C1 and by Crossroads of the World buildings. Building C2 does not destroy historic materials and features that characterize the Crossroads of the World complex because it will be separated by the paseo from and will not physically alter the Crossroads of the World buildings. Building C2 utilizes simple forms and contemporary materials to differentiate it from the Crossroads of the World buildings. In accordance with Standard 10, the essential form and integrity of the Crossroads of the World complex will be unimpaired if Building C2 were removed in the future. With implementation of Mitigation Measure CUL-MM-6, which entails consultation with a preservation architect or other qualified professional to ensure that Building C2 is designed in a manner that is compatible with the historic materials and features of Crossroads of the World, construction of Building C2 will not result in a significant impact to historic resources (i.e., Crossroads of the World or the Bullinger Building).

Building C3 is a one-story retail pavilion, located between the existing Moroccan Building and the east Central European Building on a Site currently used for surface parking. Building C3 will not destroy historic materials and features that characterize the Crossroads of the World complex because it will not physically alter the Crossroads of the World buildings. Building C3 will utilize simple forms and contemporary materials to differentiate it from the Crossroads of the World buildings. The one-story, rectangular building will be compatible in size, scale, and massing with the one- and two-story buildings that characterize Crossroads of the World. In accordance with Standard 10, the essential form and integrity of the Crossroads of the World property will be unimpaired if Building C3 were removed in the future. With implementation of Mitigation Measure CUL-MM-6, which entails consultation with a preservation architect or other qualified professional to ensure that Building C3 is designed in a manner that is compatible with the historic materials and features of Crossroads of the World, construction of Building C3 will not result in a significant impact to historic resources (i.e., Crossroads of the World).

(2) Rehabilitation of the Crossroads of the World Complex and Rehabilitation and Adaptive Reuse of the Bullinger Building

The Project's rehabilitation of the Crossroads of the World complex and the Bullinger Building has the potential to remove important historic fabric and reduce the integrity of the individual buildings. However, with the incorporation and implementation of Mitigation Measure CUL-MM-1, revised Mitigation Measure CUL-MM-4 and Mitigation Measure CUL-MM-8, including documentation of the existing properties, compliance with

requirements for the rehabilitation of the buildings in accordance with the Secretary of the Interior's Standards and Guidelines for Rehabilitation and the preparation of Historical Structure Reports to establish treatment for their continued preservation to ensure that the rehabilitation of the Crossroads of the World complex is done properly, the rehabilitation activities do not significantly impact either the Crossroads of the World complex.

The Project's rehabilitation and adaptive reuse of the Bullinger Building as additional commercial space has the potential to remove important historic fabric and reduce the integrity of the building. However, with the incorporation and implementation of Mitigation Measures CUL-MM-9 through CUL-MM-13, inclusive, including documentation of the existing building, which is being retained; i.e., the Bullinger Building, and requirements for the rehabilitation of that building in accordance with the Secretary of the Interior's Standards and Guidelines for Rehabilitation to ensure that the rehabilitation and adaptive reuse of the Bullinger Building are done properly, the rehabilitation and adaptive reuse activities do not significantly impact the Bullinger Building.

(3) Placement of New Buildings on Parcel C

As discussed above, Building C1 comprises two floors housing commercial uses, reaching a maximum height of 35 feet above grade. Although Building C1 rises slightly higher than the adjacent Bullinger Building and higher than the Crossroads of the World buildings, these differences in height are moderated by massing that sets the tallest portions of Building C1 back and to the west, away from Crossroads of the World and behind the Bullinger Building's Sunset Boulevard frontage. Above its podium, the second floor of Building C1 is adjacent to the less important rear façade of the Bullinger Building, and is set back from Sunset Boulevard and the Crossroads property so that the additional height is not immediately juxtaposed with the Crossroads buildings. Above the podium level, curtain walls of horizontally articulated glass in metal frames will further reduce the visual impression of height.

In accordance with Standard 9, Building C1 does not destroy historic materials or features that characterize the Crossroads of the World complex or the Bullinger Building. Building C1 emphasizes simple forms and contemporary materials to differentiate it from the Crossroads buildings and the Bullinger Building. Building C1 is only slightly larger than, and is thus compatible in size, scale and massing with, the Bullinger Building. Set back from the street to reduce the overall mass, Building C1 is also compatible in size, scale and massing with Crossroads of the World. In accordance with Standard 10, the essential form and integrity of the Crossroads of the World property and the Bullinger Building will be unimpaired if Building C1 were removed in the future. With incorporation and implementation of Mitigation Measure CUL-MM-6, which entails consultation with a preservation architect or other qualified professional to ensure that Building C1 has been designed in a manner that is compatible with the historic materials and features of Crossroads of the World and the Bullinger Building, the construction of Building C1 shall have a less than significant impact on historical resources (i.e., Crossroads of the World and the Bullinger Building).

As discussed above, Building C2, consisting of two floors of commercial uses, is located on a portion of the surface parking lot west of the Crossroads of the World and north of Building C1, which separates it from the Bullinger Building. Building C2 at its highest

point is taller than the Bullinger Building and any of the Crossroads of the World buildings. Similar to Building C1, this difference in height is moderated by setting the tallest portions of Building C2 back from Crossroads of the World. Building C2 includes a ground floor (podium) level. The upper levels are set back from components of the Crossroads of the World complex to reduce the perception of height and mass when experienced at ground level. The ground floor level elevations are also articulated with retail windows and entryways that are similar in scale, proportion, and rhythm to those of the Crossroads of the World buildings. Above the podium level, curtain walls of horizontally articulated glass in metal frames create a simple backdrop to the highly articulated historical profile of the Crossroads buildings.

In accordance with Standard 9, Building C2 does not destroy historic materials or features that characterize the Crossroads of the World property. Building C2 utilizes simple forms and contemporary materials, such as articulated glass in metal frames, to differentiate it from the Crossroads of the World buildings. With setbacks from the eastern and southern elevations to reduce the overall height and mass, Building C2 is also compatible in size, scale, and massing with Crossroads of the World. In accordance with Standard 10, the essential form and integrity of the Crossroads of the World property will be unimpaired if Building C2 were removed in the future. With incorporation and implementation of Mitigation Measure CUL-MM-6, which entails consultation with a preservation architect or other qualified professional to ensure that Building C2 has been designed in a manner that is compatible with the historic materials and features of Crossroads of the World, Building C2 has a less-than-significant impact on historical resources (i.e., Crossroads of the World).

Building C3, consisting of a stand-alone one-story commercial/retail building rising to 19 feet above grade, is located between the existing Moroccan Building and the east Central European Building on a Site previously used for surface parking. The one-story height of Building C3 is consistent with the one- and two-story heights of the existing Crossroads of the World buildings and continues the north-south building line on the east side of the main pedestrian axis. Building C3 has a simple, rectangular form and utilizes clear glass on its primary elevation to emphasize transparency. In accordance with Standard 9, the minimal design of Building C3 clearly differentiates it from the Crossroads of the World buildings.

In addition, in accordance with Standard 9, Building C3 does not destroy historic materials and features that characterize the Crossroads of the World complex because it does not physically alter the Crossroads of the World buildings. Building C3 utilizes simple forms and contemporary materials to differentiate it from the Crossroads of the World buildings. Building C3's one-story, rectangular structure is compatible in size, scale, and massing with the one- and two-story buildings that characterize Crossroads of the World. In accordance with Standard 10, the essential form and integrity of the Crossroads of the World property will be unimpaired if Building C3 were removed in the future. With implementation of Mitigation Measure CUL-MM-6 below, which entails consultation with a preservation architect or other qualified professional to ensure that Building C3 is designed in a manner that is compatible with the historic materials and features of Crossroads of the World, construction of Building C3 will have a less than significant impact to historic resources (i.e., Crossroads of the World).

(d) Development on Development Parcel D

The Project includes demolishing the historic two-story Craftsman style duplex at 1608 Las Palmas Avenue and building a single new building, Building D1, on Development Parcel D. Building D1 consists of six floors of residential and retail uses over a subterranean parking garage. Two historical resources are located in the immediate vicinity of Development Parcel D, including the First Baptist Church located south of Development Parcel D at the southeastern corner of Las Palmas Avenue and Selma Avenue, and the two-story Art Deco office building at 1618 Las Palmas Avenue located north of Development Parcel D. The First Baptist Church is located on the opposite side of Selma Avenue from Development Parcel D; the Art Deco office building is separated from Parcel D by a surface parking lot.

The 1932 Art Deco office building at 1618 Las Palmas Avenue is located just north of Development Parcel D and separated by a surface parking lot. Building D1 alters the surroundings and setting of the Art Deco office building by placing a new building on a Site currently occupied by surface parking. The surroundings of the Art Deco office building at 1618 Las Palmas, however, have already been altered by successive demolition and construction on neighboring parcels since its construction in 1932, and, thus, the existing setting is not critical to understanding the building's historic significance. The historic significance of 1618 Las Palmas is conveyed primarily through the plan, massing, spatial configuration, architecture, and design features of the building, all of which will remain intact and understandable.

Building D1 is located on the northeastern corner of Las Palmas Avenue and Selma Avenue across the street from the First Baptist Church at 6684 Selma Avenue. The First Baptist Church remains intact and physically unchanged with Building D1 on Development Parcel D, and its massing, form, and architectural detailing will continue to be viewable and understandable by the public. Building D1 does not materially impact the integrity of the First Baptist Church, which continues to convey its historic significance with Building D1 on Parcel D.

Building D1 is also located north of and across the street from the northern end of the Crossroads of the World complex and northwest of the Blessed Sacrament Church and School at 6641–6657 Sunset Boulevard. Construction of Building D1 does not demolish or physically alter either of these resources, and does not materially impact their integrity. Because both Crossroads of the World and the Blessed Sacrament Church and School will remain intact and unaltered, with their integrity not materially impacted, with Building D1 on Parcel D, both resources will continue to convey their historic significance even with Building D1 on Parcel D.

(1) Construction

Although construction of Building D1 does not physically impact either historical resource because neither resource is located on Parcel D, its construction does include substantial foundation work and the construction of subterranean parking. Without mitigation to ensure the protection of adjacent historic resources from damage due to underground excavation, vibration, and general construction procedures and to reduce the possibility

of settlement due to the removal of adjacent soil, construction of Building D1 could have destabilized the adjacent 1932 Art Deco office building at 1618 Las Palmas Avenue, resulting in significant impacts to historical resources. However, with incorporation and implementation of Mitigation Measure CUL-MM-7, which entails a shoring plan to ensure the protection of adjacent historic resources during construction from damage due to underground excavation, vibration, and general construction procedures and to reduce the possibility of damage from vibration and settlement due to the removal of adjacent soil, construction of Building D1 shall have a less than significant impact to historical resources.

(e) Development on Development Parcel E

The Project includes a stand-alone parking structure, Building E1, reaching a maximum height of approximately 68 feet above grade. Building E1 includes two subterranean levels and 6.5 above-grade levels to accommodate 473 parking spaces, with 450 parking spaces serving the retail, restaurant, and entertainment-related uses in Development Parcels B and C; its remaining 23 parking spaces are reserved for use by the adjacent Blessed Sacrament Church. Building E1 is located on the northwest end of the Blessed Sacrament Church and School property at the terminus of Cherokee Avenue at Selma Avenue, and immediately east of the northern portion of Crossroads of the World at the rear of the Crossroads of the World “Central European Building (East).”

Building E1, a parking structure, is located on Development Parcel E in an area currently used for surface parking that is north of the two-story Rectory building and west of a one-story former Convent building on the Blessed Sacrament Church and School property. Building E1 is spatially separate and distinct from these buildings. The new construction within Parcel E alters the spatial relationships on the Blessed Sacrament property by inserting a new structure in an area currently occupied by a surface parking lot. However, this alteration does not create a substantial adverse change in the significance of this historical resource because the integrity and/or significance of the Blessed Sacrament Church and School property are not materially impaired by Building E1. Although locating Building E1, an approximately 68-foot tall parking structure, on a Site currently occupied by surface parking does reduce integrity of setting for the Blessed Sacrament Church and School property, Building E1 does not involve any alteration or demolition of any existing buildings on the Blessed Sacrament property. Therefore, Building E1 does not affect integrity of location, design, materials, workmanship, feeling or association of this historic resource. Building E1 is located at the rear (north) of the Blessed Sacrament property, a substantial distance from the public-facing southern portion of the property where the primary church and school buildings front Sunset Boulevard. In addition, both the Rectory and former Convent buildings are support buildings with an internal orientation facing the rear parking lot. All of the existing physical elements of the Blessed Sacrament Church and School property remain intact and continue to convey the historic significance of the property with Building E1 located on Parcel E.

Although located on a separate parcel, Building E1 is also located immediately east of the northern portion of Crossroads of the World at the rear of the Crossroads of the World “Central European Building (East),” which is located on Development Parcel C. Although locating Building E1, an approximately 68-foot tall parking structure, on a Site currently occupied by surface parking does reduce integrity of setting for the northern portion of Crossroads of the World, Building E1 does not involve any alteration or demolition of any

existing buildings on the Crossroads of the World property, including the Central European Building (East). Therefore, Building E1 does not affect integrity of location, design, materials, workmanship, feeling or association. Building E1 is located at the rear (east) of the Crossroads of the World Central European Building (East) where there is no public interface. All of the existing physical elements of the Crossroads of the World, including those of the Central European Building (East) remain intact and continue to convey the historic significance of the Crossroads of the World property with Building E1 located on Parcel E.

(1) Construction

The construction of Building E1 includes substantial foundation work and the construction of subterranean parking. Without mitigation to ensure the protection of adjacent historical resources from damage due to underground excavation, its construction has the potential to destabilize the adjacent and nearby historic buildings, resulting in significant impacts to historic resources. However, construction of Building E1 will not involve any alteration or demolition of existing buildings on the Crossroads of the World property, including the Central European Building (East). Further, Mitigation Measure CUL-MM-7, which includes the implementation of a shoring plan to ensure protection of adjacent historic resources due to excavation, vibration, and general construction procedures to reduce the possibility of damage associated with vibration and settlement, will reduce potential impacts to the adjacent and nearby historic buildings, including the Blessed Sacrament Church and School property, among others, to a less than significant level.

Project Design Features

The City finds that no specific Project Design Features are incorporated into the Project to reduce the potential impacts of the Project's new construction adjacent to significant historical resources and of its rehabilitation of significant historical resources.

Mitigation Measures

The City finds that Mitigation Measures CUL-MM-2, CUL-MM-3, CUL-MM-4, CUL-MM-5, CUL-MM-6, CUL-MM-7, which are incorporated into the Project and incorporated into these Findings as though set forth herein, reduce the potential impacts of the Project's new construction adjacent to significant historical resources and of its rehabilitation of significant historical resources to less than significant. These mitigation measures were taken into account in the analysis of Project impacts.

Finding

With implementation of Mitigation Measures CUL-MM-1, CUL-MM-2, CUL-MM-3, CUL MM-4, CUL-MM-5, CUL-MM-6, CUL-MM-7, CUL-MM-8, CUL-MM-9, CUL-MM-10, CUL MM-11, CUL-MM-12, and CUL-MM-13, the potential impacts of the Project's new construction adjacent to significant historical resources and of its rehabilitation of significant historical resources are reduced to less than significant. No further mitigation measure are required. Therefore, pursuant to Public Resources Code, section 21081(a)(1), the City finds that changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid these significant effects on the environment.

Rationale for Finding

The Project's incorporation and implementation of the mitigation measures provided above reduce its potential impacts associated with new construction adjacent to significant historical resources and associated with rehabilitation of significant historical resources to less than significant. Thus, the Project creates no significant impacts to adjacent significant historical resources.

Reference

For a complete discussion of impacts associated with Cultural Resources, please see Section IV.D of the Draft EIR, pages IV.D-14 through IV.D-22, IV.D-29 through IV.D-54; and Section III, Revisions, Clarifications and Corrections in the Final EIR, pages III-15 through III-21 and III-52 through III-57, and the Errata.

3. Potential Impacts to Paleontological Resources

As indicated by the records search conducted for the Project Site, there are no previously encountered fossil vertebrate localities located within the Project Site. The closest identified localities to the Project Site were collected at depths between 47 and 80 feet below the surface area. The paleontological records search indicated that grading or very shallow excavations in the uppermost layers of soil and Quaternary deposits in the Project Site are unlikely to discover significant vertebrate fossils, but that deeper excavations have the potential to encounter significant remains of fossil vertebrates. Since the Project involves grading to a maximum depth of approximately 75 feet, it is possible that paleontological artifacts that were not recovered during prior construction or other human activity will be present and encountered during Project construction. However, with implementation of Mitigation Measure CUL-MM-17, a qualified paleontologist will perform periodic inspections of excavation and grading activities at the Project Site. If paleontological materials are encountered, the paleontologist will temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. Therefore, implementation of Mitigation Measure CUL-MM-17 ensures that impacts related to paleontological resources are less than significant.

Project Design Features

The City finds that no specific Project Design Features are incorporated into the Project to reduce its potential impacts on historical resources.

Mitigation Measures

The City finds that Mitigation Measure CUL-MM-17, which is incorporated into the Project and incorporated into these Findings as though set forth herein, reduces the potential impacts of Project construction on paleontological resources to less than significant. This mitigation measure was taken into account in the analysis of Project impacts.

Finding

With implementation of Mitigation Measure CUL-MM-17, the potential impacts of the Project's construction on paleontological resources are reduced to less than significant.

No further mitigation measures are required. Therefore, pursuant to Public Resources Code, section 21081(a)(1), the City finds that changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid these significant effects on the environment.

Rationale for Finding

The Project excavates to a maximum depth of 78 feet below the existing ground surface (Development Parcel A with six levels of subterranean parking). In the event paleontological resources are encountered, the Project will implement Mitigation Measure CUL-MM-17 to ensure that the resources are properly recovered and evaluated. Mitigation Measure CUL-MM-17 requires that a qualified paleontologist be retained to perform periodic inspections of excavation and grading activities at the Project Site. If paleontological materials are encountered, the paleontologist will temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. Ground-disturbing activities can resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist. The Project's incorporation and implementation of Mitigation Measure CUL-MM-17 reduces its potential construction impacts on paleontological resources to less than significant. Thus, the Project creates no significant construction impacts on paleontological resources.

Reference

For a complete discussion of impacts associated with Paleontological Resources, please see Section IV.D of the Draft EIR, pages IV.D-22, IV.D-25, IV.D-49, IV.D-51 and IV.D-52 through IV.D-54; and Section III, Revisions, Clarifications and Corrections in the Final EIR, page III-58.

B. Noise

1. <u>On-Site Construction Noise</u>

Noise impacts from Project construction activities occurring within or adjacent to the Project Site is a function of the noise generated by construction equipment, the location of the equipment, the timing and duration of the noise-generating construction activities, and the relative distance between the Project Site to each of the noise sensitive receptors. Construction activities generally include demolition, Site grading and excavation for the subterranean parking garage, building construction, paving/concrete installation, and landscape installation. Each stage of construction involves the use of various types of construction equipment and will, therefore, have its own distinct noise characteristics. Demolition generally involves the use of backhoes, front-end loaders, and heavy-duty trucks. Grading and excavation typically requires the use of earth moving equipment, such as excavators, front-end loaders, and heavy-duty trucks. Building construction typically involves the use of cranes, forklifts, concrete trucks, and delivery trucks. Noise from construction equipment generates both steady-state and episodic noise that can be heard within and adjacent to the Project Site.

Individual pieces of construction equipment that will be used for Project construction produce maximum noise levels (Lmax) of 74 dBA to 90 dBA at a reference distance of 50

feet from the noise source, as shown in Table IV.I-10 of the Draft EIR. These maximum noise levels occur when equipment is operating under full power conditions (i.e., the equipment engine at maximum speed). However, equipment used on construction sites often operates under less than full power conditions, or on part power. To more accurately characterize construction-period noise levels, the average (hourly L_{eq}) noise level associated with each construction stage is calculated based on the quantity, type, and usage factors for each type of equipment that will be used during each construction stage. These noise levels are typically associated with multiple pieces of equipment operating simultaneously.

Table IV.I-11 of the Draft EIR provides the estimated construction noise levels for various construction stages at the off-Site noise sensitive receptors. The estimated noise levels represent a conservative scenario in which all construction equipment was assumed to operate simultaneously and was assumed to be located at the construction area nearest to the affected receptors. These assumptions represent the worst-case noise scenario as construction activities will, typically, spread out throughout the entire Project Site farther away from the affected receptors and, thus, some equipment will be farther away from the affected receptors. In addition, the noise modeling assumes that construction noise will be constant when, in fact, construction activities and associated noise levels are periodic and fluctuate based on the construction activities. As reported in Table IV.I-11, potential construction related noise impacts at receptor R5 will be less than significant. However, the estimated construction noise levels at the nearby noise sensitive uses represented by receptors R3, and R4, and R6 through R16 which are adjacent to the Project Site, will exceed the significance threshold from 35.5 dBA at receptor R4 to 2.3 dBA at receptor R7. Therefore, temporary noise impacts associated with the Project's on-Site construction activities will be significant.

The Project's potential noise impacts from on-Site construction on Development Parcel E were separately analyzed once the Project was modified to include Development Parcel E and the construction of the Building E1, the parking structure. That analysis concluded that on-Site construction noise impacts at R4 will be significant, as the noise impacts will be similar to those reported in the Draft EIR for R4. As reported in Table III-5, *Analysis of Potential Impacts At Receptor R5 Associated with Construction Within Development Parcel E*, on page III-71 of Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, impacts associated with Parcel E construction activities at the uses represented by R5 will be approximately 0.2 dBA above the significance threshold without mitigation. As reported in Table III-4, *Analysis of Potential Impacts at Receptor R16 (Larchmont Charter School and Selma Avenue Elementary School) Associated with Construction Within Development Parcel E*, on page III-70 of Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, impacts associated with Parcel E construction activities at the uses represented by R16 will be approximately 13.3 to 14.2 dBA above the significance threshold for schools without mitigation.

With implementation of Mitigation Measure NOI-MM-1, requiring the installation of temporary and impermeable sound barriers providing a minimum 15-dBA noise attenuation level at particular locations to reduce the Project's on-Site construction noise at off-Site noise sensitive locations, the Project's on-Site construction noise impacts will be reduced to less than significant at all noise-sensitive receptors represented by receptor locations R6, R7, R8, R9, R10, R11, and R16. At plan check, building plans will include documentation prepared by a noise consultant verifying compliance with this measure.

Therefore, implementation of Mitigation Measure NOI-MM-1 ensures that impacts related to on-Site construction noise at noise-sensitive receptors represented by receptor locations R6, R7, R8, R9, R10, R11, and R16 are less than significant.

Project Design Features

The City finds that Project Design Features NOI-PDF 1 and NOI-PDF-2 are incorporated into the Project to reduce its potential impacts related to on-Site construction noise.

Mitigation Measures

The City finds that Mitigation Measure NOI-MM-1, which is incorporated into the Project and incorporated into these Findings as though set forth herein, reduces the potential impacts of the Project's on-Site construction noise on noise-sensitive receptors to less than significant. This mitigation measure was taken into account in the analysis of Project impacts.

Finding

With implementation of Mitigation Measure NOI-MM-1, the potential impacts of the Project's on-Site construction noise on noise-sensitive receptors are reduced to less than significant. No further mitigation measures are required. Therefore, pursuant to Public Resources Code, section 21081(a)(1), the City finds that changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid these significant effects on the environment.

Rationale for Finding

Without mitigation, the maximum estimated noise levels associated with construction of the Project exceed the significance threshold at each off-Site receptor location, except for receptor location R5. Therefore, under the most conservative impact assessment, temporary noise impacts associated with the Project's on-Site construction are significant at receptor locations R3, R4, and R7 through R16. However, implementation of Mitigation Measure NOI-MM-1 reduces on-Site construction noise impacts to less-than-significant levels at all off-Site sensitive receptor locations except receptor locations R3, R4, and R12 through R15 (including at the nearby LAUSD schools R11 and R16). Mitigation Measure NOI-MM-1 requires the installation of a temporary and impermeable sound barrier at particular locations identified as being significantly impacted by Project construction noise; the barriers must be designed to provide, at a minimum, the level of noise reduction at the ground level of the adjacent noise-sensitive receptors needed to reduce the construction noise levels to less than significant, with compliance to be verified at plan check. Therefore, the Project's incorporation and implementation of Mitigation Measure NOI-MM-1 reduces its potential impacts associated with on-Site construction noise at receptor locations R3, R4, and R7 through R16 to less than significant. Thus, the Project creates no significant on-Site construction noise impacts to noise-sensitive receptors at receptor locations R3, R4, and R7 through R16.

Reference

For a complete discussion of impacts associated with On-Site Construction Noise, please see Section IV.I of the Draft EIR, pages IV.I-26-IV.I-32, IV.I-33 through IV.I-52, and IV.I-

82 through IV.I-88; Section III, Revisions, Clarifications and Corrections in the Final EIR, pages III-23 through III-27 and III-65 through III-71; and the Errata.

2. Construction Vibration – Building Damage Impacts from On-Site Construction

The Project will generate ground-borne construction vibration during building demolition and Site excavation/grading activities when heavy construction equipment, such as large bulldozers, drill rigs, and loaded trucks, is used. Since impact pile driving methods will not be used during construction of the Project, in accordance with Project Design Feature NOI-PDF-2, impact pile driving vibration was not included in the on-Site construction vibration analysis. Installation of piles for shoring and foundation will utilize a drilling method that minimizes ground-borne vibration.

As reported in Table IV.I-13, at page IV.I-40 of the Draft EIR, the estimated vibration velocity levels from all construction equipment will be below the building damage significance threshold of 0.5 PPV at the multi-level parking structure located on the east side of McCadden Place (adjacent to Development Parcel B), the multi-level commercial building located on the north side of Sunset Boulevard (adjacent to Development Parcel B), and the newly constructed multi-level residential building located on the north side of Selma Avenue (adjacent to Development Parcel D). In addition, the estimated vibration levels associated with Project construction activities at the Hollywood High School Auditorium, the apartment building at 1523 McCadden Place, the office building at 1618 Las Palmas Avenue, and the Queen Anne House on Sunset Boulevard will be below the 0.12 PPV significance threshold. However, the estimated ground-borne vibration levels from heavy construction equipment (e.g., large bulldozer, drill rig, loaded truck) will exceed the 0.12 PPV significance threshold at the Crossroads of the World Buildings located on-Site, at the First Baptist Church building located on the east side of Las Palmas Avenue (adjacent to Development Parcel C), and at the Blessed Sacrament Church building located on the north side of Sunset Boulevard (also adjacent to Development Parcel C). In addition, vibration levels will exceed the 0.2 PPV significance threshold at the single-story commercial building located on the east side of Highland Avenue (adjacent to Development Parcel A) and the two-story commercial building on McCadden Place (adjacent to Development Parcel B). Thus, the estimated vibration levels from some of the construction equipment (e.g., large bulldozer, caisson drilling, and loaded trucks traveling on the construction Site) will exceed the relevant building damage significance thresholds and vibration impacts (pursuant to the threshold of significance for building damage) during construction of the Project will be significant without mitigation. This potential vibration impact will only occur when heavy construction equipment operates within 15 feet of the commercial buildings adjacent to Development Parcels A and B, or within 20 feet of the Crossroads of the World buildings and the First Baptist Church and Blessed Sacrament Church adjacent to Development Parcel C. Based on the Federal Transit Administration's (FTA) reference vibration levels and calculation procedure, the estimated vibration from the construction equipment will diminish to below the 0.2 PPV threshold for building damage at a lateral distance of 15 feet or greater. Therefore, mitigation measures were required to ensure that construction activities do not adversely impact the existing on-Site and off-Site structures.

Mitigation Measure NOI-MM-2 is incorporated into the Project and will be implemented to reduce vibration impacts on the potentially impacted buildings to a less-than-significant level. More specifically, Mitigation Measure NOI-MM-2 requires the construction

contractor to employ methods to minimize the generation of ground-borne vibration at the on-Site historic buildings (Crossroads of the World and the former Hollywood Reporter Building and the Bullinger Building) and at adjacent buildings to the south of Development Parcel A and to the north and east of Development Parcel C and to the east and south of Development Parcel E, including the First Baptist Church and the Blessed Sacrament Church, both of which were found eligible for listing in the California Register and, thus, are considered as historic buildings under CEQA. This mitigation measure will also ensure that construction activities within Development Parcel E will not significantly impact the historic structures that are part of the Blessed Sacrament Church and School. Therefore, implementation of Mitigation Measure NOI-MM-2 reduces the Project's vibration impacts (pursuant to the threshold of significance for building damage) during construction to a less-than-significant level.

Project Design Features

The City finds that Project Design Feature NOI-PDF-2 is incorporated into the Project to reduce its potential impacts related to building damage from on-Site construction.

Mitigation Measures

The City finds that Mitigation Measure NOI-MM-2, which is incorporated into the Project and incorporated into these Findings as though set forth herein, reduces the potential building damage impacts due to the Project's on-Site construction vibration to less than significant. This mitigation measure was taken into account in the analysis of Project impacts.

Finding

With implementation of Mitigation Measure NOI-MM-2, the potential building damage impacts due to the Project's on-Site construction vibration are reduced to less than significant. No further mitigation measures are required. Therefore, pursuant to Public Resources Code, section 21081(a)(1), the City finds that changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid these significant effects on the environment.

Rationale for Finding

Project-related on-Site construction activities have the potential to result in significant vibration impacts with respect to building damage at the former Hollywood Reporter Building, the Bullinger Building and the Crossroads of the World historic buildings on-Site, as well as the one- and two-story commercial buildings (located on Highland Avenue and McCadden Place) immediately south of Development Parcel A and Development Parcel B, and the First Baptist Church of Hollywood and the Blessed Sacrament Church buildings immediately adjacent to Development Parcels C and E, both of which were found eligible for listing in the California Register and, thus, are considered as historic buildings under CEQA. However, the Project implements Mitigation Measure NOI-MM-2, which requires the Applicant (i) to retain a structural engineer or other qualified professional to inspect and document the apparent physical condition of the on-Site and off-Site historic buildings' readily-visible features, and (2) to retain a qualified acoustical engineer to review proposed construction equipment and develop and implement a

vibration monitoring system capable of documenting the construction-related ground vibration levels at the on-Site and off-Site historic buildings and the off-Site commercial buildings during the Project Site demolition and excavation, where heavy construction (e.g., large bulldozer and drill rig) is operating within 20 feet of the affected buildings, and provide signals when vibrations reach warning levels or regulatory levels to enable the contractor to react appropriately, including halting construction, having the structural engineer or other qualified professional visually inspect the affected building for any damage, and repairing any damage. Therefore, the Project's incorporation and implementation of Mitigation Measure NOI-MM-2 reduces its potential building damage impacts associated with on-Site construction vibration to less than significant. Thus, the Project creates no significant on-Site construction vibration building damage impacts.

Reference

For a complete discussion of impacts associated with Construction Vibration, please see Section IV.I of the Draft EIR and, pages IV.I-27, IV.I-30 through IV.I-31, IV.I-39 through IV.I-46, IV.I-72 through IV.I-74, IV.I-82 through IV.I-84 and IV.I-86 through IV.I-87; Section III, Revisions, Clarifications and Corrections in the Final EIR, pages III-57 and III-65 through III-69; and the Errata.

3. Operational Noise – On-Site Noise

(a) Outdoor Spaces

The Project provides various outdoor spaces, including walkways, courtyards and common open space with gathering and seating areas, terraces, outdoor decks, and pool decks. Noise sources associated with outdoor uses typically include noise from people gathering and conversing. For the noise analysis, reference noise levels of 65 dBA for a male and 62 dBA for a female speaking in a raised voice were used to analyze potential noise impacts from people gathering at the outdoor spaces. In order to analyze a typical noise scenario, it was assumed that up to 50 percent of the people (half of which will be male and the other half female) will be talking at the same time. In addition, the hours of operation for use of the outdoor areas were assumed to be from 7:00 a.m. to 2:00 a.m. to capture all activities that will result from the Project.

An additional potential noise source associated with outdoor uses (e.g., hotel pool decks and plazas/courtyards) will be the use of an outdoor sound system (e.g., music or other sounds broadcast through an outdoor mounted speaker system). The sound from the outdoor sound system, if used, will be heard by people in the immediate vicinity of the outdoor areas. As part of the Project and as set forth in Project Design Feature NOI-PDF-4, the amplified sound system used in outdoor areas must be designed so as not to exceed the maximum noise levels of 80 to 95 dBA L_{eq}.

As a result of the use of these areas, the estimated noise levels calculated from off-Site sensitive receptors will exceed the significance threshold of 5 dBA (L_{eq}) above ambient noise levels at receptor location R4 (Blessed Sacrament Church). As such, noise impacts from the use of the these areas will be significant. However, implementation of Mitigation Measure NOI-MM-3 reduces the Project's potential noise impacts to a less-than-significant level.

(b) Parking Facilities

Parking for the Project consist of new subterranean parking garages and Building E1. Sources of noise within the parking garages will primarily include vehicular movements and engine noise, doors opening and closing, people talking, and intermittent car alarms. Noise levels within the parking garages will fluctuate with the amount of automobile and human activity. Since the subterranean parking levels will be fully enclosed on all sides, noise generated within the parking garages will be effectively shielded from off-Site sensitive receptor locations in immediate the vicinity of the Project Site. Furthermore, noise associated with the Project's subterranean parking garages will be less than the noise currently generated by the existing unenclosed surface parking lots on the southern portion of Development Parcel B, on the northwestern portion of Development Parcel C, and the southern portion of Development Parcel D. The noise level from the subterranean parking structure is estimated to range from 5.2 dBA (L_{eq}) at receptor location R7 to 47.1 dBA (L_{eq}) at receptor location R3. In addition, the estimated noise levels at all off-Site receptor locations will not increase ambient noise levels by more than the significance thresholds of 3 dBA (L_{eq}) applicable to receptors R11 and R16 and 5 dBA (L_{eq}) applicable to the remaining receptors (based on the lowest measured ambient noise level). Therefore, noise impacts from the subterranean parking facilities will be less than significant.

The above-grade parking structure in Development Parcel E generates additional noise sources that result in a maximum noise increase of approximately 5 dBA at the nearest noise sensitive receptor, relative to the existing surface parking lot. However, with implementation of Mitigation Measure NOI-MM-4, requiring that the ground level of the parking structure incorporate a minimum 3-foot-tall solid wall providing a minimum 3 dBA noise reduction, and the use of non-squeal paving finishes (i.e., paving finishes that are not smooth, often referred to as "broom finishes") reduces the noise increase to less than 4 dBA relative to the existing conditions, and thereby reduces noise impacts from the parking structure to less-than-significant levels. In addition, a surface parking lot already exists in Development Parcel E. Thus, net ambient noise levels will not increase by more than 5 decibels (dBA) as a result of the new parking structure.

(c) Composite Noise Level Impacts from Project Operations

In addition to considering the potential noise impacts to neighboring noise-sensitive receptors from each specific on-Site and off-Site noise source (e.g., mechanical equipment, outdoor areas, parking facilities, trash collection areas, and off-Site traffic), an evaluation of potential composite noise level increases (i.e., noise levels from all on-Site noise sources combined) at the analyzed sensitive receptor locations was also performed. This evaluation of composite noise levels from all on-Site Project noise sources, evaluated using the CNEL noise metric, was conducted to determine the contributions at the noise-sensitive receptor locations in the vicinity of the Project Site.

The primary on-Site noise sources associated with the Project operation will include mechanical equipment and outdoor areas. Other noise sources include parking facilities and trash collection areas; however, parking and trash collection areas will be located in the subterranean parking garages or enclosed areas, which will be shielded to the off-Site sensitive receptors. In identifying the estimated composite noise levels in terms of CNEL at the off-Site sensitive receptor locations from these on-Site noise sources, the

Project results in an increase in composite noise levels ranging from 0.4 dBA at receptor location R11 to 7.3 dBA at receptor location R4. The composite noise levels from Project operation at off-Site receptor locations R9 and R11 is below the 3-dBA CNEL significance threshold for the unacceptable land use category. Similarly, the composite noise levels from Project operation at off-Site receptor locations R3, R5, R7, R8, R10, R12, R13, R14, and R15 is below the 5-dBA CNEL significance threshold for the acceptable land use category. In addition, the composite noise levels at receptor locations R11 and R16 (LAUSD schools) is below the 3-dBA increase LAUSD significance threshold. The composite noise levels, however, exceed the 5-dBA CNEL significance threshold at receptor location R4 by 2.3 dBA. As such, composite noise level impacts due to Project operation are significant without mitigation measures. With implementation of Mitigation Measures NOI-MM-3 and NOI-MM-4, however, this impact is reduced to a less-than-significant level.

Project Design Features

The City finds that Project Design Feature NOI-PDF-4 is incorporated into the Project to reduce its potential impacts related to on-Site operational noise from stationary sources.

Mitigation Measures

The City finds that Mitigation Measures NOI-MM-3 and NOI-MM-4, which are incorporated into the Project and incorporated into these Findings as though set forth herein, reduce the potential on-Site operational noise impacts due to the Project's stationary sources to less than significant. These mitigation measures were taken into account in the analysis of Project impacts.

Finding

With implementation of Mitigation Measures NOI-MM-3 and NOI-MM-4, the potential on-Site operational noise impacts due to the Project's stationary sources are reduced to less than significant. No further mitigation measures are required. Therefore, pursuant to Public Resources Code, section 21081(a)(1), the City finds that changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid these significant effects on the environment.

Rationale for Finding

The Project's outdoor areas create potentially significant operational noise impacts at off-Site noise sensitive receptor location R4 (Blessed Sacrament Church). However, the Project's implementation of NOI-MM-3, which requires the erection of a 12-foot-high noise barrier wall at the Project's eastern boundary (between the Crossroads of the World buildings along the eastern boundary and the Blessed Sacrament Church boundary) that provides a minimum 5 dBA reduction at the Blessed Sacrament Church east of the Project Site, reduces this impact to a less-than-significant level. In addition, the above-grade parking structure on Development Parcel E creates potentially significant noise impacts. However, the Project's incorporation of NOI-MM-4, which requires that the parking structure incorporate a minimum 3 foot-tall solid wall providing a minimum 3 dBA noise reduction and non-squeal paving finishes (i.e., paving finishes that are not smooth, often referred to as "broom finishes"), reduce these impacts to less-than-significant levels.

Therefore, the Project's incorporation and implementation of Mitigation Measures NOI-MM-3 and NOI-MM-4 reduce its potential on-Site operational stationary source impacts to less than significant. Thus, the Project creates no significant on-Site operational stationary source noise impacts.

Reference

For a complete discussion of impacts associated with Operational Noise, please see Section IV.I of the Draft EIR, pages IV.I-45 through IV.I-52 and IV.I-84 through IV.I-88; Section III, Revisions, Clarifications and Corrections in the Final EIR, pages III-27, III-65 through III-74; and the Errata.

C. Traffic, Access and Parking – Operation

1. Intersection Levels of Service

After applying appropriate trip reductions and accounting for the removal of trips associated with the existing uses currently on-Site, the Project generates 13,187 net new daily weekday trips, including 704 a.m. peak-hour trips (231 inbound, 473 outbound) and 1,088 p.m. peak-hour trips (681 inbound, 407 outbound). The EIR concludes that the addition of Project traffic to 22 of the 111 signalized intersections studied result in a change to the volume-to-capacity ratio that exceeds the significance thresholds in the Future with Project condition. Those intersections where significant impacts occur include the following:

- Intersection 13: Highland Avenue and Franklin Avenue (North) (p.m. peak period)
- Intersection 16: Cahuenga Boulevard and Franklin Avenue (a.m. and p.m. peak periods)
- Intersection 35: La Brea Avenue and Hollywood Boulevard (a.m. and p.m. peak periods)
- Intersection 37: Highland Avenue and Hollywood Boulevard (a.m. and p.m. peak periods)
- Intersection 42: Cahuenga Boulevard and Hollywood Boulevard (a.m. and p.m. peak periods)
- Intersection 44: Vine Street and Hollywood Boulevard (a.m. and p.m. peak periods)
- Intersection 63: La Brea Avenue and Sunset Boulevard (a.m. and p.m. peak periods)
- Intersection 65: Highland Avenue and Sunset Boulevard (a.m. and p.m. peak periods)
- Intersection 66: Las Palmas Avenue and Sunset Boulevard (p.m. peak period)
- Intersection 70: Cahuenga Boulevard and Sunset Boulevard (a.m. and p.m. peak periods)
- Intersection 72: Vine Street and Sunset Boulevard (a.m. and p.m. peak periods)
- Intersection 74: Gower Street and Sunset Boulevard (p.m. peak period)

- Intersection 76: Van Ness Avenue and Sunset Boulevard (p.m. peak period)
- Intersection 81: La Brea Avenue and Fountain Avenue (a.m. peak period)
- Intersection 85: Vine Street and Fountain Avenue (p.m. peak period)
- Intersection 91: La Brea Avenue and Santa Monica Boulevard (a.m. and p.m. peak periods)
- Intersection 92: Highland Avenue and Santa Monica Boulevard (a.m. and p.m. peak periods)
- Intersection 95: Cahuenga Boulevard and Santa Monica Boulevard (a.m. and p.m. peak periods)
- Intersection 96: Vine Street and Santa Monica Boulevard (a.m. and p.m. peak periods)
- Intersection 97: Gower Street and Santa Monica Boulevard (a.m. and p.m. peak periods)
- Intersection 99: Van Ness Avenue and Santa Monica Boulevard (p.m. peak period)
- Intersection 101: Western Avenue and Santa Monica Boulevard (p.m. peak period)

However, the EIR concludes that, after the implementation of Mitigation Measures TRA-MM-1 through TRA-MM-3, which include the TDM program, additional transit service on Santa Monica Boulevard and Hollywood Boulevard, and TSM improvements, and TRA-MM-5, which includes physical improvements at the intersection of Las Palmas Avenue and Sunset Boulevard, the significant traffic impact at the following 17 intersections in the Future with Project condition are fully reduced to a less-than-significant level:

- Intersection No. 13: Highland Avenue and Franklin Avenue (North) (p.m. peak period)
- Intersection No. 16: Cahuenga Boulevard and Franklin Avenue (a.m. and p.m. peak periods)
- Intersection No. 35: La Brea Avenue and Hollywood Boulevard (a.m. and p.m. peak periods)
- Intersection No. 42: Cahuenga Boulevard and Hollywood Boulevard (a.m. and p.m. peak periods)
- Intersection No. 44: Vine Street and Hollywood Boulevard (a.m. and p.m. peak periods)
- Intersection No. 66: Las Palmas Avenue and Sunset Boulevard (a.m. and p.m. peak periods)
- Intersection No. 74: Gower Street and Sunset Boulevard (p.m. peak period)
- Intersection No. 76: Van Ness Avenue and Sunset Boulevard (p.m. peak period)
- Intersection No. 81: La Brea Avenue and Fountain Avenue (a.m. peak period)

- Intersection No. 85: Vine Street and Fountain Avenue (p.m. peak period)
- Intersection No. 91: La Brea Avenue and Santa Monica Boulevard (a.m. and p.m. peak periods)
- Intersection No. 92: Highland Avenue and Santa Monica Boulevard (a.m. and p.m. peak periods)
- Intersection No. 95: Cahuenga Boulevard and Santa Monica Boulevard (a.m. and p.m. peak periods)
- Intersection No. 96: Vine Street and Santa Monica Boulevard (a.m. and p.m. peak periods)
- Intersection No. 97: Gower Street and Santa Monica Boulevard (a.m. and p.m. peak periods)
- Intersection No. 99: Van Ness Avenue and Santa Monica Boulevard (p.m. peak period)
- Intersection No. 101: Western Avenue and Santa Monica Boulevard (p.m. peak period)

Project Design Features

The City finds that no Project Design Features are incorporated into the Project to reduce its signalized intersection levels of service impacts during operations.

Mitigation Measures

The City finds that implementation of Mitigation Measures TRA-MM-1 through TRA-MM-3 and TRA-MM-5, which are incorporated into the Project and incorporated into these Findings as though set forth herein, reduce the Project's signalized intersection levels of service impacts during operations to a less-than-significant level. These mitigation measures were taken into account in the analysis.

Findings

With implementation of Mitigation Measures TRA-MM-1 through TRA-MM-3 and TRA-MM-5, the Project's impacts on the signalized intersection levels of service are reduced to less-than-significant levels. No further mitigation measures are required. Therefore, pursuant to Public Resources Code, section 21081(a)(1), the City finds that changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid these significant effects on the environment.

Rationale for Findings

The EIR concludes that implementation of Mitigation Measure TRA-MM-1, with the combined effect of its various TDM Program strategies, results in a reduction in the Project's peak-hour trip generation by offering services, actions, specific facilities, etc., aimed at encouraging use of alternative transportation modes (e.g., transit, bus, walking, bicycling, carpool, etc.). Trip Generation Handbook, 2nd Edition, provides a summary of research of TDM programs at many different employers, and the most comprehensive

programs, including both economic incentives (e.g., transit passes, etc.) and support services, resulted in an average 24 percent reduction in commuter vehicles. Thus, following discussions with LADOT, as an achievable, but conservative estimate, TRA-MM-1 results in an overall TDM trip reduction credit of 10 percent on the Project's residential, hotel, commercial, and supermarket uses. Therefore, with implementation of Mitigation Measure TRA-MM-1, the Project's daily trips are substantially reduced.

The EIR concludes that implementation of TRA-MM-2, requiring a financial contribution from the Project to supplement the current LADOT DASH bus service along the Hollywood Boulevard and Santa Monica Boulevard corridors, approximately 25 vehicle trips are removed from the street system during the weekday A.M. and P.M. peak hours, based on the assumptions presented in the EIR and traffic analyses. Therefore, implementation of TRA-MM-2 further reduces the Project's trips.

The EIR concludes that implementation of TRA-MM-3, requiring a financial contribution from the Project of up to $200,000 for improvements to Transportation Systems Management improvements in the Hollywood-Wilshire District and targeting the Franklin Avenue, Hollywood Boulevard, Sunset Boulevard, Santa Monica Boulevard, and Highland Avenue corridors, improves traffic operations and increase intersection capacity by approximately one percent along each corridor. Therefore, with implementation of TRA-MM-3, the Project's impacts on intersection capacity are reduced.

The EIR concludes that implementation of the physical improvements at the intersection of Las Palmas Avenue and Sunset Boulevard required by Mitigation Measure TRA-MM-5 reduces the Project's impact at that intersection.

Therefore, with the implementation of Mitigation Measures TRA-MM-1 through TRA-MM-3, which include the TDM program, additional transit service on Santa Monica Boulevard and Hollywood Boulevard, and TSM improvements, and TRA-MM-5, which includes physical improvements at the intersection of Las Palmas Avenue and Sunset Boulevard, the significant impacts on the signalized intersection levels of service are reduced to less-than-significant levels.

Reference

For a complete discussion of impacts associated with Traffic, Access and Parking, please see Section IV.L of the Draft EIR, at pages IV.L-63 through IV.L-65, IV.L-99 through IV.L-103 and IV.L-132 through IV.L-140; Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, at pages III-32 and III-33 and III-85 through III-87; Appendix FEIR-4, Supplemental Traffic Analysis; and Errata to the Final EIR.

1. Regional Transportation System – CMP Arterial Monitoring Station Impacts

Two arterial CMP monitoring stations are located within the Study Area: Santa Monica Boulevard and Highland Avenue, located approximately 0.5 mile south of the Project Site, and Santa Monica Boulevard and Western Avenue, located approximately 1.75 miles southeast of the Project Site. The Draft EIR estimated the number of peak-hour Project trips at each arterial monitoring intersection as follows:

- Santa Monica Boulevard and Highland Avenue: 96 Project trips during the a.m. peak hour and 130 Project trips during the p.m. peak hour.

- Santa Monica Boulevard and Western Avenue: 59 Project trips during the a.m. peak hour and 77 Project trips during the p.m. peak hour.

Therefore, the Project prior to being modified will have added more than 50 peak-hour trips at each of the arterial monitoring intersections within the Project Study Area, and further analysis of the CMP arterial monitoring intersections was required.

A significant impact analysis was done for the Draft EIR for the two CMP arterial monitoring intersections under Future with Project Conditions. Although the intersection at Santa Monica Boulevard and Western Avenue operates at LOS F during the a.m. and p.m. peak hours under Future with Project Conditions, the addition of Project traffic will not result in an increase in V/C ratio of 0.02 or more. Therefore, this intersection is not significantly impacted based on the CMP criterion. For the intersection of Highland Avenue and Santa Monica Boulevard, the addition of Project traffic under Future with Project Conditions results in an increase in V/C ratio of 0.02 or more, during the a.m. peak hour.

The Draft EIR concluded that, with the implementation of Mitigation Measures TRA-MM-1 through TRA-MM-3, which include the TDM program, additional transit service on Santa Monica Boulevard and Hollywood Boulevard, and TSM improvements, the significant impact at the CMP arterial monitoring intersection of Highland Avenue and Santa Monica Boulevard during the a.m. peak period will be reduced to a less-than-significant level. The trip generation estimate for the Project as modified is less than the estimate provided in the Draft EIR. Therefore, the Project's impacts at this CMP arterial monitoring intersection under Future with Project Conditions are reduced to less than significant with mitigation.

Project Design Features

The City finds that no Project Design Features are incorporated into the Project to reduce its CMP Monitoring Station impacts during operations.

Mitigation Measures

The City finds that implementation of Mitigation Measures TRA-MM-1 through TRA-MM-3, which are incorporated into the Project and incorporated into these Findings as though set forth herein, reduce the Project's CMP Monitoring Station impacts during operations to a less-than-significant level. These mitigation measures were taken into account in the analysis.

Findings

With implementation of Mitigation Measures TRA-MM-1 through TRA-MM-3, the Project's impacts on the CMP arterial monitoring intersection of Highland Avenue and Santa Monica Boulevard during the A.M. peak period during operation of the Project is reduced to a less-than-significant level. No further mitigation measures are required. Therefore, pursuant to Public Resources Code, section 21081(a)(1), the City finds that changes or

alterations have been required in, or incorporated into, the Project which mitigate or avoid these significant effects on the environment.

Rationale for Findings

The EIR concludes that implementation of Mitigation Measure TRA-MM-1, with the combined effect of its various TDM Program strategies, results in a reduction in the Project's peak-hour trip generation by offering services, actions, specific facilities, etc., aimed at encouraging use of alternative transportation modes (e.g., transit, bus, walking, bicycling, carpool, etc.). Trip Generation Handbook, 2nd Edition, provides a summary of research of TDM programs at many different employers, and the most comprehensive programs, including both economic incentives (e.g., transit passes, etc.) and support services, resulted in an average 24 percent reduction in commuter vehicles. Thus, following discussions with LADOT, as an achievable, but conservative estimate, TRA-MM-1 results in an overall TDM trip reduction credit of 10 percent on the Project's residential, hotel, commercial, and supermarket uses. Therefore, with reduction in Project trips effected by Mitigation Measure TRA-MM-1, the Project's impact at the CMP arterial monitoring intersection of Highland Avenue and Santa Monica Boulevard during the A.M. peak period is reduced.

The EIR concludes that implementation of TRA-MM-2, requiring a financial contribution from the Project to supplement the current LADOT DASH bus service along the Hollywood Boulevard and Santa Monica Boulevard corridors, approximately 25 vehicle trips are removed from the street system during the weekday A.M. and P.M. peak hours, based on the assumptions presented in the EIR and traffic analyses. Therefore, implementation of TRA-MM-2 further reduces the Project's impact at the CMP arterial monitoring intersection of Highland Avenue and Santa Monica Boulevard during the A.M. peak period.

The EIR concludes that implementation of TRA-MM-3, requiring a financial contribution from the Project of up to $200,000 for improvements to Transportation Systems Management improvements in the Hollywood-Wilshire District and targeting the Franklin Avenue, Hollywood Boulevard, Sunset Boulevard, Santa Monica Boulevard, and Highland Avenue corridors, improves traffic operations and increase intersection capacity by approximately one percent along each corridor. Therefore, with implementation of TRA-MM-3, the Project's impact at the CMP arterial monitoring intersection of Highland Avenue and Santa Monica Boulevard during the A.M. peak period is reduced.

Therefore, with the implementation of Mitigation Measures TRA-MM-1 through TRA-MM-3, which include the TDM program, additional transit service on Santa Monica Boulevard and Hollywood Boulevard, and TSM improvements, the significant impact at the CMP arterial monitoring intersection of Highland Avenue and Santa Monica Boulevard during the A.M. peak period is reduced to a less-than-significant level.

Reference

For a complete discussion of impacts associated with Traffic, Access and Parking, please see Section IV.L of the Draft EIR, at pages IV.L-104 through IV.L-107 and IV.L-132 through IV.L-140; Section III, Revisions, Clarifications and Corrections to the Draft EIR,

of the Final EIR, at page III-87; and Appendix FEIR-4, Supplemental Traffic Analysis; and the Errata to the Final EIR.

VIII. ENVIRONMENTAL IMPACTS FOUND TO BE SIGNIFICANT AND UNAVOIDABLE

The Project results in the following impacts, which are significant and unavoidable.

A. Air Quality – Construction

1. Mass Daily Construction Emissions

Project construction is anticipated to occur over slightly less than approximately 48 months and be completed before 2022. Construction of the Project will consist of one month of demolition of existing buildings (excluding Crossroads of the World and the former Hollywood Reporter Building and the Bullinger Building) and surface parking lots, followed by five months of grading, six months of building/parking structure foundation, 33 months of building construction, and three months of paving, concrete pouring, and landscaping. Construction includes the export of 642,240 cubic yards of soil removal from the Project Site.

Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions. Specifically, the Project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions will result from demolition and construction activities. Mobile source emissions, primarily NO_X, will result from the use of construction equipment, such as dozers, loaders, and cranes. During the finishing phase of a building, paving operations, and the application of architectural coatings (e.g., paints) and other building materials will potentially release VOCs. The assessment of construction air quality impacts considers each of these potential sources.

The emissions levels in Table IV.B-4 on page IV.B-34 of Section IV.B of the Draft EIR represent the highest daily emissions projected to occur during each year of construction. As presented in Table IV.B-4, the Project's construction-related daily maximum regional construction emissions (i.e., combined on-Site and off-Site emissions) will not exceed the SCAQMD daily significance thresholds for VOC, CO, SO_X, PM_{10}, or $PM_{2.5}$. However, the Project's maximum regional construction emissions will exceed the SCAQMD daily significance thresholds for NO_X during periods of heavy construction equipment use and export of soil. Therefore, regional construction emissions resulting from the Project will result in a significant short-term impact.

2. Cumulative Construction Impacts

With respect to the Project's construction-period air quality emissions and cumulative Basin-wide conditions, the SCAQMD has developed strategies (e.g., SCAQMD Rule 403) to reduce criteria pollutant emissions outlined in the AQMP pursuant to Federal CAA mandates. As such, the Project complies with any regulatory requirements, including SCAQMD Rule 403, as discussed above. In addition, the Project complies with adopted

AQMP emissions control measures. Per SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, all construction projects Basin-wide will comply with these same requirements (i.e., SCAQMD Rule 403 compliance) and will also implement all feasible mitigation measures when significant impacts are identified.

According to the SCAQMD, individual construction projects that exceed the SCAQMD's recommended daily thresholds for Project-specific impacts will cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment.[4] Construction-related daily emissions at the Project Site will exceed the SCAQMD's regional significance threshold for NO_X with mitigation, as discussed further below. Consequently, the Project will have a cumulative impact due to construction-related regional NO_X emissions even with incorporation of mitigation measures.

Project Design Features

The City finds that, although the Project does not incorporate any specific Project Design Features with regard to air quality, the Project does incorporate Project Design Features GHG-PDF-1 through GHG-PDF-4, which are incorporated into the Project and incorporated into these Findings as if fully set forth herein. The City further finds that these Project Design Features reduce the potential construction criteria air pollutant impacts, as well as the potential greenhouse gas emission impacts, of the Project. These Project Design Features were taken into account in the analysis of the Project's potential impacts.

Mitigation Measures

The City finds that Mitigation Measures AIR-MM-1, AIR-MM-2, AIR-MM-3, AIR-MM-4, AIR-MM-5 and AIR-MM-6, which are incorporated into the Project and incorporated into these Findings as if fully set forth herein, reduce the potential construction regional criteria air pollutant impacts of the Project. These mitigation measures were taken into account in the analysis. The City further finds that there are no additional feasible mitigation measures the Project could implement to avoid its significant Project-level and cumulative construction regional criteria air pollutant impacts.

Findings

Pursuant to Public Resources Code, section 21081(a)(1) the City finds that changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid the significant effects on the environment. However, these impacts have not been reduced to less than significant.

Pursuant to Public Resources Code, section 21081(a)(3) the City finds that Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report to reduce these impacts to less than significant.

4 SCAQMD, Cumulative Impacts Working Group, Cumulative Impacts White Paper-Appendix D, August 2003.

Rationale for Findings

The Project's maximum regional construction emissions exceed the SCAQMD daily significance thresholds for NOX during periods of heavy construction equipment use and export of soil, resulting in a significant short-term construction impact. Implementation of the mitigation measures reduce the Project's construction emissions for all pollutants. However, even after implementing the mitigation measures, the Project still exceeds the SCAQMD regional significance threshold for NOX during excavation and grading activities, as the Project's regional NOX emissions are reduced from 240 pounds per day to 225 pounds per day, or 125 pounds over the 100 pounds per day SCAQMD significance threshold. The duration of this impact is limited to approximately five months of the 48-month construction period, or to 10 percent of the total construction period.

As reported in Table V-1, Comparison of Impacts Associated with the Project and Impacts of the Alternatives, and discussed at pages V-12 through V-27 of Section V, Alternatives, of the Draft EIR, Alternative 1: No Project/No Build Alternative will avoid these significant and unavoidable impacts by maintaining the existing conditions at the Project Site and not providing for any new development. However, the City concluded that Alternative 1 is infeasible because it will not meet any of the Project Objectives or the Project's underlying purpose, which is to transform a series of underutilized parcels into an integrated, high-density, mixed-use, transit- and pedestrian-oriented development that provides an active residential, shopping, dining, entertainment, and working community while also retaining and revitalizing the historic former Hollywood Reporter Building, the Bullinger Building and Crossroads of the World complex.

As such, the Project's Project-level and cumulative construction regional air pollutant impacts are significant and unavoidable impacts with regard to NOX emissions, even with incorporation of all feasible mitigation measures. Pursuant to Public Resources Code section 21081(a)(3), based on the evidence described below in Section XI, Statement of Overriding Considerations, the City finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report to reduce these impacts to less than significant.

Reference

For a complete discussion of impacts associated with Air Quality, please see Section IV.B of the Draft EIR pages IV.B-24 through IV.B-57 and Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR pages III-13 through III-14.

B. Air Quality – Operation

1. Mass Daily Operational Emissions

The Project incorporates Project Design Features to support and promote environmental sustainability, as discussed in Section IV.C, Greenhouse Gas Emissions, of the Draft EIR. While these features primarily reduce greenhouse gas emissions, they also reduce the Project's operational criteria air pollutant emissions. The Project Design Features (i.e., Project Design Features GHG-PDF-1 through GHG-PDF-3) and Mitigation Measure TRA-

MM-1 in Section IV.L, Traffic, Access, and Parking, of the Draft EIR) were accounted for in the analysis, and include the Project Site's accessibility to job centers and transit, increase in diversity of uses and density, limits on the use of fireplaces, and integration of below market rate housing, whose tenants are likely to use public transit and, therefore, reduce VMT and associated air quality emissions. These Project Design Features and this mitigation measure are explained further in Section IV.C, Greenhouse Gas Emissions, and Section IV.L, Traffic, Access, and Parking, respectively, of the Draft EIR. Table IV.B-6 on page IV.B-37 of the Draft EIR provides both Project emissions before and after incorporation of Project Design Features GHG-PDF-1 through GHG-PDF-3 and Mitigation Measure TRA-MM-1. As shown in Table IV.B-6, emissions resulting from operation of the Project at its projected buildout year of 2022 exceeds the SCAQMD's daily regional operational thresholds for VOC and NO_X. Although incorporation of these Project Design Features and Mitigation Measure TRA-MM-1 decreases VOC emissions by eight percent and NO_X emissions by 36 percent, air quality impacts from the Project's operational emissions are significant.

The analysis of daily operational regional emissions under existing conditions without the Project versus with the Project is presented in Table IV.B-7 on page IV.B-38 of the Draft EIR. As shown in Table IV.B-7, the net overall operational emissions associated with the Project under existing conditions will be greater in comparison to estimated emissions at Project buildout (2022) provided in Table IV.B-6. This increase in emissions from 2015 to 2022 reflects cleaner newer vehicles in future years and not a change in the intensity of use of the Project. The Project under existing conditions exceeds the established SCAQMD threshold levels for VOC and NO_X. The Project under existing conditions (2015) also exceeds the SCAQMD daily regional CO operational threshold. Therefore, air quality impacts from Project operational emissions are also significant for CO under this scenario. This conclusion assumes that the Project will have been built in 2015, which is not based on reality as it could not have existed in 2015, and the actual impact will not occur. Yet, for CEQA purposes and to conservatively disclose potential impacts, the EIR concludes that, in addition to VOC and NO_X emissions, CO emissions could be significant as if the Project were to have been developed in 2015.

There are no feasible mitigation measures to reduce the Project's VOC and NO_X emissions impacts, which are primarily associated with mobile source emissions that are not regulated locally or by the SCAQMD. Therefore, regional emissions resulting from Project operations result in a significant impact.

2. Cumulative Impacts

According to the SCAQMD, if an individual Project results in air emissions of criteria pollutants that exceed the SCAQMD's recommended daily thresholds for Project-specific impacts, then the Project will also result in a cumulatively considerable net increase of these criteria pollutants, for which the Air Basin is non-attainment. Operational emissions from Project buildout exceed the SCAQMD's regional operational thresholds for VOC and NOX even with incorporation of Project Design Features GHG-PDF-1 through GHG-PDFC-3 and Mitigation Measure TRA-MM-1. Operational emissions for the Project under existing conditions exceed the SCAQMD's regional operational thresholds for VOC, NOX, and CO even with incorporation of Project Design Features GHG-PDF-1 through GHG-PDF-3 and Mitigation Measure TRA-MM-1. These Project Design Features and this mitigation measure reduce the Project's operational criteria pollutant emissions as

follows: (1) VOC by 8 percent; (2) NOX by 36 percent; (3) CO by 27 percent; (4) SOX by 48 percent; and (5) PM10 and PM2.5 by 49 percent. Nonetheless, the emissions of non-attainment pollutants and precursors generated by Project operation are in excess of the SCAQMD Project-level thresholds, for which the Air Basin is non-attainment, and will remain cumulatively considerable.

Project Design Features

The City finds that, although the Project does not incorporate any specific Project Design Features with regard to air quality, the Project does incorporate Project Design Features GHG-PDF-1 through GHG-PDF-3, which are incorporated into the Project and incorporated into these Findings as if fully set forth herein. The City further finds that these Project Design Features reduce the potential construction criteria air pollutant impacts, as well as the potential greenhouse gas emission impacts, of the Project. These Project Design Features were taken into account in the analysis of the Project's potential impacts.

Mitigation Measures

The City finds that, although there are no feasible mitigation measures to reduce the Project's impacts from VOC or NO_X or CO emissions specifically, Mitigation Measure TRA-MM-1, which is incorporated into the Project and incorporated into these Findings as if fully set forth herein, reduces the potential operational regional criteria air pollutant impacts of the Project. This mitigation measure was taken into account in the analysis. The City further finds that there are no additional feasible mitigation measures the Project could implement to avoid its significant operational regional criteria air pollutant impacts.

Findings

Pursuant to Public Resources Code, section 21081(a)(1) the City finds that changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid the significant effects on the environment. However, these impacts have not been reduced to less than significant.

Pursuant to Public Resources Code, section 21081(a)(3) the City finds that Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report to reduce these impacts to less than significant.

Rationale for Findings

Regional criteria pollutant emissions resulting from operation of the Project at its projected buildout year of 2022 are expected to exceed the SCAQMD's daily regional operational thresholds for VOC and NOX. Although incorporation of Project Design Features GHG-PDF-1 through GHG-PDF-3 and Mitigation Measure TRA-MM-1 decrease VOC emissions by eight percent and NOX emissions by 36 percent, air quality impacts from the Project's operational emissions remain significant. There are no feasible mitigation measures to reduce the Project's impacts from VOC or NOX or CO emissions further, since these emissions primarily result from the Project's mobile sources. Even though the Project has implemented a number of measures to reduce vehicle trips, the regulation of

vehicle emissions is outside the jurisdiction of the City. Vehicle emission standards within California are regulated by the California Air Resources Board (CARB) and the United States Environmental Protection Agency (USEPA). The Project's operational emission analysis for year 2022 takes into account regulations adopted by CARB and USEPA including CARB's Advanced Clean Cars (ACC) Regulation, which went into effect starting in 2017. By 2025, when the rules will be fully implemented, new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions. With regard to Project operational emissions, mitigation measures described above reduce vehicle emissions to the greatest extent possible.

Under the analysis of the Project's operational emissions under existing conditions (2015), the Project's regional operational emissions of VOC, NOX and CO exceed the established SCAQMD threshold levels, but with incorporation of Project Design Features GHG-PDF-1 through GHG-PDF-3 and Mitigation Measure TRA-MM-1, VOC, NOX, and CO emissions are reduced by 10 percent, 39 percent, and 30 percent, respectively. However, this conclusion assumes that the Project will have been built in 2015, which is not based on reality as it could not have existed in 2015, and the actual impact will not occur. In addition, the Project operational emissions inventory for year 2015 does not take into account CARB's Advanced Clean Cars (ACC) Regulation which will result lower vehicle emissions in future years. Yet, for CEQA purposes and to conservatively disclose potential impacts, it is concluded that, in addition to VOC and NOX emissions, CO emissions could be significant as if the Project were developed in 2015.

As reported in Table V-1, Comparison of Impacts Associated with the Project and Impacts of the Alternatives, and discussed at pages V-12 through V-27 of Section V, Alternatives, of the Draft EIR, Alternative 1: No Project/No Build Alternative will avoid these significant and unavoidable impacts by maintaining the existing conditions at the Project Site and not providing for any new development. However, the City concluded that Alternative 1 is infeasible because it will not meet any of the Project Objectives or the Project's underlying purpose, which is to transform a series of underutilized parcels into an integrated, high-density, mixed-use, transit- and pedestrian-oriented development that provides an active residential, shopping, dining, entertainment, and working community while also retaining and revitalizing the historic former Hollywood Reporter Building, the Bullinger Building and Crossroads of the World complex.

As such, Project operation results in significant and unavoidable Project-level and cumulative regional impacts with regard to VOC, NOX and CO emissions. Pursuant to Public Resources Code section 21081(a)(3), based on the evidence described below in Section XI, Statement of Overriding Considerations, the City finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report to reduce these impacts to less than significant.

Reference

For a complete discussion of impacts associated with Air Quality, please see Section IV.B of the Draft EIR, pages IV.B-24 through IV.B-57; and Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, pages III-14 through III-15 and III-50 through III-54; and Errata to the Final EIR.

C. Cultural Resources

1. Impacts Associated with Demolition of Historical Resources

The Project demolishes the following four properties that have been identified as historically significant through survey evaluation:

- One-story vernacular house at 1547–1549 McCadden Place (1907);
- Three two-story Regency Revival courtyard apartment buildings at 6700 Selma Avenue and 1535–1555 Las Palmas Avenue (1939);
- One-story, single-family Craftsman style house at 1542 McCadden Place (1910);
- Two-story Craftsman style duplex at 1606–1608 Las Palmas Avenue (1912).

The Project's demolition of these buildings creates significant impacts to historical resources that cannot be mitigated to a less-than-significant level, despite the Project's incorporation of Mitigation Measures CUL-MM-14, CUL-MM-15 and CUL-MM-16 as discussed in Section IV.D, Cultural Resources, of the Draft EIR and in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR.

2. Cumulative Impacts Associated with Demolition of Historic Resources

There are a total of 145 related projects in the vicinity of the Project Site. While the majority of the related projects are located a substantial distance from the Project Site, as shown in Figure III-1 in Section III, Environmental Setting, of the Draft EIR, several related projects are located in proximity to the Project Site. Collectively, the related projects near the Project Site involve residential uses (i.e., apartments and condominiums), retail, and restaurant uses, consistent with existing uses in the Project Site area.

Although impacts to historical resources tend to be Site-specific, a cumulative impact analysis of historical resources determines whether the impacts of a Project and the related projects in the surrounding area, when taken as a whole, will substantially diminish the number of historical resources within the same or similar context or property type. Specifically, cumulative impacts will occur if the Project and related projects affect local historical resources with the same level or type of designation or evaluation, affect other structures located within the same historic district, or involve resources that are significant within the same context. As discussed above, the Project demolishes four properties identified as historic resources through survey evaluation. The impacts from the Project's demolition of these historical resources cannot be mitigated to less-than-significant level. Thus, to the extent that other nearby related projects also impact historic properties with the same level or type of designation or evaluation, or involve resources that are significant within the same context of the four properties the Project demolishes, such impacts may be cumulatively considerable. As such, cumulative impacts are concluded to be significant and unavoidable.

Project Design Features

The City finds that no specific Project Design Features are incorporated into the Project related to the demolition of historical resources.

Mitigation Measures

The City finds that although Mitigation Measures CUL-MM-14, CUL-MM-15, and CUL-MM-16, which are incorporated into the Project and incorporated into these Findings as though fully set forth herein, reduce the Project's significant impacts due to demolition of historical resources, these mitigation measures do not reduce the Project's impacts to a less-than-significant level. These mitigation measures were taken into account in the analysis. The City further finds that there are no additional feasible mitigation measures the Project could implement to avoid its significant impacts due to demolition of historic resources.

Findings

Pursuant to Public Resources Code section 21081(a)(1), the City finds that changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid the significant effects on the environment. However, these impacts have not been reduced to less than significant.

Pursuant to Public Resources Code, section 21081(a)(3), the City finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report to reduce these impacts to less than significant.

Rationale for Findings

As discussed in Section IV.D, Cultural Resources, of the Draft EIR, the Project demolishes four properties identified as historical resources through survey evaluation. Although the Project incorporates the three mitigation measures provided above to reduce these impacts, the Project's impacts due to demolition of historical resources cannot be mitigated to a less-than-significant level. Such impacts are also considered to be cumulatively significant to the extent that other nearby related projects also impact historical properties with the same level or type of designation or evaluation, or involve historical resources that are significant within the same context of the four properties that the Project demolishes.

As reported in Table V-1, Comparison of Impacts Associated with the Project and Impacts of the Alternatives, and discussed at pages V-211 through V-268 of Section V, Alternatives, of the Draft EIR, Alternative 5: Historic Preservation Alternative will avoid these significant and unavoidable impacts by retaining all of the historical resources at the Project Site in their existing conditions at the Project Site. However, the City concluded that Alternative 5 is infeasible because it will not meet or meet as well as the Project will, many of the Project Objectives or the Project's underlying purpose, as described in greater detail in Section IX, Alternatives to the Project, subsection C.5, below. In addition, Alternative 5 will worsen the environmental impacts caused by the Project with respect to Noise and Vibration and Hydrology and Water Quality. Further, as concluded in the Memorandum prepared by Kosmont Companies, entitled Economic Feasibility Review—Crossroads Hollywood, and confirmed by the peer review report prepared by HR&A, Alternative 5 will not be economically feasible as it will provide a negative return on

investment, and thus a reasonably prudent person will not proceed with attempting to build Alternative 5.

As such, the Project results in significant and unavoidable Project-level and cumulative regional impacts with regard to demolition of historical resources. Pursuant to Public Resources Code section 21081(a)(3), based on the evidence described below in Section XI, Statement of Overriding Considerations, the City finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report to reduce these impacts to less than significant.

Reference

For a complete discussion of impacts associated with the Project's demolition of historical resources, please see Section IV.D of the Draft EIR, pages IV.D-14 through IV.D-20 and IV.D-29 through IV.D-54; Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, pages III-17 through III-22, and III-54 through III-60; and Errata to the Final EIR.

D. Noise - Construction

1. On-Site Construction Noise

Noise impacts from Project construction activities occurring within or adjacent to the Project Site is a function of the noise generated by construction equipment, the location of the equipment, the timing and duration of the noise-generating construction activities, and the relative distance between the Project Site to each of the noise sensitive receptors. Construction activities generally include demolition, Site grading and excavation for the subterranean parking garage, building construction, paving/concrete installation, and landscape installation. Each stage of construction involves the use of various types of construction equipment and will, therefore, have its own distinct noise characteristics. Demolition generally involves the use of backhoes, front-end loaders, and heavy-duty trucks. Grading and excavation typically requires the use of earth moving equipment, such as excavators, front-end loaders, and heavy-duty trucks. Building construction typically involves the use of cranes, forklifts, concrete trucks, and delivery trucks. Noise from construction equipment generates both steady-state and episodic noise that can be heard within and adjacent to the Project Site.

Individual pieces of construction equipment that will be used for Project construction produce maximum noise levels (Lmax) of 74 dBA to 90 dBA at a reference distance of 50 feet from the noise source, as shown in Table IV.I-10 of the Draft EIR. These maximum noise levels occur when equipment is operating under full power conditions (i.e., the equipment engine at maximum speed). However, equipment used on construction sites often operates under less than full power conditions, or on part power. To more accurately characterize construction-period noise levels, the average (hourly L_{eq}) noise level associated with each construction stage is calculated based on the quantity, type, and usage factors for each type of equipment that will be used during each construction stage. These noise levels are typically associated with multiple pieces of equipment operating simultaneously.

Table IV.I-11 of the Draft EIR provides the estimated construction noise levels for various construction stages at the off-Site noise sensitive receptors. The estimated noise levels represent a conservative scenario in which all construction equipment was assumed to operate simultaneously and was assumed to be located at the construction area nearest to the affected receptors. These assumptions represent the worst-case noise scenario as construction activities will, typically, spread out throughout the entire Site further away from the affected receptors and, thus, some equipment will be farther away from the affected receptors. In addition, the noise modeling assumes that construction noise will be constant when, in fact, construction activities and associated noise levels are periodic and fluctuate based on the construction activities. As indicated in Table IV.I-11, potential construction related noise impacts at receptor R5 will be less than significant. However, the estimated construction noise levels at the nearby noise sensitive uses represented by receptors R3, and R4, and R6 through R16 which are adjacent to the Project Site, will exceed the significance threshold from 35.5 dBA at receptor R4 to 2.3 dBA at receptor R7. Therefore, temporary noise impacts associated with the Project's on-Site construction activities will be significant.

The Project's potential noise impacts from on-Site construction on Development Parcel E were separately analyzed once the Project was modified to include Development Parcel E and the construction of the Building E1, the parking structure. That analysis concluded that on-Site construction noise impacts at R4 will be significant, as the noise impacts will be similar to those reported in the Draft EIR for R4. As reported in Table III-5, *Analysis of Potential Impacts At Receptor R5 Associated with Construction Within Development Parcel E*, on page III-71 of Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, impacts associated with Parcel E construction activities at the uses represented by R5 will be approximately 0.2 dBA above the significance threshold without mitigation. As reported in Table III-4, *Analysis of Potential Impacts at Receptor R16 (Larchmont Charter School and Selma Avenue Elementary School) Associated with Construction Within Development Parcel E*, on page III-70 of Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, impacts associated with Parcel E construction activities at the uses represented by R16 will be approximately 13.3 to 14.2 dBA above the significance threshold for schools without mitigation.

Implementation of Mitigation Measure NOI-MM-1, requiring the installation of temporary and impermeable sound barriers providing a minimum 15-dBA noise attenuation level at particular locations to reduce the Project's on-Site construction noise at off-Site noise sensitive locations, reduces the Project's on-Site construction noise impacts to less than significant at all sensitive receptor locations represented by receptor locations R6, R7, R8, R9, R10, R11, and R16. However, at all sensitive receptor locations represented by receptor locations R3, R4, and R12 through R15, impacts are significant even after implementation of NOI-MM-1.

2. Off-Site Construction Noise

In addition to on-Site construction noise sources, materials delivery, concrete mixing, haul trucks (construction trucks), and construction worker vehicles will require access to the Project Site during the construction phase. The major noise sources associated with off-Site construction trucks will be associated with delivery/haul trucks. Construction delivery/haul trucks will generally travel between the Project Site and the Hollywood Freeway via one or more of the following routes: Sunset Boulevard, Highland Avenue,

and/or Santa Monica Boulevard. The peak period with the highest number of construction trucks will occur during the excavation/grading phase. There will also be construction trucks during other construction phases of the Project (e.g., building construction and Site landscaping). However, the level of construction-related truck activity will be greatest during the excavation/grading phase. Therefore, to present a worst-case analysis, the analysis of off-Site construction truck traffic noise impacts is based on the construction truck trips during a maximum worst-case day during the excavation/grading phase.

The hourly truck trips were calculated based on an 8-hour period (typical workday) and a uniform distribution of trips, which resulted in a maximum of 106 truck trips (53 trucks inbound and 53 trucks outbound) per hour. In addition, there will be a total of 76 worker trips to and from the Project Site on a daily basis during the excavation/grading phase. There will also be construction delivery truck trips (up to 75 truck trips per day) during other construction phases of the Project, but such trips will be significantly less than the 840 truck trips under the grading phase. Table IV.i-12 on page IV.I-38 of the Draft EIR reports the estimated construction-related construction truck noise levels along the proposed construction truck routes with noise sensitive receptors. As reported in Table IV.I-12, during the excavation/grading period, construction-related traffic noise levels will be below the 5 dBA significance threshold along Sunset Boulevard and Santa Monica Boulevard. However, the estimated noise levels along Highland Avenue will exceed the more stringent 3 dBA LAUSD significance threshold applicable to Hollywood High School. Access to the haul routes within the immediate Site vicinity may also be provided via adjacent local streets, including portions of McCadden Place, Las Palmas Avenue, and Selma Avenue. In the event that the haul trucks will require access through these streets and based on a worst-case assumption that all haul trucks will access the same street, the noise levels from the haul trucks will exceed the ambient noise levels by up to 10.2 dBA (L_{eq}) along McCadden Place, 13.1 dBA (L_{eq}) along Las Palmas Avenue, and 12.8 dBA (L_{eq}) along Selma Avenue. These noise levels will exceed the 5 dBA significance threshold. As such, temporary noise impacts from off-Site construction traffic will be significant at receptor locations R10, R11 R13, R14 and R15 during the excavation/grading phase and with haul trucks traveling on Highland Avenue, Selma Avenue, McCadden Place and Las Palmas Avenue; and at receptor location R14 during the building construction phase. Therefore, temporary noise impacts from off-Site construction traffic will be significant.

3. Cumulative On-Site Construction Noise

Noise from construction of development projects is typically localized and has the potential to affect areas immediately within 500 feet from the construction Site. Thus, noise from construction activities for two projects within 1,000 feet of each other can contribute to a cumulative noise impact for receptors located midway between the two construction sites. While the majority of the related projects are located over 1,000 feet from the Project Site, eight related projects are within 1,000 feet of the Project Site. Based on the analysis in Section IV.I, Noise, of the Draft EIR, cumulative noise impacts at the nearby sensitive uses (e.g., residential, school, and theater uses) located in proximity to the Project Site and Related Project No. 45, Related Project No. 80, Related Project No. 94, and Related Project No. 137 could occur. Construction-related noise levels from the related projects will be intermittent and temporary, and it is anticipated that, as with the Project, the related projects will comply with the construction hours and other relevant provisions set forth in the LAMC. Noise associated with cumulative construction activities

will be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual related Project and compliance with locally adopted and enforced noise ordinances. Nonetheless, if nearby Related Project No. 45, Related Project No. 80, Related Project No. 94, and Related Project No. 137 were to be constructed concurrently with the Project, significant cumulative construction noise impacts could result.

Implementation of Mitigation Measure NOI-MM-1 reduces the Project's construction noise impacts from on-Site activities at all receptor locations by up to 15 dBA, which reduces the Project's noise impacts to a less-than-significant level at receptor locations R7, R8, R9, R10, R11, and R16. However, Project construction noise impacts at receptor locations R3, R3, R12, R13, R14 and R15 remain significant. While it is anticipated that nearby related projects will similarly implement mitigation measures to address any potential noise impacts from on-Site construction activities, potential cumulative impacts as a result of construction of the Project and nearby related projects cannot be precluded. Therefore, cumulative construction noise impacts from on-Site activities will be significant and unavoidable.

4. Cumulative Off-Site Construction Noise

Off-Site construction haul trucks have a potential to result in cumulative impacts if the trucks for the related projects and the Project were to utilize the same haul routes. Specifically, a significant cumulative impact will occur if the cumulative construction truck volumes from the Project and the related projects were to create noise levels that exceed the existing daytime ambient noise level by 5 dBA along the anticipated haul routes or 3 dBA adjacent to a LAUSD School. The primary haul routes include Sunset Boulevard, Highland Avenue, and Santa Monica Boulevard. The estimated off-Site noise levels from Project construction trucks will exceed the 3 dBA significance threshold (per LAUSD) at Hollywood High School located along Highland Avenue. Therefore, cumulative noise impacts associated with Project and related Project construction traffic will be significant along Highland Avenue. In addition, impacts will occur if the existing daytime ambient noise level of 68.5 dBA (L_{eq}) along Sunset Boulevard, and 71.9 dBA along Santa Monica Boulevard is exceeded by 5 dBA. It is estimated that if the total number of trucks from the Project and related projects were to generate 128 truck trips per hour along Sunset Boulevard and 279 truck trips per hour Santa Monica Boulevard, the cumulative truck noise levels will exceed the ambient noise levels by 5 dBA and exceed the significance thresholds. Since the Project will generate up to105 truck trips during peak construction period (Site grading), it is conservatively assumed that truck traffic related to construction of the Project, combined with other related projects, cumulatively add up to these amounts, at a minimum, along Sunset Boulevard and Santa Monica Boulevard, respectively. Thus, the 5-dBA threshold will be exceeded along these roadways. In addition, the haul trucks will access the primary haul route via adjacent local streets, including McCadden Place, Las Palmas Avenue, and Selma Avenue. Project-related haul truck noise levels along these locations will be significant. Thus, to the extent that other related projects also use these streets, cumulative impacts will occur. As such, cumulative noise impacts from off-Site construction are cumulatively considerable and are significant.

Project Design Features

The City finds that Project Design Features NOI-PDF 1 and NOI-PDF-2 are incorporated into the Project to reduce its potential impacts related to on-Site and off-Site construction noise.

Mitigation Measures

The City finds that although Mitigation Measure NOI-MM-1, which is incorporated into the Project and incorporated into these Findings as though set forth herein, reduces the Project's on-Site and off-Site construction noise impacts on noise-sensitive receptors, this mitigation measure does not reduce the Project's impacts to a less-than-significant level. This mitigation measure was taken into account in the analysis. The City further finds that there are no additional feasible mitigation measures the Project could implement to avoid its significant on-Site and off-Site construction noise impacts.

Findings

Pursuant to Public Resources Code, section 21081(a)(1) the City finds that changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid the significant effects on the environment. However, these impacts have not been reduced to less than significant.

The City finds that changes and alterations and mitigation measures were made to, or incorporated into, the Project to reduce the Project's significant on-Site and off-Site construction noise impacts. No additional measures are available to reduce these impacts to less-than-significant levels.

Pursuant to Public Resources Code, section 21081(a)(3) the City finds that Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report to reduce these impacts to less than significant.

Rationale for Finding

As discussed in Section IV.I, Noise, of the Draft EIR, Project construction creates significant on-Site and off-Site construction noise impacts. Although the Project incorporates the mitigation measure and Project design features provided above to reduce or avoid these impacts, the Project's on-Site and off-Site construction noise impacts cannot be mitigated to a less-than-significant level. Such impacts are also considered to be cumulatively significant to the extent that other nearby related projects' on-Site and off-Site construction noise impacts will occur concurrently with the Project's and join with the Project's to also impact noise-sensitive receptors in the area.

As reported in Table V-1, Comparison of Impacts Associated with the Project and Impacts of the Alternatives, and discussed at pages V-12 through V-27 of Section V, Alternatives, of the Draft EIR, Alternative 1: No Project/No Build Alternative will avoid these significant and unavoidable impacts by maintaining the existing conditions at the Project Site and not providing for any new development. However, the City concluded that Alternative 1 is infeasible because it will not meet any of the Project Objectives or the Project's underlying purpose, which is to transform a series of underutilized parcels into an integrated, high-

density, mixed-use, transit- and pedestrian-oriented development that provides an active residential, shopping, dining, entertainment, and working community while also retaining and revitalizing the historic former Hollywood Reporter Building, the Bullinger Building and Crossroads of the World complex.

As such, the Project results in significant and unavoidable Project-level and cumulative regional impacts with regard to demolition of historical resources. Pursuant to Public Resources Code section 21081(a)(3), based on the evidence described below in Section XI, Statement of Overriding Considerations, the City finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report to reduce these impacts to less than significant.

Reference

For a complete discussion of impacts associated with Noise, please see Section IV.I of the Draft EIR, pages IV.I-26 through IV.I-38, IV.I-68 through IV.I-72, and IV.I-82 through IV.I-89; Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, pages III-23 through III-27, and III-67 through III-74.

E. Noise – Construction Vibration

1. Human Annoyance Impacts from On-Site Construction Vibration

Per Federal Transit Administration (FTA) guidance, the threshold of significance for human annoyance is 72 VdB for sensitive uses, including residential and theater uses, and 75 VdB for school uses, assuming there are a minimum of 70 vibration events occurring during a typical construction day. The estimated ground-borne vibration levels from construction equipment are below the significance thresholds for human annoyance at receptor locations R5, R7, R8, R9, R10, R11, R12, and R16. However, the estimated vibration levels at receptor locations R13, R14, and R15 are above the 72-VdB significance threshold for residential uses. In addition, the estimated vibration levels at receptor locations R3 (First Baptist Church) and R4 (Blessed Sacrament Church) are above the 75-VdB significance threshold for the church uses. The estimated vibration levels at receptor location R4 (Blessed Sacrament Church) are above the 75-VdB significance threshold for the church uses due to construction on Development Parcel E, as well. Therefore, vibration impacts during construction of the Project are also significant pursuant to the threshold of significance for human annoyance.

2. Human Annoyance Impacts from Off-Site Construction Vibration

Construction delivery/haul trucks will travel between the Project Site and the Hollywood Freeway via one or more of the following routes: Sunset Boulevard, Highland Avenue, and Santa Monica Boulevard. Heavy-duty construction trucks will generate ground-borne vibration as they travel along the Project's anticipated haul route(s). Thus, an analysis of potential vibration impacts using the building damage and human annoyance thresholds for ground-borne vibration along the anticipated local haul routes was conducted.

Per Federal Transit Administration guidance, the threshold of significance for human annoyance is 72 VdB for sensitive uses, including residential, hotel and theater uses, and 75 VdB for school uses. It should be noted that buses and trucks rarely create vibration that exceeds 70 VdB at 50 feet from the receptor unless there are bumps in the road. To provide a conservative analysis, the estimated vibration levels generated by construction trucks traveling along the anticipated haul route(s) were assumed to be within 20 feet of the sensitive uses along Sunset Boulevard, Highland Avenue, and Santa Monica Boulevard. As reported in the noise calculation worksheets included in Appendix I of the Draft EIR, the temporary vibration levels could reach approximately 75 VdB periodically as trucks pass sensitive receptors along the anticipated haul route(s). There are residential and hotel uses along Sunset Boulevard and Highland Avenue (between the Project Site and the Hollywood Freeway), which will be exposed to ground-borne vibration above the 72-VdB significance threshold from the construction trucks. While there are no residential uses that will be subjected to these periodic vibration levels along Santa Monica Boulevard between the Project Site and the Hollywood Freeway, there are theater uses along the anticipated haul route(s). Therefore, potential vibration impacts with respect to human annoyance that will result from temporary and intermittent vibration from construction trucks traveling along the anticipated haul route(s) are significant.

3. Cumulative Construction Vibration – Human Annoyance Impacts from On-Site Construction

There are residential uses within 80 feet of the Project Site (receptor location R14), which will be impacted due to cumulative construction vibration impacts. Therefore, significant cumulative construction vibration impacts pursuant to the threshold for human annoyance will be significant in the event concurrent construction of the Project and Related Project No. 45 were to occur.

Project Design Features

The City finds that Project Design Feature NOI-PDF-2 is incorporated into the Project to reduce its potential human annoyance impacts due to on-Site and off-Site construction vibration.

Mitigation Measures

The City finds that there are no feasible mitigation measures the Project could implement to avoid the Project's significant human annoyance impacts due to on-Site and off-Site construction vibration.

Findings

Pursuant to Public Resources Code, section 21081(a)(1) the City finds that changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid the significant effects on the environment. However, these impacts have not been reduced to less than significant. Specifically, the City finds that changes or alterations have been required in, or incorporated into, the Project to reduce the Project's significant on-Site and off-Site construction vibration impacts. Human annoyance vibration impacts due to the Project's on-Site and off-Site construction activities at sensitive receptors represented by receptor locations R2, R3, and R4 are significant and unavoidable. No

additional measures are available to reduce these impacts to less-than-significant levels. Impacts are temporary, intermittent, and limited to during daytime hours when large construction equipment (e.g., large bulldozer) is operating within 80 feet of a sensitive receptor.

Pursuant to Public Resources Code, section 21081(a)(3) the City finds that Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report to reduce these impacts to less than significant.

Rationale for Findings

Temporary vibration impacts during construction are less than significant with respect to the threshold for building damage, but significant with respect to the threshold for human annoyance at receptors R2, R3 and R4. Compliance with the regulatory requirements and implementation of Project design features reduces vibration impacts with respect to human annoyance, and ensures that vibration impacts with respect to building damage remain less than significant. Additional mitigation measures considered to reduce vibration impacts with respect to human annoyance included the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must be very deep and long to be effective, and there is not sufficient space (e.g., buffer land) to construct wave barriers on the Project Site.

In addition, constructing a wave barrier to reduce the Project's construction-related vibration impacts will, in and of itself, generate ground borne vibration from the excavation equipment, at levels that will likely be higher than those generated by Project construction (as the installation area will extend beyond the Project construction area and closer to the off-Site receptor). Thus, it is concluded that it will be infeasible to build a wave barrier, and that there are no feasible mitigation measures that can be implemented to reduce the human annoyance impacts associated with the Project's on-Site and off-Site construction activities to a less-than-significant level.

As reported in Table V-1, Comparison of Impacts Associated with the Project and Impacts of the Alternatives, and discussed at pages V-12 through V-27 of Section V, Alternatives, of the Draft EIR, Alternative 1: No Project/No Build Alternative will avoid these significant and unavoidable impacts by maintaining the existing conditions at the Project Site and not providing for any new development. However, the City concluded that Alternative 1 is infeasible because it will not meet any of the Project Objectives or the Project's underlying purpose, which is to transform a series of underutilized parcels into an integrated, high-density, mixed-use, transit- and pedestrian-oriented development that provides an active residential, shopping, dining, entertainment, and working community while also retaining and revitalizing the historic former Hollywood Reporter Building, the Bullinger Building and Crossroads of the World complex.

Therefore, the Project's human annoyance impacts from its on-Site and off-Site construction activities remain significant and unavoidable. Impacts are temporary, intermittent, and limited to during daytime hours when large construction equipment (e.g., large bulldozer) is operating within 80 feet of a sensitive receptor. Pursuant to Public

Resources Code section 21081(a)(3), based on the evidence described below in Section XI, Statement of Overriding Considerations, the City finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report to reduce these impacts to less than significant.

Reference

For a complete discussion of impacts associated with Noise, please see Section IV.H of the Draft EIR, pages IV.I-26 through IV.I-32, IV.I-39 through IV.I-46, IV.I-72 through IV.I-74, and IV.I-82 through IV.I-89; Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, pages III-23 through III-27, and III-65 through III-74; and Errata to the Final EIR.

F. Traffic, Access and Parking – Construction

1. Construction Traffic Impacts

For the following reasons, the Project results in a temporary, but significant, traffic impact during construction at the following two intersections: (1) Intersection No. 37: Highland Avenue and Hollywood Boulevard (p.m. peak hour); and (2) Intersection No. 65: Highland Avenue and Sunset Boulevard (a.m. and p.m. peak hour).

(a) Vehicle Trips During Shoring/Excavation

Since peak haul truck activity occurs during excavation and grading, and peak worker activity occurs during building construction, the construction analysis considered the peak haul trips and construction worker trips during these two phases of construction.

During the peak excavation and grading period, approximately 705,500 cubic yards of material will be excavated and hauled from the Project Site over a period of approximately 126 working days. During the shoring/excavation phase, hauling of material from the Project Site will occur on weekdays between 7:00 a.m. and 3:00 p.m. (i.e., an 8-hour period). Assuming haul trucks with a capacity of 14 cubic yards are used, approximately 5,600 cubic yards of material will be exported each workday, requiring approximately 400 haul trucks per work day.

In addition, an average of 20 delivery trucks per day will run during the excavation and grading period. Thus, up to 840 daily truck trips (420 inbound, 420 outbound) will occur during the excavation and grading period, with approximately 106 trips per hour (53 inbound, 53 outbound) uniformly over a typical 8-hour workday.

Based on regionally accepted standards, a passenger car equivalency (PCE) of 2.0 was used to equate larger truck trips to passenger vehicle trips during the peak hours. Accordingly, the Project's estimated 840 truck trips are equivalent to 1,680 daily PCE trips. The 106 hourly truck trips are equivalent to 212 PCE trips (106 inbound, 106 outbound) per hour. In addition, during this period, a maximum of 30 construction workers will work at the Project Site. Assuming minimal carpooling among workers, an average vehicle occupancy (AVO) of 1.135 persons per vehicle was assumed. Therefore, 30 workers results in a total of 24 vehicle trips to and from the Project Site on a daily

basis. Based on the hours of construction, construction workers will be arriving to and departing from the Project Site before the commuter weekday peak periods and, therefore, do not impact traffic during the a.m. and p.m. peak periods. Furthermore, construction-related traffic will be less than the trips associated with the existing uses of the Project Site that will be removed from the Study Area during construction.

Haul trucks will travel on approved truck routes designated within the City. Subject to LADOT and/or the Department of Building and Safety's approval, the Project trucks will use the most direct route to transport demolition and construction debris from the Project Site to the designated landfill. Given the Project Site's proximity to US-101, outbound traffic from the Project Site will travel on Highland Avenue to access US-101 northbound or on Sunset Boulevard to access US-101 southbound. Inbound traffic will take the route in reverse from US-101.

Given that the haul truck trips during the excavation and grading phase will be spread out over a typical 8-hour workday and since nearly all haul truck activity and construction worker trips will occur outside of the a.m. and p.m. peak periods, haul truck and construction worker activity during the excavation and grading phase will not contribute a substantial amount of traffic during the weekday a.m. and p.m. peak periods. Additionally, as stated above, most, if not all, of the construction worker trips will occur outside the typical weekday commuter a.m. and p.m. peak periods during the building construction phase.

(b) Construction Worker Trips and Parking During Building Construction

The hours of construction typically require workers to be on-Site before the A.M. commuter peak period (i.e., arrive prior to 7:00 A.M.) and allow them to leave before or after the P.M. peak period (i.e., leave before 4:00 P.M. or after 6:00 P.M.). Therefore, most, if not all, of the Project's construction worker trips occur outside the typical weekday commuter A.M. and P.M. peak periods. Furthermore, the Project's construction-related traffic is anticipated to be less than the trips associated with the existing uses of the Project Site that will be removed from the Study Area during construction.

During the peak building construction period, it is estimated that the Project will generate a combined average of approximately 360 workers per day. Since the different building components will not be constructed or installed simultaneously, and since on most days during the construction period there will be far fewer than 360 workers on Site, the construction workers trip estimate is conservative. By applying an average vehicle occupancy (AVO) of 1.0 to 1.135 persons per vehicle, 360 workers will result in a total of 317 to 360 vehicles that will arrive and depart from the Project Site each day. The estimated number of trips associated with construction workers during the peak construction building period, assuming 2.0 to 2.5 trips per day per worker, will be approximately 317 to 450 inbound and 317 to 450 outbound trips. As previously noted, these trips will occur outside of the a.m. and p.m. peak periods. Therefore, impacts are less than significant.

During construction, adequate parking for construction workers will be secured in the vicinity of the Project Site. Restrictions against workers parking in the public right-of-way in the vicinity of or adjacent to the Project Site are identified as part of the Construction Management Plan, which will be prepared pursuant to Project Design Feature TRA-PDF-

1. Project construction may require the temporary use of off-Site parking areas for material storage and truck staging.

(c) Temporary Traffic Impacts

While Project construction activities will be primarily contained within the Project Site boundaries, the curb lanes on Highland Avenue and Sunset Boulevard adjacent to the Project Site will be used intermittently throughout the construction period for equipment staging, concrete pumping, etc., resulting in the removal of one peak-hour travel lane and off-peak-hour on-street metered parking spaces on these two streets. McCadden Place adjacent to the Project Site will be partially closed, with the removal of on-street parking and one travel lane. Construction fences will likely encroach into the public right-of-way (e.g., sidewalk and roadways) adjacent to the Project Site. Temporary traffic controls will be provided to direct traffic around any closures, as required by Project Design Feature TRA-PDF-1, the Construction Management Plan. For the purposes of providing a conservative analysis, all lane and road closures were assumed to occur simultaneously. Consequently, the temporary traffic impacts associated with the lane closures create a temporary significant impact at the intersection of Highland Avenue and Hollywood Boulevard (Intersection No. 37) during the p.m. peak hour and at the intersection of Highland Avenue and Sunset Boulevard (Intersection No. 65) during the a.m. and p.m. peak hour.

Therefore, the Project results in a temporary, but significant, traffic impact during construction at these two intersections.

Project Design Features

The City finds that Project Design Feature TRA-PDF-1 is incorporated into the Project to reduce its potential construction traffic impacts associated with lane closures.

Mitigation Measures

The City finds that there are no feasible mitigation measures the Project could implement to avoid the Project's significant construction traffic impacts associated with lane closures.

Findings

Pursuant to Public Resources Code section 21081(a)(1), the City finds that changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid the significant effects on the environment. However, the Project's construction traffic impacts associated with lane closures have not been reduced to less than significant and are significant and unavoidable at the intersection of Highland Avenue and Hollywood Boulevard (Intersection No. 37) during the P.M. peak hour, and at the intersection of Highland Avenue and Sunset Boulevard (Intersection No. 65) during the A.M. and P.M. peak hour. Impacts are temporary, intermittent, and, as assumed in the analysis, will occur when all land and road closures occur simultaneously.

Pursuant to Public Resources Code, section 21081(a)(3), the City finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible

the mitigation measures or alternatives identified in the environmental impact report to reduce these impacts to less than significant.

Rationale for Findings

Temporary traffic controls will be provided to direct traffic around any closures, as required by Project Design Feature TRA-PDF-1, the Construction Management Plan. For the purposes of providing a conservative analysis, all lane and road closures were assumed to occur simultaneously. Consequently, the temporary traffic impacts associated with the lane closures create a temporary significant impact at the intersection of Highland Avenue and Hollywood Boulevard (Intersection No. 37) during the p.m. peak hour and at the intersection of Highland Avenue and Sunset Boulevard (Intersection No. 65) during the a.m. and p.m. peak hour. Therefore, the Project's construction traffic impacts associated with lane closures are determined to be significant and unavoidable, although they are temporary and will occur when all lane and road closures occur simultaneously.

As reported in Table V-1, Comparison of Impacts Associated with the Project and Impacts of the Alternatives, and discussed at pages V-12 through V-27 of Section V, Alternatives, of the Draft EIR, Alternative 1: No Project/No Build Alternative will avoid these significant and unavoidable impacts by maintaining the existing conditions at the Project Site and not providing for any new development. However, the City concluded that Alternative 1 is infeasible because it will not meet any of the Project Objectives or the Project's underlying purpose, which is to transform a series of underutilized parcels into an integrated, high-density, mixed-use, transit- and pedestrian-oriented development that provides an active residential, shopping, dining, entertainment, and working community while also retaining and revitalizing the historic former Hollywood Reporter Building, the Bullinger Building and Crossroads of the World complex.

Therefore, the Project's construction traffic impacts associated with lane closures are determined to be significant and unavoidable, although they are temporary and will occur when all lane and road closures occur simultaneously. Pursuant to Public Resources Code section 21081(a)(3), based on the evidence described below in Section XI, Statement of Overriding Considerations, the City finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report to reduce these impacts to less than significant.

Reference

For a complete discussion of impacts associated with Traffic, Access and Parking, please see Section IV.L of the Draft EIR, pages IV.L-52 through IV.L-142; Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, pages III-29 through 34 and III-83 through III-89; and Errata to the Final EIR.

G. Traffic, Access and Parking – Intersection Levels of Service During Operation

The analysis of Existing with Project Conditions evaluates potential Project-related traffic impacts as compared to existing conditions during the typical weekday a.m. and p.m. peak periods. Under this scenario, the estimated Project traffic volumes during the a.m. and p.m. peak periods were added to the existing a.m. and p.m. peak period traffic volumes to determine the change in the volume-to-capacity ratios and the corresponding LOS for all of the intersections in the Study Area based on the CMA methodology as required by LADOT.

As detailed in the traffic impact analysis for the Project as modified, after applying appropriate trip reductions and accounting for the removal of trips associated with the existing uses currently on-Site, consistent with the analysis in Section IV.L, Traffic, Access and Parking, of the Draft EIR, the Project generates 13,187 net new daily weekday trips, including 704 a.m. peak-hour trips (231 inbound, 473 outbound) and 1,088 p.m. peak-hour trips (681 inbound, 407 outbound) as compared to the 15,005 net new daily weekday trips, including 879 A.M. peak-hour trips (371 inbound, 508 outbound) and 1,283 P.M. peak-hour trips (745 inbound, 538 outbound) stated in the Draft EIR. Because the Project includes the construction of a new stand-alone parking structure in Development Parcel E, which will be accessed from Selma Avenue, the trip distribution patterns for the commercial uses have been modified as compared to the patterns provided in the Draft EIR, thereby reducing the amount of Project-related traffic accessing the Project Site via Las Palmas Avenue.

1. Existing With Project Conditions – Signalized Intersections

As reported in the Draft EIR, under Existing with Project Conditions, 96 of the 111 signalized intersections are projected to operate at LOS D or better during both the a.m. and p.m. periods. The remaining 15 signalized Study Area intersections are projected to operate at LOS E or F during at least one of the peak periods. The addition of traffic from the Project to 11 of the signalized intersections will result in a change to the volume-to-capacity ratio that will exceed the significance thresholds set forth above. Under Existing with Project Conditions, significant impacts will occur at the following intersections:

- Intersection 13: Highland Avenue and Franklin Avenue (North) (a.m. and p.m. peak period)
- Intersection 35: La Brea Avenue and Hollywood Boulevard (a.m. and p.m. peak periods)
- Intersection 37: Highland Avenue and Hollywood Boulevard (a.m. and p.m. peak periods)
- Intersection 42: Cahuenga Boulevard and Hollywood Boulevard (a.m. and p.m. peak periods)
- Intersection 44: Vine Street and Hollywood Boulevard (a.m. and p.m. peak periods)
- Intersection 63: La Brea Avenue and Sunset Boulevard (a.m. and p.m. peak periods)

- Intersection 65: Highland Avenue and Sunset Boulevard (a.m. and p.m. peak periods)
- Intersection 70: Cahuenga Boulevard and Sunset Boulevard (a.m. and p.m. peak periods)
- Intersection 72: Vine Street and Sunset Boulevard (a.m. and p.m. peak periods)
- Intersection 95: Cahuenga Boulevard and Santa Monica Boulevard (p.m. peak period)
- Intersection 96: Vine Street and Santa Monica Boulevard (p.m. peak period)

The Project's mitigation program includes a different physical improvement at the intersection of Las Palmas Avenue and Sunset Boulevard than presented in the Draft EIR, which will involve roadway widening of approximately 10 feet and restriping along the north leg of Las Palmas Avenue at Sunset Boulevard to provide one southbound left-turn lane, one shared through-right lane, and one right-turn lane (see Mitigation Measure TRA-MM-5 in Section B, Corrections and Additions to Draft EIR Sections and Appendices, in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR).

With implementation of Mitigation Measures TRA-MM-1 through TRA-MM-3, as well as Mitigation Measure TRA-MM-5, the impacts at 6 of the 11 potentially significantly impacted intersections are reduced to a less than significant level. However, despite implementation of these Mitigation Measures, the following five intersections remain significant and unavoidable under Future with Project with Mitigation Conditions with development of the Project:

- Intersection No. 37: Highland Avenue and Hollywood Boulevard (a.m. peak period)
- Intersection No. 63: La Brea Avenue and Sunset Boulevard (a.m. and p.m. peak periods)
- Intersection No. 65: Highland Avenue and Sunset Boulevard (a.m. and p.m. peak periods)
- Intersection No. 70: Cahuenga Boulevard and Sunset Boulevard (a.m. and p.m. peak periods)
- Intersection No. 72: Vine Street and Sunset Boulevard (a.m. and p.m. peak periods)

In addition, the six Study Area intersections located within the City of West Hollywood were also analyzed based on the HCM methodology as required by the City of West Hollywood. Accordingly, the estimated Project traffic volumes during the a.m. and p.m. peak periods were added to the existing a.m. and p.m. peak-period traffic volumes to

determine the change in delay and the corresponding LOS at these six Study Area intersections.

Four of the six analyzed intersections are projected to operate at LOS D or better during both the a.m. and p.m. periods under Existing with Project Conditions. The remaining two intersections are projected to operate at LOS E or F during at least one of the peak periods. However, the addition of traffic from the Project to six of the signalized intersections will not result in a change to the volume-to-capacity ratio that will exceed the significance thresholds set forth above.

2. Existing With Project Conditions – Unsignalized Intersections

As reported in the Draft EIR, under Existing with Project Conditions, 10 of the 12 unsignalized intersections in the Study Area are projected to operate at LOS D or better during the a.m. and p.m. peak periods. The remaining two intersections are projected to operate at LOS E or F during at least one of the peak periods.

Pursuant to LADOT guidelines, unsignalized intersections are not required to be evaluated for the installation of a traffic signal warrant analysis. Nonetheless, for informational purposes only, four of the six unsignalized intersections were evaluated for the installation of a traffic signal under Existing with Project Conditions. The following two unsignalized intersections meet the minimum peak-hour traffic volume threshold of Signal Warrant 3, under Existing with Project Conditions:

- Intersection 5: Gower Street and US-101 South Bound Off-Ramp/Yucca Street
- Intersection 8: Las Palmas Avenue and Selma Avenue

3. Future With Project Conditions – Signalized Intersections

Prior to mitigation, and with the modifications described in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, the Project results in a significant impact at 21 of the 111 signalized study intersections under Future with Project conditions as compared to the 22 intersections resulting from the analysis conducted for the Draft EIR. The Project's mitigation program includes implementation of a Transportation Demand Management (TDM) Program, transit system improvements, and Transportation System management (TSM) improvements. After accounting for the implementation of a TDM Program, the Project generates 11,684 net new daily weekday trips, including 618 A.M. peak-hour trips (197 inbound, 420 outbound) and 959 P.M. peak-hour trips (606 inbound, 353 outbound) as compared to the 13,275 net new daily weekday trips, including 769 A.M. peak-hour trips (317 inbound, 452 outbound) and 1,127 P.M. peak-hour trips (662 inbound, 465 outbound) reported in the Draft EIR.

The Project's mitigation program includes a different physical improvement at the intersection of Las Palmas Avenue and Sunset Boulevard than presented in the Draft EIR, which will involve roadway widening of approximately 10 feet and restriping along the north leg of Las Palmas Avenue at Sunset Boulevard to provide one southbound left-turn lane, one shared through-right lane, and one right-turn lane (see Mitigation Measure TRA-MM-5 in Section B, Corrections and Additions to Draft EIR Sections and

Appendices, in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR).

With implementation of Mitigation Measures TRA-MM-1 through TRA-MM-3, as well as Mitigation Measure TRA-MM-5, the impacts at 16 of the 21 potentially significantly impacted intersections are reduced to a less than significant level. However, despite implementation of these Mitigation Measures, the following five intersections remain significant and unavoidable under Future with Project with Mitigation Conditions with development of the Project:

- Intersection No. 37: Highland Avenue and Hollywood Boulevard (a.m. peak period)
- Intersection No. 63: La Brea Avenue and Sunset Boulevard (a.m. and p.m. peak periods)
- Intersection No. 65: Highland Avenue and Sunset Boulevard (a.m. and p.m. peak periods)
- Intersection No. 70: Cahuenga Boulevard and Sunset Boulevard (a.m. and p.m. peak periods)
- Intersection No. 72: Vine Street and Sunset Boulevard (a.m. and p.m. peak periods)

4. Future With Project Conditions – Unsignalized Intersections

As reported in the Draft EIR, under Future with Project Conditions, 8 of the 12 unsignalized intersections in the Study Area are projected to operate at LOS D or better during the a.m. and p.m. peak periods. The remaining four intersections are projected to operate at LOS E or F during at least one of the peak periods, and are therefore subject to traffic signal warrant analysis.

The following two of four unsignalized intersections meet the minimum peak-hour traffic volume threshold of Signal Warrant 3, under Future with Project Conditions:

- Intersection 5: Gower Street and US-101 South Bound Off-Ramp/Yucca Street
- Intersection 8: Las Palmas Avenue and Selma Avenue

Project Design Features

The City finds that no Project Design Features are incorporated into the Project to reduce its intersection traffic impacts during operation.

Mitigation Measures

The City finds that although Mitigation Measures TRA-MM-1 through TRA-MM-3 and TRA-MM-5, which are incorporated into the Project and incorporated into these Findings as though set forth herein, reduce the Project's intersection traffic impacts during operation, these mitigation measures do not reduce the Project's impacts to a less-than-

significant level. These mitigation measures were taken into account in the analysis. The City further finds that there are no additional feasible mitigation measures the Project could implement to avoid its significant intersection traffic impacts during operation.

Findings

Pursuant to Public Resources Code, section 21081(a)(1) the City finds that changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid the significant effects on the environment. However, these impacts have not been reduced to less than significant. Specifically, impacts to the following intersections remain significant and unavoidable:

- Intersection No. 37: Highland Avenue and Hollywood Boulevard (a.m. peak period)
- Intersection No. 63: La Brea Avenue and Sunset Boulevard (a.m. and p.m. peak periods)
- Intersection No. 65: Highland Avenue and Sunset Boulevard (a.m. and p.m. peak periods)
- Intersection No. 70: Cahuenga Boulevard and Sunset Boulevard (a.m. and p.m. peak periods)
- Intersection No. 72: Vine Street and Sunset Boulevard (a.m. and p.m. peak periods)

Pursuant to Public Resources Code, section 21081(a)(3) the City finds that Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report to reduce these impacts to less than significant.

Rationale for Findings

Implementation of Mitigation Measures TRA-MM-1 through TRA-MM-3 and TRA-MM-5 results in peak-hour trip reductions and operational improvements. Intersection operating conditions during the weekday a.m. and p.m. peak periods for the 111 signalized intersections under Existing with Project Conditions with mitigation are summarized in Table IV.L-4 on page IV.L-31 of the Draft EIR. Under Existing With Project Conditions, and after the implementation of the relevant Mitigation Measures, the significant traffic impact at six of the 11 potentially significantly impacted intersections are fully reduced to a less-than-significant level. However, impacts at the five above-listed intersections remain significant and unavoidable, even with mitigation.

Implementation of Mitigation Measures TRA-MM-1 through TRA-MM-3, and Mitigation Measure TRA-MM-5 reduces the impacts at 16 of the 21 potentially significantly impacted intersections to a less than significant level under Future with Project Conditions. However, despite implementation of these Mitigation Measures, five intersections remain

significant and unavoidable under Future with Project with Mitigation Conditions with development of the Project.

As reported in Table V-1, Comparison of Impacts Associated with the Project and Impacts of the Alternatives, and discussed at pages V-12 through V-27 of Section V, Alternatives, of the Draft EIR, Alternative 1: No Project/No Build Alternative will avoid these significant and unavoidable impacts by maintaining the existing conditions at the Project Site and not providing for any new development. However, the City concluded that Alternative 1 is infeasible because it will not meet any of the Project Objectives or the Project's underlying purpose, which is to transform a series of underutilized parcels into an integrated, high-density, mixed-use, transit- and pedestrian-oriented development that provides an active residential, shopping, dining, entertainment, and working community while also retaining and revitalizing the historic former Hollywood Reporter Building, the Bullinger Building and Crossroads of the World complex. As reported in Table V-1 and discussed at pages V-252 through V-256 of Section V, Alternatives, of the Draft EIR, Alternative 5: Historic Preservation Alternative will reduce these significant impacts to a less than significant level with the implementation of the identified mitigation measures, due to its less intense development. However, the City concluded that Alternative 5 is infeasible because it will not meet or meet as well as the Project will, many of the Project Objectives or the Project's underlying purpose, as described in greater detail in Section IX, Alternatives to the Project, subsection C.5, below. In addition, Alternative 5 will worsen the environmental impacts caused by the Project with respect to Noise and Vibration and Hydrology and Water Quality. Further, as concluded in the Memorandum prepared by Kosmont Companies, entitled Economic Feasibility Review—Crossroads Hollywood, and confirmed by the peer review report prepared by HR&A, Alternative 5 will not be economically feasible as it will provide a negative return on investment, and thus a reasonably prudent person will not proceed with attempting to build Alternative 5.

As such, the Project results in significant and unavoidable intersection traffic impacts during operation. Pursuant to Public Resources Code section 21081(a)(3), based on the evidence described below in Section XI, Statement of Overriding Considerations, the City finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report to reduce these impacts to less than significant.

Reference

For a complete discussion of impacts associated with Traffic, Access and Parking, please see Section IV.L of the Draft EIR, pages IV.L-52 through IV.L-142; Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, pages III-29 through 34 and III-83 through III-89; and Errata to the Final EIR.

H. Traffic, Access and Parking – Residential Neighborhood Impacts During Operation

Based on the Draft EIR's analysis of neighborhood intrusion impacts and arterial corridor intersections affected by the Project prior to the modifications described in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, the arterial corridors Highland Avenue, Hollywood Boulevard, and Sunset Boulevard, which provide

access to the Project Site, were examined for the potential of vehicular traffic to use alternative routes through residential neighborhoods, as discussed below.

(i) On Highland Avenue between Odin Street and Sunset Boulevard

The following streets are alternate routes to Highland Avenue between Odin Street and Sunset Boulevard: Orange Drive, Las Palmas Avenue, Cherokee Avenue, and Whitley Avenue.

(ii) On Highland Avenue between Sunset Boulevard and Santa Monica Boulevard

The following streets are alternate routes to Highland Avenue between Sunset Boulevard and Santa Monica Boulevard: Orange Drive, Mansfield Avenue, McCadden Place, Las Palmas Avenue, Cherokee Avenue, and Seward Avenue Street.

(iii) On Sunset Boulevard between Gardner Street and Van Ness Avenue

The following streets are alternate routes to Sunset Boulevard between Gardner Street and Van Ness Avenue: Selma Avenue, Hawthorn Avenue, De Longpre Avenue, and Lexington Avenue.

Based on these alternative routes, the neighborhoods that were identified according to LADOT criteria (see Section IV.L, Traffic, Access, and Parking, of the Draft EIR) that may experience significant neighborhood intrusion impacts as a result of traffic generated by the Project (under both Existing with Project and Future with Project Conditions) are the areas bounded by the following:

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

Therefore, the Project creates significant impacts to residential street segments in the Study Area. Once the Project is operational, a neighborhood can be reassessed to determine if any impacts are occurring, the nature of the impacts, and whether those impacts can be addressed through a Neighborhood Traffic Management Plan, as described in renumbered Mitigation Measure TRA-MM-6, which funds and coordinates implementation of LADOT's Neighborhood Traffic Management Plan process for the

Project, in an amount up to $500,000. The traffic calming measures listed in Table 54 of the Traffic Study have been used in various communities and have been proven to be effective at reducing neighborhood intrusion impacts by reducing or eliminating neighborhood intrusion traffic and/or improving the appearance of a neighborhood. However, due to the uncertainties surrounding the potential significantly impacted areas, it is conservatively concluded that, even after the implementation of all feasible mitigation measures, impacts to residential street segments remain significant.

Project Design Features

The City finds that no Project Design Features are incorporated into the Project to reduce its significant neighborhood intrusion traffic impacts during operation.

Mitigation Measures

The City finds that although renumbered Mitigation Measure TRA-MM-6, which is incorporated into the Project and incorporated into these Findings as though set forth herein, reduces the Project's neighborhood intrusion traffic impacts during operation, this mitigation measure does not reduce the Project's impacts to a less-than-significant level. This mitigation measure was taken into account in the analysis. The City further finds that there are no additional feasible mitigation measures the Project could implement to avoid its significant neighborhood intrusion traffic impacts during operation.

Findings

Pursuant to Public Resources Code, section 21081(a)(1) the City finds that changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid the significant effects on the environment. However, these impacts have not been reduced to less than significant. Specifically, impacts to the following street segments remain significant and unavoidable:

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

Pursuant to Public Resources Code, section 21081(a)(3) the City finds that Specific economic, legal, social, technological, or other considerations, including considerations

for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report to reduce these impacts to less than significant.

Rationale for Findings

Once the Project is operational, a neighborhood can be reassessed to determine if any impacts are occurring, the nature of the impacts, and whether those impacts can be addressed through a Neighborhood Traffic Management Plan, as described in renumbered Mitigation Measure TRA-MM-6, which funds and coordinates implementation of LADOT's Neighborhood Traffic Management Plan process for the Project, in an amount up to $500,000. The traffic calming measures listed in Table 54 of the Traffic Study have been used in various communities and have been proven to be effective at reducing neighborhood intrusion impacts by reducing or eliminating neighborhood intrusion traffic and/or improving the appearance of a neighborhood. However, due to the uncertainties surrounding the potential significantly impacted areas, it is conservatively concluded that, even after the implementation of all feasible mitigation measures, impacts to residential street segments remain significant.

As reported in Table V-1, Comparison of Impacts Associated with the Project and Impacts of the Alternatives, and discussed at pages V-12 through V-27 of Section V, Alternatives, of the Draft EIR, Alternative 1: No Project/No Build Alternative will avoid these significant and unavoidable impacts by maintaining the existing conditions at the Project Site and not providing for any new development. However, the City concluded that Alternative 1 is infeasible because it will not meet any of the Project Objectives or the Project's underlying purpose, which is to transform a series of underutilized parcels into an integrated, high-density, mixed-use, transit- and pedestrian-oriented development that provides an active residential, shopping, dining, entertainment, and working community while also retaining and revitalizing the historic former Hollywood Reporter Building, the Bullinger Building and Crossroads of the World complex. As reported in Table V-1 and discussed at page V-258 of Section V, Alternatives, of the Draft EIR, Alternative 5: Historic Preservation Alternative will avoid these significant impacts. However, the City concluded that Alternative 5 is infeasible because it will not meet or meet as well as the Project will, many of the Project Objectives or the Project's underlying purpose, as described in greater detail in Section IX, Alternatives to the Project, subsection C.5, below. In addition, Alternative 5 will worsen the environmental impacts caused by the Project with respect to Noise and Vibration and Hydrology and Water Quality. Further, as concluded in the Memorandum prepared by Kosmont Companies, entitled Economic Feasibility Review—Crossroads Hollywood, and confirmed by the peer review report prepared by HR&A, Alternative 5 will not be economically feasible as it will provide a negative return on investment, and thus a reasonably prudent person will not proceed with attempting to build Alternative 5.

As such, the Project results in significant and unavoidable residential street segment impacts during operation. Pursuant to Public Resources Code section 21081(a)(3), based on the evidence described below in Section XI, Statement of Overriding Considerations, the City finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report to reduce these impacts to less than significant.

Reference

For a complete discussion of impacts associated with Traffic, Access and Parking, please see Section IV.L of the Draft EIR, pages IV.L-52 through IV.L-142; Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, pages III-29 through 34 and III-83 through III-89; and Errata to the Final EIR.

I. Traffic, Access and Parking – Cumulative Construction Traffic Impacts

The construction of 145 related projects is assumed in the Study Area. These 145 related projects are dispersed throughout the Study Area and will draw upon a workforce from all parts of the Los Angeles region. Most, if not all, of the construction workers will arrive and depart the individual construction sites during off-peak hours (i.e., arrive prior to 7:00 A.M. and depart between 3:00 to 4:00 P.M.), thereby avoiding construction related trips during the A.M. and P.M. peak traffic periods. In addition, the haul truck routes for the related projects will be approved by LADOT and/or the Department of Building and Safety according to the location of the individual construction Site and the ultimate destination. The City's established review process takes into consideration overlapping construction projects and balances haul routes to minimize the impacts of cumulative hauling on any particular roadway.

Nonetheless, the potential exists for the construction-related activities and/or haul routes of the Project and the related projects to overlap, particularly with respect to related projects east and west of the Project Site that travel east along Sunset Boulevard and north and south of the Project Site that travel north along Highland Avenue to access the US-101 Freeway. Specifically, there is a potential for these related projects and the Project to use the same haul routes at the same time. In addition, as with the Project, other nearby related projects could require lane closures during construction. As analyzed, the Project results in a temporary significant impact at Intersection No. 37: Highland Avenue and Hollywood Boulevard during the P.M. peak hour and Intersection No. 65: Highland Avenue and Sunset Boulevard during the A.M. and P.M. peak hours, associated with the proposed lane closures during construction. Therefore, cumulative traffic impacts during construction, including potential impacts associated with lane closures and potential overlap of haul routes, although temporary, are concluded to be significant and cumulatively considerable.

Project Design Features

The City finds that Project Design Feature TRA-PDF-1 is incorporated into the Project to reduce its cumulative construction traffic impacts, including potential impacts associated with lane closures and potential overlap of haul routes.

Mitigation Measures

The City finds that there are no feasible mitigation measures the Project could implement to avoid the Project's significant cumulative construction traffic impacts, including potential impacts associated with lane closures and potential overlap of haul routes.

Findings

Pursuant to Public Resources Code, section 21081(a)(1) the City finds that changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid the significant effects on the environment. However, these impacts have not been reduced to less than significant. The Project's cumulative construction traffic impacts, including potential impacts associated with lane closures and potential overlap of haul routes, although temporary, have not been reduced to less than significant and are significant, cumulatively considerable and unavoidable. No mitigation measures are available to reduce these impacts to less-than-significant levels.

Pursuant to Public Resources Code, section 21081(a)(3) the City finds that Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report to reduce these impacts to less than significant.

Rationale for Findings

Temporary traffic controls will be provided to direct traffic around any closures, as required by Project Design Feature TRA-PDF-1, the Construction Management Plan. Nevertheless, potential exists for the construction-related activities and/or haul routes of the Project and the related projects to overlap, particularly with respect to related projects east and west of the Project Site that travel east along Sunset Boulevard and north and south of the Project Site that travel north along Highland Avenue to access the US-101 Freeway. Specifically, there is a potential for these related projects and the Project to use the same haul routes at the same time. In addition, as with the Project, other nearby related projects could require lane closures during construction. Therefore, the Project's construction traffic impacts associated with lane closures and potential overlap of haul routes are determined to be significant, cumulatively considerable and unavoidable, although temporary.

As reported in Table V-1, Comparison of Impacts Associated with the Project and Impacts of the Alternatives, and discussed at pages V-12 through V-27 of Section V, Alternatives, of the Draft EIR, Alternative 1: No Project/No Build Alternative will avoid these significant and unavoidable impacts by maintaining the existing conditions at the Project Site and not providing for any new development. However, the City concluded that Alternative 1 is infeasible because it will not meet any of the Project Objectives or the Project's underlying purpose, which is to transform a series of underutilized parcels into an integrated, high-density, mixed-use, transit- and pedestrian-oriented development that provides an active residential, shopping, dining, entertainment, and working community while also retaining and revitalizing the historic former Hollywood Reporter Building, the Bullinger Building and Crossroads of the World complex.

As such, the Project's construction traffic impacts associated with lane closures and potential overlap of haul routes are determined to be significant, cumulatively considerable and unavoidable, although temporary. Pursuant to Public Resources Code section 21081(a)(3), based on the evidence described below in Section XI, Statement of Overriding Considerations, the City finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation

measures or alternatives identified in the environmental impact report to reduce these impacts to less than significant.

Reference

For a complete discussion of impacts associated with Traffic, Access and Parking, please see Section IV.L of the Draft EIR, pages IV.L-52 through IV.L-142; and Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, pages III-29 through 34 and III-83 through III-89; and Errata to the Final EIR.

j. Traffic, Access and Parking – Cumulative Intersection Level of Service Impacts During Operation

Under Future with Project Conditions, the Project results in significant impacts to 21 of the 111 signalized intersections. Therefore, the Project's contribution to impacts under the future cumulative conditions is considerable, and cumulative impacts are significant at those intersections impacted by the Project. Mitigation Measures TRA-MM-1 through TRA-MM-3 and TRA-MM-5 reduce the Project's significant traffic impacts to less-than-significant levels at 16 of these intersections. However, significant impacts at five of the signalized intersections remain significant and unavoidable. Thus, the Project's impacts with regard to these five intersections make a cumulatively considerable contribution to a significant impact, and, therefore, the Project has a significant cumulative impact.

Project Design Features

The City finds that no Project Design Features are incorporated into the Project to reduce its cumulative intersection traffic impacts during operation.

Mitigation Measures

The City finds that although Mitigation Measures TRA-MM-1 through TRA-MM-3 and TRA-MM-5, which are incorporated into the Project and incorporated into these Findings as though set forth herein, reduce the Project's cumulative intersection traffic impacts during operation, these mitigation measures do not reduce the Project's contribution to cumulative impacts to a less-than-significant level. These mitigation measures were taken into account in the analysis. The City further finds that there are no additional feasible mitigation measures the Project could implement to avoid its significant cumulative intersection traffic impacts during operation.

Findings

Pursuant to Public Resources Code, section 21081(a)(1), the City finds that changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid the significant effects on the environment. However, these impacts have not been reduced to less than significant. Specifically, cumulative impacts to the following intersections remain significant and unavoidable:

- Intersection No. 37: Highland Avenue and Hollywood Boulevard (a.m. peak period)

- Intersection No. 63: La Brea Avenue and Sunset Boulevard (a.m. and p.m. peak periods)

- Intersection No. 65: Highland Avenue and Sunset Boulevard (a.m. and p.m. peak periods)

- Intersection No. 70: Cahuenga Boulevard and Sunset Boulevard (a.m. and p.m. peak periods)

- Intersection No. 72: Vine Street and Sunset Boulevard (a.m. and p.m. peak periods)

Pursuant to Public Resources Code, section 21081(a)(3) the City finds that Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report to reduce these impacts to less than significant.

Rationale for Findings

Implementation of Mitigation Measures TRA-MM-1 through TRA-MM-3 and TRA-MM-5 results in peak-hour trip reductions and operational improvements. Implementation of Mitigation Measures TRA-MM-1 through TRA-MM-3, and Mitigation Measure TRA-MM-5 reduces the impacts at 16 of the 21 potentially significantly impacted intersections under Future with Project Conditions to a less than significant level. However, impacts at five intersections remain significant and unavoidable, even with mitigation.

As reported in Table V-1, Comparison of Impacts Associated with the Project and Impacts of the Alternatives, and discussed at pages V-12 through V-27 of Section V, Alternatives, of the Draft EIR, Alternative 1: No Project/No Build Alternative will avoid these significant and unavoidable impacts by maintaining the existing conditions at the Project Site and not providing for any new development. However, the City concluded that Alternative 1 is infeasible because it will not meet any of the Project Objectives or the Project's underlying purpose, which is to transform a series of underutilized parcels into an integrated, high-density, mixed-use, transit- and pedestrian-oriented development that provides an active residential, shopping, dining, entertainment, and working community while also retaining and revitalizing the historic former Hollywood Reporter Building, the Bullinger Building and Crossroads of the World complex. As reported in Table V-1 and discussed at pages V-252 through V-256 of Section V, Alternatives, of the Draft EIR, Alternative 5: Historic Preservation Alternative will avoid creating any significant Project-level intersection impacts, and therefore will not contribute to any impacts created by the related projects. However, the City concluded that Alternative 5 is infeasible because it will not meet or meet as well as the Project will, many of the Project Objectives or the Project's underlying purpose, as described in greater detail in Section IX, Alternatives to the Project, subsection C.5, below. In addition, Alternative 5 will worsen the environmental impacts caused by the Project with respect to Noise and Vibration and Hydrology and Water Quality. Further, as concluded in the Memorandum prepared by Kosmont Companies, entitled Economic Feasibility Review—Crossroads Hollywood, and confirmed by the peer review report prepared by HR&A, Alternative 5 will not be economically feasible as it will

provide a negative return on investment, and thus a reasonably prudent person will not proceed with attempting to build Alternative 5.

Thus, the Project's impacts with regard to these five intersections make a cumulatively considerable contribution to a significant impact, and, therefore, the Project has a significant and unavoidable cumulative impact. Pursuant to Public Resources Code section 21081(a)(3), based on the evidence described below in Section XI, Statement of Overriding Considerations, the City finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report to reduce these impacts to less than significant.

Reference

For a complete discussion of impacts associated with Traffic, Access and Parking, please see Section IV.L of the Draft EIR, pages IV.L-52 through IV.L-142, and Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, pages III-29 through 34 and III-83 through III-89; and Errata to the Final EIR.

K. Traffic, Access and Parking – Cumulative Residential Neighborhood Impacts

Local residential streets within neighborhoods in the vicinity of the Project may be subject to significant neighborhood intrusion impacts as a result of cut-through traffic generated by the Project under both Existing With Project and Future With Project Conditions. Therefore, Project impacts to residential street segments are significant and cumulatively considerable.

Project Design Features

The City finds that no Project Design Features are incorporated into the Project to reduce its significant cumulative neighborhood intrusion traffic impacts during operation.

Mitigation Measures

The City finds that although renumbered Mitigation Measure TRA-MM-6, which is incorporated into the Project and incorporated into these Findings as though set forth herein, reduces the Project's cumulative neighborhood intrusion traffic impacts during operation, this mitigation measure does not reduce the Project's contribution to cumulative impacts to a less-than-significant level. This mitigation measure was taken into account in the analysis. The City further finds that there are no additional feasible mitigation measures the Project could implement to avoid its significant cumulative neighborhood intrusion traffic impacts during operation.

Findings

Pursuant to Public Resources Code, section 21081(a)(1) the City finds that changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid the significant effects on the environment. However, these impacts have not been reduced to less than significant. Specifically, cumulative impacts to the following street segments remain significant and unavoidable:

- Franklin Avenue to the north, Highland Avenue to the east, Sunset Boulevard to the south, and La Brea Avenue to the west.

- Franklin Avenue to the north, Cahuenga Boulevard to the east, Sunset Boulevard to the south, and Highland Avenue to the west.

- Sunset Boulevard to the north, La Brea Avenue to the east, Santa Monica Boulevard to the south, and Gardner Street to the west.

- Sunset Boulevard to the north, Highland Avenue to the east, Santa Monica to the south, and La Brea Avenue to the west.

- Sunset Boulevard to the north, Vine Street to the east, Santa Monica Boulevard to the south, and Highland Avenue to the west.

- Sunset Boulevard to the north, Van Ness Avenue to the east, Santa Monica Boulevard to the south, and Vine Street to the west.

Pursuant to Public Resources Code, section 21081(a)(3) the City finds that Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report to reduce these impacts to less than significant.

Rationale for Findings

Once the Project is operational, a neighborhood can be reassessed to determine if any impacts are occurring, the nature of the impacts, and whether those impacts can be addressed through a Neighborhood Traffic Management Plan, as described in renumbered Mitigation Measure TRA-MM-6, which funds and coordinates implementation of LADOT's Neighborhood Traffic Management Plan process for the Project, in an amount up to $500,000. The traffic calming measures listed in Table 54 of the Traffic Study have been used in various communities and have been proven to be effective at reducing neighborhood intrusion impacts by reducing or eliminating neighborhood intrusion traffic and/or improving the appearance of a neighborhood. However, due to the uncertainties surrounding the potential significantly impacted areas, it is conservatively concluded that, even after the implementation of all feasible mitigation measures, impacts to residential street segments are significant and cumulatively considerable.

As reported in Table V-1, Comparison of Impacts Associated with the Project and Impacts of the Alternatives, and discussed at pages V-12 through V-27 of Section V, Alternatives, of the Draft EIR, Alternative 1: No Project/No Build Alternative will avoid these significant and unavoidable impacts by maintaining the existing conditions at the Project Site and not providing for any new development. However, the City concluded that Alternative 1 is infeasible because it will not meet any of the Project Objectives or the Project's underlying purpose, which is to transform a series of underutilized parcels into an integrated, high-density, mixed-use, transit- and pedestrian-oriented development that provides an active residential, shopping, dining, entertainment, and working community while also retaining and revitalizing the historic former Hollywood Reporter Building, the Bullinger Building

and Crossroads of the World complex. As reported in Table V-1 and discussed at page V-258 of Section V, Alternatives, of the Draft EIR, Alternative 5: Historic Preservation Alternative will avoid creating any significant Project-level intersection impacts, and therefore will not contribute to any impacts created by the related projects. However, the City concluded that Alternative 5 is infeasible because it will not meet or meet as well as the Project will, many of the Project Objectives or the Project's underlying purpose, as described in greater detail in Section IX, Alternatives to the Project, subsection C.5, below. In addition, Alternative 5 will worsen the environmental impacts caused by the Project with respect to Noise and Vibration and Hydrology and Water Quality. Further, as concluded in the Memorandum prepared by Kosmont Companies, entitled Economic Feasibility Review—Crossroads Hollywood, and confirmed by the peer review report prepared by HR&A, Alternative 5 will not be economically feasible as it will provide a negative return on investment, and thus a reasonably prudent person will not proceed with attempting to build Alternative 5.

Therefore, due to the uncertainties surrounding the potential significantly impacted areas, it is conservatively concluded that, even after the implementation of all feasible mitigation measures, impacts to residential street segments are significant and cumulatively considerable and unavoidable. Pursuant to Public Resources Code section 21081(a)(3), based on the evidence described below in Section XI, Statement of Overriding Considerations, the City finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report to reduce these impacts to less than significant.

Reference

For a complete discussion of impacts associated with Traffic, Access and Parking, please see Section IV.L of the Draft EIR pages IV.L-52 through IV.L-142 and Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR pages III-29 through 34 and III-83 through III-89; and Errata to the Final EIR.

M. Traffic, Access and Parking – Cumulative Caltrans Analysis

A freeway impact analysis was prepared in accordance with the State-mandated CMP administered by Metro and the Freeway Analysis Agreement executed between Caltrans and LADOT in October 2013. According to this analysis, the Project results in significant traffic impacts on the evaluated freeway mainline segments. Therefore, it is recognized that the Project will contribute to the future cumulative traffic volumes on Caltrans facilities. As summarized in the supplemental Caltrans analysis, the Project will contribute to the total projected growth on the freeway mainline segments over the next 20 years until year 2035. The Project will also contribute to the freeway off-ramp queues extending beyond the available storage length. With regard to freeway mainline segments, generally Caltrans has determined that there are no mitigation measures that a single Project can feasibly implement that will directly reduce mainline impacts to a less-than-significant level. Consequently, it is conservatively concluded that the Project contributes to a significant unavoidable cumulative impact on Caltrans facilities.

Project Design Features

The City finds that no Project Design Features are incorporated into the Project to reduce the Project's contribution to significant cumulative impacts on Caltrans facilities.

Mitigation Measures

The City finds that although Mitigation Measures TRA-MM-1 through TRA-MM-3 and TRA-MM-5, which are incorporated into the Project and incorporated into these Findings as though set forth herein, reduce the Project's contribution to cumulative impacts on Caltrans facilities, these mitigation measures do not reduce the Project's contribution to these cumulative impacts to a less-than-significant level. These mitigation measures were taken into account in the analysis. The City further finds that there are no additional feasible mitigation measures the Project could implement to avoid its contribution to significant cumulative impacts to Caltrans facilities.

Findings

Pursuant to Public Resources Code, section 21081(a)(1), the City finds that changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid the significant effects on the environment. However, these impacts have not been reduced to less than significant.

Pursuant to Public Resources Code, section 21081(a)(2), the City finds that changes or alterations necessary to mitigate or avoid the significant effects on the environment are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

Pursuant to Public Resources Code, section 21081(a)(3), the City finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report to reduce these impacts to less than significant.

Rationale for Findings

The Project will contribute to the future cumulative traffic volumes on Caltrans facilities, as the Project will contribute to the total projected growth on the freeway mainline segments over the next 20 years until year 2035. The Project will also contribute to the freeway off-ramp queues extending beyond the available storage length. The City does not have jurisdiction over freeway segments or ramps. Caltrans has determined that, in general, there are no mitigation measures that a single Project can feasibly implement that will directly reduce mainline impacts to a less-than-significant level. Further, Caltrans has not prepared the necessary fee study or adopted a fee program to make fees under a Traffic Mitigation Agreement legally enforceable under CEQA. Therefore, it is conservatively concluded that the Project contributes to a significant unavoidable cumulative impact on Caltrans facilities.

Reference

For a complete discussion of impacts associated with Traffic, Access and Parking, please see Section IV.L of the Draft EIR, pages IV.L-52 through IV.L-142; Section III, Revisions,

Clarifications and Corrections to the Draft EIR, of the Final EIR, pages III-29 through 34 and III-83 through III-89; and Errata to the Final EIR.

IX. ALTERNATIVES TO THE PROJECT

A. Summary of Findings

Based on these findings and the reasoning set forth herein, the Final and Draft EIR, and the whole of the administrative record, including but not limited to the April 17, 2018 Economic Feasibility Review – Crossroads Hollywood Memorandum, the City finds that the EIR analyzes a reasonable range of alternatives, in accordance with CEQA Guidelines Section 15126.6(a), that potentially are able to feasibly attain most of the basic objectives of the Project, as modified in response to public comments, and could avoid or substantially lessen the significant and less than significant impacts of the Project as proposed and analyzed in the Draft EIR, Errata and the Final EIR. The City also finds that the EIR adequately evaluates the comparative merits of each alternative.

The City selected a reasonable range of alternatives, including alternatives that achieve the Project Objectives as Modified, have the ability to reduce impacts, are potentially feasible to implement, and are reasonable in scope in accordance with CEQA Guidelines section 15126.6(c). Based on the foregoing criteria, the EIR considered the following six alternatives: (1) No Project/No Build Alternative; (2) Reduced Height and FAR Alternative; (3) Additional Project Site Alternative; (4) No Zone or Height District Change/No Density Bonus Alternative; (5) Historic Preservation Alternative; and (6) Proposed Hollywood Community Plan Update Alternative.

Having considered the comparative merits of the six alternatives analyzed in the EIR, the City finds each alternative to be actually infeasible, when taking into account the specific economic, social, or other conditions articulated below. Based on this infeasibility, as well as the EIR's analyses in support therefore, the Project Objectives as Modified, these CEQA findings, and specific economic, social, or other considerations, including the provision of employment opportunities for highly trained workers as identified in Section XII of these Findings (Statement of Overriding Considerations), the City rejects each of the six alternatives for the reasons set forth below. These findings are supported by substantial evidence contained in the whole of the administrative record, including documents and testimony presented in this matter.

At pages V-3 and V-4 of Section V, Alternatives, of the Draft EIR, the EIR also identifies the alternatives that were considered, but were rejected as infeasible during the scoping process, including an all-retail/office alternative, an all-residential alternative, and an alternative Site alternative, and explains the reasons underlying the City’s rejection of these alternatives, including, without limitation, their failure to meet most of the Project Objectives as Modified.

Additionally, the City finds that the Refined Project’s modifications meet the basic purposes of CEQA, set forth in Section 15002, subsections (a) and (h), of the CEQA Guidelines, namely the incorporation of Project refinements to avoid and/or significantly reduce environmental impacts by reducing the scale of the Original Project. The Original Project contemplated the demolition and redevelopment of the Hollywood Reporter Building and the Bullinger Building. The Refined Project, however, contemplates the

preservation and rehabilitation of the former Hollywood Reporter Building, which was subsequently designated by the City as a Historic Cultural Monument following the publication of the Original Project's Draft EIR, and the Bullinger Building.

B. Project Objectives as Modified

The Project Objectives as Modified, detailed in the EIR in accordance with CEQA Guidelines Section 15124(b), stated that the underlying purpose of the Project is to transform a series of underutilized parcels into an integrated, high-density, mixed-use, transit- and pedestrian-oriented development that provides an active residential, shopping, dining, entertainment, and working community while also retaining and revitalizing the historic former Hollywood Reporter Building, the Bullinger Building and Crossroads of the World complex. The Project Objectives were modified in the Final EIR based on the refinements to the Project described above, including without limitation, preservation of the former Hollywood Reporter Building and the Bullinger Building, and maintenance of the current alignment of Las Palmas Avenue. As listed in the Draft EIR (Project Description, Section II at pp. II-13 to II-14) and the Final EIR (Revisions, Clarifications and Corrections, Section III at p. III-10) and the Errata, the objectives of the Project are:

- To construct a high-density, mixed-used development consistent with the uses and density envisioned for the Regional Center and Hollywood Center designations of the Project Site including hotel, commercial/retail, restaurant, and office uses, and with sustainable urban planning principles, particularly given the abundance of available public transit options near the Project Site;

- To retain and revitalize the former Hollywood Reporter Building and Crossroads of the World, both of which are designated Historic Cultural Monuments, and the Bullinger Building;

- To create an open-air pedestrian district with a mix of shopping, dining, and entertainment uses, consistent with the original vision for Crossroads of the World;

- To develop a high-rise upscale hotel as part of an open-air pedestrian district located immediately adjacent to areas of high pedestrian activities, particularly along Hollywood Boulevard and Sunset Boulevard;

- To create a pedestrian-friendly identity for the Project Site by introducing active commercial uses along street frontages;

- To improve vehicular circulation, automobile and pedestrian safety in the Project vicinity;

- To provide different types of new housing units, including studios, one-, and two-bedroom units, to help meet the market demand for new housing in the Hollywood Community Plan area;

- To locate a high-density residential and commercial mixed-use development in a transit priority area and adjacent to major transportation lines;

- To provide new restricted affordable housing units so as satisfy the varying needs and desires of all economic segments in the Hollywood Community;

- To create multimodal transit options for Project users by providing ample bicycle parking;

- To support the growth of the City's economic base through the introduction of an economically viable Project that includes revenue generating commercial activities and generates new tax revenues; and

- To enhance the public realm by introducing new amenities, such as streetscape improvements, revitalized historic resources, and entertainment and dining opportunities.

C. Project Alternatives Analyzed

1. ALTERNATIVE 1 – No Project/No Build Alternative.

This Alternative is required by CEQA. Consistent with Section 15126.6 of the CEQA Guidelines, no new development will occur on the Project Site under this No Project/No Build Alternative (also referred to as "Alternative 1"), and the existing uses at the Site will continue to operate in their current state. Thus, the physical conditions of the Project Site will remain exactly as they are today, consisting of low-density commercial/retail and office uses, along with two residential duplexes and three multi-family apartment buildings, and surface parking lots. No new buildings will be constructed, and the existing Site buildings, including with respect to parking and internal circulation, will not be removed or altered.

Impact Summary. The No Project Alternative will avoid all of the Project's less-than-significant and potentially significant and unavoidable impacts because no changes to the Project Site will occur.

Finding. With this Alternative, all of the environmental impacts projected to occur from development of the Project will be avoided. Thus, this Alternative will be the environmentally superior alternative compared to the Project. The City finds that this Alternative, however, does not meet any of the Project Objectives as Modified. The City also finds that, pursuant to Public Resources Code Section 21081(a)(3), that specific economic, legal, environmental, social, and technological or other considerations of importance to the City, including the provision of employment opportunities for highly trained workers and the considerations identified in Section XII of these Findings (Statement of Overriding Considerations) warrant rejection of the No Project Alternative described in the EIR.

Rationale for Finding. Though the No Project Alternative will avoid the Project's environmental impacts and thus not result in any significant environmental impacts, it will not achieve any of the Project Objectives as Modified, namely the construction of a high-density, mixed-used development consistent with the uses and density envisioned for the Regional Center and Hollywood Center designations of the Project Site, including hotel,

commercial/retail and restaurant uses, and with sustainable urban planning principles. Alternative 1 will retain, but will not revitalize Crossroads of the World complex and the former Hollywood Reporter Building, both designated Historic Cultural Monuments, or the Bullinger Building. Alternative 1 will not create an open-air pedestrian district with a mix of shopping, dining, and entertainment uses, consistent with the original vision for Crossroads of the World, and will not develop a high-rise upscale hotel as part of an open-air pedestrian district located immediately adjacent to areas of high pedestrian activities, particularly along Hollywood Boulevard and Sunset Boulevard. Alternative 1 will also not create a pedestrian-friendly identity for the Project Site by introducing active commercial uses along street frontages, will not improve vehicular circulation, automobile and pedestrian safety in the Project vicinity, will not provide different types of apartment units to help meet the market demand for new housing in the Hollywood Community Plan area, and will not locate a high-density residential and commercial mixed-use development in a transit priority area adjacent to major transportation lines. Importantly, Alternative 1 will not provide new restricted affordable housing units so as satisfy the varying needs and desires of all economic segments in the Hollywood Community. It will also not create multimodal transit options for Projects users by providing ample bicycle parking. Finally, unlike the Project, Alternative 1 will not support the growth of the City's economic base through the introduction of an economically viable Project that includes revenue generating commercial activities and generates new tax revenues and enhances the public realm by introducing new amenities, such as streetscape improvements, revitalized historic resources, and entertainment and dining opportunities. Accordingly, the City finds that this alternative is infeasible as it fails to achieve any of the Project's basic objectives.

Reference: For a complete discussion of impacts associated with Alternative 1, please see Section V of the Draft EIR, beginning on page V-12.

2. ALTERNATIVE 2 – Reduced Height and FAR Alternative.

Alternative 2, the Reduced Height and FAR Alternative, will result in a total reduction of 281,419 square feet of total Project floor area as compared to the Project, and will entail the demolition and redevelopment of the former Hollywood Reporter Building and the Bullinger Building sites. Alternative 2 will include the development of 8 buildings on the Project Site. Like the Project, Alternative 2 will include a hotel use, though it will be smaller (approximately 196,471 square feet and 198 rooms under Alternative 2 as compared to the Project's approximately 320,000 square feet and 308 rooms), it will include more retail/restaurant space (Alternative 2 will utilize approximately 185,000 square feet of retail/restaurant as opposed to approximately 140,000 square feet of retail/restaurant), will include fewer residential apartments in less space (946 residential apartments totaling approximately 662,280 square feet under Alternative 2 compared to 950 apartments totaling approximately 871,000 square feet), and will include more overall square footage in the proposed theater and entertainment venue (approximately 55,830 under Alternative 2 as compared to approximately 50,000 square feet). In total, Alternative 2 proposes approximately 1,099,581 square feet of total floor area, as opposed to approximately 1,381,000 square feet. Alternative 2 also results in height reductions in the three proposed towers (Building A1 reduced from 26 stories and approximately 365 feet above grade to 21 stories and approximately 308 feet above grade; Building B1 reduced from 30 floors and approximately 402 feet above grade to 29 floors and approximately 390 feet above grade; and Building B3 reduced from 31 floors and approximately 386 feet above grade to 27 floors and approximately 331 feet above grade.)

Impact Summary. The following significant and unavoidable impacts will occur under the Reduced Height and FAR Alternative: Air Quality (construction regional emissions similar to the Project, operational regional emissions less than the Project); Historic Resources (demolition of potentially historic resources more significant due to the Project's retention and rehabilitation of the former Hollywood Reporter Building and the Bullinger Building); Noise and Vibration (on-Site construction noise, off-Site construction noise, on-Site vibration re: human annoyance, off-Site vibration re: human annoyance, all less than the Project); Transportation and Traffic (construction, intersection LOS, residential street segment, all less than the Project). Alternative 2 will have similar impacts to the Project associated with Geology and Soils. Alternative 2 will reduce the Project's less than significant impacts associated with Aesthetics and Visual Quality, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use, Population and Housing, Public Services, and Utilities and Service Systems.

Finding. Alternative 2 will reduce some of the environmental impacts projected to occur from the development of the Project. However, none of the potential significant and unavoidable impacts will be avoided, and the significant and unavoidable impact on historic resources will be more severe due to Alternative 2's proposed demolition of the former Hollywood Reporter Building and Bullinger Building that the Project retains and rehabilitates. Therefore, Alternative 2 will be an environmentally superior alternative to the Project only in a limited manner, and not in all regards, and will result in a significant and unavoidable impact that does not occur under the Project. The Reduced Height and FAR Alternative meets most of the basic objectives of the Project, but not to the same extent as the Project. The City further finds that, pursuant to Public Resources Code Section 21081(a)(3), specific economic, legal, environmental, social, and technological or other considerations of importance to the City, including the provision of employment opportunities for highly trained workers and the considerations identified in Section XI of these Findings (Statement of Overriding Considerations) warrant rejection of the Reduced Height and FAR Alternative described in the EIR.

Rationale for Finding**.** The Reduced Height and FAR Alternative will develop the same uses as the Project, to a reduced extent and density. Alternative 2 will fail to meet the Project's underlying purpose of transforming a series of underutilized parcels into an integrated, high-density, mixed-use, transit- and pedestrian-oriented development that provides an active residential, shopping, dining, entertainment, and working community while also retaining and revitalizing the historic former Hollywood Reporter Building, the Bullinger Building and Crossroads of the World complex, because Alternative 2 will demolish and replace with new buildings the historic former Hollywood Reporter Building and the Bullinger Building. The Original Project analyzed in the draft EIR also proposed to demolish and redevelop the former Hollywood Reporter Building and the Bullinger Building, but the Project through modification retains and restores the former Hollywood Reporter Building, which was designated as a Historic Cultural Monument following the publication of the Draft EIR, and the Bullinger Building, which modification is in accordance with Section 15002, subsections (a) and (h) of the CEQA Guidelines, which support the incorporation of changes to a Project to avoid and/or significantly reduce environmental damage during the environmental review process. Alternative 2 will retain and revitalize Crossroads of the World, a designated Historic Cultural Monument. To a lesser extent than the Project, Alternative 2 will create an open-air pedestrian district with

a mix of shopping, dining, and entertainment uses, consistent with the original vision for Crossroads of the World, develop a high-rise upscale hotel as part of an open-air pedestrian district located immediately adjacent to areas of high pedestrian activities, particularly along Hollywood Boulevard and Sunset Boulevard, create a pedestrian-friendly identity for the Project Site by introducing active commercial uses along street frontages, improve vehicular circulation, automobile and pedestrian safety in the Project Site vicinity, locate a high-density residential and commercial mixed-use development in a transit priority area and adjacent to major transportation lines, provide new restricted affordable housing units so as to satisfy the varying needs and desires of all economic segments in the Hollywood Community, create multimodal transit options for Project users by providing ample bicycle parking, support the growth of the City's economic base through the introduction of an economically viable Project that includes revenue generating commercial activities and generates new tax revenues, and enhance the public realm by introducing new amenities, such as streetscape improvements, a revitalized historic resource, and entertainment and dining opportunities. Alternative 2 will also meet to a lesser extent than the Project the Project Objectives of constructing a high-density, mixed-used development consistent with the uses and density envisioned for the Regional Center and Hollywood Center designation of the Project Site, including hotel, commercial/retail, and restaurant uses with sustainable urban planning principles, particularly given the abundance of available public transit options near the Project Site, and providing different types of new housing units to help meet the market demand for new housing in the Hollywood Community Plan area.

Reference: For a complete discussion of impacts associated with Alternative 2, please see Section V of the Draft EIR, beginning on page V-28.

3. ALTERNATIVE 3 – Additional Project Site Alternative.

The Additional Project Site Alternative includes the addition of two new development parcels not included in the Project (Development Parcels F, and G) and includes the development of hotel, residential, retail, and entertainment uses pursuant to the existing zoning designations, height limits, and FAR allowed within the Project Site as modified by the alternative. Alternative 3 will include the development of nine mixed-use buildings throughout the Project Site (in Development Parcels A, B, C, and D), the rehabilitation of Crossroads of the World (in Development Parcel C), retention of an existing office building (in Development Parcel F and the reconstruction and expansion of the existing parking structure (in Development Parcels F and G), the construction of a stand-alone parking structure (in Development Parcel E), and the demolition and redevelopment of the former Hollywood Reporter Building and the Bullinger Building sites. The parameters of the Project Site will be expanded beyond that of the Project as Alternative 3 will add Development Parcels F and G, which are not under the control of the Applicant. Alternative 3 will include 308 hotel rooms within a 285,440-square-foot hotel with 29,193 square feet of ground floor retail and restaurant uses, an additional 155,807 square feet of retail and restaurant uses, 950 dwelling units in Development Parcels B and D, and 42,830 square feet of entertainment venue and a 13,000-square-foot movie theater in Development Parcel C. The existing 75,693 square feet of office uses in Development Parcel F will be included in Alternative 3, which is not part of the Project. The existing 4,658 square feet of commercial uses in Development Parcel G, which is not part of the Project, will be removed under this alternative to allow for the expansion of the reconstructed parking structure in Development Parcel F. The proposed uses under this alternative will total approximately 1,294,615 square feet (including existing uses to be

retained within the Crossroads of the World complex and the office building in Development Parcel F) compared to the Project's total proposed floor area of approximately 1,381,000 square feet (including existing uses to be retained within the Crossroads of the World complex).

Impact Summary. The following significant and unavoidable impacts will occur under the Additional Project Site Alternative: Air Quality (construction regional emissions similar to the Project, operational regional emissions less than the Project); Historic Resources (demolition of potentially historic resources more significant than the Project due to the Project's retention and restoration of the former Hollywood Reporter Building and the Bullinger Building); Noise and Vibration (on-Site construction noise, off-Site construction noise, on-Site vibration re: human annoyance, off-Site vibration re: human annoyance, all less than the Project); Transportation and Traffic (construction, intersection LOS, residential street segment, all less than the Project). Alternative 3 will have similar impacts to the Project associated with Geology and Soils. Alternative 3 will reduce the Project's less than significant impacts associated with Aesthetics and Visual Quality, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use, Population and Housing, Public Services, and Utilities and Service Systems.

Finding. Alternative 3 will reduce some of the Project's environmental impacts. However, none of the Project's significant and unavoidable impacts will be avoided, and Alternative 3's significant and unavoidable impact on historic resources will be more severe than the Project due to Alternative 3's proposed demolition of the former Hollywood Reporter Building and the Bullinger Building. Therefore, Alternative 3 will be an environmentally superior alternative to the Project only in a limited manner, and not in all regards, and will result in a significant and unavoidable impact avoided by the Project. The City further finds, pursuant to Public Resources Code Section 21081(a)(3), that specific, economic, legal, environmental, social, and technological or other considerations of importance to the City, including the provision of employment opportunities for highly trained workers and the considerations identified in Section XI of these Findings (Statement of Overriding Considerations) warrant rejection of the Additional Project Site Alternative described in the EIR. Moreover, in light of the fact that Development Parcels F and G are not under the control of the Project Applicant, the City finds Alternative 3 to be infeasible.

Rationale for Finding. The Additional Project Site Alternative will develop the same uses as the Project with the addition of office uses not included in the Project retained as a use on Parcel F, which is not part of the Project Site and is not within the control of the Applicant, who was unable to gain control over the parcels during the development and environmental review process. However, Alternative 3 will fail to meet the Project's underlying purpose of transforming a series of underutilized parcels into an integrated, high-density, mixed-use, transit- and pedestrian-oriented development that provides an active residential, shopping, dining, entertainment, and working community while also retaining and revitalizing the historic former Hollywood Reporter Building, the Bullinger Building and Crossroads of the World complex, because Alternative 3 will demolish and replace with new buildings the historic former Hollywood Reporter Building and the Bullinger Building. The Original Project analyzed in the draft EIR also proposed to demolish and redevelop the former Hollywood Reporter Building and the Bullinger Building, but the Project through modification retains and rehabilitates the former Hollywood Reporter Building, which was designated as a Historic Cultural Monument

following the publication of the Draft EIR, and the Bullinger Building, which modification is in accordance with Section 15002, subsections (a) and (h) of the CEQA Guidelines, which support the incorporation of changes to a Project to avoid and/or significantly reduce environmental damage during the environmental review process. Alternative 3 will also provide office uses and increased retail commercial space as compared to the Project, and it therefore meets objectives relative to these uses to a greater extent than the Project. Alternative 3 will also, like the Project, retain and revitalize Crossroads of the World, a designated Historic Cultural Monument. Alternative 3 will: create an open-air pedestrian district with a mix of uses consistent with the original vision for Crossroads of the World; develop a high-rise upscale hotel as part of an open-air pedestrian district located immediately adjacent to areas of high pedestrian activities, particularly along Hollywood Boulevard and Sunset Boulevard; create a pedestrian-friendly identity for the Project Site by introducing active commercial uses along street frontages; improve vehicular circulation, automobile and pedestrian safety in the Project Site vicinity; locate a high-density residential and commercial mixed-use development in a transit priority area and adjacent to major transportation lines; provide new restricted affordable housing units so as to satisfy the varying needs and desires of all economic segments in the Hollywood Community; create multimodal transit options for Project users by providing ample bicycle parking, support the growth of the City's economic base through the introduction of an economically viable Project that includes revenue generating commercial activities and generates new tax revenues; and enhance the public realm by introducing new amenities, such as streetscape improvements, and entertainment and dining opportunities. Alternative 3 will meet the Project Objectives of constructing a high-density, mixed-used development consistent with the uses and density envisioned for the Regional Center and Hollywood Center designation of the Project Site with sustainable urban planning principles, particularly given the abundance of available public transit options near the Project Site, and providing different types of new housing units to help meet the market demand for new housing in the Hollywood Community Plan area, but to a lesser extent than the Project.

Reference: For a complete discussion of impacts associated with Alternative 3, please see Section V of the Draft EIR, beginning on page V-90.

4. ALTERNATIVE 4-No Density Bonus Alternative.

Alternative 4 was titled the No Zone or Height District Change/No Density Bonus Alternative in the Draft EIR because the Original Project requested a Zone and Height District Change. However, the Project no longer requests a Zone and Height District Change. Alternative 4 will include the development of nine mixed-use buildings throughout the Project Site (in Development Parcels A, B, and C) and a parking structure (in Development Parcel D). Specifically, Alternative 4 will include 114,778 square feet of retail and restaurant uses, 761 dwelling units, and 84,700 square feet of office uses. The proposed uses under this alternative will total 758,300 square feet (including existing uses to be retained within the Crossroads of the World complex) compared to the Project's total proposed floor area of approximately 1,381,000 square feet. Alternative 4 will also eliminate the hotel proposed as part of the Project and, unlike the Project, Crossroads of the World will be retained but will not be revitalized, whereas the Hollywood Reporter Building and the Bullinger Building will be demolished and redeveloped with new buildings.

Impact Summary. The following significant and unavoidable impacts will occur under the No Zone or Height District Change/No Density Bonus Alternative: Air Quality (construction regional emissions similar to the Project); Historic Resources (demolition of potentially historic resources more significant than the Project due to the Project's retention and rehabilitation of the former Hollywood Reporter Building and the Bullinger Building); Noise and Vibration (on-Site construction noise, off-Site construction noise, on-Site vibration re: human annoyance, off-Site vibration re: human annoyance, all less than the Project); Transportation and Traffic (construction, intersection LOS, residential street segment, all less than the Project). Alternative 4 will reduce the Project's significant and unavoidable Air Quality impact on operational regional emissions to a less than significant level. Alternative 4 will have impacts similar to the Project associated with Geology and Soils. Alternative 4 will reduce the Project's less than significant impacts associated with Aesthetics and Visual Quality, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use, Population and Housing, Public Services, and Utilities and Service Systems.

Finding. Alternative 4 will reduce some of the Project's environmental impacts, including a significant and unavoidable impact with respect to operational regional Air Quality, to a less than significant level. However, none of the Project's other significant and unavoidable impacts will be avoided, and Alternative 4's significant and unavoidable impact on historic resources will be more severe due to Alternative 4's proposed demolition of the former Hollywood Reporter Building and the Bullinger Building and failure to revitalize the Crossroads of the World complex. Therefore, Alternative 4 will be an environmentally superior alternative to the Project only in a limited manner, and not in all regards, and will result in a significant and unavoidable impact that will not occur under the Project. The No Zone or Height District Change/No Density Bonus Alternative does not meet the Project's Objectives of retaining and revitalizing the Crossroads of the World complex and the former Hollywood Reporter Building, both designated Historic Cultural Monuments, and the Bullinger Building, and will not provide a hotel use provided by the Project. Apart from the Project Objectives it does not meet, Alternative 4 meets Project Objectives to a lesser extent than the Project. The City finds, pursuant to Public Resources Code Section 21081(a)(3), that specific economic, legal, environmental, social, and technological or other considerations of importance to the City, including the provision of employment opportunities for highly trained workers and the considerations identified in Section XI of these Findings (Statement of Overriding Considerations) warrant rejection of the Additional Project Site Alternative described in the EIR. Moreover, in light of the fact that Development Parcels F and G are not under the control of the Applicant, the City finds the development of Alternative 4 to be infeasible.

Rationale for Finding. The No Zone or Height District Change/No Density Bonus Alternative will develop the same uses as the Project with the exception of the Project's Hotel use. As such, Alternative 4 will not meet the Project Objective of developing a high-rise upscale hotel as part of an open-air pedestrian district located immediately adjacent to areas of high pedestrian activities, particularly along Hollywood Boulevard and Sunset Boulevard. Alternative 4 will fail to meet the Project's underlying purpose of transforming a series of underutilized parcels into an integrated, high-density, mixed-use, transit- and pedestrian-oriented development that provides an active residential, shopping, dining, entertainment, and working community while also retaining and revitalizing the historic former Hollywood Reporter Building, the Bullinger Building and Crossroads of the World

complex, because Alternative 4 will demolish and replace with new buildings the historic former Hollywood Reporter Building and the Bullinger Building. The Original Project analyzed in the Draft EIR also proposed to demolish and redevelop the former Hollywood Reporter Building and the Bullinger Building, but the Project through modifications retains and rehabilitates the former Hollywood Reporter Building, which was designated as a Historic Cultural Monument following the publication of the Draft EIR, and the Bullinger Building, in accordance with Section 15002, subsections (a) and (h) of the CEQA Guidelines, which support the incorporation of changes to a Project to avoid and/or significantly reduce environmental damage during the environmental review process. To a lesser extent than the Project, Alternative 4 will: create an open-air pedestrian district with a mix of shopping, dining, and entertainment uses, consistent with the original vision for Crossroads of the World; create a pedestrian-friendly identity for the Project Site by introducing active commercial uses along street frontages; improve vehicular circulation, automobile and pedestrian safety in the Project Site vicinity; locate a high-density residential and commercial mixed-use development in a transit priority area and adjacent to major transportation lines; provide new restricted affordable housing units so as to satisfy the varying needs and desires of all economic segments in the Hollywood Community (though it will provide fewer affordable units than the Project); create multimodal transit options for Project Site users by providing ample bicycle parking; support the growth of the City's economic base through the introduction of an economically viable Project that includes revenue generating commercial activities and generates new tax revenues; and enhance the public realm by introducing new amenities, such as streetscape improvements, a revitalized historic resource, and entertainment and dining opportunities. Alternative 4 will also partially meet and meet to a lesser extent than the Project the Project Objectives of constructing a high-density, mixed-used development consistent with the uses and density envisioned for the Regional Center and Hollywood Center designation of the Project Site, including hotel, commercial/retail, and restaurant uses with sustainable urban planning principles, particularly given the abundance of available public transit options near the Project Site, due to its exclusion of hotel uses, though Alternative 4 does include office uses that the Project does not, though such uses are proposed within an existing office building not on the Project Site that the Applicant does not control. Alternative 4 also does not, to the same extent of the Project, provide different types of new housing units to help meet the market demand for new housing in the Hollywood Community Plan Area.

Reference: For a complete discussion of impacts associated with Alternative 4, please see Section V of the Draft EIR, beginning on page V-155.

5. ALTERNATIVE 5 - The Historic Preservation Alternative.

The Historic Preservation Alternative includes the development of residential, retail, and office uses, while preserving the historic uses on-Site. Alternative 5 will include the development of five residential buildings, one mixed-use building, two office buildings, and one commercial building. Specifically, Alternative 5 includes 5,478 square feet of retail uses, 435 dwelling units, and 19,700 square feet of office uses. Unlike the Project, the Crossroads of the World complex, the Hollywood Reporter Building and the Bullinger Building will be retained but not rehabilitated under Alternative 5. The total area of the new development will be 474,018 square feet, including the area of the existing buildings on the Project Site to remain compared to the Project's total proposed floor area of approximately 1,381,000 square feet (including existing uses to be retained within the

Crossroads of the World complex). Alternative 5 will eliminate the hotel proposed as part of the Project.

Impact Summary. The following significant and unavoidable impacts will occur under the Historic Preservation Alternative: Air Quality (construction regional emissions similar to the Project); Noise and Vibration (on-Site construction noise and on-Site vibration re: human annoyance greater than the Project, while off-Site construction noise and off-Site vibration re: human annoyance are less than the Project); Transportation and Traffic (construction impacts will be less than the Project). Alternative 5 will reduce the Project's significant and unavoidable Air Quality impact on operational regional emissions, will avoid Historic Resource impacts relative to six identified potentially historic resources, and will reduce to a less than significant level Transportation and Traffic impacts to intersection LOS and residential street segments. Alternative 5 will reduce the Project's less than significant impacts associated with Aesthetics and Visual Quality, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Land Use, Population and Housing, Public Services, and Utilities and Service Systems. Alternative 5 will have greater, but still less than significant impacts, as compared to the Project, with respect to Hydrology and Water Quality.

Finding. Alternative 5 will reduce a number of the Project's environmental impacts, including significant and unavoidable impacts with respect to operational regional Air Quality, Historic Resources impacts with respect to demolition of the six on-Site buildings identified in the Draft EIR as historic resources (although it will not rehabilitate any of the existing historic resources on the Project Site), and Transportation and Traffic impacts to intersection LOS and residential street segments, which will be reduced to a less than significant level. However, the Project's significant and unavoidable impacts with respect to Air Quality construction regional emissions, Noise and Vibration impacts regarding on-Site construction noise and on-Site vibration re: human annoyance, will be greater than the Project, and off-Site construction noise and off-Site vibration re: human annoyance that are less than the Project but still significant and unavoidable, and construction Transportation and Traffic impacts that are less than the Project but still significant and unavoidable. Alternative 5 will also increase Hydrology and Water Quality impacts as compared to the Project. It also will not rehabilitate Crossroads of the World, the former Hollywood Reporter Building or the Bullinger Building, as the Project will. Therefore, Alternative 5 will be an environmentally superior alternative to the Project in a limited manner, and not in all regards, and will result in more severe and new significant and unavoidable impacts than will not occur under the Project. The Historic Preservation Alternative does not meet the Project's Objectives to provide a hotel use provided by the Project. Alternative 5 is further found to be economically infeasible based on evidence in the record demonstrating that it will be economically impractical to proceed with Alternative 5. Apart from the Project Objectives it does not meet, Alternative 5 meets Project Objectives to a lesser extent than the Project. It is found that, pursuant to Public Resources Code Section 21081(a)(3), that specific economic, legal, environmental, social, and technological or other considerations of importance to the City, including the provision of employment opportunities for highly trained workers and the considerations identified in Section XI of these Findings (Statement of Overriding Considerations) warrant rejection of the Historic Preservation Alternative described in the EIR.

Rationale for Finding. The Historic Preservation Alternative will develop the same types of uses as the Project with the exception of the Project's hotel use, and the office uses

proposed in the Historic Preservation Alternative. As such, Alternative 5 will not meet the Project Objective of developing a high-rise upscale hotel as part of an open-air pedestrian district located immediately adjacent to areas of high pedestrian activities, particularly along Hollywood Boulevard and Sunset Boulevard. Alternative 5 will fail to meet the Project's underlying purpose of transforming a series of underutilized parcels into an integrated, high-density, mixed-use, transit- and pedestrian-oriented development that provides an active residential, shopping, dining, entertainment, and working community while also retaining and revitalizing the historic former Hollywood Reporter Building, the Bullinger Building and the Crossroads of the World complex, because in order to preserve all of the Project Site's historical resources, Alternative 5 cannot develop the Project Site with such high-density uses. The Project provides such high-density uses while still retaining and restoring the Crossroads of World complex and the former Hollywood Reporter Building, the latter of which was designated as a Historic Cultural Monument following the publication of the Draft EIR, and the Bullinger Building. To a lesser extent than the Project, Alternative 5 will create an open-air pedestrian district with a mix of shopping, dining, and entertainment uses, consistent with the original vision for Crossroads of the World, create a pedestrian-friendly identity for the Project Site by introducing active commercial uses along street frontages, improve vehicular circulation, automobile and pedestrian safety in the Project Site vicinity, locate a high-density residential and commercial mixed-use development in a transit priority area and adjacent to major transportation lines, provide new restricted affordable housing units so as to satisfy the varying needs and desires of all economic segments in the Hollywood Community (though it will provide fewer affordable units than the Project Site), create multimodal transit options for Project Site users by providing ample bicycle parking, support the growth of the City's economic base through the introduction of an economically viable Project that includes revenue generating commercial activities and generates new tax revenues, and enhance the public realm by introducing new amenities, such as streetscape improvements, a revitalized historic resource, and entertainment and dining opportunities. Alternative 5 will only partially meet and meet to a lesser extent than the Project the Project Objectives of constructing a high-density, mixed-used development consistent with the uses and density envisioned for the Regional Center and Hollywood Center designation of the Project Site, including hotel, commercial/retail, and restaurant uses with sustainable urban planning principles, particularly given the abundance of available public transit options near the Project Site, due to its exclusion of hotel uses, though Alternative 5 does include office uses that the Project does not. Alternative 5 also does not, to the same extent of the Project, provide different types of new housing units to help meet the market demand for new housing in the Hollywood Community Plan area. Alternative 5 also worsens the environmental impacts caused by the Project with respect to Noise and Vibration and Hydrology and Water Quality. As concluded by the Memorandum prepared by Kosmont Companies, entitled Economic Feasibility Review—Crossroads Hollywood, and confirmed by the peer review report prepared by HR&A, Alternative 5 will not be economically feasible as it will provide a negative return on investment, and thus a reasonably prudent person will not proceed with attempting to build Alternative 5.

Reference: For a complete discussion of impacts associated with Alternative 5, please see Section V of the Draft EIR, beginning on page V-211.

6. ALTERNATIVE 6 - The Hollywood Community Plan Update Alternative.

The City is currently proposing an update to the Hollywood Community Plan, which was adopted in December 1988 and again became effective in April 2014. The Proposed Hollywood Community Plan Update considers changes to the land use and zoning designations for the majority of the parcels along major corridors, including, but not limited to, Sunset Boulevard, Hollywood Boulevard, and Santa Monica Boulevard. For the Project Site, although the existing land use designation (Regional Center Commercial) and zoning designations (C4-2D and C4-SD-SN) are not proposed to be changed, under the Proposed Hollywood Community Plan Update, the southern half of Development Parcel B, which is currently zoned C4-2D-SN, will be located in Subarea (SA) 4:1B and SA 4:1G and Development Parcel D, which is currently zoned C4-2D, will be located in SA 4:1F and have an increase in allowable FAR (from 2:1 to 3:1). The proposed change to C4 2D includes a 75-foot height regulation for the eastern half of Development Parcel A (SA 4:1B), the northern half of Development Parcel B (SA 4:1B), and the northwestern portion of Development Parcel C (SA 4:1B), as shown in Figure V-9 on page V-270. The Proposed Hollywood Community Plan Update allows heights in excess of 75 feet with discretionary approval. The Proposed Hollywood Community Plan Update Alternative includes the development of the same uses as the Project, with the exception of proposing an office use not contemplated by the Project, but it will not include the pedestrian paseo contemplated by the Project. Notwithstanding the fact that the 75-foot height regulation could be exceeded with discretionary approval, this alternative will be developed to a height of 75 feet. Alternative 6 will include the development of six mixed-use buildings in Development Parcels A, B, and D and two office buildings and a retail building, as well as the rehabilitation of Crossroads of the World, in Development Parcel C. Specifically, Alternative 6 will include 308 hotel rooms within a 348,500-square-foot hotel with 28,500 square feet of ground floor retail and restaurant uses in Development Parcel A, an additional 138,783 square feet of retail and restaurant uses in Development Parcels B, C, and D, 950 apartments in Development Parcels B and D, and 54,400 square feet of office space in Development Parcel C, including the demolition of the former Hollywood Reporter Building and the Bullinger Building. The proposed uses under this alternative will total approximately 1,432,000 square feet (including existing uses to be retained within the Crossroads of the World complex), which is greater than the Project's total proposed floor area of approximately 1,381,000 square feet (including existing uses to be retained within the Crossroads of the World complex).

Impact Summary. The following significant and unavoidable impacts will occur under the Hollywood Community Plan Alternative: Air Quality (construction regional emissions similar to the Project, operational regional emissions less than the Project but still significant and unavoidable); Historic Resources (demolition of potentially historic resources more significant than the Project due to the Project's retention and rehabilitation of the former Hollywood Reporter Building and the Bullinger Building); Noise and Vibration (on-Site construction noise, off-Site construction noise, on-Site vibration re: human annoyance, off-Site vibration re: human annoyance, all similar to the Project); Transportation and Traffic (construction and intersection LOS similar to the Project, while residential street segment is less than the Project, though still significant and unavoidable). Alternative 6 will have similar impacts to the Project associated with Geology and Soils, and Hazards and Hazardous Materials. Alternative 6 will reduce the Project's less than significant impacts associated with Aesthetics and Visual Quality, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use, Population and Housing, Public Services, and Utilities and Service Systems.

Finding. Alternative 6 will reduce some of the environmental impacts projected to occur from the development of the Project. However, none of the significant and unavoidable impacts will be avoided, and the significant and unavoidable impact on historic resources will be more severe due to Alternative 6's proposed demolition of the former Hollywood Reporter Building and the Bullinger Building that the Project will retain and restore. Therefore, Alternative 6 will be an environmentally superior alternative to the Project only in a limited manner, and not in all regards, and will result in a significant and unavoidable impact that does not occur under the Project. The City further finds that the Hollywood Community Plan Update Alternative does not meet the Project's objectives to the same extent as the Project. The City finds that, pursuant to Public Resources Code Section 21081(a)(3), that specific economic, legal, environmental, social, and technological or other considerations of importance to the City, including the provision of employment opportunities for highly trained workers and the considerations identified in Section XI of these Findings (Statement of Overriding Considerations) warrant rejection of Hollywood Community Plan Update Alternative described in the EIR. Moreover, because the proposed Hollywood Community Plan Update has not been adopted, the City finds Alternative 6 to be infeasible.

Rationale for Finding. The Hollywood Community Plan Update Alternative will develop the same types of uses as the Project, though it will develop a slightly larger Project. The Hollywood Community Plan Update is in the development stage, and has not been approved by the City in a final, un-appealable ruling. The Hollywood Community Plan Update is thus subject to further revisions that could result in necessary modifications to Alternative 6 that cannot be foreseen at this time. Alternative 6 will fail to meet the Project's underlying purpose of transforming a series of underutilized parcels into an integrated, high-density, mixed-use, transit- and pedestrian-oriented development that provides an active residential, shopping, dining, entertainment, and working community while also retaining and revitalizing the historic former Hollywood Reporter Building, the Bullinger Building and Crossroads of the World complex, because Alternative 6 will demolish and replace with new buildings the historic former Hollywood Reporter Building and the Bullinger Building. The Original Project analyzed in the Draft EIR also proposed to demolish and redevelop the former Hollywood Reporter Building and the Bullinger Building, but the Project through modifications retains and restores the former Hollywood Reporter Building, which was designated as a Historic Cultural Monument following the publication of the Draft EIR, and the Bullinger Building, in accordance with Section 15002, subsections (a) and (h) of the CEQA Guidelines, which support the incorporation of changes to a Project to avoid and/or significantly reduce environmental damage during the environmental review process. Alternative 6 will also meet this and other related objectives to a lesser extent than the Project due to the absence of the Project's pedestrian paseo that Alternative 6 will not include. Alternative 6 will also, albeit to a lesser extent than the Project, create an open-air pedestrian district with a mix of shopping, dining, and entertainment uses, consistent with the original vision for Crossroads of the World, create a pedestrian-friendly identity for the Project Site by introducing active commercial uses along street frontages, improve vehicular circulation, automobile and pedestrian safety in the Project Site vicinity, locate a high-density residential and commercial mixed-use development in a transit priority area and adjacent to major transportation lines, provide new restricted affordable housing units so as to satisfy the varying needs and desires of all economic segments in the Hollywood, create multimodal transit options for Project Site users by providing ample bicycle parking,

support the growth of the City's economic base through the introduction of an economically viable Project that includes revenue generating commercial activities and generates new tax revenues, and enhance the public realm by introducing new amenities, such as streetscape improvements, a revitalized historic resource, and entertainment and dining opportunities. Alternative 6 will also meet the Project Objectives of constructing a high-density, mixed-used development consistent with the uses and density envisioned for the Regional Center and Hollywood Center designation of the Project Site, including hotel, commercial/retail, and restaurant uses with sustainable urban planning principles, particularly given the abundance of available public transit options near the Project Site.

Reference: For a complete discussion of impacts associated with Alternative 6, please see Section V of the Draft EIR, beginning on page V-269.

Alternatives Rejected As Being Infeasible

In addition to the six alternatives listed above, three other alternatives were considered but rejected.

All Retail/Office Alternative: Development of the Project Site with all retail/office uses instead of the Project's proposed mix of residential, hotel, commercial/retail, entertainment, and restaurant uses was considered as an alternative; however, this alternative will not fulfill the primary Project Objectives to: (1) provide different types of new housing units to help meet the market demand for new housing in Los Angeles, particularly in the Hollywood Community Plan area; and (2) locate high-density residential uses in a transit priority area and adjacent to major transportation lines.

An All Retail/Office Alternative also will not realize the underlying purpose of the Project, which is to transform a series of underutilized parcels into an integrated, high-density, mixed-use, transit- and pedestrian-oriented development that creates an active residential, shopping, dining, entertainment, and working community. Furthermore, since this alternative assumes a similar footprint and similar size of development as the Project, implementation of an All Retail/Office Alternative will create greater traffic impacts than the Project since the traffic generation rates for retail uses are higher than those for residential uses. In addition, greater traffic impacts will result in greater air quality and related GHG impacts as a result of increased mobile emissions from the vehicular trips. This alternative will also not eliminate the Project's significant unavoidable impacts related to the demolition of historic resources and construction noise. For these reasons, the City determined that the inability of this alternative to meet the basic objectives and underlying purpose of the Project and to avoid the Project's significant environmental impacts makes this alternative infeasible. Therefore, the City rejected this alternative from further consideration in the EIR.

Residential Alternative: Development of the Project Site with residential uses with ground floor retail instead of the Project's proposed mix of residential, hotel, commercial/retail, entertainment, and restaurant uses was also considered as an alternative; however, this alternative will not fulfill the primary Project Objectives to: (1) construct a high-density, mixed-use development; (2) retain and revitalize Crossroads of the World; (3) create an open-air pedestrian district with a mix of shopping, dining, and entertainment uses; (4) develop a high-rise upscale hotel; (5) create a pedestrian-friendly identity for the Project Site by introducing active commercial uses along street frontages; and (6) improve

vehicular circulation and automobile and pedestrian safety in the Project Site vicinity, including improvements to Las Palmas Avenue. In addition, since this alternative assumes the same footprint and size of development as the Project, development of this alternative will not eliminate the Project's significant unavoidable impacts related to air quality during construction and operation, the demolition of historic resources, construction noise, and traffic. For these reasons, the City determined that the inability of this alternative to meet the basic objectives of the Project and to avoid the Project's significant environmental impacts makes this alternative infeasible. Therefore, the City rejected this alternative from further consideration in the EIR.

Alternate Site Alternative: Development of the Project at an alternate off-Site location will not be consistent with the purpose and objectives of the Project. The underlying purpose of the Project is to transform a series of underutilized parcels into an integrated, high-density, mixed-use, transit- and pedestrian-oriented development that provides an active residential, shopping, dining, entertainment, and working community. The primary objectives of the Project are to: (1) revitalize the former Hollywood Reporter Building, the Bullinger Building and the Crossroads of the World complex; (2) create an open-air pedestrian district with a mix of shopping, dining, and entertainment uses, to expand upon the original vision for Crossroads of the World; (3) create a pedestrian-friendly identity for the Project Site by introducing active commercial uses along street frontages; and (4) locate a high-density residential and commercial mixed use development in a transit priority area and adjacent to major transportation lines. As such, the Project is focused on the development of a particular Site, which is under the ownership of the Project Applicant. In addition, given the built-out nature of the Hollywood Community Plan area, no equivalent alternate Site is available in Hollywood that: (1) extends over more than four contiguous City blocks; (2) comprises approximately 8.3 acres; and (3) is located less than 1,000 feet of a Metro rail station. For these reasons, the City determined that this alternative is infeasible, and rejected this alternative from further consideration in the EIR.

Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines states that an analysis of alternatives to a Project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives.

Table V-1 of the Draft EIR provides a summary matrix that compares the impacts of associated with the Project with the impacts of each of the analyzed alternatives. A more detailed description of the potential impacts associated with each alternative is presented in Section V (Alternatives) of the Draft EIR, as revised in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

Alternative 1 (No Project—No Build) will avoid all of the Project's significant environmental impacts, including, without limitation, the Project's significant and unavoidable impacts related to construction and operational air quality, historic impacts related to demolition,

on-Site and off-Site noise impacts during construction and vibration impacts from on-Site and off-Site construction activities with respect to human annoyance, construction traffic, operational intersection traffic, and operational neighborhood street segment traffic. Alternative 1 will eliminate all of the Project's remaining less-than-significant and less-than-significant with mitigation impacts since no changes to the existing conditions will occur. However, Alternative 1 will not meet any of the Project Objectives listed above or the Project's underlying purpose to transform a series of underutilized parcels into an integrated, high-density, mixed-use, transit- and pedestrian-oriented development that provides an active residential, hotel, shopping, dining, entertainment, and working community, while also retaining and revitalizing the former Hollywood Reporter Building, the Bullinger Building and historic Crossroads of the World complex.. Furthermore, as stated above, the CEQA Guidelines require the identification of an Environmentally Superior Alternative other than a No Project Alternative.

Accordingly, in accordance with the CEQA Guidelines, a comparative evaluation of the remaining alternatives indicates that Alternative 4, the No Zone or Height District Change/No Density Bonus Alternative, is the Environmentally Superior Alternative. This alternative represents a reduced scope of development and slightly different mix of uses compared to the Project. Alternative 4 will eliminate the Project's significant environmental impacts related to air quality during operation. In addition, this alternative will reduce many of the Project's less-than-significant impacts prior to mitigation and less-than-significant impacts with mitigation, including glare, archaeological and paleontological resources, GHG, groundwater quality, land use consistency, noise, employment, schools, libraries, CMP facilities, wastewater, solid waste, and energy. Furthermore, the following impacts will be similar to the Project's impacts: aesthetics, views, light, and shading; historic resources (significant and unavoidable); tribal cultural resources (less than significant); geology and soils (less than significant); surface water quality (less than significant); groundwater hydrology (less than significant); land use compatibility (less than significant); housing and population (less than significant); police protection (less than significant); fire protection (less than significant); parks and recreation (less than significant); bicycle, pedestrian, and vehicular safety, and parking (less than significant). Although Alternative 4 will reduce the Project's significant environmental impacts related to air quality during construction, on- and off-Site noise during construction, vibration related to building damage and human annoyance during construction, and traffic during operation, Alternative 4 will not eliminate such impacts. In addition, as with the Project, Alternative 4 will not eliminate the historic impacts associated with the demolition of historic resources to accommodate the new buildings. This alternative will also not fully achieve several of the Project Objectives, including the following:

- To provide different types of new housing units, including studios, one-, two-, and three-bedroom units) and apartment rentals (i.e., studios, one-, and two-bedroom units, to help meet the market demand for new housing in the Hollywood Community Plan area;

- To retain and revitalize the former Hollywood Reporter Building, the Bullinger Building and Crossroads of the World, both of which are designated Historic Cultural Monuments;

- To create an open-air pedestrian district with a mix of shopping, dining, and entertainment uses, consistent with the original vision for Crossroads of the World;

- To develop a high-rise upscale hotel as part of an open-air pedestrian district located immediately adjacent to areas of high pedestrian activities, particularly along Hollywood Boulevard and Sunset Boulevard;

- To create a pedestrian-friendly identity for the Project Site by introducing active commercial uses along street frontages;

- To improve vehicular circulation, automobile and pedestrian safety in the Project vicinity, including improvements to Las Palmas Avenue; and

- To support the growth of the City's economic base through the introduction of an economically viable Project that includes revenue generating commercial activities and generates new tax revenues.

Alternative 4 also will not meet the following objective to the same extent as the Project:

- To enhance the public realm by introducing new amenities, such as streetscape improvements, a revitalized historic resource, and entertainment and dining opportunities.

Therefore, since Alternative 4 will not fully achieve the Project Objectives, the City finds that Alternative 4, the No Zone or Height District Change/No Density Bonus Alternative, will not meet the underlying purpose of the Project to the same extent as the Project.

As with Alternative 4, Alternative 2, the Reduced Height and FAR Alternative, also represents a reduced scope of development and slightly different mix of uses as compared to the Project. Alternative 2 will reduce, but not eliminate, the Project's significant environmental impacts related to air quality during construction and operation, on- and off-Site noise during construction, vibration related to building damage and human annoyance during construction, and traffic during construction and operation. In addition, this alternative will reduce many of the Project's less-than-significant impacts prior to mitigation measures and less-than-significant impacts with mitigation, including glare, archaeological and paleontological resources, GHG, groundwater quality, land use consistency, noise, employment, schools, libraries, CMP facilities, wastewater, solid waste, and energy. Furthermore, the following impacts will be similar to the Project's impacts: aesthetics, views, light, and shading (less than significant); historic resources (significant and unavoidable) and tribal cultural resources (less than significant); geology and soils (less than significant); surface water quality (less than significant); groundwater hydrology (less than significant); land use compatibility (less than significant); housing and population (less than significant); police protection (less than significant); fire protection (less than significant); parks and recreation (less than significant); bicycle, pedestrian, and vehicular safety, and parking (less than significant). When compared to Alternative 4, Alternative 2 will achieve almost all of the Project Objectives, with the exception of one that is specifically related to Alternative 2's elimination of the hotel use. With development of similar, although reduced, uses as the Project, this alternative will meet the following Project Objectives:

- To create an open-air pedestrian district with a mix of shopping, dining, and entertainment uses, consistent with the original vision for Crossroads of the World;

- To develop a high-rise upscale hotel as part of an open-air pedestrian district located immediately adjacent to areas of high pedestrian activities, particularly along Hollywood Boulevard and Sunset Boulevard;

- To create a pedestrian-friendly identity for the Project Site by introducing active commercial uses along street frontages;

- To improve vehicular circulation, automobile and pedestrian safety in the Project vicinity, including improvements to Las Palmas Avenue;

- To locate a high-density residential and commercial mixed-use development in a transit priority area and adjacent to major transportation lines;

- To provide new restricted affordable housing units so as to satisfy the varying needs and desires of all economic segments in the Hollywood Community;

- To create multimodal transit options for Projects users by providing ample bicycle parking;

- To support the growth of the City's economic base through the introduction of an economically viable Project that includes revenue generating commercial activities and generates new tax revenues; and

- To enhance the public realm by introducing new amenities, such as streetscape improvements, a revitalized historic resource, and entertainment and dining opportunities.

Therefore, second to Alternative 4, the City finds that Alternative 2 will also be considered an Environmentally Superior Alternative to the Project. However, when compared to Alternative 4, the City finds that Alternative 2 will meet more of the Project Objectives and realize the underlying purpose of the Project to transform the Project Site into an integrated, high-density, mixed-use, transit- and pedestrian-oriented development that provides an active residential, hotel, shopping, dining, entertainment, and working community while also retaining and revitalizing the former Hollywood Reporter Building, the Bullinger Building and the Crossroads of the World complex.

Reasonable Range of Potentially Feasible Alternatives

Pursuant to CEQA Guidelines Section 15126.6(a), an EIR must describe a range of reasonable alternatives to the Project, or to the location of the Project, which will feasibly attain most of the basic objectives of the Project but will avoid or substantially lessen any of the significant effects of the Project, and evaluate the comparable merits of the alternatives. However, an EIR need not consider every conceivable alternative to a Project. Section V, Alternatives, of the Draft EIR as modified by Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, analyzes six alternatives, including the No Project/No Build Alternative, the Reduced Height and FAR Alternative, the Additional Project Site Alternative, the No Zone or Height District Change/No Density Bonus Alternative, the Historic Preservation Alternative, and the Proposed Hollywood

Community Plan Update Alternative. The City finds that these alternatives constitute a range of reasonable alternatives to the Project that will attain most of the basic objectives of the Project but will avoid or substantially lessen any of the Project's significant impacts.

The EIR concludes that the Project will result in significant impacts related to air quality, historical resources, noise, and traffic. The Alternatives analyzed in Section V, Alternatives, of the Draft EIR include those that reduce the net development of the Project enough to avoid the Project's significant and unavoidable impacts to air quality and traffic (i.e., Alternative 5); those that reduce the Project's significant and unavoidable impacts related to noise (i.e., Alternatives 2, 3, and 4); and one that avoids the Project's significant and unavoidable impact related to demolition of historical resources (Alternative 5, Historic Preservation Alternative). The EIR also identifies alternatives that were rejected from further consideration in the EIR, and explains why they were rejected, as required by CEQA Guidelines Section 15126.6(c).

The City further finds that the EIR achieves the goal of an alternatives analysis under CEQA by identifying ways to mitigate or avoid the significant effects of Project development. During the administrative process, the Project was modified to include preservation and rehabilitation of the former Hollywood Reporter Building and the Bullinger Building to reduce further its impacts on historical resources.

For all of these reasons, based on the EIR and the information in the record, the City finds that the EIR fulfills CEQA's requirements by including and analyzing a range of reasonable alternatives.

Reasons Why the Project is Being Proposed, Notwithstanding Significant Unavoidable Impacts

In addition to identification of the Project's significant unavoidable impacts, Section 15126.2(b) of the CEQA Guidelines states that where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the Project is being proposed, notwithstanding the effects of the identified significant and unavoidable impacts, should be described.

As discussed in Section II, Project Description, of the Draft EIR, the Project is a mixed-use Project that revitalizes the Project Site and provides new multi-family housing opportunities and neighborhood-serving retail and restaurant uses that serve the community and promote walkability. In addition, the Project will provide a sufficient number of new housing units to help meet the market demand for new housing in Southern California, and the Hollywood community in particular.

The Project provides an opportunity to fulfill policy directives reflected in both local and regional land use plans by concentrating mixed-use, pedestrian-friendly development in an area that is targeted for higher density, urban growth. Specifically, as discussed in Section IV.H, Land Use, of the Draft EIR, the Project Site is located in a High-Quality Transit Area (HQTA) as designated by the Southern California Association of Governments' (SCAG) 2012–2035 Regional Transportation Plan and Sustainable Communities Strategy (2012–2035 RTP/SCS) and the more recently adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS). HQTAs are described as generally walkable transit villages or corridors that

are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Local jurisdictions are encouraged to focus housing and employment growth within HQTAs. At the local level, the Project Site is designated as Regional Center Commercial in the Hollywood Community Plan and is located within a designated Regional Center. The Project will be located in an area well-served by existing public transportation, including Metro and LADOT bus lines and the Metro Red Line Hollywood/Highland Station, to focus growth along major transportation corridors and within walking distance of a transit station. In addition, the Project will be located along Sunset Boulevard and two blocks south of Hollywood Boulevard, two commercial corridors that are characterized by a high degree of pedestrian activity and "people-scaled" uses. The Project will be designed to create a vibrant new district that will be connected to the urban fabric of Hollywood while retaining Crossroads' historic identity. The distinct new high-rise buildings, located across three city blocks, will be linked by a pedestrian paseo that will run between the Crossroads of the World and the proposed hotel at Highland Avenue and Selma Avenue. This pedestrian paseo will feature areas (e.g., interactive water features, seating, planting, fire places, and/or movie screens) designed to promote gathering and socializing, which can serve as a focus of activity for the surrounding community and inject new life into the Project area, including the revitalized historic Crossroads of the World complex. In addition, the Project will be designed and constructed to incorporate environmentally sustainable design features required by the Los Angeles Green Building Code, and the sustainability intent of the U.S. Green Building Council's Leadership in Energy Efficiency and Design (LEED) green building program, using both LEED-H v2010 and LEED-NC v2009 rating systems, to achieve at minimum the Silver Rating under LEED v4 rating system. Design features in compliance with LEED standards will be incorporated to reduce energy and water usage and waste water and solid waste generation, thereby reducing associated greenhouse gas emissions.

Six alternatives to the Project were considered in Section V, Alternatives, of the Draft EIR. Among those alternatives, Alternative 4, the No Zone or Height District Change/No Density Bonus Alternative will eliminate the Project's significant environmental impacts related to air quality during operation. Although Alternative 4 will reduce the Project's significant environmental impacts related to air quality during construction, on-Site noise during construction, vibration related to building damage and human annoyance during construction, and traffic during operation, Alternative 4 will not eliminate such impacts. In addition, as with the Project, Alternative 4 will not eliminate the historic impacts associated with the demolition of historic resources to accommodate the new buildings. This alternative will also not achieve several of the Project objectives and will not meet the underlying purpose of the Project to the same extent as the Project.

Alternative 5, the Historic Preservation Alternative, will eliminate the Project's significant environmental impacts related to air quality during operation, the demolition of historic resources, and traffic during operation. Although Alternative 5 will reduce the Project's significant environmental impacts related to air quality during construction, on-Site noise during construction, vibration related to building damage and human annoyance during construction, and traffic during construction, Alternative 5 will not eliminate such impacts. In addition, while eliminating some of the Project's significant and unavoidable impacts, Alternative 5 will have greater impacts related to: (1) adjacent new construction to historic resources since a greater number of historic resources will be potentially impacted by underground excavation and construction in all four development parcels; (2) surface

water quality during operation since this alternative will have less of beneficial effect than the Project in terms of improving the quality of rainfall runoff as BMPs will only be applied to the new development; and (3) construction noise since this alternative will affect a greater number of sensitive receptors, including the residents of the apartment buildings that will be retained under this alternative, than will the Project.

No feasible alternative was identified that will eliminate the Project's significant impacts related to air quality during construction, on-Site noise during construction, vibration related to building damage and human annoyance during construction, and traffic during construction with the exception of the No Project/No Build Alternative. The No Project/No Build Alternative will avoid the Project's significant and unavoidable impacts, including those related to air quality during construction and operation, historic resources, on-Site noise during construction, vibration related to building damage and human annoyance during construction, and traffic during construction and operation. However, the No Project/No Build Alternative will not meet any of the Project objectives or the Project's underlying purpose to transform underutilized parcels in the Hollywood community near the Metro Red Line Hollywood/Highland Station into an integrated, high-density, mixed-use, pedestrian-oriented development that provides an active residential, hotel, shopping, dining, entertainment, and working community while also retaining and revitalizing the historic Crossroads of the World complex. As discussed in Section V, Alternatives, of the Draft EIR, the Project, as proposed, satisfies the Project objectives to a greater degree than any of the proposed alternatives. The Draft EIR also includes mitigation measures that reduce the potential impacts associated with the Project to the extent feasible.

Overall, the Project presents numerous benefits that override the adverse effects it may have on the environment.

Significant Irreversible Environmental Changes

In accordance with Section 15126.2(c) of the CEQA Guidelines, an EIR is required to evaluate significant irreversible environmental changes that will be caused by implementation of the proposed Project. As stated in CEQA Guidelines Section 15126.2(c), "[u]ses of nonrenewable resources during the initial and continued phases of the Project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the Project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."

The Project will necessarily consume a limited amount of slowly renewable and non-renewable resources that could result in irreversible environmental changes. This consumption will occur during construction of the Project and will continue throughout its operational lifetime. The development of the Project will require a commitment of resources that will include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation. As demonstrated below, the Project will not consume a large commitment of natural resources or result in significant irreversible environmental changes.

Building Materials and Solid Waste

Solid waste generation during construction and operation of the Project is addressed in Section IV.M.3, Utilities and Service Systems—Solid Waste, of the Draft EIR. Construction of the Project will require consumption of resources that do not replenish themselves or which may renew so slowly as to be considered non-renewable. These resources include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), and petrochemical construction materials (e.g., plastics). However, in accordance with Project Design Feature UTL-PDF-4, building materials with a minimum of 10 percent recycled-content will be used for the construction of the Project.

During construction of the Project, the Project will implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous construction debris or minimize the generation of construction waste to 2.5 pounds per square foot of building floor area in accordance with Project Design Feature UTL-PDF-5. In addition, the Project will provide for on-Site recycling containers to promote the recycling of paper, metal, glass, and other recyclable materials and adequate storage areas for such containers during construction and after the building is occupied in accordance with Project Design Feature UTL-PDF-3. Thus, the consumption of non-renewable building materials, such as lumber, aggregate materials, and plastics, will be reduced.

Water

Consumption of water during construction and operation of the Project is addressed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR. As evaluated therein, the short-term and intermittent water use during construction of the Project will be less than the net new water consumption of the Project at buildout. In addition, the Project falls within the available and projected water supplies for normal, single-dry and multiple-dry years through the year 2040, and the Los Angeles Department of Water and Power (LADWP) will be able to meet the water demand for the Project in addition to the existing and planned water demands of its future service area. Furthermore, pursuant to Project Design Feature UTL-PDF-1, the Project will implement a variety of water conservation features including, but not limited to, the use of: high-efficiency toilets, high-efficiency clothes washer, leak-detection system for swimming pools, drip/sub-surface irrigation, and water fixtures that exceed applicable standards, among others. Project Design Feature UTL-PDF-2 will also reduce outdoor water used by a minimum of 50 percent from the calculated baseline at peak watering month by installing efficient irrigation. Thus, as evaluated in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR, while Project operation will result in the irreversible consumption of water, the Project shall not result in a significant impact related to water supply.

Energy Consumption and Air Quality

During ongoing operation of the Project, non-renewable fossil fuels will represent the primary energy source, and thus the existing finite supplies of these resources will be incrementally reduced. Fossil fuels, such as diesel, gasoline, and oil, will also be consumed in the use of construction vehicles and equipment. Project consumption of

non-renewable fossil fuels for energy use during construction and operation of the Project is addressed in Section IV.M.4, Utilities and Service System—Energy, of the Draft EIR. As discussed therein, construction activities for the Project will not require the consumption of natural gas but will require the use of fossil fuels and electricity. As the consumption of fossil fuels will occur on a temporary basis during construction, impacts related to the construction consumption of fossil fuels will be less than significant.

The Project's increase in electricity and natural gas demand during Project operation will be within the anticipated service capabilities of the LADWP and the Southern California Gas Company, respectively. As discussed in Section IV.M.4, Utilities and Service Systems—Energy, of the Draft EIR, the Project will be designed and constructed in accordance with state and local green building standards that will serve to reduce the energy demand of the Project. Specifically, the Project complies with the City's Green Building Ordinance, as applicable and new buildings and infrastructure will be designed to be environmentally sustainable and to achieve at least the standards of the Silver Rating under the U.S. Green Building Council's Leadership in Energy Efficiency and Design (LEED®) green building program or equivalent green building standards. In addition, the residential units within the Project shall not include natural gas fueled fireplaces. The Project also provides a minimum of 135 kilowatts of photovoltaic panels on the Project Site. With regard to transportation fuel, the Project results in an approximate 45-percent reduction in vehicle miles traveled (VMT) and related transportation fuel consumption as a result of the various Project design features and characteristics discussed further in Section IV.C, Greenhouse Gas Emissions (see Mitigation Measure TRA-MM-1 for details regarding the Transportation Demand Management Program; Project Design Feature GHG-PDF-4 for details regarding electric vehicle supply equipment), and Section IV.M.4, Utilities and Services Systems—Energy, of the Draft EIR. Therefore, the Project will not cause the wasteful, inefficient, and unnecessary consumption of energy and will be consistent with the intent of Appendix F to the CEQA Guidelines. In addition, Project operations do not conflict with adopted energy conservation plans. Refer to Section IV.M.4, Utilities and Service Systems—Energy, of the Draft EIR, for further analysis regarding the Project's consumption of energy resources.

Environmental Hazards

The Project's potential use of hazardous materials is addressed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR. As evaluated therein, the types and amounts of hazardous materials that will be used in connection with the Project will be typical of those used in residential, commercial, and hotel developments, including cleaning agents, paints, pesticides, and other materials used for landscaping. Construction of the Project will also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials shall be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, state, and local regulations. Ground disturbance associated with Site clearance, excavation, and grading activities during construction is also not anticipated to encounter hazardous subsurface conditions. Nonetheless, as set forth in Project Design Feature HAZ-PDF-1, a sub-slab soil gas sample will be obtained from beneath the footprint of a portion of Development Parcel C where PCE concentrations were detected, to ensure that the concentration of PCE is below the standard for the specific use to be developed at this location. As such,

construction impacts related to potential subsurface contamination shall be less than significant.

Conclusion

Based on the above, Project construction and operation will require the irretrievable commitment of limited, slowly renewable, and non-renewable resources, which wo;; limit the availability of these resources and the Project Site for future generations or for other uses. However, the consumption of such resources are not considered substantial and will be consistent with regional and local growth forecasts and development goals for the area. The loss of such resources will not be highly accelerated when compared to existing conditions and such resources will not be used in a wasteful manner. Therefore, although irreversible environmental changes will result from the Project, such changes are concluded to be less than significant. Considering that the Project will consume an immaterial amount of natural resources, and it is replacing an existing urban use on an infill Site, the limited use of nonrenewable resources is justified.

Growth-Inducing Impacts

Section 15126.2(d) of the CEQA Guidelines requires that growth-inducing impacts of a Project be considered in a Draft EIR. Growth-inducing impacts are characteristics of a Project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that will remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant that, for example, may allow for more construction in service areas). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, thus requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also require a discussion of the characteristics of projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Finally, the CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment. Growth can be induced or fostered as follows:

- Direct growth associated with a Project;
- Indirect growth created by either the demand not satisfied by a Project or the creation of surplus infrastructure not utilized by a Project.

As discussed in Section IV.J.3, Population, of the Draft EIR, the Project will result in the construction of up to 868 net new residential apartment units. As such, the Project will increase the residential population of the City of Los Angeles by 2,118 additional persons at full buildout. Based on 2012–2035 RTP/SCS, the net new increase of 2,118 permanent residents will represent approximately 0.2 percent of the projected growth in the SCAG Region between 2015 and 2022, and approximately 1.55 percent of the projected growth in the City of Los Angeles during the same period. As a point of comparison, based on SCAG's forecast in the 2016–2040 RTP/SCS, the net new increase of 2,118 permanent residents will represent approximately 0.22 percent of the

projected growth in the SCAG Region between 2015 and 2022, and approximately 1.11 percent of the projected growth in the City of Los Angeles during the same period. The Project's population share based on growth projections in the 2016–2040 RTP/SCS is nearly the same as the Project's population share based on growth projections in the 2012–2035 RTP/SCS, for both the SCAG Region and the City of Los Angeles. With regard to housing, as discussed further in Section IV.J.2, Housing, of the Draft EIR, the Project will result in the construction of up to 868 net new residential apartment units. The Project's residential units will represent approximately 0.23 percent and 0.21 percent of SCAG's forecasted housing growth for the SCAG Region between 2015 and 2022, based on 2012–2035 RTP/SCS and 2016–2040 RTP/SCS, respectively. The Project's residential units will represent approximately 1.04 percent and 0.95 percent of SCAG's forecasted housing growth for the City of Los Angeles between 2015 and 2022, based on 2012–2035 RTP/SCS and 2016–2040 RTP/SCS, respectively. In addition, with regard to employment, as discussed in Section IVJ.1, Employment, of the Draft EIR, the additional 1,000 on-Site employees that will be generated by the Project will represent approximately 0.24 percent of employment growth forecasted for the SCAG Region between 2015 and 2022 (i.e., the Project's baseline and buildout years) and approximately 2.16 percent of the employment growth forecasted for the City of Los Angeles between 2015 and 2022 based on SCAG's 2012–2035 RTP/SCS and approximately 0.19 percent of employment growth forecasted for the SCAG Region and approximately 0.85 percent of the employment growth forecasted for the City of Los Angeles for the same time period based on SCAG's 2016–2040 RTP/SCS. Therefore, the Project's population, housing, and employment generation will be well within SCAG's respective projections for the Subregion. As such, the Project exceed SCAG's population, housing, or employment projections, nor will it induce substantial indirect population or housing growth related to Project-generated employment opportunities.

Construction workers will not be expected to relocate their households' places of residence as a direct consequence of working on the Project. The work requirements of most construction projects are highly specialized so that construction workers remain at a job Site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Therefore, given the availability of construction workers, the Project will not be considered growth-inducing from a short-term employment perspective, but rather the Project will provide a public benefit by providing new employment opportunities during the construction period.

The area surrounding the Project Site is already developed with a mix of commercial, office, and residential uses and the Project will not remove impediments to growth. All roadway improvements planned for the Project will be tailored to improve circulation flows and safety throughout the area, consistent with the Project's impacts and objectives. The Project may require local infrastructure upgrades to maintain and improve sewer, electricity, and natural gas lines on-Site and in the immediate vicinity of the Project Site utility. Such improvements will be intended primarily to meet Project-related demand and will not necessitate regional utility infrastructure improvements that have not otherwise been accounted for and planned for on a regional level. The Project employees' demand for convenient commercial goods and services will be met by new retail, service, and other resources included as part of the Project or already located within close proximity to the Project Site. No new development specifically to meet the Project's scale of commercial demand will be needed.

Overall, the Project will be consistent with the growth forecast for the City of Los Angeles Subregion, and will be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of vehicle miles traveled and proximity to public transit options, specifically the Metro Red Line and bus lines. Therefore, growth-inducing impacts shall be less than significant.

Potential Secondary Effects

Section 15126.4(a)(1)(D) of the CEQA Guidelines requires that "if a mitigation measure will cause one or more significant effects in addition to those that will be caused by the Project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the Project as proposed." The following provides a discussion of the potential secondary impacts that could occur as a result of the implementation of the proposed mitigation measures, for those environmental issue areas where mitigation is proposed.

(a) Air Quality

Mitigation Measures AIR-MM-1 through AIR-MM-6 pertain to air quality impacts during construction. Specifically, Mitigation Measure AIR-MM-1 requires that all construction equipment be properly tuned and maintained in accordance with the manufacturer's specifications. The contractor is also required to keep on-Site documentation to show that the equipment has been maintained in accordance with the manufacturer's specifications. Mitigation Measure AIR-MM-2 requires that contractors maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues shall have their engines turned off after 5 minutes when not in use, to reduce vehicle emissions. Mitigation Measure AIR-MM-3 requires that construction activities be discontinued during second-stage smog alerts. A record of any second-stage smog alerts and discontinued construction activities as applicable is also to be maintained by the contractor on-Site. Mitigation Measure AIR-MM-4 requires that construction activity utilize electricity from power poles or solar power, rather than diesel power generators and/or gasoline power generators. If stationary construction equipment, such as diesel- or gasoline-powered generators, must be operated continuously, such equipment is required to be located at least 100 feet from sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible. Mitigation Measure AIR-MM-5 requires that the Project representative make available to the lead agency and SCAQMD a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of the grading/excavation/export phase. Documentation on-Site will be required to allow the Construction Monitor to to compare the on-Site equipment with the inventory and certified Tier specification and operating permit. Mitigation Measure AIR-MM-6 gives preference to contractors for soil import/export that have haul trucks meeting EPA Model Year 2007/2010 NOx emissions levels when such trucks are reasonably available. These mitigation measures will reduce air quality impacts during construction. As such, implementation of these mitigation measures shall not result in adverse secondary impacts.

(b) Cultural Resources

Mitigation Measures CUL-MM-1 through CUL-MM-16 pertain to impacts to the Crossroads of the World property and other adjacent historic resources. Specifically, Mitigation Measure CUL MM-1 requires that the existing conditions of the Crossroads of the World property be documented in accordance with Historic American Building Survey (HABS) guidelines and standards. Mitigation Measure CUL-MM-3 requires that the possible connection of Building C2 to the Crossroads of the World "French Building" and "Early American Building" and to the Bullinger Building be designed and completed in accordance with the Secretary of the Interior's Standards and Guidelines for Rehabilitation. Mitigation Measure CUL-MM-4 requires that the Crossroads of the World complex be rehabilitated in accordance with the Secretary of the Interior's Standards and Guidelines for Rehabilitation. Mitigation Measure CUL-MM-5 requires that the Project include an interpretive program located on the Crossroads of the World property which informs the public about the history and original configuration of the Crossroads of the World property. Mitigation Measure CUL-MM-6 requires that the Project design team consult with a preservation architect or other qualified professional to ensure that Building C1, Building C2, Building C3, and Building D1 are designed and constructed in accordance with the Secretary of the Interior's Standards for Rehabilitation to ensure that the proposed new construction would protect the historic integrity of the Crossroads of the World property and adjacent historic resources, including the Bullinger Building, the First Baptist Church and the 1932 Art Deco office building at 1618 Las Palmas Avenue. Mitigation Measure CUL-MM-7 requires that the Project include a shoring plan to ensure the protection of adjacent historic resources, including, but not limited to, Crossroads of the World, the Bullinger Building, the First Baptist Church, and the 1932 Art Deco office building at 1618 Las Palmas Avenue, during construction from damage due to underground excavation, vibration, and general construction procedures and to reduce the possibility of damage from vibration and settlement due to the removal of adjacent soil. Mitigation Measure CUL MM 8 requires that a Historic Structure Report (HSR) be developed for the Crossroads of the World property to document its historic significance, identify character-defining features, and establish treatments for its continued preservation. Mitigation Measure CUL MM 9 requires that the existing conditions of the former Hollywood Reporter Building and the Bullinger Building be documented in accordance with HABS guidelines and standards. Mitigation Measure CUL MM 10 requires the planning and implementation of the rehabilitation and adaptive reuse of the former Hollywood Reporter Building and the Bullinger Building in consultation with a preservation architect or other qualified professional to ensure minimal loss of original material and character-defining features. Mitigation Measure CUL MM 11 requires rehabilitation of the former Hollywood Reporter Building and the Bullinger Building to be completed in accordance with the Secretary of the Interior's Standards and Guidelines for Rehabilitation. Mitigation Measure CUL MM 12 requires the rehabilitation of the former Hollywood Reporter Building and the Bullinger Building to include interpretative programs written by a professional who meets the Secretary of Interior's Professional Qualifications Standards for Historic Architecture, which inform the public about the history and original uses of the buildings. Mitigation Measure CUL MM 13 requires an HSR report prepared for the former Hollywood Reporter Building and the Bullinger Building to document their historic significance. Mitigation Measure CUL MM 14 requires that prior to their demolition, the 1910 Craftsman house at 1542 McCadden Place, the 1907 vernacular house at 1547 McCadden Place, the 1912 Craftsman style duplex at 1606–08 Las Palmas Avenue, the complex of three courtyard apartments at 6700–6718 Selma Avenue and 1535–1555 Las Palmas Avenue, be documented in accordance with HABS

guidelines and standards. Mitigation Measures CUL-MM-15 and 16 require the Applicant to offer the historical buildings for potential relocation and rehabilitation, at a cost of $1 (one dollar) each to any qualified party capable of relocating and rehabilitating the building(s).

Mitigation Measures CUL-MM-1 through CUL-MM-8 will reduce potential impacts to the Crossroads of the World property and other adjacent historic resources to a less-than-significant level. Mitigation Measures CUL-MM-9 through CUL-MM-13 will reduce potential impacts to the former Hollywood Reporter building and the Bullinger Building to a less-than-significant level. In addition, CUL-MM-14 through CUL-MM-16 will also reduce potential impacts on historic resources associated with the Project, although not to a less-than-significant level. As such, implementation of these mitigation measures will not result in adverse secondary impacts.

Mitigation Measure CUL-MM-17 requires that a qualified paleontologist be retained to perform periodic inspections of excavation and grading activities at the Project Site. This mitigation measure will reduce potential Project-level impacts associated with paleontological resources to a less than significant level. As such, implementation of this mitigation measure will not result in adverse secondary impacts.

(c) Noise

Mitigation Measures NOI-MM-1 and NOI-MM-2 pertain to construction noise. Mitigation Measure NOI-MM-1 specifies areas where a temporary and impermeable sound barrier will be installed. It was determined in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft EIR, that the sound barrier will further obstruct public views of on-Site ground-level construction activities. Therefore, the proposed temporary sound barriers will serve to minimize views of the construction area from adjacent uses and reduce construction noise impacts on nearby sensitive receptors. As such, implementation of this mitigation measure will not result in adverse secondary impacts.

Mitigation Measure NOI-MM-2 requires that the contractor retain the services of a qualified vibration consultant to monitor ground-borne vibration at the exterior of the adjacent buildings to the south, north, and east of the Project Site during Site excavation (when the use of heavy construction equipment, such as a large bulldozer, drill rig, or loaded truck occurs) within 15 feet of the existing off-Site building structures adjacent to the Project Site and to monitor ground-borne vibration at the exterior of the existing on-Site historic building structures during Site excavation (when the use of heavy construction equipment, such as a large bulldozer, drill rig, or loaded truck occurs) within 20 feet of the existing on-Site historic building structures. This mitigation measure will reduce vibration impacts from on-Site construction with respect to building damage at the off-Site buildings immediately west and east of the Project Site to a less-than-significant level. As such, implementation of this mitigation measure will not result in adverse secondary impacts.

Mitigation Measures NOI-MM-3 and NOI-MM-4 pertain to operational noise. Specifically, Mitigation Measure NOI-MM-3 requires that a 12-foot-high noise barrier wall be erected at the Project's eastern boundary (between the Crossroads of the World buildings along the eastern boundary and the Blessed Sacrament Church boundary). The noise barrier shall provide a minimum 5-dBA reduction at the Blessed Sacrament Church east of the

Project Site. Mitigation Measure NOI-MM-4 requires a minimum three-foot-tall solid wall providing a minimum 3-dBA noise reduction at the ground level of the parking structure within Development Parcel E, and the use of non-squeal paving finishes (i.e., paving finishes that are not smooth, often referred to as “broom finishes”). As such, implementation of these mitigation measure will not result in adverse secondary impacts.

(d) Traffic, Access, and Parking

Mitigation Measure TRA-MM-1 requires implementation of a Transportation Demand Management Program that includes strategies to promote non-auto travel and reduce the use of single-occupant vehicle trips. Implementation of Mitigation Measure TRA-MM-1 will be beneficial in addressing the Project’s transportation impacts during operation and will not result in any physical improvements. As such, implementation of Mitigation Measure TRA-MM-1 will not result in adverse secondary impacts.

Mitigation Measure TRA-MM-2 requires implementation of Transit System Improvements to improve existing transit services in the Project area. The Project applicant will establish and contribute a fixed fee of $1,330,864 to a trust fund to be administered by LADOT. The funding may include the purchase of one 35-foot zero emissions bus and related expenses toward transit system improvements along the Hollywood Boulevard and Santa Monica Boulevard corridors. The purchase of the bus will not result in any physical improvements and will reduce Project trips. As such, implementation of Mitigation Measure TRA-MM-2 will not result in adverse secondary impacts.

Mitigation Measure TRA-MM-3 requires implementation of Transportation Systems Management Improvements. LADOT’s Automated Traffic Surveillance and Control (ATSAC) Section has identified the need to replace existing Multi-Mode video fiber/fiber optic cables with approximately 30,000 feet of high-capacity Single-mode data cables in existing conduits and upgrade eight closed-circuit television (CCTV) cameras/equipment in the Hollywood area. The new cables will provide the network capacity for additional CCTV cameras to maintain real-time video monitoring of intersection, corridor, transit, and pedestrian operations in Hollywood. These video fiber/fiber optic upgrades will be implemented either by the Project applicant through the B-Permit process of the Bureau of Engineering, or through payment of a one-time fixed fee of $200,000 to LADOT to fund the cost of the upgrades. Mitigation Measure TRA-MM-3 will require minimum changes in road facilities to replace existing conduits and CCTV cameras/equipment. As such, implementation of Mitigation Measure TRA-MM-3 will not result in adverse secondary impacts.

Mitigation Measure TRA-MM-5 requires physical improvements at Las Palmas Avenue and Sunset Boulevard, which includes widening approximately 10 feet and restriping along the north leg of Las Palmas Avenue at Sunset Boulevard to provide one southbound left-turn lane, one shared through-right lane, and one right-turn lane. Mitigation Measure TRA-MM-3 will require minimal changes to the intersection and will improve conditions at the intersection. As such, implementation of Mitigation Measure TRA-MM-5 will not result in adverse secondary impacts.

Mitigation Measure TRA-MM-6 addresses significant impacts to neighborhood intrusion through the implementation of a Neighborhood Traffic Management Plan. Specifically, Mitigation Measure L-4 requires that the Project applicant fund and coordinate

implementation of LADOT's Neighborhood Traffic Management Plan process for the Project, in an amount up to $500,000, for six eligible neighborhoods. The final Neighborhood Traffic Management plan will consider and evaluate neighborhood improvements that can offset the effects of added traffic, including street trees, sidewalks, landscaping, neighborhood identification features, and pedestrian amenities. It will be the Project applicant's responsibility to implement any approved Neighborhood Traffic Management measures through the Bureau of Engineering's B-permit process. The neighborhood improvements will require minimal changes to the road facilities. As such, implementation of Mitigation Measure L-4 will not result in adverse secondary impacts.

6. Effects Not Found To Be Significant

Section 15128 of the CEQA Guidelines states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a Project were determined not to be significant and not discussed in detail in the EIR. An Initial Study was prepared for the Project and is included in Appendix A of the Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in the Draft EIR. The City of Los Angeles determined through the Initial Study that the Project will not have the potential to cause significant impacts related to: agricultural and forest resources; objectionable odors; biological resources; landslides and the ability of soils to support the use of septic tanks; placing housing or structures within a 100-year flood plain and seiche, tsunami, or mudflow events; habitat conservation plan or natural community conservation plan; mineral resources; certain noise-related topics; change in air traffic patterns and hazardous design feature. A summary of the analysis provided in Appendix A for these issue areas is provided below.

(a) Agricultural and Forestry Resources

The Project Site is currently developed with various uses, including low-density commercial/retail and office uses, residential uses, and surface parking lots. The Project wite is not zoned for agricultural or forest uses, and no agricultural or forest lands occur on-Site or in the Project area. Therefore, the Initial Study concluded that no impacts related to agricultural and forestry resources will occur, and no further evaluation in an EIR is required.

(b) Air Quality

No objectionable odors are anticipated as a result of either construction or operation of the Project. Project construction will use conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction will be localized and temporary in nature and will not be sufficient to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402. The Project will not include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding, or other land uses associated with odor complaints. On-Site trash receptacles used by the Project will have the potential to create odors. As trash receptacles will be contained, located, and maintained in a manner that promotes odor control, no substantially adverse odor impacts are anticipated. Thus, the Initial Study concluded that odor impacts will be less than significant.

(c) Biological Resources

The Project Site is located within an urbanized area and is currently developed with various uses including low-density commercial/retail and office uses, residential uses, and surface parking lots. Due to the lack of suitable habitat on-Site, the Project will not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. No riparian or other sensitive natural community exists on the Project Site or in the surrounding area. No water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site or in the vicinity. There are no established native resident or migratory wildlife corridors on the Project Site or in the vicinity. Furthermore, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. Thus, the Project will not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans.

With regard to protected trees, a Protected Tree Report was prepared for the Project Site and found that of the 71 trees identified on the Project Site, four trees are California live oaks (*Quercus agrifolia*). The Protected Tree Report concludes that three of the California live oaks were planted, and as such, are not considered protected under the Protected Tree Ordinance. However, one California live oak may be native to the Project Site, and this tree will removed by the Project. The proposed removal of the on-Site native tree will be implemented in compliance with applicable requirements of the City's Protected Tree Ordinance. In addition, the Project will replace the removed native tree with 24-inch box trees on a 4:1 basis, which exceeds replacement requirements set forth in the Protected Tree Ordinance and is consistent with current Board of Public Works planning policy.

The Tree Report also identifies 18 street trees located within and along the perimeter of the Project Site. The Project will remove some of the identified street trees, particularly those located along the segment of Las Palmas Avenue that will be realigned. The Project will replace removed street trees in accordance with the requirements of the City of Los Angeles Street Tree Division, including species, number, and spacing requirements.

Although unlikely, on-Site and street trees located throughout the Project Site and along the Project Site perimeters could potentially provide nesting sites for migratory birds. However, tree removal under the Project will comply with the Migratory Bird Treaty Act (MBTA), which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds will not occur. With compliance with this existing regulatory requirement, impacts will be less than significant. Therefore, the Initial Study concluded that impacts to biological resources will be less than significant, and no further evaluation in an EIR is required.

(d) Geology and Soils

The Project Site is characterized by a relatively flat topography with minimally sloping terrain. In addition, the Project Site is not located in a landslide area as mapped by the City of Los Angeles or California Geological Survey (CGS), or within an area identified as

having a potential for slope instability. Thus, the Initial Study concluded that no impacts from landslides will occur. The Project will not have the potential to exacerbate current environmental conditions related to landslides, and no mitigation measures will be required.

The Project's wastewater demand will be accommodated via connections to the existing wastewater infrastructure. As such, the Project will not require the use of septic tanks or alternative wastewater disposal systems. Thus, the Initial Study concluded that Project will have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems.

(e) Hazards and Hazardous Materials

The Project Site is not located within 2 miles of an airport or a private airstrip or located within an airport planning area and will not have the potential to exacerbate current environmental conditions so as to result in a safety hazard for people residing or working in the area. Thus, the Initial Study concluded that no impacts will occur, and no mitigation measures shall be required.

The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone (VHFHSZ). Therefore, the Project will not have the potential to exacerbate current environmental conditions so as to expose people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. Thus, the Initial Study concluded that impacts will be less than significant, and no mitigation measures will be required.

(f) Hydrology and Water Quality

The Project Site is not located within a 100-year flood plain as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles. Thus, the Project will not place housing within a 100-year flood plain or place structures that will impede or redirect flood flows within a 100-year flood plain. However, the Project Site is located within the potential inundation area for the Hollywood Reservoir/ Mulholland Dam. The Mulholland Dam is a Los Angeles Department of Water and Power (LADWP) dam located in the Hollywood Hills approximately 2.5 miles north of the Project Site. The Mulholland Dam is continually monitored by various governmental agencies to guard against the threat of dam failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum considered earthquake for the Site. Pursuant to these regulations, the Mulholland Dam is regularly inspected and meets current safety regulations. In addition, the LADWP has emergency response plans to address any potential impacts to its dams. Given the distance of the Mulholland Dam to the Project Site, the oversight by the Division of Safety of Dams, including regular inspections, and the LADWP's emergency response program, the potential for substantial adverse impacts related to inundation at the Project Site as a result of dam failure will be less than significant.

The Project Site is approximately 11 miles east of the Pacific Ocean. In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within an area potentially affected by a tsunami. Furthermore, the Project Site is not positioned downslope from an area of potential mudflow. Therefore, the Initial

Study concluded that no seiche, tsunami, or mudflow events will impact the Project Site.

(g) Land Use and Planning

The Project Site is located within an urbanized area that is currently developed with various uses including low-density commercial/retail and office uses, residential uses, and surface parking lots. As such, the Project Site does not support any habitat or natural community. Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. Thus, the Initial Study concluded that the Project will not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan.

(h) Mineral Resources

No mineral extraction operations currently occur on the Project Site. The Project Site is located within an urbanized area and has been previously disturbed by development. As such, the potential for mineral resources to occur on-Site is low. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey. The Project Site is not located within a City-designated oil field or oil drilling area. Therefore, the Initial Study concluded that no impacts related to mineral resources will occur, and no further evaluation in an EIR is required.

(i) Noise

The Project Site is not located within 2 miles of an airport or within an area subject to an airport land use plan. The Project Site is also not located within the vicinity of a private airstrip. Therefore, the Initial Study concluded that the Project will not expose people working in the Project area to excessive noise levels from airports, and no impacts will occur.

(j) Transportation/Circulation

The Project Site is not located within the vicinity of any private or public airport or planning boundary of any airport land use plan. The closest airport to the Project Site, Bob Hope Airport in Burbank, is located approximately 7 miles north of the Project Site. Additionally, the Project does not propose any uses that will increase the frequency of air traffic. The Project will have a maximum height of approximately 402 feet. As such, the Project will be required to comply with applicable Federal Aviation Administration (FAA) requirements regarding rooftop lighting for high-rise structures. In addition, the Project will be required to comply with the notice requirements imposed by the FAA for all new buildings taller than 200 feet, and will complete Form 7460-1 (Notice of Proposed Construction or Alteration). With compliance with these regulations, and given the distance between the Project Site and the nearest airport, impacts to air traffic patterns will be less than significant. Therefore, the Initial Study concluded that impacts will be less than significant.

The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. Furthermore, all roadway improvements will be implemented in accordance with City regulations. In addition, the residential and commercial uses proposed will be consistent with the surrounding uses in

the Project vicinity. Therefore, the Initial Study concluded that no impact will occur from sharp curves or dangerous intersections.

C. CEQA Considerations

1. The City, acting through the Department of City Planning is the “Lead Agency” for the Project, evaluated the EIR. The City finds that the EIR was prepared in compliance with CEQA and the CEQA Guidelines. The City finds that it has independently reviewed and analyzed the EIR for the Project, that the Draft EIR which was circulated for public review reflected its independent judgment and that the Final EIR reflects the independent judgment of the City.

2. The EIR evaluated the following potential Project and cumulative environmental impacts: Aesthetics; Air Quality; Cultural Resources; Geology and Soils; Greenhouse Gas Emissions; Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Noise; Population, Housing and Employment; Public Services; Transportation; and Utilities. Additionally, the EIR considered Growth Inducing Impacts and Significant Irreversible Environmental Changes. The significant environmental impacts of the Project, a reasonable range of alternatives and feasible mitigation measures were identified in the EIR.

3. The City finds that the EIR provides objective information to assist the decision-makers and the public at large in their consideration of the environmental consequences of the Project. The public review period provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding the Draft EIR. The Final EIR was prepared after the review period and responds to comments made during the public review period.

4. Textual refinements were compiled and Project refinements were made and presented to the decision-makers for review and consideration. The City staff has made every effort to notify the decision-makers and the interested public/agencies of each textual change in the various documents and each refinement to the Project associated with Project review. These textual and Project refinements occurred for a variety of reasons. First, it is inevitable that draft documents will contain errors and will require clarifications and corrections. Second, Project refinements occurred as a result of the public participation process, and textual clarifications were required in order to describe those refinements.

5. The Department of City Planning evaluated comments on environmental issues received from persons who reviewed the Draft EIR. In accordance with CEQA, the Department of City Planning prepared written responses describing the disposition of significant environmental issues raised. The Final EIR provides adequate, good faith and reasoned response to the comments. The Department of City Planning reviewed the comments received and responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts to the Draft EIR. The Lead Agency has based its actions on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental impacts identified and analyzed in the EIR.

6. The Final EIR and the changes to the Draft EIR. The Final EIR provides additional information that was not included in the Draft EIR. Having reviewed the information contained in the Draft EIR, the Final EIR, and in the administrative record, as well as the requirements of CEQA and the CEQA Guidelines regarding recirculation of Draft EIRs, the City finds that there are no new significant impacts, no substantial increases in the severity of a previously disclosed impacts, significant information in the record of proceedings or other criteria under CEQA that will require recirculation of the Draft EIR. Specifically, the City finds that:

a. The Responses To Comments contained in the Final EIR fully considered and responded to comments claiming that the Project will have significant impacts or more severe impacts not disclosed in the Draft EIR and include substantial evidence that none of these comments provided substantial evidence that the Project will result in changed circumstances, significant new information, considerably different mitigation measures, or new or more severe significant impacts than were discussed in the Draft EIR.

b. The City has thoroughly reviewed the public comments received regarding the Project and the Final EIR as they relate to the Project to determine whether under the requirements of CEQA, any of the public comments provide substantial evidence that will require recirculation of the EIR prior to its adoption, and has determined that recirculation of the EIR is not required.

c. None of the information submitted after publication of the Final EIR, including testimony at the public hearings on the Project, constitutes significant new information or otherwise requires preparation of a supplemental or subsequent EIR. The City does not find this information and testimony to be credible evidence of a significant impact, a substantial increase in the severity of an impact disclosed in the Final EIR, or a feasible mitigation measure or alternative not included in the Final EIR.

d. As demonstrated in the Final EIR, the refinements to the Project following publication of the Draft EIR do not result in a new significant impact, a substantial increase in the severity of an impact disclosed in the Draft EIR, or otherwise require recirculation of the Draft EIR.

7. The mitigation measures identified for the Project were included in the Draft EIR and, as revised, in the Final EIR. As revised, the final mitigation measures for the Project are described in the Mitigation Monitoring Program (MMP). Each of the mitigation measures identified in the MMP is incorporated into the Project. The City finds that the impacts of the Project have been mitigated to the extent feasible by the mitigation measures identified in the MMP.

8. CEQA requires the Lead Agency approving a Project to adopt a MMP for the changes made to the Project or conditions of Project approval, adopted in order to mitigate or avoid significant effects on the environment, that is designed to ensure compliance during Project implementation. The MMP includes all of the mitigation measures and Project design features adopted by the City in connection with the approval of the Project and has been designed to ensure compliance with such measures during implementation of the Project. In accordance with CEQA, the MMP provides the means to ensure that the mitigation measures are fully enforceable. In accordance with the requirements of Public Resources Code Section 21081.6, the City hereby adopts the MMP.

9. In accordance with the requirements of Public Resources Section 21081.6, the City hereby adopts each of the mitigation measures expressly set forth herein as conditions of approval for the Project.

10. The custodian of the documents or other material which constitute the record of proceedings upon which the City's decision is based is the City Department of City Planning.

11. The City finds and declares that substantial evidence for each and every finding made herein is contained in the EIR, which is incorporated herein by this reference, or is in the record of proceedings in the matter.

12. The City is certifying an EIR for, and is approving and adopting findings for, the entirety of the actions described in these Findings and in the EIR as comprising the Project.

13. The EIR is a Project EIR for purposes of environmental analysis of the Project. A Project EIR examines the environmental effects of a specific Project. The EIR serves as the primary environmental compliance document for entitlement decisions regarding the Project by the City and other regulatory jurisdictions.

14. The City finds that none of the public comments to the Draft EIR or subsequent public comments or other evidence in the record, including any refinements in the Project in response to input from the community and the Council Office, includes or constitutes substantial evidence that requires recirculation of the Draft or Final EIR prior to its certification and that there is no substantial evidence elsewhere in the record of proceedings that will require substantial revision of the Draft or Final EIR prior to its certification, and that neither the Draft EIR nor the Final EIR need be recirculated prior to certification.

XII. STATEMENT OF OVERRIDING CONSIDERATIONS

The Final EIR identified that the Project will result in significant impacts that cannot be feasibly mitigated with respect to:

1. Air Quality: Project level and cumulative-regional emissions during construction; Project level and cumulative regional emissions during operation,

2. Cultural Resources: Project level and cumulative-demolition of historic resources,

3. Noise: Project level and cumulative on-Site noise during construction; Project level and cumulative off-Site noise during construction; Project level and cumulative on-Site vibration during construction (pursuant to the threshold for human annoyance), Project level and cumulative off-Site vibration (pursuant to the threshold for human annoyance) during construction and

4. Traffic: construction-related traffic (intersections), and operational traffic (intersections and residential neighborhoods), both Project level and cumulative, and impacts to Caltrans facilities (freeway mainline segments and off-ramp queueing).

1. <u>Air Quality</u>.

As discussed above, the Project will exceed the South Coast Air Quality Management District (SCAQMD) regional significance threshold for nitrogen oxides (NO_X) during some periods of construction. Implementation of all feasible mitigation measures will reduce, but not eliminate, this impact. As such, Project construction results in significant and unavoidable Project-level and cumulative impacts with regard to regional NO_X emissions during construction.

Regional operational emissions associated with the Project buildout analysis year will exceed SCAQMD daily emission thresholds for regional volatile organic compounds (VOCs) and NO_X. In addition, the net overall operational emissions associated with the Project under existing conditions will exceed the SCAQMD threshold levels for VOC, NO_X, and carbon monoxide (CO). Implementation of all feasible mitigation measures reduces, but does not eliminate, these impacts. Therefore, operation of the Project has significant and unavoidable Project-level and cumulative impacts on regional air quality.

2. Cultural Resources.

The Project requires the demolition of four properties identified as historic resources through survey evaluation. Mitigation measures are implemented to reduce these impacts; however, such impacts from demolition cannot be mitigated to a less-than-significant level. In addition, such impacts are also considered to be cumulatively significant to the extent that other nearby related projects also impact historic properties with the same level or type of designation or evaluation or involve resources that are significant within the same context of the four properties to be demolished.

3. Noise.

(a) On-Site construction noise.

As discussed in the EIR, construction noise impacts due to on-Site construction activities associated with the Project were evaluated by calculating the construction-related noise levels at representative sensitive receptor locations and comparing these estimated construction-related noise levels associated with construction of the Project to the existing ambient noise levels (i.e., noise levels without construction noise from the Project). The maximum estimated noise levels associated with construction of the Project exceed the significance threshold at the majority of receptors. Implementation of Mitigation Measure NOI-MM-1 reduce the Project's on-Site construction noise impacts during construction; however, significant impacts remain at some of the off-Site receptor locations.

Further, cumulative noise impacts at the nearby sensitive uses could occur. Construction-related noise levels from nearby related projects will be intermittent and temporary, and, as with the Project, the related projects will comply with the construction hours and other relevant provisions set forth in the LAMC. Noise associated with cumulative construction activities will be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual related Project and compliance with locally adopted and enforced noise ordinances. Nonetheless, if certain nearby related projects were to be constructed concurrently with the Project, significant cumulative construction noise impacts could result.

(b) Off-Site Construction Noise.

Project and cumulative construction noise due to construction truck traffic from the Project and other related projects will likely exceed the ambient noise levels along the haul route. There are no feasible mitigation measures to reduce the off-Site construction noise impacts. Conventional mitigation measures, such as construction of noise barrier walls to reduce the off-Site construction noise impacts, are not feasible as the barriers will obstruct the access to the properties. However, in accordance with Project Design Feature TRA-PDF-1 included in Section IV.L, Traffic, Access and Parking, of this Draft EIR, the Project is implementing a Construction Management Plan that includes advanced notification to property owners and occupants, including nearby schools, of construction activities; scheduling of construction activities to reduce the effect on traffic flow; and scheduling of construction activities to not interfere with LAUSD drop-off and pick-up activities and pedestrian routes. Nonetheless, Project and cumulative noise impacts from off-Site construction are significant and unavoidable.

(c) On-Site Construction Vibration.

With regard to human annoyance from on-Site construction, the threshold of significance for human annoyance will be exceeded at some sensitive receptors (residential and church uses). There are no feasible mitigation measures that can be implemented to reduce the temporary vibration impacts associated with human annoyance from on-Site construction to a less-than-significant level. Therefore, vibration impacts with respect to human annoyance as a result of on-Site construction activities are significant and unavoidable.

Construction vibration impacts pursuant to the threshold for human annoyance will be cumulatively considerable at certain residential sensitive uses in the event of concurrent construction between the Project and Related Project No. 45.

(d) Off-Site Construction Vibration.

As evaluated in the EIR, construction trucks will generate ground-borne vibration as they travel along the designated haul routes. Potential vibration impacts with respect to human annoyance resulting from temporary and intermittent vibration from construction trucks traveling along the anticipated haul route(s) will be significant. There are no feasible mitigation measures that can reduce the potential vibration impacts with respect to human annoyance. Thus, vibration impacts with respect to human annoyance as a result of off-Site construction truck travel are significant and unavoidable.

With regard to cumulative impacts, as the related projects are expected to use trucks similar to the Project, it is expected that their construction trucks will generate similar vibration levels along the anticipated haul route(s). Therefore, to the extent that other related projects use the same haul route as the Project, potential cumulative human annoyance impacts associated with temporary and intermittent vibration from haul trucks traveling along the designated haul routes will be significant.

(e) Traffic-Construction.

During Project construction, temporary lane closures will occur, which will result in temporary traffic shifts to adjacent streets (i.e., Highland Avenue and Wilcox Avenue). In addition, it construction fences may encroach into the public right-of-way (e.g., sidewalk

and roadways) adjacent to the Project Site. However, as described in Project Design Feature TRA-PDF-1, the Project is implementing a Construction Management Plan to reduce traffic impacts during construction. Nevertheless, traffic impacts associated with these proposed closures will remain temporarily significant and unavoidable at two intersections (i.e., Intersection No. 37 at Highland Avenue and Hollywood Boulevard in the P.M. peak hours; Intersection No. 65 at Highland Avenue and Sunset Boulevard at A.M. and P.M. peak hours).

With regard to cumulative impacts, cumulative impacts associated with lane closures and potential overlap of haul routes from related projects will also be significant and unavoidable. Installation of construction fences during Project construction may result in the temporary loss of metered parking spaces on Highland Avenue, McCadden Place, Las Palmas Avenue, Selma Avenue, and Sunset Boulevard. Thus, Project impacts and cumulative impacts related to parking during the construction of the Project are significant.

(f) Traffic-Operation.

Intersection Levels of Service. Under Existing with Project Conditions, the addition of traffic from the Project to 11 of the signalized intersections results in a change to the volume-to-capacity ratio that exceeds the significance thresholds set forth in the EIR. Implementation of Mitigation Measures TRA-MM-1 through TRA-MM-3 and TRA-MM-5 result in peak-hour trip reductions and operational improvements. Under Existing with Project Conditions, and even after implementation of these mitigation measure(s), traffic impacts at the following five study intersections remain significant and unavoidable:

- Intersection No. 37: Highland Avenue and Hollywood Boulevard (A.M. and P.M. peak periods)
- Intersection No. 63: La Brea Avenue and Sunset Boulevard (P.M. peak period)
- Intersection No. 65: Highland Avenue and Sunset Boulevard (A.M. and P.M. peak periods)
- Intersection No. 70: Cahuenga Boulevard and Sunset Boulevard (A.M. and P.M. peak periods)
- Intersection No. 72: Vine Street and Sunset Boulevard (A.M. and P.M. peak periods)

The Future with Project Conditions identifies the potential incremental impacts of the Project at full buildout on projected future traffic operating conditions during the typical weekday A.M. and P.M. peak periods by adding the net Project-generated traffic to the Future Without Project traffic forecasts for the year 2022. The traffic impacts at the following five study intersections remain significant and unavoidable under Future With Project with Mitigation Conditions:

- Intersection No. 37: Highland Avenue and Hollywood Boulevard (A.M. peak period)

- Intersection No. 63: La Brea Avenue and Sunset Boulevard (A.M. and P.M. peak periods)

- Intersection No. 65: Highland Avenue and Sunset Boulevard (A.M. and P.M. peak periods)

- Intersection No. 70: Cahuenga Boulevard and Sunset Boulevard (A.M. and P.M. peak periods)

- Intersection No. 72: Vine Street and Sunset Boulevard (A.M. and P.M. peak periods)

With regard to cumulative impacts, under Future with Project Conditions, the Project results in significant impacts to 22 of the 111 signalized intersections. Therefore, the its contribution to impacts that will occur under the future cumulative conditions are considerable, and cumulative impacts are significant at those intersections impacted by the Project. Implementation of Mitigation Measures TRA-MM-1 through TRA-MM-3 and TRA-MM-5 reduces several of the significant traffic impacts to less-than-significant levels. However, significant impacts at the five identified signalized intersections remain significant and unavoidable. Thus, the Project's impacts with regard to the five identified intersections make a cumulatively considerable contribution to a significant impact, and, therefore, the Project has a significant cumulative impact.

(g) Traffic/Residential Neighborhood Analysis.

Based on the applicable significance thresholds and according to LADOT criteria, the neighborhoods that may be subject to significant neighborhood intrusion impacts as a result of traffic generated by the Project (under both Existing with Project and Future with Project Conditions) are the areas bounded by the following:

- Franklin Avenue to the north, Highland Avenue to the east, Sunset Boulevard to the south, and La Brea Avenue to the west.

- Franklin Avenue to the north, Cahuenga Boulevard to the east, Sunset Boulevard to the south, and Highland Avenue to the west.

- Sunset Boulevard to the north, La Brea Avenue to the east, Santa Monica Boulevard to the south, and Gardner Street to the west.

- Sunset Boulevard to the north, Highland Avenue to the east, Santa Monica to the south, and La Brea Avenue to the west.

- Sunset Boulevard to the north, Vine Street to the east, Santa Monica Boulevard to the south, and Highland Avenue to the west.

- Sunset Boulevard to the north, Van Ness Avenue to the east, Santa Monica Boulevard to the south, and Vine Street to the west.

Once the Project is operating, a neighborhood can be reassessed to determine if any impacts are occurring, the nature of the impacts, and whether those impacts can be

addressed through a Neighborhood Traffic Management Plan, as described in Mitigation Measure TRA-MM-6-4, which funds and coordinates implementation of LADOT's Neighborhood Traffic Management Plan process for the Project, in an amount up to $500,000. The traffic calming measures listed in Table 54 of the Traffic Study have been used in various communities and have been proven to be effective at reducing neighborhood intrusion impacts by reducing or eliminating neighborhood intrusion traffic and/or improving the appearance of a neighborhood. However, it is conservatively concluded that, even after the implementation of all feasible mitigation measures, impacts to residential street segments remain significant.

With regard to cumulative impacts, local residential streets within neighborhoods in the vicinity of the Project may be subject to significant neighborhood intrusion impacts as a result of cut-through traffic generated by the Project under both Existing With Project and Future With Project Conditions. Therefore, Project impacts to residential street segments are significant and cumulatively considerable.

(h) Traffic/Caltrans Facilities Analysis

As set forth previously, the Project will contribute to the future traffic volumes on Caltrans facilities, as the Project will contribute to the total projected growth on the freeway mainline segments over the next 20 years until year 2035. The Project will also contribute to the freeway off-ramp queues extending beyond the available storage length. Since Caltrans has determined that, in general, there are no mitigation measures that a single Project can feasibly implement that will directly reduce mainline impacts to a less-than-significant level, it is conservatively concluded that the Project contributes to significant and unavoidable impacts on Caltrans facilities.

Section 21081 of the California Public Resources Code and Section 15093(b) of the CEQA Guidelines provide that when the decision of a public agency allow the occurrence of significant impacts identified in a Final EIR that are not substantially lessened or avoided, the lead agency must state in writing the reasons supporting its decision based on the Final EIR and/or other information in the record. Article I of the City's CEQA Guidelines incorporates all of the State CEQA Guidelines contained in Title 15, California Code of Regulations, Sections 15000 et seq., and thereby requires, pursuant to Section 15093(b) of the CEQA Guidelines, that the decision-maker adopt a Statement of Overriding Considerations at the time a project is approved if it finds that significant adverse environmental effects identified in the Final EIR cannot be substantially lessened or avoided. These findings and the Statement of Overriding Considerations are based on substantial evidence in the record, including but not limited to the Final EIR, the source references in the Final EIR, and other documents and material that constitute the record of proceedings.

Accordingly, the City adopts the following Statement of Overriding Considerations. The City recognizes that significant and unavoidable impacts will result from implementation of the project. Having (i) adopted all feasible mitigation measures, (ii) considered but rejected as infeasible alternatives to the project, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the project against the project's significant and unavoidable impacts, the City hereby finds that the each of the project's

benefits, as listed below, outweighs and overrides the significant unavoidable impacts of the Project.

Summarized below are the benefits, goals and objectives of the Project. These provide the rationale for approval of the project. Any one of the overriding considerations of economic, social, aesthetic and environmental benefits individually is sufficient to outweigh the significant unavoidable impacts of the project and justifies the approval, adoption or issuance of all of the required permits, approvals and other entitlements for the project and the certification of the completed Final EIR. Each of the listed project benefits set forth in this Statement of Overriding Considerations provides a separate and independent ground for the City's decision to approve the project despite the project's identified significant and unavoidable environmental impacts to air quality, cultural resources, noise and vibration, and traffic impacts:

- The project invests a minimum of $100,000,000 in California upon completion of construction, as recognized by the Governor of the State of California, who certified the project as an Environmental Leadership Development Project under CEQA Sections 21178 et seq., and creates up to 5,420 annual jobs including high-wage, highly skilled jobs that pay prevailing wages and living wages and construction jobs and permanent jobs for Californians and generates up to $37.4 million in State and local taxes, including $10.6 million that will be collected by Los Angeles County and $4.6 million collected by local cities;

- The project combats climate change as a high-density, mixed-use infill project that results in no net additional GHG emissions, as determined by the State Air Resources Board pursuant to Division 25.5 (commencing with Section 38500) of the Health and Safety Code, and by providing a minimum 135 kW capacity solar panels and by achieving LEED Silver certification, and by promoting the use of public transit including the Metro Red Line, which is located 777 feet from the project site and had a ridership of 44,861,106 in 2017, and providing 1,241 bicycle parking spaces, resulting in a 45 percent reduction in Vehicle Miles Traveled compared to a similar mixed-use development, thereby fulfilling the State's, SCAG's and the City's land use and transportation goals to reduce greenhouse gas emissions;

- The Project helps achieve the Mayor's goal to build 100,000 units of housing by 2021 by providing 950 new rental housing units, including 105 units for Very Low Income Households, in a mix of unit types, specifically studios, one bedrooms and two bedrooms, to help meet the demand for new housing in the City, and in particular in the Hollywood Community Plan Area;

- The project revitalizes an underutilized site by retaining and rehabilitating the Crossroads of the World complex and former Hollywood Reporter Building, both City-designated Historic Cultural Monuments, and integrating them into a cohesive mixed-use development consistent with the uses and density envisioned for the Regional Center and Hollywood Center designations of the project site; specifically, by developing hotel, residential, retail, entertainment and dining uses with a total of 68,783 square feet of publicly accessible open space consisting of a pedestrian paseo, courtyards and plazas.

FINDINGS OF FACT (SUBDIVISION MAP ACT)

In connection with the approval of Vesting Tentative Tract Map No. 73568-1A, the City Planning Commission of the City of Los Angeles, pursuant to Sections 66473.1, 66474.60, .61 and .63 of the State of California Government Code (the Subdivision Map Act), makes the prescribed findings as follows:

(a) THE PROPOSED MAP IS CONSISTENT WITH APPLICABLE GENERAL AND SPECIFIC PLANS.

The adopted Hollywood Community Plan designates the project site for Regional Center Commercial land uses with the corresponding zones of C2, C4, P, PB, RAS3, and RAS4. The project site is not located in a Specific Plan Area. The project site contains 6.86 net acres and is presently zoned C4-2D-SN and C4-2D. The proposed development for merger and resubdivision for 5 ground lots and 30 airspace lots, 950 residential apartments (11 percent, or 105 units, for Very Low Income Households), 308 key hotel, and 190,000 square feet of commercial use (68,000 square feet of commercial is existing) is allowable under the current adopted zone and the land use designation. The proposed floor area ratio (FAR) would be approximately 3.81:1 averaged across the Project Site. According to the the General Plan Framework, Regional Centers are intended to serve as the focal points of regional commerce, identity, and activity, and contain a diversity of uses. The development of sites and structures integrating housing with commercial uses is encouraged in concert with supporting services, recreational uses, open spaces, and amenities. Regional Centers are typically high-density places whose physical form is substantially differentiated from the lower-density neighborhoods of the City.

The Project would retain and rehabilitate Crossroads of the World, the former Hollywood Reporter Building and the Bullinger Building and remove all other existing uses on the Project Site and construct a high-density mixed-use development that would include eight mixed-use buildings with residential, hotel, commercial/retail, entertainment and restaurant uses, a stand-alone, one-story commercial/retail building on the eastern edge of the Crossroads of the World complex, and a stand-alone parking structure, with open space amenities. Therefore, the Project is consistent with the Regional Center designation.

The project is requesting a concurrent request under Case No. CPC-2015-2025-DB-MCUP-CU-SPR for the following entitlements: (1) reserving 11 percent, or 105 units, for Very Low Income Households, and utilizing Parking Option 1, with On-Menu Incentives to: a) permit a 35 percent increase in the maximum allowable Floor Area Ratio (FAR) from 2:1 to 2.7:1 FAR (for the C4-2D-SN portion of the site and Parcel E1) and from 3:1 to 4.05:1 FAR (for the C4-2D portion of the site); b) permit the averaging of floor area for an average FAR of approximately 3.26:1 across the site, density, parking and open space on two or more contiguous lots and permitting vehicular access from a less restrictive zone to a more restrictive zone; and c) an Off-Menu Incentive to permit an approximately 16.51 percent increase of 3.8:1 FAR in lieu of approximately 3.26:1 FAR averaged across the site; and (2) Conditional Uses to permit: a) a Master Conditional Use to permit the

on-site and off-site sale, dispensing and consumption of a full line of alcoholic beverages in connection with a total of 22 establishments associated with the Project's proposed hotel and commercial uses; b) a Master Conditional Use to permit eight uses with public dancing and live entertainment; and c) a Major Development Project for a project creating 250 or more hotel guest rooms; and (4) a Site Plan Review for a project resulting in an increase of 50 or more dwelling units. The project is consistent with the underlying zone, and the utilization of the request for the Density Bonus Compliance Review as stated above is appropriate and consistent with state law.

The Subdivision Map Act requires the Advisory Agency to find the proposed map be consistent with the General Plan. The Hollywood Community Plan, a part of the Land Use Element of the City's General Plan, states the following objectives that are relevant to the project:

Hollywood Community Plan

Objective No. 1: To further the development of Hollywood as a major center of population, employment, retail service and entertainment.

Objective No. 3: To make provision for the housing required to satisfy the varying needs and desires of all economic segments of the community, maximizing the opportunity for individual choice.

Objective No. 4: To promote economic well-being and public convenience through allocating and distributing commercial lands for retail service and office facilities in quantities and patterns based on accepted planning principles and standards.

The project site is located within the Hollywood portion of the City that is undergoing a significant transition. Many new developments, including mixed-use projects, are either built (such as the Columbia Square Project and the Eastown Apartments), under construction (such as the South Block Development and 6250 Sunset Project) or proposed. Several of these projects, like Crossroads Hollywood, involve the retention, rehabilitation and adaptive reuse of iconic historic buildings such as the Columbia Square Project and the 6250 Sunset Project. This project will help achieve Objective No. 1 above to revitalize the Hollywood Center by creating a lively, pedestrian-oriented area by rehabilitating the historic Crossroads of the World complex, the Hollywood Reporter Building and the Bullinger Building, and making it the anchor of a mixed-use development. Specifically, the project includes eight mixed-use buildings with residential, hotel, commercial/retail, entertainment and restaurant uses around a pedestrian paseo that runs through the middle of the project site. The Hollywood Community Plan also states that proposed development in excess of 4.5:1 up to 6:1 FAR may be permitted for Regional Center Commercial development if the development meets objectives in the Redvelopment Plan. The project site has a "D" Limitation pursuant to Ordinance No. 182,173 that limits the FAR to 3:1, but a project may exceed the 3:1 FAR provided that the project is approved by the City Planning Commission, or the City Council on appeal, pursuant to the procedures set forth in LAMC 12.32

D; and conforms with Hollywood Community Plan policies The project requests an increase in FAR through the State Density Bonus law, for a 3.8:1 FAR averaged across the site.

The project will also help achieve Objective No. 3 above by resulting in the construction of 950 residential units, including 11 percent, or 105 units, for Very Low Income Households. According to the City's Housing Element 2013-2021, "[i]t is the overall housing vision of the City of Los Angeles to create for all residents a city of livable and sustainable neighborhoods with a range of housing types, sizes and costs in proximity to jobs, amenities and services." The project achieves this vision by providing needed housing, including affordable housing, along a major transit corridor, Sunset Boulevard, and within a quarter mile radius of several high-capacity transit lines including the Metro Rapid Bus and Metro Red Line. Specifically, the project is located two blocks south of the Hollywood and Highland Metro Subway Station, where the Red Line connect Hollywood to Union Station and North Hollywood. This type of development is also consistent with the City's Framework Element which states that anticipated growth should be directed toward high-density, mixed-use centers and to the neighborhoods around its 80 rail stations.

The project is also consistent with Objective No. 4 above because of its mixed-use nature which will promote economic well-being by providing commercial uses in an underutilized, commercially zoned property. In addition, the project's uses are consistent with the adjacent properties which are primarily within the C4 Zone and are generally developed with commercial, institutional (i.e., churches and schools) and office uses. Finally, the project also promotes public convenience as it is located along a major transit corridor, Sunset Boulevard, and within walking distance (less than half a mile) of high-capacity transit, including the Metro Red Line located at the intersection of Hollywood Boulevard and Highland Avenue.

In addition to achieving the objectives of the Hollywood the Community Plan, the project would also support and be consistent with the following objectives identified in subsection 506.2.3: Regional Center Commercial Density of the Hollywood Redevelopment Plan:

Objective a: To concentrate high intensity and/or density development in areas with reasonable proximity or direct access to high capacity transportation facilities or which effectively utilize transportation demand management programs.

Objective b: To provide for new development which complements the existing buildings in areas having architecturally and/or historically significant structures.

Objective d: To encourage the development of appropriately designed housing to provide a balance in the community.

Objective e: To provide for substantial, well designed public open space in the

Project Area.

The project achieves Objective “a” above because it locates high-density commercial and residential uses near high capacity transportation facilities like the Metro Subway station at Hollywood and Highland. In addition, as listed above in the MMP, the project includes Mitigation Measure, TRA-MM-1, which requires that the project prepare and implement a TDM Program that includes strategies to promote non-auto travel and reduce the use of single-occupant vehicle trips. The project accomplishes Objective “b” above because it retains and rehabilitates existing, historic buildings on the project site, specifically the Crossroads of the World complex, the former Hollywood Reporter Building and the Bullinger Building. The proposed new buildings would have varying materials, colors and facade plane variations to complement the eclectic architectural styles of the Crossroads of the World Complex and the former Hollywood Reporter Building. The Crossroads of the World Complex and the former Hollywood Reporter Building will be rehabilitated and integrated into the new buildings in accordance with the Secretary of Interior’s Standards.

As previously stated, the project will also help achieve Objective “d” above by developing 950 residential units with 11 percent, or 105 units, for Very Low Income Households. The residential portion of the project is appropriately designed to accommodate tenants who wish to live near public transit, near employment centers in Hollywood, and near commercial establishments that would be created by the project. In addition, the unit mix of the project includes studios, one bedrooms and two bedrooms to create a housing balance to serve several segments of the population.

Finally, in conformance with Objective “e” above, the project provides well-designed public open space. Specifically, the project will provide a pedestrian paseo with courtyards connecting the historic Crossroads of the World complex and the new proposed hotel at the corner of Selma Avenue and Highland Avenue. The pedestrian paseo will be accessible from Las Palmas Avenue, McCadden Place, and Selma Avenue and will be designed to feature pedestrian seating areas with hardscape and landscape areas, as well as feature retail kiosks and other commercial uses at the ground floor to activate the open space.

Therefore, as conditioned, the proposed tract map is consistent with the intent and purpose of the General Plan, the Hollywood Community Plan and the Hollywood Redevelopment Plan.

(b) THE DESIGN AND IMPROVEMENT OF THE PROPOSED SUBDIVISION ARE CONSISTENT WITH APPLICABLE GENERAL AND SPECIFIC PLANS.

The design and improvement of the proposed subdivision will be consistent with the City’s General Plan Transportation Element: Mobility Plan 2035. Specifically, under Mobility Plan 2035, Sunset Boulevard is a designated Avenue I with a right-of-way width of 100 feet. Selma Avenue is a designated Local Street - Standard in the Mobility Plan 2035 with a right-of-way width of 60 feet. Highland Avenue is a designated Avenue I in the Mobility Plan 2035 with a right-of-way width of 100

feet. McCadden Place is a designated Local Street - Standard in the Mobility Plan 2035 with a right-of-way width of 60 feet. Las Palmas Avenue is a designated Local Street - Standard in the Mobility Plan 2035 with a right-of-way width of 60 feet. Engineering is requiring the following improvements:

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

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

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

d) Improve Sunset Boulevard and Highland Avenue adjoining the Ground Lot No.1, 2 and Ground Lot No. 4 of subdivision by the construction of additional concrete sidewalks to complete 13-foot full width concrete sidewalks (on both sides) with tree wells.

The project includes a total of 2,258 parking spaces within subterranean parking garages and one stand-along parking garage. Specifically, the parking garage for Development Parcel A provides six levels of subterranean parking. Development Parcels B provides five levels of subterranean parking; Parcel C provides four levels of subterranean parking; while the parking garage for Development Parcel D provides three levels of subterranean parking. In addition, parking is provided behind the Blessed Sacrament Church in Parcel E in a standalone parking garage (Building E1) that includes two subterranean levels and 5 above-grade levels. The subterranean parking levels are physically integrated within the project site, and are accessed via new driveways. Specifically, primary vehicular access to the subterranean garages is provided via driveways along Selma Avenue, McCadden Place, and Las Palmas Avenue, and primary vehicular access to Building E1 is provided along Selma Avenue. There are no driveways proposed on Sunset Boulevard. In total, there are 23 existing driveways on the project site – 14 will be closed, one maintained as is, eight will be modified and two new driveways will be created, for a total of 11 driveways for the project. In each case, the vehicular driveway is the minimum width required to be as efficient as possible. The project also provides 1,241 bicycle parking spaces.

The project also provides infrastructure improvements, including 239 new on-site trees, parkways and courtyards throughout the project site. Also, the project includes on-site and off-site improvements to the existing sanitary sewer system to serve the project’s demand for wastewater conveyance. In addition, the ground floors of the buildings are designed to provide for an enhanced pedestrian experience with retail entries, changes in materials, glazing and awnings along the street-level frontage. Finally, the following improvements will be made:

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

Therefore, as conditioned, the design and improvements of the proposed subdivision are consistent with the applicable General and Specific Plans.

(c) THE SITE IS PHYSICALLY SUITABLE FOR THE PROPOSED TYPE OF DEVELOPMENT.

The project site is physically suitable for the proposed subdivision. The site is in an urbanized area and already fully developed with surface parking lots and 172,573 square feet of existing floor area consisting of 82 residential units (including multi-family dwelling units and two duplexes) and commercial/retail and office uses. The project consists of demolition of all existing on-site buildings and surface parking lots except for the historic Crossroads of the World Complex, former Hollywood Reporter Building and the Bullinger Building, and the construction of eight new mixed-use buildings with residential, hotel, commercial/retail, entertainment, and restaurant uses, a new stand-alone, one-story commercial/ retail building on the eastern edge of the Crossroads of the World complex and a stand-alone parking garage. The project site is relatively flat and is located in a highly urbanized area of the Hollywood Community Plan Area. The Department of Building and Safety, Grading Division in their April 23, 2018 email confirms that the property is located outside of a City of Los Angeles Hillside Area; is exempt or located outside of a State of California liquefaction, earthquake induced landslide, or fault-rupture hazard zone; and, does not require any grading or construction of an engineered retaining structure to remove potential geologic hazards. The tract has been approved contingent upon the satisfaction of the Department of Building and Safety, Grading Division prior to the recordation of the map and issuance of any permits. In conclusion, the site is physically suitable for the proposed development.

(d) THE SITE IS PHYSICALLY SUITABLE FOR THE PROPOSED DENSITY OF DEVELOPMENT.

While the project replaces an underutilized lot consisting of 82 residential units and commercial/retail and office uses, surface parking lots and 172,573 square feet of existing floor area with new residential, hotel, commercial/retail, entertainment, and restaurant uses, the project site is physically suitable for the proposed density of the subdivision because it is a commercially-zoned (i.e., C4-2D-SN and C4-2D) infill site within an already high-density mixed-use residential, commercial and institutional use area. The C4-2D-SN and C4-2D Zones allow residential and commercial uses, thus allowing the mixed-use project. Specific uses around the project site consist of a mix of residential uses, including multiple-family residential structures, primarily along Las Palmas Avenue and Selma Avenue; single-family homes that have been adaptively repurposed into commercial uses along McCadden Place and Las Palmas Avenue; and

commercial uses along Sunset Boulevard and Highland Avenue, which make up the general character of the surrounding area around the project site. To the north, there are one- to three-story commercial, institutional and multi-family residential developments along Selma Avenue in the C4-2, C4-2D, C4-2-SN and PF-2D Zones. To the south, there are one- to two-story commercial developments along Sunset Boulevard in the C4-2D-SN Zone. To the east, there are one- to three-story buildings associated with the Blessed Sacrament Church and School campus in the C4-2D Zone; and to the west, there are one- to three-story buildings associated with the Hollywood High School campus across Highland Avenue in the PF-1XL Zone.

The project is also requesting a concurrent City Planning Commission approval for a Density Bonus Compliance Review and Site Plan Review application. By reserving eleven percent (or 105 units) of its proposed 950 units for Very Low Income Households, the project is eligible for a 35% density bonus increase and, thereby, an On-Menu Incentive for a 35 percent increase in the permitted Floor Area Ratio (FAR) from 2:1 to 2.7:1 FAR (for the C4-2D-SN portion of the site and Parcel E1) and from 3:1 to 4.05:1 FAR (for the C4-2D portion of the site). The project is also seeking an On-Menu Incentive to permit the averaging of floor area for an average FAR of approximately 3.26:1 across the site, density, parking and open space on two or more contiguous lots and permitting vehicular access from a less restrictive zone to a more restrictive zone; and a Waiver of Development Standard (Off-Menu) to permit an approximately 16.51 percent increase of 3.8:1 FAR in lieu of approximately 3.26:1 FAR averaged across the site.

In addition, the project is seeking to utilize Parking Option 1 to allow two parking spaces for each unit with 2 to 3 bedrooms and one parking space for each unit with 0 to 1 bedrooms. The project provides a total of 2,258 parking spaces within parking garages that are contained underground or within a parking structure on the project site, ensuring adequate parking for the proposed project. In addition, the project includes 173,854 square feet of usable common and private open space, in excess of the minimum 101,075 square feet of open space required by the Los Angeles Municipal Code (LAMC). Finally, the project is also requesting Site Plan Review for a project resulting in an increase of 50 or more dwelling units.

The proposed project is required to obtain the approval of Case No. CPC-2015-2025-DB-MCUP-CU-SPR (condition 20 under Department of City Planning-Site Specific Conditions above), prior to the issuance of any building permits. As conditioned and with the approval of Case No. CPC-2015-2025-DB-MCUP-CU-SPR, the project complies with all LAMC requirements for parking, yards and open space. Therefore, as conditioned, the proposed Vesting Tract Map is physically suitable for the proposed density of the development.

(e) THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS ARE NOT LIKELY TO CAUSE SUBSTANTIAL ENVIRONMENTAL DAMAGE OR SUBSTANTIALLY AND AVOIDABLY INJURE FISH OR WILDLIFE OR THEIR HABITAT.

The EIR prepared for the project identifies no potential adverse impacts on fish or

wildlife resources. The project site, as well as the surrounding area, are presently developed with residential, mixed-use, institutional and commercial structures and do not provide a natural habitat for either fish or wildlife. The project site is presently improved with surface parking lots and 172,573 square feet of existing floor area consisting of 82 residential units and commercial/retail and office uses and does not contain any natural open spaces, act as a wildlife corridor, contain riparian habitat, wetland habitat, migratory corridors, conflict with a Habitat Conservation Plan, nor possess any areas of significant biological resource value. With regard to protected trees, a Protected Tree Report was prepared for the project site and found that of the 71 trees identified on the project site, four trees are California live oaks (*Quercus agrifolia*). The Protected Tree Report concludes that three of the California live oaks were planted, and as such, are not considered protected under the Protected Tree Ordinance. However, one California live oak may be native to the project site, and this tree will removed by the project. The proposed removal of the on-site native tree will be implemented in compliance with applicable requirements of the City's Protected Tree Ordinance. In addition, the project will replace the removed native trees with 24-inch box trees on a 4:1 basis, which exceeds replacement requirements set forth in the Protected Tree Ordinance and is consistent with current Board of Public Works planning policy. Therefore, the design of the subdivision would not cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.

(f) THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS ARE NOT LIKELY TO CAUSE SERIOUS PUBLIC HEALTH PROBLEMS.

The required improvements resulting from the subdivision will not cause serious public health problems. The Bureau of Sanitation, Wastewater Collection System Division issued a letter dated April 30, 2018, stating that they reviewed the existing sewer and storm drain lines serving the tract, and determined that there will be no potential problems to these City structures or potential maintenance problems. The EIR fully analyzed the impacts of both construction and operation of the project on the existing public utility and sewer systems, facilities and services and determined that impacts are less than significant. In addition, the development is required to be connected to the City's sanitary sewer system, where the sewage will be directed to the LA Hyperion Treatment Plant, which has been upgraded to meet Statewide ocean discharge standards. The Bureau of Engineering has reported that the proposed subdivision does not violate the existing California Water Code because the subdivision will be connected to the public sewer system and will have only a minor incremental impact on the quality of the effluent from the Hyperion Treatment Plant.

(g) THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS WILL NOT CONFLICT WITH EASEMENTS ACQUIRED BY THE PUBLIC AT LARGE FOR ACCESS THROUGH OR USE OF PROPERTY WITHIN THE PROPOSED SUBDIVISION.

The proposed subdivision and improvements will not conflict with any easements. No such easements are known to exist. In addition, the Bureau of Engineering indicated in their report dated April 24, 2018 that the proposed improvements will

not conflict with easements. Needed public access for roads and utilities will be acquired by the City prior to recordation of the proposed tract.

(h) THE DESIGN OF THE PROPOSED SUBDIVISION WILL PROVIDE, TO THE EXTENT FEASIBLE, FOR FUTURE PASSIVE OR NATURAL HEATING OR COOLING OPPORTUNITIES IN THE SUBDIVISION. (REF. SECTION 66473.1)

In assessing the feasibility of passive or natural heating or cooling opportunities in the proposed subdivision design, the applicant has prepared and submitted materials which consider the local climate, contours, configuration of the parcel(s) to be subdivided and other design and improvement requirements.

Providing for passive or natural heating or cooling opportunities will not result in reducing allowable densities or the percentage of a lot which may be occupied by a building or structure under applicable planning and zoning in effect at the time the tentative map was filed.

The lot layout of the subdivision has taken into consideration the maximizing of the north/south orientation and the topography of the site has been considered in the maximization of passive or natural heating and cooling opportunities.

These findings shall apply to both the tentative and final maps for Vesting Tentative Tract Map No. 73568.

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November 9, 2018

Attachment To Appeal by Livable LA

The City Planning Commission erred and/or abused its discretion in approving a Vesting Tentative Tract Map (VTM) No. VTT-73568-1A, CPC-2015-2025-DB-MCUP-CU-SPR, and ENV-2015-2026-EIR. The grounds for this appeal are provided in detail below and in the May 14, 2018 and July 25, 2017 letters from Chatten-Brown & Carstens to City Planning Environmental Review Coordinator Alejandro Huerta, and our prior appeal to the City Planning Commission, all of which are incorporated by reference. Our prior comments have not been adequately responded to. The EIR for the VTM is inadequate for numerous reasons explained in detail below and in these letters. In addition to appealing the VTM and MCUP, the certification of this EIR is also appealed pursuant to Public Resources Code section 21151 subdivision (c).

All parcels in the nearby area include a condition that an approved Transportation Plan has been approved by CRA, implemented by the CRA. The CRA prepared the Plan but it has not been approved by the CRA Board or implemented. An approved Transportation Plan must be required.

Additionally, the letter of determination clearly states that low-income units would be held for right of refusal to any tenants who qualify for them. Tenants cannot qualify as the lists are currently closed. More importantly, the units cannot be promised to anyone. This goes against the Housing Authority of the City of Los Angeles (HACLA) covenants for affordable housing. Units cannot be promised to anyone by the owner/developer. HACLA already has a waiting list of people waiting for affordable units. The tenants would not have the legal right to cut to the front of the line.

The only option is a true right of return, with no qualifiers set by the developer. This means no credit/background checks to return; units will be held at the current rate being paid; and only allowed rent increases once every twelve months at the rates set by the Los Angeles Housing + Community Investment Department (HCIDLA) for Los Angeles Rent Stabilization Ordinance (LARSO). Tenants should not be charged an increase in deposit. Tenants must receive rent subsidies for units within nearby radius for the time during construction. This will be for the 60 families still residing on the premises which will be held outside of the "affordable" units held for density bonus.

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August 23, 2018

Attachment To Appeal by Livable LA

The Advisory Agency erred and/or abused its discretion in approving a Vesting Tentative Tract Map (VTM) No. 73568. The grounds for this appeal are provided in detail below and in the May 14, 2018 and July 25, 2017 letters from Chatten-Brown & Carstens to City Planning Environmental Review Coordinator Alejandro Huerta, which are incorporated by reference. Our prior comments have not been adequately responded to. The EIR for the VTM is inadequate for numerous reasons explained in detail below and in these letters. In addition to appealing the VTM, the certification of this EIR is also appealed pursuant to Public Resources Code section 21151 subdivision (c).

The approval of VTM 73568 would allow piecemeal review of the development of properties located on Selma Avenue, Highland Avenue, McCadden Place, and Sunset Boulevard (the Project). Piecemeal review violates the California Environmental Quality Act (CEQA) and Los Angeles Municipal Code section 12.36's requirement for processing multiple approvals together. We are aware the Site Plan Review portion of the Project is noticed for hearing by the City Planning Commission on September 13, 2018 at 8:30 a.m. This portion of the project should not be heard separately from the present appeal of the VTM, and the appeal of the VTM should not be set for hearing without sufficient notice.

There are four cultural heritage nominations for buildings at the Crossroads brought by the Aids Healthcare Foundation and the Art Deco Society and recommended by the Cultural Heritage Commission. These nominations should be approved, and no further decisions should be made about the VTM until those nominations are decided upon.

The VTM approval decision is 294 pages, mailed on August 15, 2018 but not received until August 27, 2018. We anticipate submitting further explanations of our objections prior to the Planning Commission hearing of the appeal. A 10 day period running from August 15 to August 27 is not sufficient for comments about such an extensive decision and EIR including an Errata.

The Kosmont report did not use capitalized value of long term ground leases. The land use rent, if it has been negotiated and finalized, must be shown or calculated to the present value.

All other parcels in the nearby area include a condition that an approved Transportation Plan has been approved by CRA, implemented by the CRA. The CRA prepared the Plan but it has not been approved by the CRA Board or implemented. An approved Transportation Plan must be required.

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May 14, 2018

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Re: Further Comments on Environmental Impact Report ENV-2015-2026-EIR State Clearinghouse No. 2015101073; Renewed Request for Continuance of May 15, 2018 Hearing on Crossroads Hollywood Project

Dear Mr. Huerta:

On behalf of Livable LA, we submitted comments on the Crossroads Hollywood Project environmental impact report (EIR). We have the following additional objections, and renew our request, submitted on April 20, 2018, that the hearing for the Crossroads Hollywood project (the Project) set for May 15, 2018 by the Deputy Advisory Agency/Hearing Officer be continued to allow sufficient time for public review of the material, including modifications to the Project, that has only recently been made available.

Without waiving any prior objections, we object to the following defects in the Final EIR.

1. **The New Stand-Alone Parking Structure Will Have Impacts That Must Be Analyzed in a Recirculated EIR.**

When a lead agency adds "significant new information" to an EIR after the public has reviewed the Draft EIR but before the agency certifies the EIR, the agency must pursue an additional round of consultation by recirculating the revised Draft EIR to the public. (Pub. Resources Code § 21092.1.) New information is "significant" if, as a result of the additional information, "the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of

the project or a feasible way to mitigate or avoid such an effect." (*Laurel Heights Improvement Assn. v. Regents of Univ. of California* (1993) 6 Cal. 4th 1112, 1129, CEQA Guidelines, Cal.Code Regs., tit. 14, § 15088.5, subd. (a).)

The FEIR states the Modified Project includes "the addition of Development Parcel E, which would be located at the terminus of Cherokee Avenue at Selma Avenue… for the construction of a stand-alone parking structure north of the Blessed Sacrament Church." (FEIR, p. II-272.) Because this new structure was not included in the Draft EIR, its potentially significant impacts on traffic, air quality, and noise among other impacts, should be disclosed in a recirculated EIR.

2. The Newly-Created Economic Feasibility Review Does Not Support Rejection of Alternative 5 as Economically Infeasible.

An environmentally superior alternative that avoids significant impacts may not be rejected merely because it would cost more and create a lower rate of return for a project. Rather, evidence is required showing the alternative would be impracticable. "The fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible. What is required is evidence that the *additional* costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project." (*Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587, 599 [quoting *Citizens of Goleta Valley v. Board of Supervisors, supra,* 197 Cal.App.3d at p. 1181, italics added].) In *Preservation Action*, the court invalidated a city's rejection of a reduced-size alternative for a proposed home improvement warehouse project on a site occupied by an unused historic building. The court stated "The administrative record does not contain any evidence that the reduced-size alternative would be so much less profitable and produce so many fewer tax dollars that the project would be impractical." (*Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336, 1357.) Similarly, in the present case there is insufficient evidence to support rejection of Alternative 5.

The FEIR claims that a newly-prepared economic analysis shows Alternative 5 cannot provide the financial ability to rehabilitate five on-site historical resources. (FEIR, p. II-13.) The evidence presented in the Economic Feasibility Review—Crossroads Hollywood and Peer Review in Appendix FEIR-2 of the Final EIR does not provide sufficient evidence to support a claim of economic infeasibility. As found by independent economic analysis submitted by Aaron Chowla, this conclusion is defective for several reasons including: the "estimated land cost" should have been lower than provided; estimated construction costs for Alternative 5 have an unreasonably high markup for general allowances and soft costs; the Feasibility Review improperly assumes losing 2/3 of useable space due to historic preservation (1,432,500 SF for original project compared to 474,018 SF for historic preservation); the Feasibility Review underestimates

the Lease/SF revenue associated with a historic preservation alternative; and the Feasibility Review model assumes no debt financing with beneficial tax breaks and a higher return on equity a developer could receive under Alternative 5. Furthermore, it appears the assumptions in the FEIR's economic analysis failed to account for rehabilitation cost savings that could be realized through application of the Historical Building Code. (http://ohp.parks.ca.gov/pages/1074/files/2016%20CA%20CHBC.pdf.) The FEIR improperly rejects the economic feasibility of Alternative 5.

3. Alternative 5 Meets Most Project Objectives.

The FEIR asserts that Alternative 5 Does not "fully meet" the majority of project objectives. (FEIR, p. II-9.) The FEIR asserts that Alternative 5 would create "greater impacts… on existing historical resources…since a greater number of historic resources would potentially be impacted by underground excavation and construction on all four development parcels." (FEIR, p. II-9.) This assertion is ridiculous because Alternative 5 can easily be conditioned not to create such impacts. The FEIR asserts that surface water quality impacts will not be improved as under the project but, again, Alternative 5 could be conditioned to provide these benefits. Finally, the FEIR states noise and vibration would be greater to sensitive receptors that "remain on-site." (FEIR, p. II-9.) However, as the FEIR elsewhere states, impacts to on-site residents or users is not a factor in CEQA analysis unless the project exacerbates an existing condition. (FEIR, p. II-20 citing *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369.)

4. The FEIR Fails to Adequately Respond to Comments Regarding Traffic Impacts.

The FEIR fails to adequately address the objections Caltrans and we raised regarding the Project's impacts to the US-101 Freeway.

Caltrans stated the CMP methodology used in the EIR is "not adequate when analyzing freeway impacts." (FEIR, II-63.) Rather than use an adequate methodology, the FEIR responds that an October 2013 Freeway Analysis Agreement somehow absolves the City from conducting adequate analysis. It does not. Caltrans' objections identify a significant issue that has not been mitigated.

Caltrans further requested a Traffic Mitigation Agreement be signed prior to circulation of the Final EIR. (FEIR, p. II-65.) However, the FEIR states the City does not view such an agreement as a defensible mitigation measure. Nonetheless, the City claims "a significant unavoidable cumulative impact on Caltrans facilities would occur." (FEIR, p. II-66.) As we stated in our comment letter, such impacts must be mitigated. (FEIR, p II-277). The City may not adopt a statement of overriding considerations for cumulative

traffic impacts when feasible mitigation measures such as the traffic mitigation agreement have not been adopted. (Pub. Resources Code § 21081.)

The size of the Project must be reduced to reduce the impacts to Caltrans facilities. (FEIR, p. II-277.) However, the FEIR fails to address this feasible mitigation measure.

5. Greenhouse Gas Emissions Analysis and Mitigation is Inadequate.

The FEIR defends the use of a business as usual or what is termed a "No Implementation of Energy Reduction Measures (NEIRM)" scenario as being included to "demonstrate the efficacy of these measures for informational purposes only." (FEIR, p. II-283.) The FEIR's attempt to take credit for measures that must be implemented in any case is misleading. The baseline scenario must assume these legally required mitigation measures will be implemented.

The FEIR states the project will "not result in any net additional GHG emissions . . . . with the purchase of emission offset credits." (FEIR, p. II-283.) The Project must avoid additional GHG emissions through reduction of emissions and implementation of measures to avoid creating new emissions. Reducing the size of the Project would reduce its emissions.

6. The Development Application for the Hollywood Center (Millenium) Project Reveals Cumulative Impacts that Must be Analyzed in the EIR.

On May 4, 2018, the City made available the Application for Environmental Leadership Development Project for the Hollywood Center Project (Millenium project). This Millenium project will have cumulative impacts with the proposed Crossroads Project that should be analyzed in the EIR.

7. Liquefaction Can Create Significant Impacts.

The FEIR states that the General Plan Safety Element's classification of the sites a "susceptible to liquefaction" is "outdated" and proceeds to state various sources that have not identified the site as subject to liquefaction. (FEIR, p. II-20.) However, the General Plan is the authoritative source for information, not to be overruled by a zoning map or imprecise State of California map referenced in the FEIR. The General Plan is the "constitution for future development" and is located at the top of "the hierarchy of local government law regulating land use." (*DeVita v. County of Napa* (1995) 9 Cal.4th 763, 773.) The FEIR seeks to sweep liquefaction issues under the rug by claiming the area is not in a liquefaction hazard zone. (FEIR, p. II-21.) The EIR's treatment of land use consistency is inadequate because of its failure to address the General Plan Safety Element's identification of the susceptibility to liquefaction other than by saying it is outdated. The FEIR reveals a potentially significant impact that requires recirculation of

the EIR so the public and public agencies may evaluate why the FEIR asserts the City's General Plan Safety Element is incorrect. Construction in an area subject to liquefaction exacerbates those risks.

8. Impacts to LAUSD Schools Will Be Significant.

The Los Angeles Unified School District states "Based upon a review of the Draft EIR, the proposed project will have a significant impact on LAUSD schools." (FEIR, II-80.) LAUSD's Hollywood High School and Selma Avenue Elementary School campuses would be located within 0.25 mile of the proposed project Site. These significant impacts would occur in the areas of air quality, noise, traffic, and pedestrian safety impacts. The significant impacts on LAUSD schools, which were not identified in the Draft EIR, requires recirculation of the EIR for public review to ensure the proposed mitigation measures actually reduce the newly-identified significant impacts below a level of significance.

9. Air Quality Impacts Would be Significant But Feasible Mitigation Measures Are Impermissibly Omitted.

SCAQMD staff recommended "additional mitigation measures to further reduce construction and operational emissions, particularly from NO." (FEIR, p. II-87.) The FEIR improperly refused to adopt such measures or explain the reasons they would not be adopted. The FEIR incorrectly states the requirement to adopt all feasible mitigation measures "is not a requirement in CEQA." (FEIR, II-89.)

10. Floor Area Averaging is Not Allowed for the Project as Proposed.

One comment letter from Crown Sunset Associates, LLC appropriately stated:

> The DEIR also simply takes for granted the averaging of floor area ratio across the entire Project site without actually analyzing the legality or propriety of doing so. The only means by which the Project can purport to legally install three high rise buildings is by scraping off the unused density of the Crossroads of the World site.

(FEIR II-158.) Floor area averaging requires findings set forth in LAMC section 12.24.W.19 including a finding that unified development is proposed. It requires procedures including approval by all persons holding ground leases in the subject property. A covenant must be required to do the following:

> (1) guaranteeing to continue the operation and maintenance of the development as a unified development;

(2) indicating the floor area and, if applicable, density used on each parcel and the floor area and, if applicable, density potential, if any, that would remain;

(3) guaranteeing the continued maintenance of the unifying design elements;

These provisions for allowing floor area averaging have not been met.

Conclusion.

The Final EIR must be supplemented to address the shortcomings we and others have identified in our objections to the FEIR. While the project has been modified in some ways to address significant impacts, these modifications do not go far enough and, where new development is proposed, can create significant impacts of their own. Once the defects in the EIR are remedied, the Final EIR must be recirculated for adequate public and public agency review and comment. We join in the objections stated in the comments noted above, as well as other objections to the Project.

Thank you for your consideration.

Sincerely,

Douglas P. Carstens