

# **I. Executive Summary**

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In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of this Draft Environmental Impact Report (EIR) contains a brief summary of the Crossroads Hollywood Project (the Project) and its potential environmental effects. More detailed information regarding the Project and its potential environmental effects is provided in the following sections of this Draft EIR. Also included in this section of this Draft EIR is an overview of the purpose and focus of this Draft EIR, a general description of the Project and proposed entitlements, a description of the organization of this Draft EIR, an overview of the Project, a general description of areas of controversy, a description of the public review process for this Draft EIR, and a summary of the alternatives to the Project evaluated in this Draft EIR.

## **1. Purpose of this Draft EIR**

As described in Section 15123(a) and 15362 of the CEQA Guidelines, an EIR is an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. Therefore, the purpose of this Draft EIR is to focus the discussion on the Project's potential environmental effects that the City of Los Angeles (City), as the Lead Agency, has determined to be, or potentially may be significant. In addition, feasible mitigation measures are recommended, when applicable, that could reduce or avoid the Project's significant environmental impacts.

This Draft EIR serves as the environmental document for all actions associated with the Project. This EIR is a "Project EIR" as defined by Section 15161 of the CEQA Guidelines. Furthermore, this Draft EIR complies with Section 15064 of the CEQA Guidelines which discusses determining the significance of the environmental effects caused by a project.

## **2. Draft EIR Focus and Effects Found Not To Be Significant**

In accordance with Section 15128 of the CEQA Guidelines, 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 Draft EIR. An Initial Study was prepared for the Project, and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse, Governor's Office of Planning and Research (OPR), responsible agencies, and other interested parties on October 22, 2015, for a 30-day review period. The Initial Study, NOP, and NOP comment letters are included in Appendix A to this 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 this Draft EIR. The City determined through the Initial Study the potential for significant impacts in the following environmental issue areas:

- Aesthetics (including views, light/glare, and shading)
- Air Quality
- Cultural Resources
- Geology and Soils
- Greenhouse Gas (GHG) Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use
- Noise
- Population and Housing
- Public Services (including fire protection, police protection, schools, parks and recreation, and libraries)
- Traffic, Access, and Parking
- Utilities and Service Systems (including water supply and infrastructure, wastewater, solid waste, energy)

The City determined through the Initial Study that the Project would not have the potential to cause significant impacts related to agricultural and forest resources; air quality (specifically, odors); biological resources; geology and soils (specifically, landslides and soil support), hazards and hazardous materials (specifically, airports, private airstrips, and wildlands); hydrology and water quality (specifically, flood plains/flooding and inundation by seiche, tsunami, and mudflow); land use (specifically, habitat or natural community conservation plans); mineral resources; noise (specifically, airports and private airstrips);

and transportation and traffic (specifically, air traffic and traffic design and use). Therefore, these areas were not analyzed in this Draft EIR. The Initial Study demonstrating that no significant impacts would occur for these issue areas is included in Appendix A to this Draft EIR.

### 3. Draft EIR Organization

This Draft EIR is comprised of the following sections:

- I. **Executive Summary.** This section describes the purpose of this Draft EIR, Draft EIR focus and effects found not to be significant, Draft EIR organization, Project summary, areas of controversy and issues to be resolved, public review process, summary of alternatives, and a summary of environmental impacts and mitigation measures.
- II. **Project Description.** This section describes the project location, existing conditions, Project objectives, and characteristics of the Project.
- III. **Environmental Setting.** This section contains a description of the existing physical and built environment and a list of related projects anticipated to be built within the project vicinity.
- IV. **Environmental Impact Analysis.** This section contains the environmental setting, project and cumulative impact analyses, mitigation measures (where necessary), and conclusions regarding the level of significance after mitigation for each of the following environmental issues: aesthetics (views, light/glare, and shading); air quality; greenhouse gas emissions; cultural resources; geology and soils; hazards and hazardous materials; land use; noise; employment; housing; population; public services (police protection, fire protection, schools, libraries, and parks and recreation); traffic, access, and parking; utilities and service systems (water supply and infrastructure, wastewater, solid waste, and energy).
- V. **Alternatives.** This section provides an analysis of a reasonable range of alternatives to the Project including: No Project/No Build Alternative; Reduced Height and FAR<sup>1</sup> Alternative; Additional Project Site Alternative; No Zone or Height District Change/No Density Bonus Alternative; Historic Preservation Alternative; and Proposed Hollywood Community Plan Update Alternative.

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<sup>1</sup> FAR = Floor Area Ratio

- VI. Other CEQA Considerations.** This section provides a discussion of significant unavoidable impacts that would result from the Project and the reasons why the Project is being proposed notwithstanding the significant unavoidable impacts. An analysis of the significant irreversible changes in the environment and potential secondary effects that would result from the Project is also presented here. This section also analyzes potential growth-inducing impacts of the Project and potential secondary effects caused by the implementation of the mitigation measures for the Project. Lastly, a summary of the possible effects of the Project that were determined not to be significant within the Initial Study is provided.
- VII. References.** This section lists the references and sources used in the preparation of this Draft EIR.
- VIII. Acronyms and Abbreviations.** This section provides a list of acronyms and abbreviations used in this Draft EIR.
- IX. List of Preparers.** This section lists the persons, public agencies, and organizations that were consulted or contributed to the preparation of this Draft EIR.

This Draft EIR includes the environmental analysis prepared for the Project and appendices as follows:

- Appendix A—Initial Study/NOP/NOP Comment Letters
- Appendix B—Lighting Study
- Appendix C—Air Quality
- Appendix D—Greenhouse Gas Emissions
- Appendix E—Cultural Resources
- Appendix F—Geotechnical Feasibility Investigation Report
- Appendix G—Environmental Site Assessment
- Appendix H—Water Resources Report
- Appendix I—Noise Calculation Worksheets
- Appendix J—Population and Employment Cumulative Calculations

- Appendix K—Los Angeles Police Department Response Letter
- Appendix L—Los Angeles Fire Department Response Letter
- Appendix M—Los Angeles Unified School District Response Letter
- Appendix N—Los Angeles Public Library and Department of Recreation and Parks Response Letters
- Appendix O—Traffic, Access, and Parking
- Appendix P—Water Supply and Infrastructure
- Appendix Q—Wastewater
- Appendix R—Energy
- Appendix S—Alternatives

## **4. Existing Project Site Conditions**

The Project Site is currently developed with various uses, including low-density commercial/retail and office uses in the historic Crossroads of the World property; two residential duplexes totaling four dwelling units; three two-story, multi-family apartment buildings totaling 80 dwelling units; one- and two-story structures used for commercial/retail and office uses; and surface parking lots. Overall, existing on-site uses include a total of approximately 172,573 square feet of floor area. Intermittent landscaping is dispersed throughout the Project Site and generally consists of ornamental trees and shrubs.

Existing development on Development Parcel A of the Project Site consists of one- and two-story commercial/retail uses, including a small acting school and music rehearsal store, and surface parking areas. Existing development on Development Parcel B includes a single-story commercial use fronting McCadden Place, two residential duplexes on the south side of Selma Avenue, three two-story multi-family residential buildings along Selma Avenue and Las Palmas Avenue, a small single-story chiropractic office along Las Palmas Avenue, a one- to two-story building consisting of community-serving small retail shops along Sunset Boulevard, and a one- to three-story office building also along Sunset Boulevard.

Existing development on Development Parcel C of the Project Site includes Crossroads of the World, which is a designated City Cultural-Historic Monument (Monument #134) and is also listed on the National Register of Historic Places and the California Register of Historical Resources. The approximately 50,000-square-foot

Crossroads of the World complex consists of one- and two-story office, retail, and recording studio uses in a variety of architectural styles, such as Streamline Moderne and French-, English-, Moorish-, and Spanish-influenced styles. The buildings are connected by a series of landscaped walkways with pedestrian entrances on Sunset Boulevard and Las Palmas Avenue; pedestrian access from Selma Avenue has been removed and currently blocked off with a locked wrought-iron gate. The complex was designed in 1936 as an international shopping center and was the City's first outdoor pedestrian village that included a mix of retail and office uses. Over the years, the property has been adaptively reused and is currently used primarily as an office complex for the entertainment industry and other companies.

Development Parcel C of the Project Site also includes a two-story office/retail building west of Crossroads of the World and along Sunset Boulevard, one- and two-story office buildings along Las Palmas Avenue, and a surface parking lot. Existing development on Development Parcel D of the Project Site includes a two-story commercial/retail building and a surface parking lot.

The Project Site also includes the segment of the Las Palmas Avenue right-of-way located between Selma Avenue and Sunset Boulevard. With Project implementation, Las Palmas Avenue would be realigned. In addition, a multi-level parking structure would be constructed underneath Development Parcels B and C (and the realigned street) to serve the proposed uses in both development parcels.

## **5. Jobs and Economic Improvement through Environmental Leadership Act (Assembly Bill 900)**

In September 2011, the Governor signed the Jobs and Economic Improvement through Environmental Leadership Act (AB 900) to provide streamlining benefits to "environmental leadership development projects (leadership projects)" under CEQA. The OPR has provided guidelines for submitting applications for streamlined environmental review pursuant to AB 900, as amended by Senate Bill (SB) 743 and SB 734 (discussed below). As defined in Public Resources Code (PRC) Section 21180(b)(1), the Project is considered a leadership project as it meets the following conditions:

*A residential, retail, commercial, sports, cultural, entertainment, or recreational use project that is certified as LEED silver or better by the United States Green Building Council and, where applicable, that achieves a 10-percent greater standard for transportation efficiency than for comparable projects. These projects must be located on an infill site. For a project that is within a metropolitan planning organization for which a sustainable communities strategy or alternative planning strategy is in effect, the infill*

*project shall be consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy, for which the State Air Resources Board, pursuant to subparagraph (H) of paragraph (2) of subdivision (b) of Section 65080 of the Government Code, has accepted a metropolitan planning organization's determination that the sustainable communities strategy or the alternative planning strategy would, if implemented, achieve the greenhouse gas emission reduction targets.*

The Governor may certify a leadership project for a streamlined environmental review if all of the following conditions are met:

- (1) The Project would result in a minimum investment of \$100 million in California upon completion of construction;
- (2) The Project would create high-wage, highly skilled jobs that pay prevailing wages and living wages and provide construction jobs and permanent jobs for Californians, and help reduce unemployment;
- (3) The Project would provide unbundled parking for the residential dwelling units, with the exception of the affordable residential dwelling units, pursuant to PRC Section 21184.5, as amended by SB 734 (as discussed below);
- (4) The Project would not result in any net additional GHG emissions, including GHG emissions from employee transportation, as determined by the State Air Resources Board pursuant to Division 25.5 (commencing with Section 38500) of the Health and Safety Code;
- (5) The Project Applicant has entered into a binding and enforceable agreement that all mitigation measures required pursuant to Division 13 of the PRC to certify the Project shall be conditions of approval of the Project, and those conditions would be fully enforceable by the lead agency. In the case of environmental mitigation measures, the Project Applicant would agree, as an on-going obligation, that those measures would be monitored and enforced by the lead agency for the life of the obligation;
- (6) The Project Applicant would agree to pay the costs of the Court of Appeal in hearing and deciding any case, including payment of the costs for the appointment of a special master if deemed appropriate by the court, in a form and manner specified by the Judicial Council; and
- (7) The Project Applicant would agree to pay the costs of preparing the administrative record for the Project concurrent with review and consideration of

the Project pursuant to Division 13 of the PRC, in a form and manner specified by the lead agency for the Project.

In September 2013, the Governor signed SB 743 (Chapter 386 of the 2013 California Legislation Session), which became effective on January 1, 2014. Among other provisions, SB 743 amends CEQA by adding PRC Section 21099 regarding analysis of aesthetics and parking impacts for urban infill projects and modifies AB 900, as discussed above.

PRC Section 21099 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.” PRC Section 21099 defines a “transit priority area” as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” PRC Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way, from parcels that are developed with qualified urban uses.

In addition, SB 743 amended AB 900 regarding the documentation of a binding agreement between the Project Applicant and the lead agency establishing the requirements set forth in PRC Sections 21183 (d), (e), and (f) to remove the need for a binding agreement prior to the release of the Draft EIR. Furthermore, SB 743 added Section 21185 to the PRC, which requires that the Judicial Council adopt a rule of court to establish procedures applicable to actions or proceedings brought to attack, review, set aside, void, or annul the certification of the EIR for leadership projects certified by the Governor or the granting of any Project approvals that require the actions or proceedings, including any potential appeals therefrom, be resolved within 270 days of certification of the record of proceedings pursuant to PRC Section 21186. This creates an accelerated timeframe for potential CEQA litigation.

In August 2016, the Governor signed SB 734, which became effective immediately, to amend Sections 21178, 21181, 21183, 21189.1, and 21189.3 of the PRC. SB 734 also added Section 21184.5 to the PRC, which requires a leadership project to provide unbundled parking for the residential dwelling units, with the exception of the affordable residential dwelling units. Specifically applicable to the Project, PRC Section 21181, as

amended by SB 734, extends the authority of the Governor to certify a project as an environmental leadership development project eligible for streamlining to January 1, 2018, which amends the original date of January 1, 2016, established under AB 900. SB 734 also provides that the certification expires and is no longer valid if the lead agency fails to approve a certified project before January 1, 2019.

The Project Applicant submitted an application to the Governor for certification of the Project as a leadership project under AB 900, as amended by SB 743 and SB 734, and the application was subject to public review from August 29, 2016, through September 27, 2016. On November 14, 2016, the California Air Resources Board issued Executive Order G-16-095, determining that the Project would not result in any net additional GHG emissions for purposes of certification under AB 900. On November 29, 2016, the Governor certified the Project as an eligible 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 Section 21184(b)(2)(C) of the PRC, 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.

Pursuant to PRC Section 21187, within 10 days of the Governor certifying the Project as an leadership project, the City of Los Angeles issued a public notice on January 6, 2017, stating that the Project Applicant has elected to proceed under Chapter 6.5 (commencing with Section 21178) of the PRC, which provides, among other things, that any judicial action challenging the certification of the EIR or the approval of the Project described in the EIR is subject to the procedures set forth in Sections 21185 to 21186, inclusive, of the PRC.

## **6. Overview of the Project**

The Project proposes to redevelop the Project Site with a cohesive, mixed-use development that retains and integrates Crossroads of the World within a collection of new buildings of contemporary design, which creates an open-air pedestrian district with a mix of shopping, dining, and entertainment uses. Crossroads of the World, which is a designated City Cultural-Historic Monument (Monument #134) and is also listed on the National Register of Historic Places and the California Register of Historical Resources, would be retained and rehabilitated as part of the Project. Eighty-four existing residential units (including 80 multi-family dwelling units and two duplexes) and low-density commercial/retail and office uses, as well as surface parking lots, would be demolished and replaced with eight new mixed-use buildings, including residential, hotel, commercial/retail, office, 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. Three of the buildings would be high-rise buildings ranging in height from 26 to 32 stories. The remaining buildings would be one to six stories tall. The Project design would preserve the historic setting of the Crossroads of the World complex by distributing density and height to portions of the Project Site away from the complex.

Upon buildout, the Project would include approximately 950 residential units, 308 hotel rooms, approximately 95,000 square feet of office uses, and approximately 185,000 square feet of commercial/retail uses, totaling approximately 1,432,500 square feet of floor area (including existing uses to be retained within the Crossroads of the World complex). It is anticipated that approximately 83,200 square feet and 40,000 square feet of the proposed retail area would consist of restaurant uses and a supermarket, respectively. The Project would demolish a total of approximately 131,656 gross square feet of existing development. In total, the Project would result in an increase of approximately 1,259,927 square feet of net new floor area on the Project Site.

The Project also includes vehicular and pedestrian circulation improvements, including the realignment of Las Palmas Avenue at Sunset Boulevard. Currently, there is an offset intersection at this location because the Las Palmas Avenue street segment north of Sunset Boulevard lies east of its street segment south of Sunset Boulevard. The Project would realign Las Palmas Avenue to create a four-legged intersection, forming a continuous street at Sunset Boulevard. The Project also proposes to establish a new pedestrian passageway (i.e., a pedestrian paseo) that would extend diagonally near Sunset Boulevard from the front of Crossroads of the World to the northwestern corner of the Project Site at Highland Avenue and Selma Avenue.

The Project Site includes four areas referred to as Development Parcels A, B, C, and D. Development Parcel A includes Building A1; Development Parcel B includes Buildings B1, B2, B3, and B4; Development Parcel C includes Buildings C1, C2, and C3 and Crossroads of the World; and Development Parcel D includes Building D1. These development parcels are discussed in further detail below.

### Development Parcel A—Hotel Area (Building A1)

The Project would remove all existing land uses on Development Parcel A and construct Building A1, which would be located on the south side of Selma Avenue between Highland Avenue and McCadden Place. Building A1 would consist of a high-rise structure that would contain 377,000 square feet of space, including a 308-room hotel, ancillary meeting rooms, a lobby lounge and bar, a rooftop bar and lounge, and approximately 28,500 square feet of ground floor restaurant and retail uses. Building A1 would be approximately 26 stories tall and would reach a maximum height of approximately 365 feet.

Development Parcel A would have six levels of subterranean parking with 307 parking spaces to serve the hotel building.

### Development Parcels B and D—Mixed-Use Residential and Retail Area (Buildings B1, B2, B3, B4, and D1)

The Project would remove all existing land uses on Development Parcels B and D and construct a total of five mixed-use residential buildings (i.e., Buildings B1, B2, B3, B4, and D1) with ground floor restaurant and retail uses. Development Parcel B, consisting of Buildings B1, B2, B3, and B4, would include a total of approximately 872 residential units (190 condominium units and 682 rental units) and approximately 58,500 square feet of restaurant and retail uses. Building B1 would consist of 30 floors and would reach a maximum height of approximately 402 feet above grade. Development Parcel B is located between McCadden Place and Las Palmas Avenue.

Building B2 would consist of six floors and would reach a maximum height of approximately 87 feet above grade. Building B3 would consist of 32 floors and would reach a maximum height of approximately 386 feet above grade. Building B4 would consist of six floors in addition to a mezzanine floor and would reach a maximum height of approximately 95 feet above grade. All buildings in Development Parcel B would include ground floor restaurant and retail uses with residential units above. Development Parcel B would have five levels of subterranean parking, which would be connected to and shared with Development Parcel C. The shared parking structure would have 2,083 parking spaces to serve all the uses on both development parcels.

Development Parcel D would consist of Building D1, which would include approximately 78 residential units and approximately 4,500 square feet of ground floor restaurant and retail uses. Building D1 would consist of six floors and would reach a maximum height of approximately 85 feet above grade. Development Parcel D would have three levels of subterranean parking with 104 parking spaces. Development Parcel D is located at the northeastern corner of Las Palmas Avenue and Selma Avenue.

In total, Development Parcels B and D would have 950 residential units (including 190 condominiums and 760 apartments) and approximately 63,000 square feet of ground floor restaurant and retail uses. Of the 760 apartment units proposed, 84 units would be provided as Very Low Income household dwelling units. These rental units would replace the existing 84 rent-stabilized units located in Development Parcel B that would be removed under the Project.

## Development Parcel C—Commercial Area (Buildings C1, C2, and C3, and Crossroads of the World)

The commercial portion of the Project, consisting of creative office and restaurant and retail uses, would be located in Development Parcel C east of Las Palmas Avenue and directly adjacent to the historic Crossroads of the World complex. As previously discussed, Crossroads of the World would be retained and rehabilitated as part of the Project. The rehabilitation of Crossroads of the World would include relocating the only single-story building located along Las Palmas Avenue (referred to in this Draft EIR as the “Early American Building” immediately north of the property at 1512 Las Palmas Avenue) within the Crossroads of the World complex to the central portion of the complex immediately to the east of Building C2. The remaining structures would remain in their current locations and would undergo interior renovations. Upon buildout of the Project, Crossroads of the World would provide approximately 50,000 square feet of restaurant and retail uses.

New development on Development Parcel C would include Buildings C1, C2, and C3, providing a total of approximately 95,000 square feet of office uses and approximately 43,500 square feet of ground floor restaurant and retail uses. Building C1 would be three stories tall and would reach a maximum height of approximately 65 feet above grade. Building C2 would consist of two floors and would reach a maximum height of approximately 81 feet above grade. Building C3 would consist of one floor with a maximum height of 19 feet. In total, Development Parcel C would consist of approximately 95,000 square feet of office uses and approximately 93,500 square feet of restaurant, retail, and other commercial uses (including the uses within the Crossroads of the World complex). As described above, Development Parcel C would have five levels of subterranean parking, which would be connected to and shared with Development Parcel B. The shared parking structure would have 2,083 parking spaces to serve all the uses on Development Parcels B and C.

### a. Project Design

The Project design would create a vibrant new district that is connected to the urban fabric of Hollywood, while retaining the historic identity of Crossroads of the World. The distinct new high-rise buildings, located across three city blocks, would be linked by a pedestrian paseo that would run diagonally between the iconic Crossroads of the World and the proposed hotel at Highland Avenue and Selma Avenue. The paseo would improve accessibility to the Project Site and Crossroads of the World from the surrounding Hollywood community and encourage pedestrian traffic from the nearby Metro rail stop. In addition, the proposed realignment of Las Palmas Avenue would create a stronger north-south connection and improved circulation for pedestrians and automobiles.

The Project would utilize façade design features, including articulated façades, to add visual interest and to differentiate the residential and commercial uses of the buildings. Ground floor retail uses would be clad with red brick to create a unifying element among the nine new structures. The three high-rise buildings would each have different façade treatments, heights, and massing to create unique identities for each building. The mid-rise residential buildings and low-rise creative office buildings would employ varying façade rhythms and materials.

All parking of the Project would be subterranean, and driveways would be located so as to minimize disruptions to the sidewalk and retail frontage. The Project would reduce the number of active driveways currently used on-site by the commercial and residential uses from 19 to 10. More specifically, there are no driveways proposed on Sunset Boulevard. For Development Parcel A, four driveways are proposed—an egress only driveway for hotel guests on Highland Avenue, a driveway for hotel guests on Selma Avenue, a driveway for hotel guests on McCadden Place, and another driveway for hotel service on McCadden Place. For Development Parcel B, three driveways are proposed—a driveway for Project residents on McCadden Place, another driveway for Project residents on Las Palmas Avenue, and a service driveway on Las Palmas Avenue. For Development Parcel C, two driveways for the commercial/retail uses are proposed on Las Palmas Avenue. For Development Parcel D, one driveway for Project residents is proposed on Las Palmas Avenue.

The pedestrian paseo would contain different hardscape and landscaped areas to mark entrances to the Project. Groupings of tall palm trees would emphasize the path, and lower planters and hardscape areas would demarcate seating and gathering spaces. Hardscape elements would consist of a varied palette of materials (e.g., pavement, stone, concrete paths and sidewalks, brick, etc.). Additionally, the podium level would offer common open space amenities, including pools, gardens, terraces, and seating areas for the residents.

As discussed above, the height of the Project's eight mixed-use buildings would range from two to 32 stories (i.e., 65 feet to approximately 402 feet above grade); and an additional one-story retail building to be located within Development Parcel C would be approximately 19 feet in height. The Project design would respect the historic setting of the Crossroads of the World complex by locating new buildings away from Crossroads of the World. Structures located on the eastern portion of the Project Site (Buildings C1, C2, and C3) would be limited to one to three stories, consistent with the existing scale of the Crossroads of the World complex. The three high-rise structures would be located west of Las Palmas Avenue to be consistent with the larger-scale buildings on Highland Avenue, Sunset Boulevard, and Hollywood Boulevard.

## **b. Setback and FAR**

The Project would include approximately 1,432,500 square feet of developed floor area (including existing uses to be retained within the Crossroads of the World complex), corresponding with a total floor area ratio (FAR) of approximately 4.72:1 averaged across the Project Site. Setbacks for individual buildings throughout the Project Site would be provided in accordance with Los Angeles Municipal Code (LAMC) requirements.

## **c. Access, Circulation, and Parking**

The Project proposes the realignment of Las Palmas Avenue at Sunset Boulevard. Currently, there is an offset intersection at this location because Las Palmas Avenue does not run through as a continuous street. The Project would realign Las Palmas Avenue to create a four-legged intersection at Sunset Boulevard. This realignment would improve vehicular circulation, automobile and pedestrian safety, and the condition of the public right-of-way.

Vehicular access to the Project would be provided via several access points. Access to Development Parcel A would be made available via Selma Avenue and McCadden Place and an egress only driveway on Highland Avenue; parking for Development Parcel B would be accessible via McCadden Place and Las Palmas Avenue; parking for Development Parcel C would be accessible via Las Palmas Avenue; and parking for Development Parcel D would be accessible via Las Palmas Avenue.

The Project would be serviced through three loading areas. Development Parcel A would have a dedicated loading area below grade (i.e., P1 Level of the subterranean parking structure) served by a ramp from McCadden Place. A centralized and enclosed loading dock would be provided at-grade in Development Parcel B. This loading dock would be accessed from Las Palmas Avenue and would serve all uses on Development Parcels B and C through at-grade and below-grade service corridors and elevators. Development Parcel D would have a loading space at ground level, which would be accessed from the parking garage entrance at Las Palmas Avenue. New driveway cuts would require review and approval by the Los Angeles Department of Transportation (LADOT) for placement, width, and spacing.

All proposed parking for the Project would consist of new subterranean parking. Development Parcel A would have six levels of subterranean parking with 307 parking spaces to serve the hotel building. Development Parcel B would have five levels of subterranean parking connected under the realigned Las Palmas Avenue to Development Parcel C with 2,083 parking spaces to accommodate all the uses in Buildings B1, B2, B3, B4, C1, C2, C3, and the Crossroads of the World complex. Development Parcel D would

have three levels of subterranean parking with 104 parking spaces to serve the uses on this development parcel. Vehicle and bicycle parking would be provided in accordance with applicable LAMC requirements. A total of 2,494 vehicle parking spaces would be provided in the three subterranean parking garages, and a total of 1,239 bicycle parking spaces (with 1,052 long-term parking spaces and 187 short-term parking spaces) would also be provided throughout the Project Site at mixed locations (e.g., in the subterranean parking garages, above-ground along the paseo, etc.).

The Project also proposes to establish a new pedestrian passageway/paseo that would extend diagonally from Sunset Boulevard/Crossroads of the World to the northwestern corner of the Project Site at Highland Avenue and Selma Avenue. Additional landscaped public walkways would connect the entire Project Site, promoting access from Sunset Boulevard, Las Palmas Avenue, Selma Avenue, and McCadden Place.

#### **d. Realignment-Related Improvements**

The Project includes on- and off-site improvements to the existing sanitary sewer system related to the realignment of Las Palmas Avenue. Specifically, the on-site 30-inch sewer main in Las Palmas Avenue from Selma Avenue to Sunset Boulevard would be removed and replaced with new sewer mains in the following off-site locations: Selma Avenue from Las Palmas Avenue to Cassil Place, Cassil Place from Selma Avenue to Sunset Boulevard, and Sunset Boulevard from Cassil Place to Las Palmas Avenue. New sewer mains would be constructed in accordance with Los Angeles Department of Public Works Bureau of Sanitation (BOS) requirements.

#### **e. Landscaping and Open Space**

The Project would provide a variety of open space and recreational amenities. The Project would include open space and green space. Proposed landscaped public walkways, including a pedestrian paseo, would promote access and connectivity through the Project Site from Sunset Boulevard, Las Palmas Avenue, Selma Avenue, and McCadden Place. Within the pedestrian paseo, there would be areas designed to promote gathering and socializing. These areas would consist of interactive water features, seating, planting, and fire pits. These areas would occur where the pedestrian paseo passes McCadden Place, mid-block between McCadden Place and Las Palmas Avenue, and in the open space plaza east of Las Palmas Avenue. The landscape planting would consist of drought-tolerant, native, and adapted plant species. Street trees would be provided in accordance with Urban Forestry Division requirements.

In addition, the Project would also 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. In total, approximately 108,648 square feet of open space, consisting of approximately 12,199 square feet of interior amenity space, 75,470 square feet of common open space, and approximately 20,979 square feet of private open space (i.e., balconies), would be provided 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 would provide an additional 44,177 square feet of open space, as well as approximately 21,029 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 would total approximately 173,854 square feet. The Project would also provide approximately 246 new trees, including roof deck trees, trees along the paseo, and street trees along Highland Avenue, Selma Avenue, Las Palmas Avenue and Sunset Boulevard.

## **f. Lighting and Signage**

Project signage would be compatible with the commercial and entertainment-oriented uses of the Project Site and the Project vicinity. Proposed signage would include monument or mounted Project identity signage, building and commercial tenant signage, and general ground-level and wayfinding pedestrian signage, as permitted by the Hollywood Signage Supplemental Use District (HSSUD) (applicable to the western portion of Development Parcel A and the southern portion of Development Parcel B only). Wayfinding signs would be located at parking garage entrances, elevator lobbies, vestibules, and residential corridors. Illuminated signage would include identification signs, digital message boards, and tenant retail signs. The Project would include lighting from within the interior, as well as lighting at the building exterior elevations, exterior plazas, and roof decks. Exterior lighting would include light at each building entrance and exit, light for the canopies and shade structures adjacent to the building façade, and light for the patios and deck spaces surrounding the buildings. Exterior façade lighting would include accent lighting at the glazed façade components. The pattern of exterior lighting would vary at the retail, hotel, residential, and office buildings to create different effects, unique to each building's architectural composition. Site lighting would also include light for circulation and safety, as well as accent light onto trees and land forms. Pathway lighting would be provided by low height bollards and poles, and wall-mounted down lights at the building perimeter. Landscape lighting would include up lights on trees, recessed fixtures within the parapet walls, planters and benches. All on-site lighting would comply with regulatory requirements, including the requirements that are set forth by the California Green Building Standards (CalGreen) and Title 24 that stipulate the use of high-performance lights with color and glare control. In addition, design elements would 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 or the public right-of-way,

and Project illuminated signs would not exceed 600 candelas per square meter during nighttime hours (with a maximum of 150 candelas per square meter adjacent to and facing Selma Avenue). All on-site exterior building lighting would be automatically controlled to illuminate only when necessary. In addition, all interior lighting would be equipped with occupancy sensors that would automatically extinguish and/or dim lights when not in use.

All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be approved by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties.

## **g. Sustainability Features**

The Project would incorporate features to support and promote environmental sustainability. “Green” principles are incorporated throughout the Project to comply with the City of Los Angeles Green Building Code (as amended pursuant to Ordinance No. 181,480 and Ordinance No. 182,849). These include, but are not limited to, energy-efficient buildings, pedestrian- and bicycle-friendly site design, and water conservation and waste reduction features that would assist the Project in becoming certified under the U.S. Green Building Council’s Leadership in Energy and Environmental Design (LEED)-CS<sup>®</sup> or LEED-NC<sup>®</sup> Rating System and the Gold Rating under LEED 2009 (v3) or the Silver Rating under LEED v4 rating system. The Project would also utilize sustainable planning and building strategies and incorporate the use of environmentally friendly materials, such as non-toxic paints and recycled finish materials, whenever feasible.

In addition, the Project Site is located within 1,000 feet from the Metro Red Line Hollywood/Highland Station, which would encourage and support the use of public transportation and reduce vehicle miles traveled by Project residents.

## **7. Project Construction and Scheduling**

Construction of the Project would be conducted in phases. Project construction would commence with demolition of the existing buildings (excluding Crossroads of the World) and surface parking lots, followed by grading and excavation for the subterranean parking garages. Building foundations would then be placed, followed by building construction, paving/concrete installation, and landscape installation. Project construction is anticipated to occur over approximately 48 months and be completed in 2022. It is estimated that approximately 643,753 cubic yards (cy) of soil would be hauled from the Project Site during the grading and excavation phase, as well as an additional 1,490 cy during off-site improvements to the existing sanitary sewer system related to the realignment of Las Palmas Avenue. Haul trucks arriving and leaving the Project Site would

travel via one of the following routes: Sunset Boulevard to the Hollywood Freeway; Sunset Boulevard and Highland Avenue to the Hollywood Freeway; or Sunset Boulevard, Highland Avenue, and Santa Monica Boulevard to the Hollywood Freeway.

A Construction Traffic Management Plan and Truck Haul Route Program would be implemented during construction to minimize potential conflicts between construction activity and through traffic. The Construction Traffic Management Plan and Truck Haul Route Program would be subject to LADOT review and approval.

## 8. Necessary Approvals

The City of Los Angeles has the principal responsibility for approving the Project. Approvals required for development of the Project include, but are not limited to, the following:

- Zone and Height District change from C4-2D and C4-2D-SN to C4-2D and C4-2D-SN to replace the “D” Limitation to reflect the proposed Project pursuant to LAMC Section 12.32-F;
- Major Development Project Conditional Use Permit pursuant to LAMC Section 12.24-U,14;
- Vesting Conditional Use Permit for floor area ratio averaging in a unified development;
- Master Conditional Use Permit for the sale of alcoholic beverages in connection with a total of 22 alcohol-related uses associated with the Project’s proposed hotel and commercial uses and eight uses with live entertainment;
- Site Plan Review;
- Development Agreement;
- Vesting Tentative Tract Map, including a street vacation and subsurface vacation;
- Owner Participation Agreement;
- Findings of Consistency with the Redevelopment Plan; and
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, waivers of dedication requirements, grading permits, excavation permits, foundation permits, and building permits.

## 9. Areas of Controversy

Potential areas of controversy and issues to be resolved by the City's decision-makers may include those environmental issue areas where the potential for a significant unavoidable impact has been identified. These areas may include regional air pollutant emissions, demolition of historic resources, noise and vibration during Project construction, and traffic during Project construction and operation. There were also several comments related to other environmental issues provided to the City in response to the NOP. Based on the NOP comment letters provided in Appendix A to this Draft EIR, issues known to be of concern in the community included, but were not limited to, Project construction and operation impacts on noise and air quality, historical and cultural resources, traffic and transportation, water supply, public services (schools), housing, and cumulative impacts. Refer to Appendix A to this Draft EIR for copies of the NOP comment letters.

## 10. Public Review Process

The City prepared an Initial Study and circulated an NOP for public comment to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on October 22, 2015, for a 30-day review period. In addition, a public scoping meeting was conducted on November 14, 2015. The Initial Study, NOP, and NOP comment letters are included in Appendix A to this Draft EIR.

This Draft EIR is being circulated for a 45-day public comment period. Following the public comment period, a Final EIR will be prepared that will include responses to the comments raised regarding this Draft EIR.

## 11. Summary of Alternatives

This Draft EIR examined six alternatives to the Project in detail, which include: No Project/No Build Alternative; Reduced Height and FAR Alternative; Additional Project Site Alternative; No Zone or Height District Change/No Density Bonus Alternative; Historic Preservation Alternative; and Proposed Hollywood Community Plan Update Alternative. A general description of these alternatives is provided below. Refer to Section V, Alternatives, of this Draft EIR for a more detailed description of these alternatives and a comparative analysis of the impacts of these alternatives with those of the Project.

### **Alternative 1: No Project/No Build Alternative**

Alternative 1, the No Project/No Build Alternative, assumes that the Project would not be approved and no new development would occur within the Project Site. Thus, the physical conditions of the Project Site would generally remain as they are today. Under

Alternative 1, the existing uses on Development Parcel A, which includes one- and two-story commercial/retail uses; Development Parcel B, which includes commercial uses, residential uses, and office and retail uses; Development Parcel C, which includes Crossroads of the World, and office and retail uses; and Development Parcel D, which includes commercial/retail uses, would continue to operate on the Project Site, and no new construction would occur. Furthermore, no changes to the existing on-site parking or access/circulation areas would occur.

## **Alternative 2: Reduced Height and FAR Alternative**

The Reduced Height and FAR Alternative includes the development of hotel, residential, retail, and entertainment uses pursuant to the existing zoning designations, height limits, and floor area ratio allowed within the Project Site and applying a 35-percent density bonus permitted under SB 1818 (Density Bonuses), as implemented by the City under LAMC Section 12.22-A,25 (Affordable Housing Incentives—Density Bonus). This alternative would not be requesting to replace the “D” Limitation of the C4-2D (Commercial, Height District 2 with Development Limitation) and C4-2D-SN (Commercial, Height District 2 with Development Limitation, Signage Supplemental Use District) zones.

Alternative 2 would include the development of eight mixed-use buildings throughout the Project Site (in Development Parcels A, B, and C), the rehabilitation of Crossroads of the World (in Development Parcel C), and a parking structure (in Development Parcel D). The footprint of the Project Site would be the same as that of the Project. Specifically, Alternative 2 would include 198 hotel rooms within a 189,000-square-foot hotel with 33,529 square feet of ground floor retail and restaurant uses in Development Parcel A, an additional 151,471 square feet of retail and restaurant uses in Development Parcels B and C, 946 dwelling units in Development Parcel B, and 42,830 square feet of entertainment venue and a 13,000-square-foot movie theater in Development Parcel C. The proposed uses under this alternative would total approximately 1,099,581 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 1,432,500 square feet (including existing uses to be retained within the Crossroads of the World complex). This alternative would eliminate the office uses and condominiums proposed as part of the Project. This alternative would also include the development of an entertainment venue and movie theater uses. Each development parcel is discussed in further detail below.

### **Development Parcel A—Hotel Area (Building A1)**

Alternative 2 would remove all existing land uses on Development Parcel A and construct Building A1, which would be located on the south side of Selma Avenue between Highland Avenue and McCadden Place. Building A1 would consist of 198 hotel rooms,

ancillary meeting rooms, a lobby lounge and bar, a rooftop bar and lounge, and ground floor restaurant and retail uses. The ground floor restaurant and retail uses would comprise approximately 33,529 square feet. Building A1 would be approximately 21 stories tall and would reach a maximum height of approximately 308 feet.

### Development Parcel B—Mixed-Use Residential and Retail Area (Buildings B1, B2, B3, and B4)

Similar to the Project, Alternative 2 would remove all existing land uses on Development Parcel B and construct four mixed-use residential buildings (Buildings B1, B2, B3, and B4) with ground floor commercial/retail uses. These buildings would include a total of approximately 946 residential units (apartment rentals), and approximately 57,792 square feet of commercial/retail uses. Unlike the Project, Alternative 2 would not include condominiums. This alternative would include 104 very low affordable units (inclusive of 84 units to replace the existing 84 rent-stabilized units to be removed) to qualify for a 35-percent density bonus permitted by LAMC Section 12.22-A,25 and other incentives, including the Averaging Incentive in order to allow FAR and density averaging of residential units (pursuant to the Affordable Housing Incentives provisions in LAMC Section 12.22-A,25(f)(8)). The alternative would also utilize Parking Option 1 pursuant to LAMC Section 12.22-A,25(d)(1).

Building B1 would consist of 29 floors and would reach a maximum height of approximately 390 feet above grade. Building B2 would consist of six floors and would reach a maximum height of approximately 87 feet above grade. Building B3 would consist of 27 floors and would reach a maximum height of approximately 331 feet above grade. Building B4 would consist of six floors in addition to a mezzanine floor and would reach a maximum height of approximately 95 feet above grade. Similar to the Project, buildings in Development Parcel B would include ground floor commercial/retail and restaurant uses with residential units above.

### Development Parcel C—Commercial Area (Buildings C1 & C2, Crossroads of the World)

The commercial portion of Alternative 2 would consist of an entertainment venue, a movie theater, and retail/restaurant use and would be located in Development Parcel C located east of Las Palmas Avenue and directly adjacent to the historic Crossroads of the World complex. This differs from the Project as Alternative 2 would no longer include creative office uses. As discussed above, Crossroads of the World would be retained and rehabilitated as part of the Project. Similar to the Project, rehabilitation of Crossroads of the World under Alternative 2 would include relocating the only single-story building (referred to in Section IV.D, Cultural Resources, of this Draft EIR as the Early American

Building, immediately north of the property at 1512 Las Palmas Avenue) within the Crossroads of the World complex that is located along Las Palmas Avenue to the central portion of the complex immediately to the east of Building C2. All of the other Crossroads of the World structures would remain in their current locations and would undergo exterior rehabilitation and interior renovations. Similar to the Project, upon buildout of this alternative, Crossroads of the World would provide approximately 50,000 square feet of retail/restaurant uses.

New development on Development Parcel C would include Buildings C1, C2, and C3, together adding up to approximately 42,830 square feet of entertainment venue, 13,000 square feet of movie theater, and 43,679 square feet of retail/restaurant uses. Building C1 would be three stories tall and would reach a maximum height of approximately 64 feet above grade. Building C2 would consist of two stories and would reach a maximum height of approximately 42 feet above grade. Building C3 would consist of one floor with a maximum height of 19 feet.

### Development Parcel D—Parking Area (Building D1)

Development Parcel D would consist of Building D1, which would be a parking structure that would include two subterranean levels and six above grade levels to accommodate 228 parking spaces. Building D1 would reach a maximum height of approximately 65 feet above grade.

### Other Features Under Alternative 2

The overall building design under Alternative 2 would be similar to that of the Project in terms of architectural style, fenestration, building materials and colors, and sustainable design. With regard to sustainability features, Alternative 2 would incorporate similar features as the Project to support and promote environmental sustainability, including those related to energy conservation and efficiency, water conservation, water quality, solid waste, transportation, air quality, and noise. In addition, the types of lighting and signage proposed for this alternative would be similar to that proposed for the Project. Furthermore, as with the Project, Alternative 2 would provide setbacks along the Project Site boundaries in accordance with LAMC requirements.

Vehicular access to Alternative 2 would be provided via several access points, similar to the Project. As with the Project, Alternative 2 would establish a new pedestrian passageway/paseo that would extend diagonally from Sunset Boulevard/Crossroads of the World to the corner of Selma Avenue and McCadden Place and along the northern boundary of Development Parcel A on Selma Avenue to Highland Avenue. Additional

landscaped public walkways would connect the entire Project Site, while promoting access from Sunset Boulevard, Las Palmas Avenue, Selma Avenue, and McCadden Place.

Similar to the Project, Alternative 2 would include the realignment of Las Palmas Avenue at Sunset Boulevard. As such, Alternative 2 would also include on-site and off-site improvements to the existing sanitary sewer system related to the realignment of Las Palmas Avenue. Specifically, the on-site 30-inch sewer main in Las Palmas Avenue from Selma Avenue to Sunset Boulevard would be removed and replaced with new sewer mains in the following off-site locations: Selma Avenue from Las Palmas Avenue to Cassil Place, Cassil Place from Selma Avenue to Sunset Boulevard, and Sunset Boulevard from Cassil Place to Las Palmas Avenue. New sewer mains would be constructed in accordance with BOS requirements.

Similar to the Project, parking for Alternative 2 would consist of new subterranean parking garages. As with the Project, Development Parcel A would have six levels of subterranean parking with 248 parking spaces to serve the hotel building. Similarly, Development Parcels B and C would have five connected/shared levels of subterranean parking with 2,000 parking spaces. However, unlike the Project, Development Parcel D under Alternative 2 would be developed with a stand-alone parking structure that would comprise two subterranean levels and six above grade levels with 168 parking spaces to provide additional spaces to all the retail/restaurant uses in Development Parcels B and C. A new traffic signal would be installed at the intersection of Las Palmas Avenue and Selma Avenue to facilitate pedestrian movement between the Project and the parking structure proposed on Development Parcel D. Automobile and bicycle parking would be provided in accordance with applicable LAMC requirements.

Similar to the Project, this alternative would provide a variety of open space and recreational amenities. Proposed landscaped public walkways would promote access and connectivity through the Project Site. Alternative 2 would provide a total of approximately 184,556 square feet of open space, consisting of approximately 67,751 square feet of common open space, 10,250 square feet of interior amenity space, approximately 41,350 square feet of private open space (i.e., balconies). This alternative also includes publicly-accessible open space, specifically including an additional 21,028 square feet of pedestrian paseo and 44,177 square feet of existing Crossroads of the World courtyards. The amount of open space provided under this alternative would be approximately 10,700 square feet more than the Project (173,854 square feet) due to a greater number of private balconies proposed under this alternative (827 balconies) compared to the Project (420 balconies). Open space would be provided in accordance with the open space provisions for new residential projects set forth in LAMC Section 12.21-G.

With regard to construction activities and schedule, it is anticipated that the overall duration of construction would be reduced (approximately 41.4 months) compared to the Project (approximately 48 months) based on the proposed development under Alternative 2 (e.g., smaller project, shorter towers, and less excavation (Development Parcel D)). Furthermore, the amount of soil and demolition export required for Alternative 2 is estimated to be approximately 636,095 cubic yards (cy) of soil, as well as an additional 1,490 cy during off-site improvements to the existing sanitary sewer system related to the realignment of Las Palmas Avenue, which would be less than the soil and demolition export required under the Project. As with the Project, excavation for this alternative would reach a maximum depth of approximately 78 feet (Development Parcel A with six levels of subterranean parking).

### **Alternative 3: Additional Project Site Alternative**

The Additional Project Site Alternative includes the addition of three new development parcels (Development Parcels E, F, and G) to the Project Site and development of hotel, residential, retail, and entertainment uses pursuant to the existing zoning designations, height limits, and FAR allowed within the Project Site and applying a 35-percent density bonus permitted under SB 1818 (Density Bonuses) and as implemented by the City under LAMC Section 12.22-A,25 (Affordable Housing Incentives—Density Bonus). This alternative would not be requesting to replace the “D” Limitation of the C4-2D (Commercial, Height District 2 with Development Limitation) and C4-2D-SN (Commercial, Height District 2 with Development Limitation, Signage Supplemental Use District) Zones. Development Parcel E consists of a parking lot directly adjacent to the Blessed Sacrament Church that is located at the terminus of Cherokee Avenue at Selma Avenue, east of Development Parcel C. Development Parcel F consists of an office building, which would be retained as part of this alternative, and associated parking structure located at the northeastern corner of McCadden Place and Sunset Boulevard. Development Parcel G consists of commercial uses located at 1534-1540 McCadden Place immediately south of the duplexes in Development Parcel B on the northeastern corner of Selma Avenue and McCadden Place. The addition of Development Parcels F and G allows for the entire block bounded by Selma Avenue on the north, Las Palmas Avenue on the east, Sunset Boulevard on the south, and McCadden Place on the west to be part of this alternative.

Alternative 3 would 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 the 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). The parameters of the Project Site would be expanded beyond that of the Project as Alternative 3 would add Development Parcels E, F, and G.

Alternative 3 would 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 would be retained under this alternative. The existing 4,658 square feet of commercial uses in Development Parcel G would 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 would 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 1,432,500 square feet (including existing uses to be retained within the Crossroads of the World complex). This alternative would eliminate the condominiums proposed as part of the Project. This alternative would also include the development of an entertainment venue and movie theater uses instead of new creative office uses in Development Parcel C. Each development parcel is discussed in further detail below.

### Development Parcel A—Hotel Area (Building A1)

Alternative 3 would remove all existing land uses on Development Parcel A and construct Building A1, which would be located on the south side of Selma Avenue between Highland Avenue and McCadden Place. Building A1 would consist of 308 hotel rooms, ancillary meeting rooms, a lobby lounge and bar, a rooftop bar and lounge, and ground floor restaurant and retail uses. The ground floor restaurant and retail uses would comprise approximately 29,193 square feet. Building A1 would be approximately 26 stories tall and would reach a maximum height of approximately 363 feet.

### Development Parcels B and D—Mixed-Use Residential and Retail Area (Buildings B1, B2, B3, B4, and D1)

Similar to the Project, Alternative 3 would remove all existing land uses on Development Parcels B and D and construct five mixed-use residential buildings (Buildings B1, B2, B3, B4, and D1) with ground-floor commercial/retail uses. Development Parcel B, consisting of Buildings B1, B2, B3, and B4, would include a total of approximately 866 residential units (apartment rentals) and approximately 57,792 square feet of commercial/retail uses. Alternative 3 would continue to provide 84 affordable rental housing units that would replace the existing 84 rent-stabilized units located in Development Parcel B that would be removed. Unlike the Project, Alternative 3 would not include condominiums. This alternative would include 105 Very Low Income household dwelling units for a 35-percent additional FAR and other incentives, including Parking Option 1 (parking reduction incentive pursuant to the Affordable Housing Incentives provisions in LAMC Section 12.22-A,25(d)(1)) and the Averaging Incentive in order to allow

density averaging of residential units, pursuant to the Affordable Housing Incentives provisions in LAMC Section 12.22-A,25(f)(8).

Building B1 would consist of 27 floors and would reach a maximum height of approximately 366 feet above grade. Building B2 would consist of six floors and would reach a maximum height of approximately 87 feet above grade. Building B3 would consist of 24 floors and would reach a maximum height of approximately 298 feet above grade. Building B4 would consist of six floors in addition to a mezzanine floor and would reach a maximum height of approximately 95 feet above grade. Similar to the Project, buildings in Development Parcel B would include ground floor commercial/retail and restaurant uses with residential units above.

Development Parcel D would consist of Building D1, which would include approximately 84 residential units and approximately 4,336 square feet of ground-floor commercial/retail uses. Building D1 would consist of six floors and would reach a maximum height of approximately 85 feet above grade.

### Development Parcel C—Commercial Area (Buildings C1 & C2, Crossroads of the World)

The commercial portion of Alternative 3 would consist of an entertainment venue, a movie theater, and retail/restaurant use and would be located in Development Parcel C located east of Las Palmas Avenue and directly adjacent to the historic Crossroads of the World complex. This differs from the Project as Alternative 3 would no longer include new creative office uses. As discussed above, Crossroads of the World would be retained and rehabilitated as part of the Project. Similar to the Project, rehabilitation of Crossroads of the World under Alternative 3 would include relocating the only single-story building (referred to in Section IV.D, Cultural Resources, of this Draft EIR as the Early American Building, immediately north of the property at 1512 Las Palmas Avenue) within the Crossroads of the World complex that is located along Las Palmas Avenue to the central portion of the complex immediately to the east of Building C2. All of the other Crossroads of the World structures would remain in their current locations and would undergo renovations. Similar to the Project, upon buildout of this alternative, Crossroads of the World would provide approximately 50,000 square feet of retail and restaurant uses to replace the primarily office and commercial uses currently on-site.

New development on Development Parcel C would include Buildings C1, C2, and C3, together adding up to approximately 42,830 square feet of entertainment venue, 13,000 square feet of movie theater, and 43,679 square feet of retail/restaurant uses. Building C1 would be three stories tall and would reach a maximum height of approximately 64 feet above grade. Building C2 would consist of two floors and would reach a maximum

height of approximately 42 feet above grade. Building C3 would consist of one floor with a maximum height of 19 feet.

### Development Parcel E—Parking Structure (Building E1)

Development Parcel E would consist of Building E1, which would be a stand-alone parking structure that would include two subterranean levels and six and a half above grade levels. Development Parcel E is located at the terminus of Cherokee Avenue at Selma Avenue, east of Development Parcel C. Building E1 would reach a maximum height of approximately 60 feet above grade.

### Development Parcel F—Office Building and Parking Structure (Building F1)

Development Parcel F would consist of Building F1, which would retain the existing office building and involve the reconstruction of the associated parking structure. The office building would retain 75,693 square feet of existing office space, and the reconstructed parking structure would comprise two subterranean levels and three above grade levels. Development Parcel F is located immediately west of Development Parcel B at the northeastern corner of McCadden Place and Sunset Boulevard. Building F1, the existing office building, consists of five floors with a maximum height of 30 feet.

### Development Parcel G—Parking Structure

Development Parcel G would involve the removal of the two vacant commercial buildings on-site, totaling approximately 4,658 square feet, to accommodate the reconstruction and expansion of the parking structure proposed in Development Parcel F immediately south of this development parcel. As described under Development Parcel F, the reconstructed parking structure would comprise two subterranean levels and three above grade levels. Development Parcel G is located at 1534-1540 McCadden Place immediately south of the duplexes in Development Parcel B on the northeastern corner of Selma Avenue and McCadden Place.

### Other Features Under Alternative 3

The overall building design under Alternative 3 would be similar to that of the Project in terms of architectural style, fenestration, and building materials and colors. With regard to sustainability features, Alternative 3 would incorporate similar features as the Project to support and promote environmental sustainability, including those related to energy conservation and efficiency, water conservation, water quality, solid waste, transportation, air quality, and noise. In addition, the types of lighting and signage proposed for this alternative would be similar to that proposed for the Project. Furthermore, as with the

Project, Alternative 3 would provide setbacks along the Project Site boundaries in accordance with LAMC requirements.

Vehicular access to Alternative 3 would be provided via several access points, similar to the Project. As with the Project, Alternative 3 would establish a new pedestrian passageway/paseo that would extend diagonally from Sunset Boulevard/Crossroads of the World to the northwestern corner of the Project Site at Selma Avenue and Highland Avenue. Additional landscaped public walkways would connect the entire Project Site, while promoting access from Sunset Boulevard, Las Palmas Avenue, Selma Avenue, and McCadden Place.

Similar to the Project, Alternative 3 would include the realignment of Las Palmas Avenue at Sunset Boulevard. As such, Alternative 3 would also include on-site and off-site improvements to the existing sanitary sewer system related to the realignment of Las Palmas Avenue. Specifically, the on-site 30-inch sewer main in Las Palmas Avenue from Selma Avenue to Sunset Boulevard would be removed and replaced with new sewer mains in the following off-site locations: Selma Avenue from Las Palmas Avenue to Cassil Place, Cassil Place from Selma Avenue to Sunset Boulevard, and Sunset Boulevard from Cassil Place to Las Palmas Avenue. New sewer mains would be constructed in accordance with BOS requirements.

Similar to the Project, parking for Alternative 3 would consist of new subterranean parking garages. Development Parcel A would have six levels of subterranean parking with 307 parking spaces to serve the hotel building on this development parcel. Development Parcels B and C would have four connected/shared levels of subterranean parking (one level less than the Project) with 1,546 parking spaces. Similar to the Project, Development Parcel D would also include 104 parking spaces in a subterranean garage. However, unlike the Project, Development Parcel E would be added under Alternative 3 and would include a stand-alone parking structure that would comprise two subterranean levels and six above-grade levels to accommodate 423 parking spaces with 400 parking spaces serving the retail, restaurant, and entertainment-related uses in Development Parcels B and C; the remaining 23 parking spaces would be reserved for use by the adjacent Blessed Sacrament Church. Furthermore, Development Parcels F and G would reconstruct the existing parking structure in Development Parcel F to comprise two subterranean levels and three above grade levels to accommodate 328 parking spaces, with 142 parking spaces serving the existing office building and the remaining 186 spaces serving the proposed retail, restaurant, and commercial uses in Development Parcels B and C. Automobile parking would be provided in subterranean parking garages in Development Parcels A, B, and C, and both subterranean and above-grade parking structures in Development Parcels D, E, F, and G. Bicycle parking would be provided

throughout the Project Site, including 1,040 long-term bicycle parking spaces and 185 short-term bicycle parking spaces in accordance with applicable LAMC requirements.

Similar to the Project, this alternative would provide a variety of open space and recreational amenities. This alternative would include open space and green space, consisting of a series of integrated walkways that connect the dynamic mixed-use district created by the Project with the Hollywood neighborhood. Proposed additional landscaped public walkways would also promote access through the Project Site. Alternative 3 would provide a total of approximately 183,074 square feet of open space, consisting of approximately 75,470 square feet of common open space, 12,199 square feet of interior amenity space, and approximately 30,200 square feet of private open space (i.e., balconies). This alternative also includes publicly-accessible open space, specifically including an additional 21,028 square feet of pedestrian paseo and 44,177 square feet of existing Crossroads of the World courtyards. The amount of open space provided under this alternative would be approximately 9,220 square feet more than the Project due to a greater number of private balconies proposed under this alternative (604 balconies) compared to the Project (420 balconies). Similar to the Project, open space would be provided in accordance with the open space provisions for new residential projects set forth in LAMC Section 12.21-G.

With regard to construction activities and schedule, it is anticipated that the overall duration of construction would be reduced (approximately 39.2 months) compared to the Project (approximately 48 months) based on the proposed development under Alternative 3 (e.g., smaller project and shorter towers). Furthermore, the amount of soil and demolition export required for Alternative 3 is estimated to be approximately 559,255 cy of soil, as well as an additional 1,490 cy during off-site improvements to the existing sanitary sewer system related to the realignment of Las Palmas Avenue, which would be less than the soil and demolition export required under the Project. As with the Project, excavation for this alternative would reach a maximum depth of approximately 78 feet (Development Parcel A with six levels of subterranean parking).

## **Alternative 4: No Zone or Height District Change/No Density Bonus Alternative**

The No Zone or Height District Change/No Density Bonus Alternative includes the development of residential, retail, and office uses pursuant to the existing zoning designations for the Project Site. However, Alternative 4 would no longer include the rehabilitation of the Crossroads of the World.

Alternative 4 would 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 would 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 would 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 1,432,500 square feet (including existing uses to be retained within the Crossroads of the World complex). This alternative would eliminate the hotel and condominiums proposed as part of the Project. In addition, unlike the Project, Crossroads of the World would not be revitalized. Similarly, this alternative would not create a pedestrian paseo or realign Las Palmas Avenue at Sunset Boulevard. Each development parcel is discussed in further detail below.

### Development Parcels A and B—Mixed-Use Residential and Retail Area (Buildings A1, A2, B1, B2, B3, and B4)

Similar to the Project, Alternative 4 would remove all existing land uses on Development Parcels A and B. Alternative 4 would construct six mixed-use residential buildings (Buildings A1, A2, B1, B2, B3, and B4) with ground floor commercial/retail uses. Development Parcel A, consisting of Buildings A1 and A2, would include a total of approximately 222 residential units (apartment rentals) and approximately 26,800 square feet of commercial/retail uses. Building A1 would consist of 11 floors, and Building A2 would consist of six floors.

Development Parcel B, consisting of Buildings B1, B2, B3, and B4, would include a total of approximately 539 residential units (apartment rentals) and approximately 86,600 square feet of ground floor commercial/retail uses. Building B1, B2, and B4 would consist of six floors, while Building B3 would consist of 18 floors. Alternative 4 would continue to provide 84 affordable rental housing units that would replace the existing 84 rent-stabilized units located in Development Parcel B that would be removed. Unlike the Project, Alternative 4 would not include condominiums.

### Development Parcel C—Office and Retail Area (Buildings C1 & C2, Crossroads of the World)

Similar to the Project, Alternative 4 would consist of office and retail uses, which would be located in Development Parcel C located east of Las Palmas Avenue and directly adjacent to the historic Crossroads of the World complex. As discussed above, Crossroads of the World would be retained as predominantly office space under this alternative. Similar to the Project, Alternative 4 would include relocating the single-story building (referred to in Section IV.D, Cultural Resources, of this Draft EIR as the Early American Building, immediately north of the property at 1512 Las Palmas Avenue) within the Crossroads of the World complex that is located along Las Palmas Avenue to the

central portion of the complex immediately to the east of Building C2. The remaining structures would remain in their current locations. Upon buildout of this alternative, Crossroads of the World would provide approximately 50,000 square feet of office uses. Unlike the Project, Crossroads of the World would not be revitalized and brought back to its originally intended use as an outdoor pedestrian shopping, dining, and entertainment center because it would not create a pedestrian paseo that would activate the area.

New development on Development Parcel C would include Buildings C1, C2, and C3, together adding up to approximately 34,700 square feet of office uses and 1,378 square feet of retail uses. Building C1 would be two stories tall and Buildings C2 and C3 would consist of one floor.

### Development Parcel D—Parking Area (Building D1)

Development Parcel D would consist of Building D1, which would be a stand-alone parking structure that would include two subterranean levels and four above grade levels to accommodate 172 parking spaces to serve the proposed retail and office uses.

### Other Features Under Alternative 4

The overall building design under Alternative 4 would be similar to that of the Project in terms of architectural style, fenestration, and building materials and colors. With regard to sustainability features, Alternative 4 would comply with the requirements of Title 24, CALGreen, and the Los Angeles Green Building Code. However, Alternative 5 would not include the Project Design Features proposed by the Project beyond the minimum required. In addition, the types of lighting and signage proposed for this alternative would be similar to those proposed for the Project. Furthermore, as with the Project, Alternative 4 would provide setbacks along the Project Site boundaries in accordance with LAMC requirements.

Vehicular access to Alternative 4 would be provided via several access points. However, unlike the Project, this alternative would not establish a new pedestrian passageway/paseo that would extend diagonally across the Project Site. Consequently, although landscaped public walkways along the south side of Selma Avenue and along Las Palmas Avenue between Selma Avenue and Sunset Boulevard would be provided, no direct connection between Development Parcel A and Development Parcel C would be established.

Alternative 4 would not include the realignment of Las Palmas Avenue at Sunset Boulevard. As such, Alternative 4 would not include on-site and off-site improvements to the existing sanitary sewer system related to the realignment of Las Palmas Avenue.

Similar to the Project, parking for Alternative 4 would consist of new subterranean parking garages. Development Parcel A would have four levels of subterranean parking with 370 parking spaces to serve the mixed-use buildings on this development parcel. Development Parcel B would also have four levels of subterranean parking and would include 1,200 parking spaces to serve the mixed-use buildings on this development parcel. However, unlike the Project, this subterranean parking would not extend beneath Development Parcel C. Instead, Development Parcel D would contain a stand-alone parking that would include 173 parking spaces in two subterranean parking levels and four above-grade parking levels to accommodate the demand generated by the office and retail uses on Development Parcel C and the retail uses on Development Parcel B. Automobile and bicycle parking would be provided in accordance with applicable LAMC requirements.

Similar to the Project, this alternative would provide a variety of open space and recreational amenities but to a lesser extent. This alternative would include open space and green space in accordance with the provisions for new residential projects set forth in LAMC Section 12.-21.G.

With regard to construction activities and schedule, it is anticipated that the overall duration of construction under Alternative 4 would be reduced compared to the Project due to this alternative's smaller project, shorter buildings, and less excavation (no parking structure under Development Parcel C and one less subterranean level under Development Parcel D). Furthermore, the amount of soil and demolition export required for Alternative 4 is estimated to be approximately 396,351 cy of soil, which would be less than the soil and demolition export required under the Project. Excavation for this alternative would reach a maximum depth of approximately 52 feet, which is less than the Project (i.e., 78 feet).

## **Alternative 5: 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 would 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 would be retained but not rehabilitated under Alternative 5. The total area of the new development would 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 1,432,500 square feet (including existing uses to be retained within the Crossroads of the World complex). This

alternative would eliminate the hotel and condominiums proposed as part of the Project. Each development parcel is discussed in further detail below.

### Development Parcel—Residential Uses (Buildings A1, A2, and A3)

Alternative 5 would preserve in-place the existing historic single-story wood-frame vernacular house located at 1547–1549 McCadden Place. This house, which has been converted into a commercial use, would not be demolished or rehabilitated and would remain as a commercial use. All other existing land uses on Development Parcel A would be removed to allow for the construction of three residential buildings (Buildings A1, A2, and A3), totaling approximately 185 residential units (apartment rentals). Building A1 on the western portion of Development Parcel A would consist of 13 floors, and Buildings A2 and A3 on the eastern portion along McCadden Place would consist of three floors. Buildings A2 and A3 would be located to the north and south of the existing historic structure (i.e., house at 1547–1549 McCadden Place).

### Development Parcel B—Mixed-Use Residential and Retail Area (Buildings B2 and B3)

Alternative 5 would preserve all the existing historic structures on Development Parcel B, including the following:

- One-story Craftsman style house, currently containing a commercial use and located at 1542 McCadden Place on the northwestern portion of Development Parcel B;
- Three two-story courtyard apartment buildings designed in a Regency Revival style located at 6700–6718 Selma Avenue and 1535–1555 Las Palmas Avenue; and
- Two- and three-story building (former *The Hollywood Reporter* Building) located at 6713–6715 Sunset Boulevard.

These historic buildings would not be demolished or rehabilitated and would retain their current uses. All other existing land uses on Development Parcel B would be removed to allow for the construction of one residential building (Building B2) with 21 residential units (apartment rentals) and a mixed-use building (Building B3), comprising approximately 196 residential units (apartment rentals) and 4,100 square feet of commercial/retail uses. Building B2, which would be located at the site of the two existing residential duplexes on the southeastern corner of Selma Avenue and McCadden Place, would consist of three floors. Building B3, which would be located on the southern portion of Development Parcel B on the northwestern corner of Sunset Boulevard and Las

Palmas Avenue, would consist of 12 floors. Unlike the Project, Alternative 5 would not include condominiums.

### Development Parcel C—Office and Retail Area (Buildings C1 & C2)

Similar to the Project, Alternative 5 would consist of office and retail uses in Development Parcel C east of Las Palmas Avenue and directly adjacent to the historic Crossroads of the World complex. As discussed above, Crossroads of the World would be retained but not rehabilitated as part of this alternative. As with the Project, Alternative 5 would include relocating the only single-story building (referred to in Section IV.D, Cultural Resources, of this Draft EIR as the Early American Building, immediately north of the property at 1512 Las Palmas Avenue) within the Crossroads of the World complex that is located along Las Palmas Avenue to the central portion of the complex immediately to the east of Building C2, where it would be attached. Alternative 5 would also preserve the existing historic two-story commercial block at 6683 Sunset Boulevard on the northeastern corner of Sunset Boulevard and Las Palmas Avenue.

New development on Development Parcel C would include Buildings C1, C2, and C3, together adding up to approximately 19,700 square feet of office uses and 1,378 square feet of retail uses. Building C1 would be located immediately north of the 6683 Sunset Boulevard building and immediately east of the Crossroads of the World buildings that flank the “ship” building to the west. Building C2 would be located in the existing surface parking lot of the Crossroads of the World complex, and Building C3 would be located along the eastern edge of the complex. Buildings C1, C2, and C3 would consist of one story.

### Development Parcel D—Residential Uses (Building D1)

Alternative 5 would preserve in-place the existing historic two-story Craftsman style duplex located at 1606–1608 Las Palmas Avenue. This duplex would remain as a commercial use. Alternative 5 would construct a residential building (Building D1) on the existing parking lot immediately south of this historic building. Building D1 would include a total of approximately 33 residential units (apartment rentals) and would consist of three stories.

### Other Features Under Alternative 5

The overall building design under Alternative 5 would be similar to that of the Project in terms of architectural style, fenestration, and building materials and colors. With regard to sustainability features, Alternative 5 would comply with the requirements of Title 24, CALGreen, and the Los Angeles Green Building Code. However, Alternative 5 would not include the Project Design Features proposed by the Project beyond the minimum

required. In addition, the types of lighting and signage proposed for this alternative would be similar to those proposed for the Project. Furthermore, as with the Project, Alternative 5 would provide setbacks along the Project Site boundaries in accordance with LAMC requirements.

Vehicular access to Alternative 5 would be provided via several access points. However, unlike the Project, this alternative would not establish a new pedestrian passageway/paseo that would extend diagonally across the Project Site. Consequently, although landscaped public walkways along the south side of Selma Avenue and along Las Palmas Avenue between Selma Avenue and Sunset Boulevard would be provided, no direct connection between Development Parcel A and Development Parcel C would be established.

Alternative 5 would not include the realignment of Las Palmas Avenue at Sunset Boulevard. As such, Alternative 5 would not include on-site and off-site improvements to the existing sanitary sewer system related to the realignment of Las Palmas Avenue.

Similar to the Project, parking for Alternative 5 would consist of new subterranean parking garages. However, Alternative 5 would also include at-grade parking. Specifically, Development Parcel A would include 23 parking spaces at grade and 230 parking spaces within five subterranean levels for the residential uses located in Building A1, 12 parking spaces at grade for the residential uses located in Building A2, and 12 parking spaces at grade for the residential uses located in Building A3. Development Parcel B would include 32 parking spaces at grade for the residential uses located in Building B2 and 32 parking spaces at grade and 320 parking spaces in five subterranean levels for the mixed-use residential and retail uses provided in Building B3. Parking for Development Parcel C would be provided in two levels of subterranean parking below Buildings C1 and C2 and would include 204 parking spaces. Development Parcel D would also include 40 parking spaces at grade for the residential uses located in Building D1. Automobile and bicycle parking would be provided in accordance with applicable LAMC requirements.

Similar to the Project, this alternative would provide a variety of open space and recreational amenities, which would consist of interactive water features, seating, planting, fire places, and/or movie screens. This alternative would include open space and green space in accordance with the provisions for new residential projects set forth in LAMC Section 12.-21.G.

With regard to construction activities and schedule, it is anticipated that the overall duration of construction under Alternative 5 would be reduced compared to the Project due to a smaller project, shorter buildings, and less excavation associated with fewer subterranean levels of parking and area. The amount of soil and demolition export

required for Alternative 5 is estimated to be approximately 161,403 cy of soil, which would be less than the soil and demolition export required under the Project. Excavation for this alternative would reach a maximum depth of approximately 62 feet, which is less than the Project (i.e., 78 feet).

## **Alternative 6: Proposed Hollywood Community Plan Update Alternative**

The City is currently proposing an update to the Hollywood Community Plan, which was originally 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, would be located in Subarea (SA) 4:1B and SA 4:1G, and Development Parcel D, which is currently zoned C4-2D, would be located in SA 4:1F and would 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). 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. Notwithstanding the fact that the 75-foot height regulation could be exceeded with discretionary approval, this alternative would be developed to a height of 75 feet. This alternative considers conformance with the Proposed Hollywood Community Plan Update but would not necessitate discretionary action save for Site Plan Review.

Alternative 6 would 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 would 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. The proposed uses under this alternative would total approximately 1,432,000 square feet (including existing uses to be retained within the Crossroads of the World complex), which is slightly less than the Project's total proposed

floor area of 1,432,500 square feet (including existing uses to be retained within the Crossroads of the World complex). This alternative would eliminate the condominiums proposed as part of the Project and would have less retail/restaurant and office space than the Project. However, this alternative would provide larger apartment rental units than the Project, resulting in an increase in residential square footage. Each development parcel is discussed in further detail below.

### Development Parcel A—Hotel Area (Building A1)

Alternative 6 would remove all existing land uses on Development Parcel A and construct Building A1, which would be located on the south side of Selma Avenue between Highland Avenue and McCadden Place. Similar to the Project, Building A1 would consist of 308 hotel rooms, ancillary meeting rooms, a lobby lounge and bar, a rooftop bar and lounge, and ground floor restaurant and retail uses. The ground floor restaurant and retail uses would comprise approximately 33,529 square feet. Due to the height regulation on the eastern portion of Development Parcel A, Building A1 would be designed with the eastern half limited to four stories with a maximum height of 75 feet and the western half comprising a 29-story tower with a north-south orientation along Highland Avenue, reaching a maximum height of approximately 398.5 feet above grade.

### Development Parcel B—Mixed-Use Residential and Retail Area (Buildings B1, B2, B3, and B4)

Similar to the Project, Alternative 6 would remove all existing land uses on Development Parcel B and construct four mixed-use residential buildings (Buildings B1, B2, B3, and B4) with ground floor commercial/retail uses. These buildings would include a total of approximately 799 residential units (rental units) and approximately 82,905 square feet of commercial/retail uses. Unlike the Project, Alternative 6 would not include condominiums. This alternative would include 84 Very Low Income household dwelling units (to replace the existing 84 rent stabilized units) to qualify for a 35-percent Density Bonus and other incentives, including the Averaging Incentive in order to allow FAR and density averaging of residential units (pursuant to the Affordable Housing Incentives provisions in LAMC Section 12.22-A,25(F)(8)). The alternative would also utilize Parking Option 1 pursuant to LAMC Section 12.22-A,25(D)(1).

The northern half of Development Parcel B, Buildings B1, B2 and B4 would consist of six floors and would be limited to a height of 75 feet above grade. As with Building A1, Building B3 would be designed with the southern half composed of a 38-story tower with an east-west orientation along Sunset Boulevard, reaching a maximum height of approximately 439 feet above grade, and the northern half limited to six stories, with a maximum height of approximately 75 feet. Similar to the Project, buildings in Development

Parcel B would include ground floor commercial/retail and restaurant uses with residential units above.

### Development Parcel C—Commercial Area (Buildings C1, C2, and C3, and Crossroads of the World)

The commercial portion of Alternative 6 would consist of creative office space in two buildings that are two and three stories in height on the western portion of Development Parcel C adjacent to the historic Crossroads of the World complex and retail/restaurant uses within the rehabilitated buildings and one new one-story building in the Crossroads of the World complex. This differs from the Project as Alternative 6 would no longer include mixed-use buildings on Development Parcel C. As discussed above, Crossroads of the World would be retained and rehabilitated as part of the Project. Similar to the Project, rehabilitation of Crossroads of the World under Alternative 6 would include relocating the only single-story building (referred to in Section IV.D, Cultural Resources, of this Draft EIR as the Early American Building, immediately north of the property at 1512 Las Palmas Avenue) within the Crossroads of the World complex that is located along Las Palmas Avenue to the central portion of the complex immediately to the east of Building C2. All of the other Crossroads of the World structures would remain in their current locations and would undergo interior renovations. Similar to the Project, upon buildout of this alternative, Crossroads of the World would provide approximately 50,000 square feet of retail/restaurant uses.

New development on Development Parcel C would include Buildings C1, C2, and C3, together adding up to approximately 54,400 square feet of office and 1,378 square feet of retail/restaurant uses. Building C1, which would entirely comprise office space, would be three stories tall and would reach a maximum height of approximately 64 feet above grade. Building C2, which would also entirely comprise office space, would consist of two floors and would reach a maximum height of approximately 41 feet above grade. Building C3, which would be the same as under the Project, would consist of one floor of retail/restaurant uses with a maximum height of 19 feet.

### Development Parcel D—Mixed-Use Residential and Retail Area (Building D1)

Development Parcel D would consist of Building D1, which would include approximately 151 residential units (rentals) and approximately 4,500 square feet of ground floor commercial/retail uses. Building D1 would comprise 19 stories, reaching a maximum height of approximately 213 feet above grade. Above the ground floor commercial/retail uses would be five levels of above grade parking, and Levels 7 through

19, which would step back slightly from the eastern edge of the building, would consist of the residential units.

### Other Features Under Alternative 6

The overall building design under Alternative 6 would be similar to that of the Project in terms of architectural style, fenestration, and building materials and colors. With regard to sustainability features, Alternative 6 would incorporate similar features as the Project to support and promote environmental sustainability, including those related to energy conservation and efficiency, water conservation, water quality, solid waste, transportation, air quality, and noise. In addition, the types of lighting and signage proposed for this alternative would be similar to that proposed for the Project. Furthermore, as with the Project, Alternative 6 would provide setbacks along the Project Site boundaries in accordance with LAMC requirements.

Vehicular access to Alternative 6 would be provided via several access points. However, unlike the Project, this alternative would not establish a new pedestrian passageway/paseo that would extend diagonally across the Project Site. Consequently, although landscaped public walkways would be provided along the south side of Selma Avenue and along Las Palmas Avenue between Selma Avenue and Sunset Boulevard, no direct connection between Development Parcel A and Development Parcel C would be established. In addition, Alternative 6 would not include the realignment of Las Palmas Avenue at Sunset Boulevard. As such, Alternative 6 would not include on-site and off-site improvements to the existing sanitary sewer system related to the realignment of Las Palmas Avenue.

Parking for Alternative 6 would consist primarily of new subterranean parking garages. As with the Project, Development Parcel A would have six levels of subterranean parking with 307 parking spaces to serve the hotel building. Unlike the Project, Alternative 6 would not have connected/shared levels of subterranean parking under Development Parcels B and C. Instead, each parcel would provide its own separate subterranean parking. More specifically, Development Parcel B would have five levels of subterranean parking with 1,273 parking spaces to serve all the residential and ground floor retail/restaurant uses in Buildings B1, B2, B3, and B4. Development Parcel C would have two levels of subterranean parking with 213 parking spaces to serve the new office and retail/restaurant uses in Buildings C1, C2, and C3, as well as the Crossroads of the World complex. In addition, unlike the Project, Development Parcel D under Alternative 6 would be developed with five levels of above grade parking and three levels of below grade parking, providing a total of 240 parking to serve the residential and ground floor retail/restaurant uses in Building D1. Automobile and bicycle parking would be provided in accordance with applicable LAMC requirements.

Similar to the Project, this alternative would provide a variety of open space and recreational amenities, which would consist of interactive water features, seating, planting, fire places, and/or movie screens. This alternative would include open space and green space in accordance with the provisions for new residential projects set forth in LAMC Section 12.21-G.

With regard to construction activities and schedule, it is anticipated that the overall duration of construction would be the same as that of the Project (approximately 48 months). Furthermore, the amount of soil and demolition export required for Alternative 6 is estimated to be approximately 542,540 cy of soil, which would be less than the soil and demolition export required under the Project. As with the Project, excavation for this alternative would reach a maximum depth of approximately 78 feet (Development Parcel A with six levels of subterranean parking).

## **12. Summary of Environmental Impacts and Mitigation Measures**

Table I-1 on page I-41 provides a summary of the environmental impacts of the Project. These impacts are summarized as follows:

**Table I-1  
Summary of Impacts Under the Project**

Environmental Issue	Proposed Project Impact
<b>A. AESTHETICS, VIEWS, LIGHT/GLARE, AND SHADING</b>	
Aesthetics	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Views	Less Than Significant
Light/Glare	Less Than Significant
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Shading	Less Than Significant
<b>B. AIR QUALITY</b>	
Construction	
<i>Regional Emissions</i>	<b>Significant and Unavoidable</b>
<i>Local Emissions</i>	Less Than Significant
<i>Toxic Air Contaminants</i>	Less Than Significant
Operation	
<i>Regional Emissions</i>	<b>Significant and Unavoidable</b>
<i>Local Emissions</i>	Less Than Significant
<i>Toxic Air Contaminants</i>	Less Than Significant
<b>C. GREENHOUSE GAS EMISSIONS</b>	
Construction	Less Than Significant
Operation	Less Than Significant
<b>D. CULTURAL RESOURCES</b>	
Historic Resources	
<i>Demolition of Historic Resources</i>	<b>Significant and Unavoidable</b>
<i>Relocation of a Significant Resource</i>	Less Than Significant with Mitigation
<i>Adjacent New Construction</i>	Less Than Significant with Mitigation
Archaeological Resources	Less Than Significant
Paleontological Resources	Less Than Significant with Mitigation
Tribal Cultural Resources	Less Than Significant
<b>E. GEOLOGY AND SOILS</b>	Less than Significant with Mitigation
<b>F. HAZARDS AND HAZARDOUS MATERIALS</b>	
Hazardous Materials Use and Storage	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant

**Table I-1 (Continued)**  
**Summary of Impacts Under the Project**

Environmental Issue	Proposed Project Impact
Hazardous Waste Generation, Handling, and Disposal	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Underground and Aboveground Storage Tanks	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Asbestos-Containing Materials	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Lead-Based Paint	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Polychlorinated Biphenyls	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Oil Wells and Methane Gas	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Subsurface Conditions	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Emergency Response	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<b>G. HYDROLOGY AND WATER QUALITY</b>	Less than Significant with Mitigation
Surface Water Hydrology	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Surface Water Quality	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Groundwater Hydrology	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Groundwater Quality	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant

**Table I-1 (Continued)**  
**Summary of Impacts Under the Project**

Environmental Issue	Proposed Project Impact
<b>H. LAND USE</b>	
Land Use Consistency	Less Than Significant
Land Use Compatibility	Less Than Significant
<b>I. NOISE</b>	
Construction	
<i>On-Site Noise</i>	<b>Significant and Unavoidable</b>
<i>Off-Site Noise</i>	<b>Significant and Unavoidable</b>
<i>On-Site Vibration (Building Damage)</i>	Less Than Significant with Mitigation
<i>On-Site Vibration (Human Annoyance)</i>	<b>Significant and Unavoidable</b>
<i>Off-Site Vibration (Building Damage)</i>	Less Than Significant
<i>Off-Site Vibration (Human Annoyance)</i>	<b>Significant and Unavoidable</b>
Operation	
<i>On-Site Noise (Mechanical Equipment)</i>	Less Than Significant
<i>On-Site Noise (Outdoor Spaces)</i>	Less Than Significant with Mitigation
<i>On-Site Noise (Parking Facilities)</i>	Less Than Significant
<i>On-Site Noise (Loading Dock and Trash Collection Areas)</i>	Less Than Significant
<i>Off-Site Noise</i>	Less Than Significant
<i>Composite Noise</i>	Less Than Significant with Mitigation
<b>J.1. EMPLOYMENT</b>	
Construction	Less Than Significant
Operation	Less Than Significant
<b>J.2 HOUSING</b>	
Construction	Less Than Significant
Operation	Less Than Significant
<b>J.3 POPULATION</b>	
Construction	Less Than Significant
Operation	Less Than Significant
<b>K.1 PUBLIC SERVICES—POLICE PROTECTION</b>	
Construction	Less Than Significant
Operation	Less Than Significant
<b>K.2 PUBLIC SERVICES—FIRE PROTECTION</b>	
Construction	Less Than Significant
Operation	Less Than Significant

**Table I-1 (Continued)**  
**Summary of Impacts Under the Project**

Environmental Issue	Proposed Project Impact
<b>K.3 PUBLIC SERVICES—SCHOOLS</b>	
Construction	Less Than Significant
Operation	Less Than Significant
<b>K.4 PUBLIC SERVICES—LIBRARIES</b>	
Construction	Less Than Significant
Operation	Less Than Significant
<b>K.5 PUBLIC SERVICES—PARKS AND RECREATION</b>	
Construction	Less Than Significant
Operation	Less Than Significant
<b>L. TRAFFIC, ACCESS, AND PARKING</b>	
Construction	
<i>Intersection Levels of Service</i>	<b>Significant and Unavoidable</b>
<i>Access and Safety</i>	Less Than Significant
<i>Bus/Transit</i>	Less Than Significant
<i>On-Street Parking</i>	Less Than Significant
Operation	
<i>Intersection Levels of Service</i>	Less Than Significant with Mitigation
<i>Regional Transportation System</i>	Less Than Significant with Mitigation
<i>Residential Neighborhood</i>	<b>Significant and Unavoidable</b>
<i>Access and Circulation</i>	Less Than Significant
<i>Bicycle, Pedestrian, and Vehicular Safety</i>	Less Than Significant
<i>Parking</i>	Less Than Significant
<b>M.1 UTILITIES AND SERVICE SYSTEMS—WATER SUPPLY AND INFRASTRUCTURE</b>	
Construction	Less Than Significant
Operation	Less Than Significant
<b>M.2 UTILITIES AND SERVICE SYSTEMS—WASTEWATER</b>	
Construction	Less Than Significant
Operation	Less Than Significant
<b>M.3 UTILITIES AND SERVICE SYSTEMS—SOLID WASTE</b>	
Construction	Less Than Significant
Operation	Less Than Significant
<b>M.4 UTILITIES AND SERVICE SYSTEMS—ENERGY</b>	
Construction	Less Than Significant
Operation	Less Than Significant
<hr/> <i>Source: Eyestone Environmental, 2017.</i>	

## A. Aesthetics, Views, Light/Glare, and Shading

### a. Analysis of Project Impacts

In September 2013, the Governor signed Senate Bill 743 (SB 743), which became effective on January 1, 2014. Among other provisions, SB 743 adds Public Resources Code (PRC) 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.” PRC Section 21099 defines a “transit priority area” as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” PRC Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds in the 2006 *L.A. CEQA Thresholds Guide*, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

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 intervals 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 PRC 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. As such, the Project’s aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. The analysis regarding aesthetics, visual character, views, light and glare, and shading presented below and in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of this Draft EIR is provided for informational purposes.

#### (1) Aesthetics and Visual Quality

##### (a) Construction

Overall, while construction would alter the visual character of the Project area on a temporary basis, Project construction activities would not substantially alter or degrade the

existing visual character and quality of the Project Site and its surroundings or introduce elements that generate substantial long-term contrast with or substantially detract from the visual character of the surrounding area. In addition, in accordance with SB 743, this impact would not be considered significant. Therefore, aesthetics impacts associated with construction of the Project would be less than significant. Notwithstanding, to further reduce the Project's less-than-significant aesthetics impacts during construction, the Project would include the installation of temporary construction fencing along the periphery of the Project Site to screen much of the construction activity from view at the street level, as provided in Project Design Feature A-1. In addition, as set forth in Project Design Feature A-2, any pedestrian walkways and construction fencing accessible to the public would be monitored for graffiti removal throughout the construction period. Furthermore, as set forth in Mitigation Measure I-1 in Section IV.I, Noise, of this Draft EIR, a temporary and impermeable sound barrier would be installed along the perimeter of the Project Site, which would further obstruct public views of on-site ground-level construction activities.

*(b) Operation*

Based on the visual simulations presented in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of this Draft EIR, the Project would alter the visual character of the Project Site by replacing portions of four-city blocks that currently contain low-rise, low-density buildings and surface lots with nine new structures, three of which would be a high-rise hotel and residential towers. Buildout of the Project would increase the height, density, and massing of on-site structures as compared to existing conditions. However, the change in scale would be moderated by a high degree of articulation created by fenestration; variations in building planes, rooflines, heights, and façade setbacks and projections; and a variety of surface materials to reduce the visual effect of the height and massing from public vantage points and provide a pedestrian scale adjacent to the public streets. New landscaping also would enhance the pedestrian environment and provide visual relief. In accordance with SB 743, this impact would not be considered significant, and no mitigation measures would be required.

**(2) Views**

Scenic resources within the Project area that are available from public locations include the Hollywood Hills and the Hollywood Sign. Views of these resources are limited, partial, distant, and/or non-existent. Focal views closer to the Project Site (beyond the Crossroad of the World complex) include the historic Blessed Sacrament Church and the Hollywood Athletic Club Building, both of which are located east of the Project Site along Sunset Boulevard; and the Hollywood First National Building located north of the Project Site at Hollywood Boulevard and Highland Avenue. The Project does not substantially obscure public focal views of these resources as illustrated in the view simulations provided in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of this Draft EIR. In fact, the

Project's paseo creates a visual axis to the Blessed Sacrament Church bell tower. In addition, none of the roadways within the immediate Project Site vicinity are designated as scenic highways.

Public viewing locations or vantage points of the Project Site include public streets and sidewalks adjacent to the Project Site and in the surrounding area that have existing views of identified valued view resources; distant view locations, such as public vantage points within the Hollywood Hills; and other public areas surrounding the Project Site offering views of Hollywood. Public views from vantages within the surrounding Project area are limited due to dense urban development and flat terrain. Surrounding views consist of the urban landscape with a varied composite of low-rise to high-rise commercial, entertainment, office, educational, and residential buildings. Intermittent, pedestrian-level, long-range views of the Hollywood Hills and/or Hollywood Sign are available from segments of several north-south roadways in the area and more limited segments of some east-west roadways (primarily along portions of Sunset Boulevard).

Under existing conditions, short-range views of the Project Site are already obstructed from most public vantages and are generally only available to viewers at adjacent locations (i.e., pedestrians and motorists) along Sunset Boulevard and Highland Avenue and from the immediate uses surrounding the Project Site to the north and west. However, the three high-rise buildings would be prominently visible from the surrounding areas. The introduction of the high-rise hotel and residential buildings would result in changes to short-range focal views and long-range distant views of the Project Site. Due to the height and massing of the proposed buildings, the changes to short-range views, particularly along the immediately adjacent Sunset Boulevard and Highland Avenue, would be more substantial than changes to long-range views, as further described below. Within short-range views from street-level vantage points adjacent to the Project Site, the Project would be prominently visible and would be substantially taller and have more perceived bulk than the existing commercial and residential structures. However, short-range views of Crossroads of the World along Sunset Boulevard would be preserved. In particular, the revolving globe and the "ship" building at the main entrance would remain prominent and visible along Sunset Boulevard.

Long-range northerly views in the area around the Project Site provide intermittent and distant views to very limited portions of the Hollywood Hills. The Project, based on its height and massing, would be visible from certain locations to the south, southeast, and southwest that are not already obscured by intervening urban features. However, views of the Hollywood Hills available to the north-facing views of the commercial building, low-rise motels, and low- to mid-rise residential building located directly south of Sunset Boulevard and the Project Site are already limited under existing conditions. Views would continue to be limited on an intermittent basis along north-south roadways, including the Highland

Avenue roadway corridor and North Cherokee Avenue just southeast of the Project Site. The potential for blocked views of the Hollywood Hills would diminish as the viewer moves away from the Project Site, just north and west of the Project Site. From longer range views, the Project would appear to contribute to the existing fabric of urban development that frames the foreground of long-range views of the Hollywood Hills. Accordingly, while the Project would obstruct some partial, limited, and distant views of the Hollywood Hills, impacts would occur on an intermittent basis at single, fixed vantage points, rather than resulting in substantial blockages across long distances, such as along the length of a public roadway. Therefore, the reduction in publicly-available intermittent views of the Hollywood Hills that would result from the Project would not be considered a substantial obstruction of existing views of these visual resources.

East-facing views from the west of the Project Site of valued visual resources, the Hollywood Hills and sign, are not available due to the presence of existing development and intervening urban features and the orientation of the Hollywood Hills. Looking east from along the east-west streets south of the Project Site, including Sunset Boulevard and Fountain Avenue, public/street views of the Hollywood Hills and the Hollywood Sign are not available. Therefore, the Project would not have the potential to block existing east-facing views of the Hollywood Hills and the Hollywood Sign.

The Project would alter views to the south from the Hollywood Hills and north-south roadways. As previously described, the Project would be taller than the existing buildings located within the Project Site vicinity. However, the three-dimensional qualities to the building planes create vertical and horizontal articulation to break up the bulk and massing of the new structures. Furthermore, the height and scale of the Project would be comparable to the surrounding high-rise buildings located in the surrounding Hollywood community area. As is the case under existing conditions, future views with implementation of the Project would continue the highly urbanized nature of the area stretching from Hollywood to downtown Los Angeles and beyond. The increase in building height and density resulting from the Project would be integrated within the greater fabric of urban development. In terms of long-range views, the downtown skyline and distant horizon line would still be visible and would not be affected by the Project. Therefore, since the Project would not obstruct views of visually prominent or valued resources from vantages to the north, impacts would be less than significant.

Similar to other nearby views of the Project Site, Project development would be visually evident but would not obstruct public views of valued visual resources (e.g., the historic Hollywood Athletic Club building and the Blessed Sacrament Church bell tower) from vantage points to the east. The Project would merely block public views of other buildings to the west of the Project Site. In addition, as distance increases from the Project Site, intervening structures would obscure much of the view of the proposed development.

Therefore, the Project would not obstruct views of visually prominent resources from vantages to the east, and impacts would be less than significant.

Based on the above, the Project would not substantially obstruct existing public views of the Hollywood Hills and Hollywood Sign.

### (3) Light and Glare

#### *(a) Construction*

Lighting needed during Project construction has the potential to generate light spillover to off-site sensitive land uses in the Project vicinity, including the residential uses directly north and west of the Project Site. Construction activities would occur in accordance with the provisions of LAMC Section 41.40, which limits the hours of construction to between 7:00 A.M. and 9:00 P.M. on weekdays and between 8:00 A.M. and 6:00 P.M. on Saturdays and national holidays, with no construction permitted on Sundays. While the majority of Project construction would occur during daylight hours, there is a potential based on the proposed Project's anticipated construction hours that construction could occur in the evening hours and require the use of artificial lighting. Outdoor lighting sources, such as floodlights, spot lights, and/or headlights associated with construction equipment and hauling trucks, typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of Project construction. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. Additionally, as identified in Project Design Feature A-3, construction lighting would be shielded and/or aimed so that no direct beam illumination would fall outside of the Project Site boundary. Construction lighting, while potentially bright, would be focused on the particular area undergoing work. Accordingly, uses which are not adjacent to the construction site would not be anticipated to be substantially affected by construction lighting. Therefore, with adherence to existing LAMC regulations and Project Design Feature A-3 identified above, light resulting from construction activities would not significantly impact off-site sensitive uses, substantially alter the character of off-site areas surrounding the construction area, adversely impact day or nighttime views in the area, or substantially interfere with the performance of an off-site activity.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area, and the temporary nature of construction activities. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction

activities. Furthermore, as noted above, construction would primarily occur during the daytime hours in accordance with the LAMC. The glare from vehicles that currently park on the Project Site would be similar or cause greater visual impacts than temporary construction glare, if any. Furthermore, as set forth in Project Design Feature A-1, temporary construction fencing would be placed along the periphery of the Project Site to screen construction activity from view at the street level from off-site locations. Therefore, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur.

Accordingly, light and glare associated with Project construction would not substantially alter the character of off-site areas surrounding the Project Site or adversely impact day or nighttime views in the area. In addition, in accordance with SB 743, this impact would not be considered significant. Therefore, impacts from Project-related sources of artificial light and glare during construction would be less than significant.

*(b) Operation*

*(i) Illuminance and Nighttime Glare*

Sensitive receptors relative to light and glare within the vicinity of the Project Site include residential uses. In addition, motorists traveling along roadways in the Project vicinity are sensitive to daytime glare. To document existing and future lighting conditions, illuminance and contrast were evaluated at nearby sensitive receptors. Receptor locations representing sensitive receptors were selected based on the potential for greater light intensity associated with the Project Site and closer proximity to the Project Site. In addition, to account for building heights and heights of proposed illuminated signage, vertical calculation plane locations were identified and used to evaluate impacts associated with Project illumination and signage in the vicinity of the receptors. The illuminance (light trespass) associated with Project building and site lighting at the calculated vertical planes adjacent to the sensitive receptors would range from 0.1 foot-candle to up to 0.7 foot-candle. The Project-related illuminance levels at the receptors would range from no increase in foot-candles to a maximum increase of 0.8 foot-candle. These Project-related illuminance levels associated with building and site lighting would be well below the 2.0-foot-candle threshold and would, therefore, be less than significant.

Similarly, illuminated signage would generate a maximum of 0.2 to up to 2.70 foot-candles at the vertical planes near the sensitive receptors. Thus, Project-related illuminance associated with illuminated signage would be below the 3.0 foot-candle significance threshold and would, therefore, be less than significant.

With regard to nighttime glare/contrast, as discussed above, the analysis conservatively assumed the simultaneous use of all exterior sign lighting. As set forth in

Project Design Feature A-9, the maximum sign luminance would be 600 candelas with a maximum of 150 candelas for signage along and facing Selma Avenue. Accordingly, the resulting contrast associated with proposed signage would range from 1:1 to up to 6:1. These contrast levels are considered low. Thus, potential impacts associated with nighttime glare/contrast would be less than significant.

*(ii) Daytime Glare*

Daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. Sun reflection can also occur with reflected light from parked vehicles. In general, sun reflection that has the greatest potential to interfere with driving occurs from the lower stories of a structure. Sun reflection from the Project would occur during periods in which the sun is low on the horizon and when the point of reflection within the Project is in front of the driver, in the direction of travel.

Project development could affect daytime glare conditions with the introduction of new buildings and signage at the Project Site. To address daytime glare conditions, Project Design Feature A-8 requires that glass used in building façades shall be anti-reflective or treated with an anti-reflective coating in order to minimize glare. Thus, daytime glare attributable to the Project would be controlled. In addition, Project signage would not cause glare during the day since signage lighting would be a maximum of 600 candelas, which would not be intense enough to create substantial contrast during daytime hours. Thus, Project development would not incorporate substantial amounts of highly reflective building materials or signage that would be highly visible to off-site glare-sensitive uses and would not substantially alter the character of the off-site areas surrounding the Project Site or interfere with the performance of an off-site activity. As a result, Project daytime glare impacts would be less than significant.

**(4) Shading**

*(a) Winter Solstice*

Project shadows during the winter would extend in a northerly direction and would move from northwest to northeast across the surrounding area. Specifically, Project shadows would extend toward the northeastern corner of Hollywood High School across Highland Avenue west of Development Parcel A and the multi-family residences, including a future residential project to north of Development Parcels A and B across Selma Avenue from approximately 9:00 A.M. to 10:00 A.M. Project shadows would continue to shade these residential uses from approximately 11:00 A.M. to 3:00 P.M. By 3:00 P.M., Project shadows would extend to a new multi-family residential building immediately adjacent to the east of

Development Parcel D and Selma Avenue Elementary School along Selma Avenue. Project shadows during the winter would shade portions of the future residential project, which may include potentially routinely useable outdoor spaces (e.g., balconies and rooftop amenities), to the north of Development Parcels A and B across Selma Avenue for more than three hours. However, per the provisions of SB 743 and PRC Section 21099, which supersede the *L.A. CEQA Thresholds Guide*, this impact would not be considered significant.

*(b) Summer Solstice*

During the summer solstice, Project shadows would be the shortest due to the higher position of the sun and would move from west to east. Specifically, Project shadows would extend within the Project Site and into the surrounding roadways from approximately 9:00 A.M. to 5:00 P.M. Project shadows would extend toward the northeastern corner of Hollywood High School across Highland Avenue west of Development Parcel A from approximately 9:00 A.M. to 11:00 A.M. After 11:00 A.M., Project shadows would not extend to any surrounding sensitive uses during the summer and would not affect potentially routinely useable outdoor spaces associated with these uses. Therefore, as the Project would not cast shadows on shade-sensitive uses surrounding the Project Site for four or more hours, shading impacts during the summer would be less than significant.

*(c) Fall and Spring Equinoxes*

Project shadows during the fall and spring, respectively, would extend in a northerly direction and would move from northwest to northeast across the surrounding area. Specifically, Project shadows would extend toward the northeastern corner of Hollywood High School across Highland Avenue west of Development Parcel A and the multi-family residences, including a future residential project to north of Development Parcels A and B across Selma Avenue, from approximately 9:00 A.M. to 11:00 A.M. Project shadows would continue to shade these residential uses from approximately 11:00 A.M. to 3:00 P.M. By 4:00 P.M., Project shadows would extend to a new multi-family residential building immediately adjacent to the east of Development Parcel D and Selma Avenue Elementary School along Selma Avenue. Project shadows, during the fall and spring, would shade portions of the future residential project, which may include potentially routinely useable outdoor spaces (e.g., balconies and rooftop amenities), to the north of Development Parcels A and B across Selma Avenue, for more than three hours. However, per the provisions of SB 743 and PRC Section 21099, which supersede the *L.A. CEQA Thresholds Guide*, this impact would not be considered significant.

## (5) Consistency with Regulatory Framework

As detailed in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of this Draft EIR, the Project would be consistent with applicable policies from the Framework Element, Hollywood Community Plan, and Hollywood Redevelopment Plan that relate to aesthetics. The Project also would be consistent with the objectives of the Citywide Design Guidelines for commercial and mixed-use projects. In addition, the Project would generally support the applicable Walkability Checklist objectives and implement relevant strategies. Overall, the Project would be consistent with applicable regulatory standards and policies that relate to aesthetics.

### b. Cumulative Impacts

#### (1) Aesthetics/Visual Quality

There are several related projects that are located sufficiently close to the Project Site to enter the same field of view as the Project. With respect to visual quality and character, the nearby related projects would be similar to or smaller in scale than the Project and generally representative of the existing urban fabric and character in the area. Existing views from the Hollywood Hills convey the highly urbanized nature of the area between the Hollywood Hills and downtown Los Angeles, and the Project Site is difficult to distinguish within the greater fabric of urban development. High-rise structures, both existing and proposed/planned (including, but not limited to, Related Project Nos. 47, 53, 67, 87, 90, and 145) are evident in portions of Hollywood. Near the Project Site are: Related Project No. 47, the Millennium Hollywood Mixed-Use Project, includes apartments, hotel, office, retail, and restaurants within four new structures with a maximum height of 422 feet; Related Project No. 53, the Lexington Mixed-Use Project, includes apartments, restaurant, and retail within a seven-story building with a maximum height of 91 feet; Related Project No. 67, the Palladium Residences, includes apartments, restaurants, and retail within two buildings with a maximum height of 300 feet; Related Project No. 87, Academy Square, includes office, apartments, retail, and restaurant within three office buildings and one residential tower with a maximum height of 250 feet; Related Project No. 90, a mixed-use development located at 7107 Hollywood Boulevard, includes apartments, retail, and a restaurant within three buildings with a maximum height of 275 feet; and Related Project 145, the Sunset and Gordon Mixed-Use Project, includes residential, office, and retail uses within a 23-story high-rise building with a maximum height of 260 feet. Many of the related projects, including these nearby related projects represent infill development, and, in general, would reinforce existing and emerging land use patterns (e.g., mid- and high-rise development) in the area rather than introduce new development characteristics to the Project area. Furthermore, as with the Project, these related projects would be consistent with the prominent high-rise development along Sunset Boulevard and Hollywood Boulevard in the vicinity of the Project Site. In addition, similar to the Project,

future developments, including the related projects, would be subject to the City's design review processes and discretionary review to ensure consistency with adopted guidelines and standards that address aesthetics (e.g., LAMC height limits, density, setback requirements, and specific Community Plan design guidelines, etc.). Notwithstanding, the Project would result in the removal of six historic properties, resulting in aesthetic impacts. To the extent that related projects would also result in the removal of historic resources, cumulative impacts associated with degradation of the environment could occur. However, in accordance with SB 743, which supersedes the *L.A. CEQA Thresholds Guide*, the Project's aesthetic impacts would not be significant and would not contribute toward a cumulatively considerable impact.

## (2) Views

In general, related projects have the potential to block views from local streets and other public vantages throughout a project area. With respect to the Project, the views most likely to be affected on a cumulative basis are significantly north-facing views of the Hollywood Hills. However, as previously indicated, the Project would not significantly affect views of the Hollywood Hills or Hollywood sign. Additionally, given the fact that long-range views along north-south roadways, such as Highland Avenue, would continue to be available, any potential impacts would be limited. As under existing conditions, such views would remain intermittent throughout the Project area, as many existing buildings currently obstruct views of these resources from surrounding vantage points. As with the Project, views of other off-site visual resources, including architectural or historically significant structures, could be affected by the related projects. However, in accordance with SB 743, the Project's contribution to cumulative aesthetics impacts would not be significant. In addition, due to the highly urbanized nature of development near the Project Site, views are intermittent. Thus, cumulative impacts would be less than significant.

## (3) Light and Glare

Development of the Project, as well as the related projects in the area, would introduce new or expanded sources of artificial light. Consequently, ambient light levels are likely to increase in the Project area. Of the related projects, two related projects (Related Project Nos. 37 and 45) are located immediately east and north of and within sufficient proximity to the Project Site to have the potential to combine with the Project and result in cumulative light and glare impacts.

With regard to light, as previously described, the Project Site is located within the highly urbanized Hollywood community, with urban lighting characteristics exhibiting medium to high ambient nighttime light levels. As such, the Project and nearby related projects, including Related Project Nos. 37 and 45, which would include typical land uses for the Project area, would not significantly alter the existing lighting environment currently

experienced in the area. Additionally, cumulative lighting would not be expected to interfere with the performance of off-site activities given the moderate ambient nighttime artificial light levels already present. Furthermore, the Project's and related projects' adherence to applicable City requirements regarding lighting, including compliance with HSSUD, discussed above, would control the Project's potential artificial light sources to a sufficient degree so as not to be considered cumulatively considerable. Similarly with regard to glare, the Project's and nearby related projects' proposed uses are compatible with other development in the high-density urban environment. In addition, it is anticipated that the Project and other future development projects would be subject to discretionary review to ensure that significant sources of glare are not introduced and that, as with the Project, related projects would include standard design features related to use of low-level lighting and shielding, as well as use of non-reflective surfaces to minimize the potential for glare. Therefore, based on the above and in accordance with SB 743, the Project's contribution to light and glare impacts would not be cumulatively considerable, and cumulative light and glare impacts from development of the Project and the related projects would be less than significant.

#### (4) Shading

The closest related projects to the Project Site are Related Project Nos. 37 and 45 to the northeast and north of the Project Site, respectively. As discussed above, the Project would shade shadow-sensitive uses for more than three hours during the winter solstice and spring and fall equinoxes. The nearby related projects could also cast shadows on nearby shadow-sensitive uses. In accordance with SB 743, the Project's shading impacts would not be significant, and future related projects within the Project vicinity would also be exempted from aesthetics impacts related to shading. Therefore, cumulative impacts would be less than significant.

### c. Project Design Features

The following project design features are proposed with regard to aesthetics, views, light/glare, and shading:

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

**Project Design Feature A-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.

**Project Design Feature A-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.

**Project Design Feature A-4:** New on-site utilities that may be required to serve the Project will be installed underground.

**Project Design Feature A-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.

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

**Project Design Feature A-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.

**Project Design Feature A-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.

**Project Design Feature A-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.

#### **d. Mitigation Measures**

Project-level and cumulative impacts with regard to aesthetics/visual quality, views, light and glare, and shading would be less than significant. Therefore, no mitigation measures are required.

#### **e. Level of Significance After Mitigation**

Project-level and cumulative impacts related to aesthetics/visual quality, views, light and glare, and shading would be less than significant.

### **B. Air Quality**

#### **a. Analysis of Project Impacts**

##### **(1) Construction**

##### *(a) Regional Construction Impacts*

Construction of 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 would result from demolition and construction activities. Mobile source emissions, primarily nitrogen oxides (NO<sub>x</sub>), would 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 would potentially release volatile organic compounds (VOCs). The assessment of construction air quality impacts considers each of these potential sources. As evaluated in Section IV.B, Air Quality, of this Draft EIR, construction-related daily maximum regional construction emissions (i.e., combined on-site and off-site emissions) would not exceed the South Coast Air Quality Management District (SCAQMD) daily significance thresholds for VOC, carbon monoxide (CO), sulfur oxides (SO<sub>x</sub>), respirable particulate matter (PM<sub>10</sub>), or fine particulate matter (PM<sub>2.5</sub>). However, maximum regional construction emissions would exceed the SCAQMD daily significance thresholds for NO<sub>x</sub> during periods of heavy construction equipment use and export of soil. Therefore, regional construction emissions resulting from the Project would result in a significant short-term impact.

*(b) Localized Impacts from On-Site Construction Activities*

Maximum localized construction emissions for off-site sensitive receptors would not exceed any of the SCAQMD-recommended localized screening thresholds. Therefore, localized construction emissions resulting from the Project would result in a less-than-significant air quality impact.

*(c) Toxic Air Contaminants (TAC)*

The greatest potential for TAC emissions during construction would be from diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. Because the construction schedule estimates that the phases which require the most heavy-duty diesel vehicle usage, such as site grading/excavation, would last for a much shorter duration (e.g., approximately five months), construction of the Project would not result in a substantial, long-term (i.e., 70-year) source of TAC emissions. Additionally, the SCAQMD CEQA guidance does not require a health risk assessment for short-term construction emissions. It is, therefore, not necessary or meaningful to evaluate long-term cancer impacts from construction activities which occur over a relatively short duration. In addition, there would be no residual emissions or corresponding individual cancer risk after construction. As such, Project-related TAC impacts during construction would be less than significant.

**(2) Operation**

*(a) Regional Operational Impacts*

Regional emissions resulting from operation of the Project at its buildout year of 2022 are expected to exceed the SCAQMD's daily regional operational thresholds for VOC and NO<sub>x</sub>. Although incorporation of Project Design Features would decrease VOC emissions by eight percent and NO<sub>x</sub> emissions by 36 percent, air quality impacts from Project operational emissions would remain significant.

An analysis of daily operational regional emissions of existing conditions without the Project versus with the Project was also conducted. The Project under existing conditions would exceed the established SCAQMD threshold levels for VOC and NO<sub>x</sub>, as well as the CO operational threshold. Therefore, air quality impacts from Project operational emissions would also be significant for CO under this scenario. This conclusion assumes that the Project would have been built in 2015, which is not based on reality as it would not have existed in 2015, and the actual impact would not occur. Yet, for CEQA purposes and to conservatively disclose potential impacts, the EIR calculates that in addition to VOC and NO<sub>x</sub> emissions, CO emissions could be significant as if the Project were to have been developed in 2015.

*(b) Localized Impacts from On-Site Operational Activities*

Operation of the Project would not introduce any major new sources of air pollution within the Project Site. On-site operational emissions would not exceed any of the localized significance thresholds at Project buildout (2022) or under existing conditions.

*(c) CO "Hot Spots" Analysis*

In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included Long Beach Boulevard and Imperial Highway (Lynwood), Wilshire Boulevard and Veteran Avenue (Westwood), Sunset Boulevard and Highland Avenue (Hollywood), and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which had a daily traffic volume of approximately 100,000 vehicles per day. The SCAQMD's 2003 Air Quality Management Plan (AQMP) estimated that the 1-hour concentration for this intersection was 4.6 parts per million (ppm), which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day. At buildout of the Project, the highest average daily trips at an intersection in the vicinity of the Project Site would be approximately 72,268 daily trips at the Highland Avenue and Sunset Boulevard intersection, which is below the daily traffic volumes that would be expected to generate CO exceedances as evaluated in the 2003 AQMP. This daily trip estimate is based on the peak hour conditions of the intersection. Therefore, the Project would not cause any new or exacerbate any existing CO hotspots to exceed the 1-hour or 8-hour CO standard, and, as a result, impacts related to localized mobile-source CO emissions would be less than significant.

*(d) Toxic Air Contaminants Impacts Evaluation*

*(i) On-Site Sources*

The primary sources of potential air toxics associated with Project operations include diesel particulate matter (DPM) from delivery trucks associated with the Project's commercial component (e.g., truck traffic on local streets and idling on adjacent streets). However, these activities, and the land uses associated with the Project, are not considered land uses that generate substantial TAC emissions. It should be noted that the SCAQMD recommends that health risk assessments (HRAs) be conducted for substantial sources of DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions. Based on this guidance, the Project is not considered to be a substantial source of DPM warranting a refined HRA since daily truck trips to the Project Site would not exceed 100 trucks per day

or more than 40 trucks with operating transport refrigeration units. In addition, the airborne toxic control measure (ATCM) mandated by the California Air Resources Board (CARB) limits diesel-fueled commercial vehicles (delivery trucks) to idle for no more than 5 minutes at any given time, which would further limit DPM emissions.

As the Project would not contain substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). The Project would not include these types of potential industrial manufacturing process sources. It is expected that quantities of hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides, etc.) for the types of proposed land uses would be below thresholds warranting further study under California Accidental Release Program (CalARP). As such, the Project would not release substantial amounts of TACs, and impacts on human health would be less than significant.

#### *(ii) Off-Site Sources*

Potential sources of TACs within the Project Site vicinity were identified using SCAQMD's Facility Information Database (FIND) search and site reconnaissance to identify potential non-permitted air toxic emitting sources (e.g., freeways, diesel trucks idling at warehouse distribution facilities in excess of 100 trucks per day). Based on this screening analysis, no substantial sources (e.g., gasoline stations, dry cleaners, warehouse distribution) of TAC emissions within the Project Site vicinity were identified, and the location of the proposed residential and neighborhood-serving retail and restaurant uses would be consistent with the recommended siting distances (e.g., no sensitive receptors within 500 feet of a freeway) provided in the CARB and SCAQMD guidance documents. Therefore, the Project would not result in the exposure of sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and TAC impacts would be less than significant.

### (3) SCAQMD CEQA Air Quality Handbook Policy Analysis

The determination of AQMP consistency is primarily concerned with the long-term influence of the Project on air quality in the Air Basin. While development of the Project would result in short-term regional impacts, Project development would not have a significant long-term impact on the region's ability to meet state and federal air quality

standards. The Project would comply with SCAQMD Rule 403 related to fugitive dust control and would implement all feasible mitigation measures for control of NO<sub>x</sub>. The Project's long-term influence would also be consistent with the goals and policies of the AQMP and is, therefore, considered consistent with the SCAQMD's AQMP.

#### (4) City of Los Angeles Policies

The Project is consistent with applicable policies of the City of Los Angeles General Plan Air Quality Element. The Project would implement project features that would reduce vehicular trips, reduce vehicle miles traveled (VMT), and encourage use of alternative modes of transportation. In addition, the Project's mix of residential and neighborhood-serving commercial uses located in proximity to existing transportation infrastructure and public transit and multimodal options would result in a reduction of VMT and vehicle trips. Therefore, the Project would serve to implement applicable policies of the City of Los Angeles pertaining to air quality.

### **b. Cumulative Impacts**

#### (1) Construction

The Project would comply with regulatory requirements, including SCAQMD Rule 403 requirements. In addition, the Project would comply 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 would comply with these same requirements (i.e., SCAQMD Rule 403 compliance) and would 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 would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. Construction-related daily emissions at the Project Site would exceed the SCAQMD's regional significance threshold for NO<sub>x</sub> with mitigation. Consequently, the Project would have a cumulative impact due to construction-related regional NO<sub>x</sub> emissions even with incorporation of mitigation measures. In terms of localized air quality impacts, construction of the Project would have a less-than-significant impact with regard to localized emissions; therefore, the Project's localized emissions are not cumulatively considerable.

Similar to the Project, the greatest potential for TAC emissions at each related project would generally involve DPM emissions associated with heavy equipment

operations during demolition and grading/excavation activities. Construction activities at each related project would not result in a long-term (i.e., 70-year) substantial source of TAC emissions. Additionally, the SCAQMD CEQA guidance does not require a HRA for short-term construction emissions. As such, cumulative TAC emission impacts during construction would be less than significant.

## (2) Operation

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 would 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 would exceed the SCAQMD's regional operational thresholds for VOC and NO<sub>x</sub> even with incorporation of Project Design Features. Operational emissions for the Project under existing conditions would exceed the SCAQMD's regional operational thresholds for VOC, NO<sub>x</sub>, and CO even with incorporation of Project Design Features. These Project Design Features would serve to reduce criteria pollutant emissions as follows: (1) VOC by 8 percent; (2) NO<sub>x</sub> by 36 percent; (3) CO by 27 percent; (4) SO<sub>x</sub> by 48 percent; and (5) PM<sub>10</sub> and PM<sub>2.5</sub> by 49 percent. Nonetheless, the emissions of non-attainment pollutants and precursors generated by Project operation in excess of the SCAQMD project-level thresholds, for which the Air Basin is non-attainment, would remain cumulatively considerable.

However, localized NO<sub>2</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>, operational impacts would not exceed the SCAQMD's thresholds. As such, the potential localized operational impacts from the Project's on-site activities would not be cumulatively considerable.

With respect to TAC emissions, neither the Project nor any of the related projects (which are largely residential, retail/commercial, and office uses) would represent a substantial source of TAC emissions, which are typically associated with large-scale industrial, manufacturing, and transportation hub facilities. The Project and related projects would be consistent with the recommended screening level siting distances for TAC sources, as set forth in CARB's Land Use Guidelines, and the Project and related projects would not result in a cumulative impact requiring further evaluation. However, the Project and each of the related projects would likely generate minimal TAC emissions related to the use of consumer products and landscape maintenance activities, among other things. Pursuant to Assembly Bill (AB) 1807, which directs CARB to identify substances as TACs and adopt ATCMs to control such substances, the SCAQMD has adopted numerous rules (primarily in Regulation XIV) that specifically address TAC emissions. These SCAQMD rules have resulted in and will continue to result in substantial Basin-wide TAC emissions reductions. As such, cumulative TAC emissions during long-term operations would be less

than significant. In addition, the Project would not result in any substantial sources of TACs that have been identified by CARB's Land Use Guidelines and, thus, would not result in a cumulatively considerable impact.

### c. Project Design Features

No specific Project Design Features are proposed with regard to air quality. The Project would incorporate Project Design Features C-1 through C-4 to support and promote environmental sustainability as discussed under Section IV.C, Greenhouse Gas Emissions, of this Draft EIR. While these features are designed primarily to reduce greenhouse gas emissions, they would also serve to reduce criteria air pollutants and are, therefore, provided below.

### d. Mitigation Measures

The following mitigation measures set forth a program of air pollution control strategies designed to reduce the Project's air quality impacts during construction, particularly those impacts related to NO<sub>x</sub> emissions:

**Mitigation Measure B-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.

**Mitigation Measure B-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.

**Mitigation Measure B-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.

**Mitigation Measure B-4:** Petroleum-powered construction activity shall utilize electricity from power poles, when available, rather than temporary diesel power generators and/or gasoline power generators. If stationary petroleum-powered construction equipment, such as 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.

**Mitigation Measure B-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 the Tier 3 standards. 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.

## **e. Level of Significance After Mitigation**

### **(1) Construction**

Implementation of the mitigation measures described above would reduce construction emissions for all pollutants. However, even with the incorporation of mitigation measures, the Project would exceed the SCAQMD regional significance thresholds for NO<sub>x</sub> during excavation and grading activities. Regional NO<sub>x</sub> emissions would be reduced from 240 pounds per day to 225 pounds per day or 125 pounds over the 100 pounds per day SCAQMD significance threshold. This duration would be limited to approximately five months of the 48-month construction duration or 10 percent of total construction. As such, Project construction would result in significant and unavoidable Project-level and cumulative regional impacts with regard to NO<sub>x</sub> emissions even with incorporation of all feasible mitigation measures.

No significant impacts related to localized emissions or TAC emissions during construction are anticipated to occur for the Project. As such, potential Project-level and cumulative localized or TAC impacts would be less than significant.

## (2) Operations

Although there are no feasible mitigation measures to reduce the Project's impacts from VOC or NO<sub>x</sub> emissions, the Project would incorporate Project Design Features to reduce operational emissions, as discussed under Section IV.C, Greenhouse Gas Emissions, of this Draft EIR. With inclusion of Project Design Features, VOC and NO<sub>x</sub> emissions would be reduced by eight percent and 36 percent, respectively, under the Project buildout analysis year. Under the Project existing conditions (2015), the Project VOC, NO<sub>x</sub>, and CO emissions would be reduced by 10 percent, 39 percent, and 30 percent, respectively, with inclusion of Project Design Features. However, regional operational emissions associated with Project buildout analysis year still would exceed the SCAQMD daily emission threshold for regional VOC and NO<sub>x</sub> after implementation of feasible Project Design Features. Furthermore, the Project under existing conditions (2015) would also exceed the SCAQMD daily regional CO operational threshold. This conclusion assumes that the Project would be built in 2015, which is not based on reality as it would not have existed in 2015, and the actual impact would not occur. Yet, for CEQA purposes and to conservatively disclose potential impacts, the EIR calculates that in addition to VOC and NO<sub>x</sub> emissions, CO emissions would have a significant and unavoidable Project-level impact on regional and cumulative air quality, for which the Air Basin is non-attainment. With regard to the consistency with the air quality policies set forth in the SCAQMD's AQMP and the City of Los Angeles General Plan Air Quality Element, the Project would have a less-than-significant impact.

The Project is not anticipated to include any substantial TAC emission sources. Specifically, the Project would not result in the exposure of sensitive receptors to carcinogenic or TACs that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0. As such, potential Project-level and cumulative impacts from Project TAC emissions would be less than significant.

## C. Greenhouse Gas Emissions

### a. Analysis of Project Impacts

The Project would generate an incremental contribution to and cumulative increase in sources of GHGs. However, even a very large individual project would not generate enough GHG emissions on its own to significantly influence global climate change. Thus, potential GHG impacts are addressed generally as a cumulative impact for environmental review purposes.

When taking into consideration implementation of applicable Project Design Features identified throughout this Draft EIR, including the requirements set forth in the City

of Los Angeles Green Building Code and the full implementation of current state mandates, the GHG emissions for the Project would be approximately 315 metric tons of equivalent mass of CO<sub>2</sub> (MTCO<sub>2</sub>e) per year during construction and 18,051 MTCO<sub>2</sub>e per year during operation of the Project for a combined total of 18,365 MTCO<sub>2</sub>e per year. The Project would result in a decrease in GHG emissions that represents an approximate 38-percent reduction from the “no implementation of emission reduction measures” (NIERM) scenario, which is more commonly known as the “business-as-usual” or BAU scenario. This demonstrates the efficacy of the GHG reduction programs and measures applicable to the Project. In addition, the Project is designed in accordance with the regulatory requirements and includes Project Design Features that would be consistent with the following City of Los Angeles goals provided in the Air Quality Element of the City of Los Angeles General Plan:

- Improving energy and water efficiency in buildings;
- Installing water-efficient landscaping;
- Reducing per capita water use; and
- Increasing recycling rates.

Moreover, the Project would be 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 would use “green building” features as a framework for achieving cross-cutting emissions reductions as new buildings and infrastructure would be designed to achieve the standards of the Silver Rating under LEED<sup>®</sup>. Similarly, the Project would be 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 would result in a VMT reduction of approximately 45 percent in comparison to NIERM and would be consistent with SCAG’s 2016–2040 RTP/SCS. The Project also would comply 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 would advance these objectives.

With regard to AB 900, the Project would 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 would meet the GHG emissions requirements for streamlined environmental review under CEQA.

Therefore, the Project would 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 would be less than significant.

## **b. 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 would be very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. The state has mandated a goal of reducing statewide emissions to 1990 levels by 2020, even though statewide population and commerce 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 would be 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 would 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 would 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 would 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 would 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.

### c. Project Design Features

The following Project Design Features are proposed with regard to GHG emissions:

**Project Design Feature C-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<sup>®</sup> or LEED-NC<sup>®</sup> Rating System as of January 1, 2011. Specific sustainability features that are integrated into the Project design to enable the Project to achieve LEED<sup>®</sup> Silver certification will include the following:

- a. 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.
- b. Use of Energy Star-labeled products and appliances.
- c. 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.
- d. Reduce indoor water use by a minimum of 35 percent from the calculated baseline, as required for LEED<sup>®</sup> Silver certification, by installing water fixtures that exceed applicable standards.
- e. See Project Design Feature M.1-2 in Section IV.M.1-1, Utilities and Services Systems—Water Supply and Infrastructure, regarding outdoor water usage.

**Project Design Feature C-2:** The residential units within the Project will not include the use of fireplaces.

**Project Design Feature C-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.

**Project Design Feature C-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.

The Project Applicant agreed to meet the requirement set forth in California Public Resources Code Section 21183, subdivision (c) to demonstrate that the Project would result in no net additional GHG emissions through the purchase of voluntary carbon credits sufficient to offset all projected additional GHG emissions (374,209 MT CO<sub>2e</sub>). The SCAQMD recommends that offsets should have a 30-year project life, should be real, quantifiable, verifiable, and surplus and will be considered in the following prioritized manner: (1) project design feature/on-site reduction measures; (2) off-site within neighborhood; (3) off-site within district; (4) off-site within state; and (5) off-site out-of-state. Notably, the commitments to enter into contracts to offset net additional GHG emissions provided in the Application for CEQA Streamlining and included as Appendix D of this Draft EIR are incorporated as follows:

**Project Design Feature C-5:** No later than six (6) months after the issuance of a Temporary Certificate of Occupancy for the Project, the Project Applicant shall 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 shall 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 shall 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 shall provide courtesy copies of any such contracts to the CARB and the Governor's Office promptly following the execution of such contracts.

**Project Design Feature C-6:** Prior to issuance of any Certificate of Occupancy for any building in the Project, the Project Applicant or its successor shall 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, shall 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 shall be calculated on a net present value basis for a 30-year useful life.

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

**Project Design Feature C-8:** Once the City has had an opportunity to review and approve the methodology and associated calculations, the Project Applicant shall 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. 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.

#### **d. Mitigation Measures**

As part of the Project, the Project Applicant would comply with applicable LA Green Plan requirements as set forth throughout this Draft EIR and specific Project Design Features to further support and promote environmental sustainability. These features include compliance with regulatory requirements, including the provisions set forth in the CALGreen Code that have been incorporated into the City of Los Angeles Green Building Code. These features also include energy conservation, water conservation, and waste

reduction features. With implementation of regulatory requirements and Project Design Features, including those provided above, and Mitigation Measure L-1 in Section IV.L, Traffic, Access, and Parking, of this Draft EIR, impacts related to GHG emissions would be less than significant.

### **e. Level of Significance After Mitigation**

Project impacts related to GHG emissions would be less than significant.

## **D. Cultural Resources**

### **a. Analysis of Project Impacts**

#### **(1) Historic Resources**

##### *(a) Impacts Associated with Demolition of Historic Resources*

The Project would demolish the following 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 commercial block at 6683 Sunset Boulevard (1923)
- Two-story Craftsman style duplex at 1606–1608 Las Palmas Avenue (1912)
- Hollywood Reporter Building at 6713 Sunset Boulevard

Demolition of these buildings would result in significant impacts to historic resources. These impacts cannot be mitigated to a less-than-significant level.

##### *(b) Relocation of Significant Resources*

The Crossroads of the World property is composed of nine buildings and their related circulation and site features. Together, these elements create a single historic resource. The Project proposes to relocate one small building located at the southwestern portion of the property. Referred to as the “Early American Building,” the building to be relocated is designed in an American Colonial Revival style. The building consists of a

linear configuration of individual store spaces just east of Las Palmas Avenue. The Early American Building is currently oriented east-west and located between Las Palmas Avenue and the northwestern corner of the Crossroads of the World “French Building.” The Early American Building would be relocated to the center of the Crossroads of the World property, re-oriented north-south in alignment with the other Crossroads buildings along the property’s north-south pedestrian axis, and attached to proposed Building C2.

Removal of a historic resource from its original physical location and setting has the potential to diminish the historic significance of a building. As discussed in Section IV.D, Cultural Resources, of this Draft EIR, *location* is one of the seven aspects of historic integrity. *Location* is defined as the place where the historic property was constructed or the place where the historic event took place. Relocation can be particularly sensitive for historic properties containing multiple buildings, such as Crossroads of the World, where the configuration of multiple buildings and the spatial relationships established by that configuration are important character-defining features of the historic resource. For evaluation of Crossroads of the World, the Crossroads property is considered a single historic resource.

The National Park Service has established a special criterion for moved properties, Criteria Consideration B, as a guide to evaluating their potential historic significance. According to Criteria Consideration B, “a property removed from its original or historically significant location can be eligible if it is significant primarily for architectural value or it is the surviving property most importantly associated with a historic person or event.” The guidance, however, goes on to state that “a moved property that is part of a complex but is of less significance than the remaining (unmoved) buildings” does not need to meet Criteria Consideration B in order to be considered. Because the Early American Building is one component of the larger Crossroads of the World complex and is the smallest of nine component buildings, Criteria Consideration B does not apply.

Issues relating to relocation are also addressed in the Secretary of the Interior’s Standards for Rehabilitation. Standard 2 states: “The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.” Relocation of the Early American Building would alter the original plan and configuration of the Crossroads of the World property by relocating one of its nine component buildings. The Early American Building was constructed in an east-west orientation with its shopfronts facing north. It was designed in anticipation of a second phase of Crossroads development that would have added additional storefronts located north and parallel to the Early American Building with storefronts facing south to create a second, east-west pedestrian axis connecting Crossroads to Las Palmas Avenue. Additional construction would have filled in the open space between the northern and southern Crossroads buildings along the

north-south axis to create a T-shaped internal circulation pattern with access from Sunset Boulevard, Selma Avenue, and Las Palmas Avenue. Because the second phase was never implemented, the Early American Building's storefronts face a surface parking lot and the originally intended east-west internal "street" was never built.

All of the other eight Crossroads buildings would remain in their original location after implementation of the Project. These buildings, oriented along the north-south central pedestrian axis between Sunset Boulevard and Selma Avenue, establish the primary configuration of buildings and open spaces that characterize the property and define the property's important spatial relationships. The Early American Building is the smallest of the nine Crossroads buildings and because of its location and orientation, it has little spatial relationship with the other buildings. After relocation of the Early American Building, the majority of the original configuration of buildings and spatial relationships that characterize the Crossroads of the World property would remain intact and unaltered. In addition, all other aspects of the Crossroads of the World property would retain existing distinctive materials, features, and spaces and, as such, would not have an impact on the National Register or California Register listing as it would not reduce the historic integrity or significance of this resource. However, relocation of the Early American Building has the potential to imply a false historic condition. Specifically, moving existing historic fabric to a new location has the potential to create a false sense of historical development at Crossroads of the World, which could result in a significant impact to historic resources. However, with implementation of Mitigation Measure D-2, which entails consultation with a preservation architect or other qualified professional during planning and implementation of the proposed relocation of the Early American Building to ensure minimal loss of original materials and other character-defining features during and after relocation, and Mitigation Measure D-5, which entails inclusion of an interpretive program on-site to address the original location and relocation of the Early American Building and inform the public about the history and original configuration of the Crossroads of the World property, potential impacts associated with relocation of the Early American Building would be reduced to a less-than-significant level.

In addition to relocation, the Project also proposes to alter the Early American Building by attaching it to the proposed new construction. However, all other aspects of the Crossroads of the World property would retain existing distinctive materials, features, and spaces and, as such, would not have an impact on the National Register or California Register listing as it would not significantly reduce the overall historic integrity or significance of this resource. Furthermore, implementation of Mitigation Measure D-3 provided below would ensure that the proposed connection would be completed in conformance with the Secretary of the Interior's Standards for Rehabilitation. Thus, potential impacts associated with alteration of the Early American Building would be reduced to less-than-significant levels.

(c) *Potential Impacts from Adjacent New Construction*

Guidance provided by the National Park Service for reviewing proposed new construction that may affect a historic resource, as stated in the 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 would be unimpaired.”

(i) *New Construction on Development Parcel A*

A single building, Building A1, would be constructed on Development Parcel A. Building A1 would comprise 26 floors of hotel with ancillary commercial uses over a below grade parking garage. Because the 1907 vernacular house at 1547 McCadden Place would be demolished to allow for construction of Building A1, no historic resources would be present immediately adjacent to Building A1 after its completion. Two historic 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.

The 1928 five-story apartment building at 1523 McCadden Place is located several parcels south of Development Parcel A, and construction of Building A1 would not result in any physical impact to 1523 McCadden Place. The full height of Building A1 would be set back from the south above the 5th floor, further distancing the majority of the new building’s height and mass from the properties to the south. Construction of Building A1 would, however, alter the surroundings of 1523 McCadden Place by placing substantial height and mass on a site currently occupied by modest one-and two-story buildings.

The surroundings of the apartment building at 1523 McCadden Place have been altered by successive demolition and construction on neighboring parcels since its construction in 1928, and the existing setting is not critical to understanding the building’s

historic significance. 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 would continue to convey its historic significance after construction of Building A1. Construction of Building A1 would not result in a significant impact to 1523 McCadden Place.

The Hollywood High School Historic District is located across Highland Avenue from Development Parcel A outside the Project Site boundaries and would not be physically altered by the construction of Building A1. 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 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 would remain intact after construction of Building A1, and its plan, spatial relationships, massing, architecture and design features would continue to convey its historic significance.

Building A1 would be 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 would also be located substantially north and west of the Queen Anne house at 6720–6722 Sunset Boulevard. Because it would be located a substantial distance from these resources, construction of Building A1 would not demolish or physically alter any of these resources or their immediate surroundings. Construction of Building A1 would 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 would continue to convey their historic significance after construction of Building A1.

Finally, Building A1 would 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, new construction on Development Parcel A has the potential to destabilize the adjacent historic buildings, resulting in significant impacts to historic resources. With implementation of Mitigation Measure D-7 below, 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 C1 would not result in a significant impact to historic resources.

*(ii) New Construction on Development Parcel B*

The Project would construct four new buildings on Development Parcel B, consisting of Buildings B1, B2, B3, and B4. Specifically, Building B1 would consist of 30 floors and would reach a maximum height of approximately 402 feet above grade. Building B2 would consist of 6 floors and would reach a maximum height of approximately 87 feet above grade. Building B3 would consist of 32 floors and would reach a maximum height of approximately 386 feet above grade. Building B4 would consist of 6 floors in addition to a mezzanine floor and would reach a maximum height of approximately 95 feet above grade.

All of the historic buildings contained within Development Parcel B would be demolished prior to the new construction. Consequently, no resources would be located immediately adjacent to any of the four new buildings to be constructed on Development Parcel B.

Two historic resources have been identified in the immediate vicinity of Development Parcel B. These are 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 new construction would not result in the demolition or physical alteration of either resource.

Proposed construction on Development Parcel B includes Building B1, which would be constructed on the west side of Las Palmas Avenue, across the street from the First Baptist Church at 6684 Selma Avenue. The First Baptist Church would remain intact and physically unchanged after construction of Building B1, and the church building's massing, form, and architectural detailing would continue to be viewable and understandable by the public. Construction of Building B1 would not materially impact the integrity of the First Baptist Church, and it would continue to convey its historic significance after construction of Building B1.

The proposed construction on Development Parcel B includes Building B3, which would consist of 32 floors and would reach a maximum height of approximately 386 feet above grade. Building B3 would be constructed 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 would be a substantial distance between the house and Building B3. The Queen Anne house would remain intact and in its original location after construction of Building B3, and its setting within the Hollywood Center Motel property would remain unchanged.

New construction on Development Parcel B would be separated by the proposed new construction 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 would also be located south and west of the Art Deco office building at 1618 Las Palmas Avenue. Because it would be located a substantial distance from these resources, construction on Development Parcel B would not demolish or physically alter any of these resources or their immediate surroundings. As such, construction on Development Parcel B would 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 would continue to convey their historic significance after the new construction on Development Parcel B.

Finally, the proposed new construction on Development Parcel B would include substantial foundation work and the construction of subterranean parking. Without mitigation to ensure the protection of nearby historic buildings (i.e., 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 has the potential to destabilize nearby historic buildings, resulting in significant impacts to historic resources. With implementation of Mitigation Measure D-7 below, 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 would not result in a significant impact to historic resources.

*(iii) New Construction on Development Parcel C: Potential Impacts to Crossroads of the World*

The Project proposes to construct three new buildings that have the potential to impact Crossroads of the World. A new building (C1) would be constructed just west of Crossroads of the World on a site made vacant by the demolition of the 1923 commercial building at 6683 Sunset Boulevard and the relocation of the Crossroads of the World Early American Building. A second building (C2) would be constructed on the surface parking lot west of Crossroads of the World. A third building (C3) would be constructed on the east side of the Crossroads property between the Moorish influenced “Moroccan Building” and

east “Central European Building.” The buildings and site features that comprise the Crossroads of the World property have been identified and listed collectively as a single historic resource. Therefore, the proposed adjacent new construction is evaluated for potential impacts to the Crossroads of the World property as a whole.

### Building C1

Building C1 would comprise three floors of office and retail space reaching a maximum height of 65 feet above grade. Because Building C1 would occupy a portion of the Crossroads of the World property at its southwestern end and be constructed directly adjacent to two Crossroads of the World buildings, it has the potential to result in significant impacts to the Crossroads of the World property. The plan and orientation of Building C1 would reconfigure the Las Palmas Avenue approach to Crossroads of the World from an east-west orientation to a northwest-southeast orientation. Building C1 would rise over twice the height of the adjacent Crossroads of the World buildings. This difference in height would be moderated by massing that sets the tallest portions of Building C1 back from Crossroads of the World. The Building C1 podium would be the same height as the two-story height of the neighboring Crossroads of the World buildings, and the ground floor (podium) level elevations would be articulated to establish a clear relationship with the height of the neighboring Crossroads buildings. The Building C1 ground floor level would also be articulated with retail windows and entryways that are similar in scale, proportion, and rhythm to those of the existing Crossroads of the World buildings. Above its podium, the upper floors of Building C1 would be 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 would further reduce the visual impression of height.

In accordance with Standard 9, Building C1 would not destroy historic materials or features that characterize the Crossroads of the World property. The new construction would emphasize simple forms and contemporary materials to differentiate the new building from the Crossroads buildings. With setbacks from the eastern and southern elevations to reduce the overall height and mass, Building C1 would also be 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 would be unimpaired if Building C1 were removed in the future. With implementation of Mitigation Measure D-6, which entails consultation with a preservation architect or other qualified professional to ensure that Building C1 is designed in a manner that is compatible with the historic materials and features of Crossroads of the World, construction of Building C1 would not result in a significant impact to historic resources (i.e., Crossroads of the World).

### Building C2

Building C2 would consist of two floors of office and retail space. The building would occupy a portion of the existing surface parking lot west of the Crossroads of the World. A one-story connection would link Building C2 to the relocated Early American Building, which would be oriented north-south, continuing the building line south from the west Central European Building at the northern end of the Crossroads of the World property.

The construction of Building C2 would alter the Early American Building by attaching it to the proposed new construction. As discussed above, the buildings and site features that comprise the Crossroads of the World property have been identified and listed collectively as a single historic resource. The Early American Building is one of nine buildings that comprise the Crossroads property and is not considered a historic resource individually. Therefore, any alteration to the Early American Building must be evaluated for potential impacts to the Crossroads of the World property as a whole.

Attachment of the Early American Building to Building C2 would require removal of historic fabric from the rear elevation of the Early American Building. This elevation (the existing southern elevation) was constructed as the back of the Early American Building facing a neighboring property line and its features are simple and utilitarian. The rear elevation does not contain the expressive design features prominent on the front and side elevations that give the Early American Building its distinctive appearance and are defining characteristics of the Crossroads of the World property. Removal of historic fabric from the rear elevation of the Early American Building would 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 Early American Building, and all of the existing original fabric and character-defining features of the eight additional component buildings would remain intact. With implementation of Mitigation Measure D-3, which entails designing the connection in accordance with the Secretary of the Interior's Standards and Guidelines for Rehabilitation to ensure that the proposed connection is executed with minimal impact to the important character-defining features of the Early American Building, alteration of the Early American Building would not result in a significant impact to Crossroads of the World.

As shown in the conceptual drawings, Building C2 would rise over twice the height of the attached Early American Building and at its highest point be taller than any of the other existing Crossroads of the World buildings. Similar to Building C1, this difference in height would be moderated by setting the tallest portions of Building C2 back from Crossroads of the World. Building C2 would include a ground floor (podium) level articulated to relate to the existing roof level of the relocated and attached Early American Building. The upper levels would be set back from the Early American Building and other component of the Crossroads of the World historic buildings to reduce the perception of height and mass when experienced at ground level. The ground floor level elevations

would also be articulated with retail windows and entryways that are similar in scale, proportion, and rhythm to those of the existing Crossroads of the World buildings. Above the podium level, curtain walls of horizontally articulated glass in metal frames would create a simple backdrop to the highly articulated historical profile of the Crossroads buildings.

In accordance with Standard 9, Building C2 would not destroy historic materials or features that characterize the Crossroads of the World property. Building C2 would utilize 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 would also be 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 would be unimpaired if Building C2 were removed in the future.

With implementation of Mitigation Measure D-3 below, 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 and that connecting Building C2 to the Early American Building would not destroy historic materials and overall features that characterize the Crossroads of the World resource, construction of Building C2 would not result in a significant impact to historic resources.

### Building C3

Building C3 is a one-story retail pavilion to be located between the existing Moroccan Building and the east Central European Building on a site currently used for surface parking. The one-story height of the new building would be consistent with the one- and two-story heights of the existing Crossroads of the World buildings and continue the north-south building line on the east side of the main pedestrian axis.

The new building would be of a simple, rectangular form and utilize clear glass on its primary elevation to emphasize transparency. In accordance with Standard 9, the minimal design of Building C3 would be clearly differentiated from the Crossroads of the World buildings.

In addition, in accordance with Standard 9, Building C3 would not destroy historic materials and features that characterize the Crossroads of the World property because it would not physically alter the Crossroads of the World buildings. Building C3 would utilize simple forms and contemporary materials to differentiate it from the Crossroads of the World buildings. The one-story, rectangular building would 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 would be unimpaired if Building C3 were removed in the future.

With implementation of Mitigation Measure D-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 would not result in a significant impact to historic resources (i.e., Crossroads of the World).

The proposed new construction on Development Parcel C would include substantial foundation work and the construction of subterranean parking underneath the Crossroads of the World property. 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 settlement due to the removal of adjacent soil, new construction on Development Parcel C has the potential to destabilize the Crossroads of the World historic buildings, resulting in significant impacts to historic resources. With implementation of Mitigation Measure D-7 below, 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 C would not result in a significant impact to historic resources.

*(iv) New Construction on Development Parcel D*

A single building, Building D1, would be constructed on Development Parcel D. Building D1 would consist of six floors of residential and retail uses over a subterranean parking garage. The historic building (i.e., two-story Craftsman style duplex at 1608 Las Palmas Avenue) contained within Development Parcel D would be demolished prior to the new construction. Two historic resources have been identified in the immediate vicinity of Development Parcel D. These are 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 proposed new construction on Development Parcel D would not physically impact either resource because it does not propose construction on these sites.

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. Construction of Building D1 would not result in any physical impact to the Art Deco office building, although

construction of Building D1 would alter the surroundings and setting of the Art Deco office building by constructing 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 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 would remain intact and understandable.

Building D1 would be constructed 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 would remain intact and physically unchanged after construction of Building D1, and its massing, form, and architectural detailing would continue to be viewable and understandable by the public. Construction of Building D1 would not materially impact the integrity of the First Baptist Church, which would continue to convey its historic significance after construction of Building D1.

Building D1 would also be located north of and across the street from the northern end of the Crossroads of the World property and northwest of the Blessed Sacrament Church and School at 6641–6657 Sunset Boulevard. Construction of Building D1 would not demolish or physically alter either of these resources and would not materially impact their integrity. Because both Crossroads of the World and the Blessed Sacrament Church and School would remain intact and unaltered by the construction of Building D1, both resources would continue to convey their historic significance after the construction of Building D1.

Finally, the proposed new construction on Development Parcel D would 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, new construction on Development Parcel D has the potential to destabilize the adjacent 1932 Art Deco office building at 1618 Las Palmas Avenue, resulting in significant impacts to historic resources. With implementation of Mitigation Measure D-7 below, 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 Building D1 would not result in a significant impact to historic resources.

*(v) Realignment of Las Palmas Avenue*

The Project would realign the segment of Las Palmas Avenue just north of Sunset Boulevard, so that it becomes continuous with its segment south of Sunset Boulevard. The realignment would shift the Las Palmas Avenue segment between Selma Avenue and Sunset Boulevard.

The segment of Las Palmas Avenue immediately adjacent to the First Baptist Church would remain in its existing alignment. Accordingly, the realignment of Las Palmas Avenue would have no impact on the First Baptist Church.

The Crossroads of the World property is located east of the existing Las Palmas Avenue alignment, and the proposed realignment would shift Las Palmas Avenue farther to the west. Therefore, the realignment of Las Palmas Avenue would have no impact on Crossroads of the World.

All other potential historic resources located along Las Palmas Avenue between Selma Avenue and Sunset Boulevard, including the courtyard apartment buildings at 6700 Selma Avenue and 1535-55 Las Palmas Avenue, the two-story commercial building at 6683 Sunset Boulevard, and the Hollywood Reporter Building at 6713 Sunset Boulevard would have been demolished prior to the realignment of Las Palmas Avenue. The demolition of these resources would result in significant impacts to historic resources as discussed above. Realignment of Las Palmas Avenue would not result in any additional impacts to historic resources.

*(d) Summary of Impacts on Historical Resources*

Based on the above analyses, a summary of the potential impacts on historic resources is provided below.

1. The Project would require the demolition of six properties identified as historic resources through survey evaluation. These impacts cannot be mitigated to a less-than-significant level.
2. The Project would relocate one building on the Crossroads of the World property that has the potential to create a false sense of historic development. However, with implementation of Mitigation Measure D-5, impacts would be less than significant.
3. The Project would construct a new building that connects to one original building on the Crossroads of the World property. This connection has the potential to reduce the historic integrity of the Crossroads of the World property. However,

with implementation of Mitigation Measure D-3, impacts would be less than significant.

4. The Project would construct three new buildings that have the potential to reduce the historic integrity of the Crossroads of the World property. However, with implementation of Mitigation Measure D-6, impacts would be less than significant.
5. The Project would require substantial foundation work and the construction of subterranean parking. However, with implementation of Mitigation Measure D-7, the protection of historic resources from damage due to underground excavation and general construction procedures and the reduction of the possibility of damage from vibration and settlement due to the removal of adjacent soil would be ensured. Therefore, impacts would be less than significant.

## (2) Archaeological Resources

The results of the archaeological records search indicate that there are no identified archaeological sites within the Project Site and three archaeological sites located within a 0.5-mile radius of the Project Site. No isolates are located within the Project Site or a 0.5-mile radius of the Project Site. 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 disturbance of the ground surface has previously occurred on-site. The maximum depth of excavation for Project development would be 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 would cease, and deposits would be treated in accordance with the regulatory requirements summarized above, including those set forth in Public Resources Code (PRC) Section 21083.2 with respect to any unique archaeological resource. In addition, if human remains were discovered during construction of the Project, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.91 and 5097.98, as amended. With the implementation of regulatory requirements, potential impacts related to archaeological resources would be reduced to less-than-significant levels.

## (3) Paleontological Resources

A records search conducted for the Project Site indicates there are no previously encountered fossil vertebrate localities located within the Project Site. The closest

identified localities in proximity to the Project Site were collected at depths between 47 and 80 feet below the surface area. The paleontological records search indicates 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. However, deeper excavations have the potential to encounter significant remains of fossil vertebrates. Grading to a maximum depth of approximately 75 feet would occur within the Project Site. Thus, the possibility exists that paleontological artifacts that were not recovered during prior construction or other human activity may be present. As set forth in Mitigation Measure D-10, a qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities of the Project Site. In the event paleontological materials are encountered, the paleontologist shall be allowed to 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 D-10 would ensure that any potential impacts related to paleontological resources would be less than significant.

#### (4) Tribal Cultural Resources

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

- Fernandeano 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 Fernandeano 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 this 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 this Draft EIR). The results of this review is also included in

Appendix E.6 of this 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 area. However, pursuant to AB 52, there is no authority to defer a tribe's authority to a third party. Notwithstanding, the Gabrieleño Tribal Consultants did not submit any evidence into the record of tribal cultural resources at the Project Site.

As discussed above, cultural/archaeological resources records search was conducted by the SCCIC at California State University, Fullerton. This records search 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. 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 area in September 2016. The results of the records search did not identify any previously recorded sacred lands within the Project Site or 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 are in mutual agreement that the Project would not result in a potential significant impact to a tribal cultural resource (see Appendix E.7 of this Draft EIR). As such, impacts related to tribal cultural resources would be less than significant.

## **b. Cumulative Impacts**

There are 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, 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 historic resources tend to be site-specific, a cumulative impact analysis of historic resources determines whether the impacts of a project and the related projects in the surrounding area, when taken as a whole, would substantially diminish the number of historic resources within the same or similar context or property type. Specifically, cumulative impacts would occur if the Project and related projects affect local 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 the Project would result in the removal of six properties identified as historic resources by survey evaluation, these impacts 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 six properties to be demolished, such impacts may be cumulatively considerable. As such, cumulative impacts are concluded to be significant and unavoidable.

With regard to potential cumulative impacts related to archaeological and paleontological resources, the Project vicinity is located within an urbanized area that has been substantially disturbed and developed over time. In the event that archaeological resources are uncovered, each related project would be required to comply with applicable regulatory requirements, such as CEQA Guidelines Section 15064.5, PRC Section 21083.2, Health and Safety Code Section 7050.5, and PRC Section 5097.9. In addition, as part of the environmental review processes for the related projects, it is expected that mitigation measures would be established as necessary to address the potential for uncovering of paleontological resources. Therefore, Project impacts to archaeological and paleontological resources would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to tribal cultural resources, it is expected that the related projects would also comply with regulatory requirements, including required consultation with the California Native American Tribes. Thus, impacts would not be cumulatively considerable.

### **c. Project Design Features**

No specific Project Design Features are proposed with regard to cultural resources.

## d. Mitigation Measures

### (1) Historic Resources

The following mitigation measures would reduce potential impacts to the Crossroads of the World property and other adjacent historic resources to a less-than-significant level.

**Mitigation Measure D-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. Copies of the documentation shall be offered to Hollywood Heritage, the Los Angeles Conservancy, the Los Angeles Public Library, and the South Central Coastal Information Center at California State University, Fullerton.

**Mitigation Measure D-2:** Planning and implementation of the relocation of the Crossroads of the World “Early American Building” shall include consultation with a preservation architect or other qualified professional to ensure minimal loss of original materials and character-defining features during and after relocation.

**Mitigation Measure D-3:** The connection of the proposed Building C2 to the Crossroads of the World “Early American 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 Department of City Planning Office of Historic Resources.

**Mitigation Measure D-4:** The Crossroads of the World “Early American Building” 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 Department of City Planning Office of Historic Resources.

**Mitigation Measure D-5:** The Project shall include an interpretive program located on the Crossroads of the World property which addresses the original location and relocation of the Early American Building and informs the public about the history and original configuration of the Crossroads of the World property.

**Mitigation Measure D-6:** The Project design team shall 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

First Baptist Church and the 1932 Art Deco office building at 1618 Las Palmas Avenue. The final design will require the approval of the Department of City Planning Office of Historic Resources.

**Mitigation Measure D-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, 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 D-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.

The following recommended mitigation measure would reduce potential impacts on historic resources associated with the Project although not to a less-than-significant level.

**Mitigation Measure D-9:** 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, the two-story commercial building at 6683 Sunset Boulevard, and the former Hollywood Reporter Building at 6713 Sunset Boulevard shall be documented in accordance with Historic American Building Survey (HABS) guidelines and standards. Copies of the documentation shall be offered to Hollywood Heritage, the Los Angeles Conservancy, the Los Angeles Public Library, and the South Central Coastal Information Center at California State University, Fullerton.

## (2) Paleontological Resources

**Mitigation Measure D-10:** 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.

### **e. Level of Significance After Mitigation**

The Project would require the demolition of six properties identified as historic resources through survey evaluation. Mitigation measures are provided above to reduce these impacts. However, such impacts cannot be mitigated to a less-than-significant level and would be significant and unavoidable. 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 six properties to be demolished.

With implementation of the mitigation measures provided above, potential impacts associated with partial relocation and alteration of Crossroads of the World and new construction adjacent to existing historic resources would be less than significant. Thus, no significant impacts to Crossroads of the World would occur as a result of implementation of the Project.

As discussed above, Project impacts related to archaeological and tribal cultural resources would be less than significant. In addition, Mitigation Measure D-10 would reduce potential Project-level impacts associated with paleontological resources to a less-than-significant level. Cumulative impacts associated with paleontological resources would also be less than significant.

## **E. Geology and Soils**

### **a. Analysis of Project Impacts**

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. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of

CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project.

Construction activities would 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 would then be placed, followed by building construction, the realignment of Las Palmas Avenue, and the installation of utilities, paving, concrete, and landscape. The parking garage for Development Parcel A would provide six levels of subterranean parking. Development Parcels B and C would provide five connected/shared levels of subterranean parking underneath the two development parcels and the realigned Las Palmas Avenue, while the parking garage for Development Parcel D would provide three levels of subterranean parking. The maximum depth of excavation would range from 36 to 78 feet below grade surface. It is estimated that approximately 643,753 cubic yards (cy) of soil, as well as an additional 1,490 cy during off-site improvements to the existing sanitary sewer system related to the realignment of Las Palmas Avenue, would be excavated from the Project Site. All existing certified fill would be removed during grading and excavation.

The Project is typical of urban environments and would not involve mining operations, deep excavation into the earth, or boring of large areas creating unstable seismic conditions or stresses in Earth's crust. Furthermore, as discussed above, there are no active or potentially active faults that underlie the Project Site. Accordingly, the Project would not exacerbate seismic conditions or other geologic conditions on the Project Site or vicinity, and, as such, impacts related to surface ground rupture, strong seismic ground shaking, liquefaction, and seismically induced settlement would be less than significant. In addition, the Project would not cause, accelerate, or exacerbate in whole or in part geologic hazards, including instability from erosion, that would result in substantial damage to structures, infrastructure, or other properties or expose people to substantial risk of injury.

## (1) Seismic Hazards

### *(a) Surface Ground Rupture*

Ground rupture is the visible breaking and displacement of the earth's surface along the trace of a fault during an earthquake. No known active or potentially active faults underlie the Project Site. In addition, 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 would not exacerbate existing environmental conditions by bringing people or structures into areas potentially susceptible to substantial adverse effects, including fault rupture. Therefore, impacts associated with surface rupture from a known earthquake fault would be 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 would potentially be subject to strong ground motion if a moderate to strong earthquake occurs on a local or regional fault. These potentially significant impacts related to seismic ground shaking at the Project Site would not be exacerbated by the Project because the Project would not involve mining operations, deep excavation into the earth, or boring of large areas creating unstable seismic conditions that would 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 would be less than significant, and no mitigation measures are required.

The following discussion about building and seismic codes is provided for informational purposes. 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, would reduce the substantial risk that buildings would collapse. The Geotechnical Report contains preliminary recommendations for the type of engineering practices that would 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 would 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 would also be required to 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 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 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 this 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 would not be capable of liquefaction during an earthquake event. Therefore, based on these considerations, the Project would not exacerbate existing environmental conditions and cause or accelerate geologic hazards related to liquefaction, which would result in substantial damage to structures or infrastructure, or bring people into areas that are susceptible to substantial risk of injury. As such, impacts associated with liquefaction would be less than significant, and no mitigation measures are required.

*(d) Seismically Induced Settlement*

Seismically induced settlement or compaction of dry or moist, cohesionless soils can be an effect related to earthquake ground motion. Such settlements are typically most damaging when the settlements are differential in nature across the length of structures. Some seismically induced settlement of the proposed structures should be expected as a result of strong ground-shaking. As previously discussed, 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. Based on the Geotechnical Report, seismically induced settlement of silty sand layers located above the water table may occur on the Project Site. These settlements are estimated to be on the order of 0.5 inch and would be taken into account in the structural design of the proposed development. In addition, the Project would 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 would not exacerbate and cause or accelerate geologic hazards related to seismically induced settlement.

## (2) 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 parking garage for Development Parcel A would provide six levels of subterranean parking. Development Parcels B and C would provide five connected/shared levels of subterranean parking underneath the two development parcels and the realigned Las Palmas Avenue, while the parking garage for Development Parcel D would provide three levels of subterranean parking. Accordingly, the maximum depth of excavation would range from 36 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 could be required within the Project Site. However, as discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, if dewatering is required, adherence to applicable National Pollutant Discharge Elimination System (NPDES) Permit and industrial user sewer discharge permit requirements would ensure operation of the temporary dewatering system would have a minimal effect on local groundwater recharge in the vicinity of the Project Site. In addition, a permanent dewatering system during Project operation would result in only minor impacts to the top of the groundwater table and would not affect any supply wells. Therefore, potential geologic hazards from groundwater would be less than significant, and no mitigation measures are required.

## (3) 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 would 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 would be exported off-site to the nearest landfill for proper disposal and recycling.

All required excavations would 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 would adhere to the requirements of the Los Angeles Municipal Code and the California Building Code. The Project Applicant would also be 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 would not be exacerbated by the Project and, thus, would be less than significant.

#### (4) Soil Erosion

Project-related construction activities would occur in accordance with erosion control requirements, including grading and dust control measures, imposed by the City pursuant to grading permit regulations. Specifically, Project construction would comply with the Los Angeles Building Code, which requires necessary permits, plans, plan checks, and inspections to ensure that the Project would reduce the sedimentation and erosion effects. In addition, the Project would be 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) would be implemented during construction to reduce sedimentation and erosion levels to the maximum extent possible. In addition, Project construction contractors would be 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 would 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. As mentioned, 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, 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. If dewatering is required, adherence to applicable NPDES Permit and industrial user sewer discharge permit requirements would ensure operation of the temporary dewatering system would have a minimal effect on local groundwater recharge in the vicinity of the Project Site. In addition, a permanent dewatering system during Project operation would result in only minor impacts to the top of the groundwater table and would 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 would not exacerbate, cause, or accelerate geologic hazards related to subsidence. Therefore, impacts related to subsidence would be less than significant, and no mitigation measures are required.

### (6) 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 would not be affected as the extent of proposed excavation would be deeper than these soils. If encountered, such soils would be removed during excavation. Furthermore, with the incorporation of site-specific geotechnical recommendations, impacts related to expansive soils would not be exacerbated by the Project and, thus, would be 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 would not be exacerbated by the Project and, thus, would be less than significant.

### (7) 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 vicinity. Therefore, the Project would not destroy, permanently cover, or materially and adversely modify any distinct and prominent geologic or topographic features. Impacts associated with landform alteration would not occur, and no mitigation measures are required.

## **b. 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 (inclusive of the 145 related projects identified in

Section III, Environmental Setting, of this Draft EIR) would expose a greater number of people to seismic hazards. However, as with the Project, related projects and other future development projects would be 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 would not be cumulatively considerable, and cumulative impacts with regard to geology and soils would be less than significant.

### **c. Project Design Features**

No specific Project Design Features are proposed with regard to geology and soils.

### **d. Mitigation Measures**

Project-level and cumulative impacts with regard to geology and soils would be less than significant. Therefore, no mitigation measures are required.

### **e. Level of Significance After Mitigation**

Considering the rigorous investigation process required under the engineering standard of care, compliance with state laws and city regulatory requirements, technical review and approval by the regulatory agency of a design-level geotechnical engineering report, Project-level impacts related to geology and soils would be less than significant. In addition, cumulative impacts with regard to geology and soils would be less than significant.

## **F. Hazards and Hazardous Materials**

### **a. Analysis of Project Impacts**

#### **(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 would be affected by construction-related hazardous materials. However, the Project Site is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment. Additionally, all potentially hazardous materials would be used and stored in accordance with manufacturers' instructions. In addition, 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 would 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 would 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, would 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 would be affected by construction-related hazardous materials. Project construction would 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 Environmental Site Assessment (ESA) did not identify any significant environmental concerns on the Project Site, the perchloroethylene (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 would be required to comply with relevant and applicable federal, state, and local regulations and requirements, including Department of Toxic Substances Control (DTSC) and Resource Conservation and Recovery Act (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 would prevent releases of hazardous waste and ensure that Project construction activities would not expose people or schools to a substantial risk resulting from the release or explosion of a hazardous material. In addition, these regulatory requirements would prevent exposure to a health hazard in excess of regulatory standards. Therefore, impacts associated with hazardous waste management during construction would be less than significant, and no mitigation measures are required.

*(c) Underground and Aboveground Storage Tanks*

The parking garage for Development Parcel A would provide six levels of subterranean parking. Development Parcels B and C would provide five connected/shared levels of subterranean parking underneath the two development parcels and the realigned Las Palmas Avenue, while the parking garage for Development Parcel D would provide three levels of subterranean parking. The maximum depth of excavation would range from 36 to 78 feet below the existing ground surface. As previously discussed, no underground storage tanks (USTs) or above-ground storage tanks (ASTs) were observed or identified within the Project Site. Therefore, no USTs or ASTs would be encountered or affected during Project construction, and there would be no potential to encounter residual subsurface contamination. Thus, impacts related to USTs and ASTs during construction would 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 would 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 would be removed by a certified asbestos abatement contractor in accordance with applicable regulations. With compliance with relevant regulations and requirements, Project construction activities would not expose people or schools to a substantial risk resulting from the release of asbestos fibers in the environment. Therefore, impacts related to ACMs would 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 would 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 would not expose people or schools to a substantial risk resulting from the release of LBP into the environment. Therefore, impacts related to LBP would 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 biphenyl (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 would 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 would not expose people or schools to a substantial risk resulting from the release of PCBs in the environment. Therefore, impacts related to PCBs would 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 would be negligible. No impacts related to oil wells and methane gas during construction would occur during Project construction, and no mitigation measures are required.

*(h) Subsurface Conditions*

The maximum depth of excavation would range from 36 to 78 feet below the existing ground surface. The Recognized Environmental Conditions (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 which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would 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 F-1, a future sub-slab soil gas sample will 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 would 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. As discussed in Section IV.L, Traffic, Access, and Parking, of this Draft EIR, a Construction Management Plan would be implemented during construction of the Project that would include street closure information, a detour plan, and a staging plan and would ensure that adequate and safe access remains available within and near the Project Site during construction activities. The Construction Management Plan would require that Project construction be confined to the Project Site along Highland Avenue and, therefore, would not interfere with this route or have a significant impact on the City's emergency evacuation plan. However, as evaluated further in Section IV.K, Public Services, of this Draft EIR, although construction activities would 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 would employ temporary traffic control measures, such as flag persons, to manage traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to 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.) would 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 would not be anticipated to 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 would be less than significant, and no mitigation measures are required. Refer to Section IV.K, Public Services, of this Draft EIR for a detailed analysis regarding emergency response.

## (2) Operational Impacts

### *(a) Hazardous Materials Use and Storage*

Operation of the Project would 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 would 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 would be adequately reduced to a less-than-significant level through compliance with these standards and regulations. Therefore, as the Project would comply with applicable regulations and would 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 would be less than significant, and no mitigation measures are required.

### *(b) Hazardous Waste Generation, Handling, and Disposal*

Development of the Project would involve the use of hazardous materials typically associated with residential, office, hotel, 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 would occur in compliance with all applicable federal, state, and local requirements concerning the handling and disposal of hazardous waste. Furthermore, hazardous wastes would 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 would 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 would be less than significant, and no mitigation measures are required.

*(c) Underground and Aboveground Storage Tanks*

The Project proposes to use fuel storage tanks to power the generators to be used for the Project. Although the type and quantity of storage tanks are unknown at this time, their use would be subject to the applicable requirements of the CCR, CFR, and Health and Safety Code (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 would 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 would be less than significant, and no mitigation measures are required.

*(d) Asbestos-Containing Materials*

Development of the Project would include the use of commercially-sold construction materials that would 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 proposed at the Project Site would 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 ACMs during operation of the Project would occur, and no mitigation measures are required.

*(e) Lead-Based Paint*

Development of the Project would include the use of commercially-sold construction materials that would not include LBP. Project development is, therefore, not anticipated to increase the occurrence of LBP at the Project Site. Operation of the new development proposed at the Project Site would not expose persons or schools in the immediate vicinity to any risk resulting from the release of lead in the environment. Thus, no impacts associated with LBP during operation of the Project would occur, 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 would not contain PCBs. Therefore, during operation of the Project, maintenance of such electrical systems would not expose people or schools in the immediate vicinity to PCBs. In addition, the Project Applicant would comply with applicable laws regulating PCBs, including but not limited to 40 CFR 761, in addition to federal, state,

and local regulations as discussed above in the Regulatory Framework. As such, operation of the Project would 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 would occur, 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 Project would not exacerbate existing environmental conditions so as to increase the potential to 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 would 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 CHHSL threshold levels. 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 micrograms per liter ( $\mu\text{g}/\text{l}$ ), which is below the CHHSL for commercial properties but is above the acceptable concentration for residential properties. This portion of the Project Site would be developed with office and retail uses and would not include residential uses. In addition, the Project Site is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would 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 F-1, an additional soil gas sample will 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 would not exacerbate existing conditions. Therefore, impacts related to hazards from subsurface conditions would be less than significant.

*(i) Emergency Response*

During operation, the Project would not involve any activities that would impede public access or travel along the public right-of-way or interfere with an adopted emergency response or evacuation plan. As discussed in Section IV.K.2, Public Services—Fire Protection, of this Draft EIR, emergency vehicles would 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 would 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), since 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, would not cause a substantial effect on emergency response as a result of increased traffic congestion. Refer to Section IV.K, Public Services, of this Draft EIR, for a detailed analysis regarding emergency response. As such, impacts associated with emergency response and emergency evacuation plans would be less than significant.

## **b. Cumulative Impacts**

Development of the Project, in combination with the related projects described in Section III, Environmental Setting, of this Draft EIR, would have the potential to increase the risk for accidental releases of hazardous materials. Each of the related projects would 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 would 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 would 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. Although some related projects may have the potential to result in physical modifications to these streets, both Project construction and operation would not require or result in any modifications to either roadway. In addition, the Project would 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 F-1, the Project would 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 would be less than significant.

## **c. Project Design Features**

The following Project Design Feature has been incorporated into the Project and assumed in analyzing its impacts with regard to hazardous materials:

**Project Design Feature F-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.

#### **d. Mitigation Measures**

Project-level and cumulative impacts with regard to hazards and hazardous materials would be less than significant. Therefore, no mitigation measures are required.

#### **e. Level of Significance After Mitigation**

Project-level and cumulative impacts with regard to hazards and hazardous materials would be less than significant without mitigation.

### **G. Hydrology and Water Quality**

#### **a. Analysis of Project Impacts**

##### **(1) Construction**

##### *(a) Surface Water Hydrology*

Project construction activities for the demolition of existing uses and construction of new buildings would require grading and excavation that would have the potential to temporarily alter the existing surface drainage patterns and flows within the Project Site. During the process, exposing underlying soils would divert existing surface flows and make the Project Site temporarily more permeable. However, the Project would be required to 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 would not substantially alter the Project Site drainage patterns in a manner that would result 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 would ensure that the Project would not cause flooding that would have 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.

As part of the Project, the realignment of Las Palmas Avenue would relocate the existing stormwater catch basins and temporarily alter existing drainage patterns and flows within the Project Site. The relocated catch basins and lateral would continue to be the same type and size as the existing. Since the only source of surface water that would be disturbed as a result of the realignment is the Project Site, the realignment would have minimal impact on the surface hydrology. Therefore, the closure of Las Palmas Avenue would have minimal impact upon the surrounding surface water flow patterns as no off-site water is being conveyed onto Las Palmas Avenue. Since Las Palmas Ave does not have any existing stormwater drainage infrastructure, there would also be no impact to the public system. As such, construction-related impacts to surface water hydrology would be less than significant, and no mitigation measures are required.

During the realignment process, soils would be exposed and runoff would be decreased due to the ability of stormwater to infiltrate the ground. However the Project would 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 would be managed and directed off-site to not overwhelm the existing stormwater drainage infrastructure, and post-construction runoff flow rate would not be expected to change significantly. Therefore, with adherence to all applicable regulations, construction-related impacts to surface water hydrology would be less than significant, and no mitigation measures are required.

*(b) 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 would not result in discharge that would create: (1) pollution that would 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) nuisance that would 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 would 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 would not result in discharges that would cause violations of regulatory standards within Santa Monica Bay. Therefore, construction-related impacts to surface water quality would be less than significant, and no mitigation measures are required.

*(c) 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 would not be anticipated to affect existing wells. Therefore, construction of the Project would 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 could be required. Dewatering systems would 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 would ensure that the operation of a temporary dewatering system would have a minimal effect on local groundwater recharge within the Project Site's vicinity. Therefore, the Project is not anticipated to adversely impact the flow rate or direction of groundwater and would not have an adverse effect on any water supply wells. Impacts would be less than significant, and no mitigation measures are required.

*(d) 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 this Draft EIR. As a result, ground disturbance associated with construction site clearance, excavation, and grading activities would be 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 this Draft EIR, compliance with these requirements and implementation of Project Design Feature F-1 would prevent releases of PCE and ensure that construction activities would 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.) would 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 this Draft EIR, would reduce 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 would not be anticipated to affect existing wells. Accordingly, Project impacts on groundwater quality would be less than significant, and no mitigation measures are required.

## (2) Operation

### *(a) Surface Water Hydrology*

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

The Project would slightly alter on-site drainage patterns. Under existing conditions, the Project Site is comprised of 18 drainage subareas that drain to existing off-site basins and adjacent storm drains. Under post-development conditions, the Project would be comprised of 11 drainage areas that would drain to both existing and proposed off-site basins and adjacent storm drains. While the Project would slightly alter flow distribution, the total drainage area would not change. Under existing conditions, most stormwater sheet flows drain from the Project Site without filtration or capture devices. The Project will allow 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 proposed stormwater treatment would reduce pollution from roof drainage, area drains, and surface runoff and reduce volume discharged to the public storm drain system. In comparing the existing to proposed conditions, there would be an overall reduction in stormwater runoff. As mentioned, the Las Palmas Avenue realignment would relocate the existing stormwater catch basins. Given that stormwater flow rates for this area (i.e., subareas draining into Catch Basin #10, #11, and #12) are not expected to change significantly, the relocated catch basins and laterals would be the same type and size as the existing. In addition, with the implementation of a LID plan, the Project would provide

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 would not control and not increase runoff from the Project.

Based on the above, the Project would 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 would result in an incremental effect on the capacity of the existing storm drain system. As such, operation of the Project would result in a less-than-significant impact on surface water hydrology, and no mitigation measures are required.

*(b) Surface Water Quality*

As the Project would be subject to the requirements for "All Other Development" in the City of Los Angeles LID Manual, Section 3.1.2, the Project would 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 would be 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 would be implemented instead to supplement irrigation demand and reduce stormwater runoff.

The Project would maintain approximately the same percentage of impervious surface area as under existing conditions. Under existing conditions, most runoff from the Project Site is discharged without any controls. In order to comply with LID requirements, the Project would implement BMPs to reduce the quantity and improve the quality of rainfall runoff from the Project Site. The infiltration system would be 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 would 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 would not result in discharges that would cause: (1) pollution which would alter 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 would 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. Furthermore, operation of the Project would not result in discharges that would violate regulatory standards. Therefore, impacts to surface water quality would be less than significant, and no mitigation measures are required.

*(c) Groundwater Hydrology*

As discussed above, with implementation of the Project, there would 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 would 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 this Draft EIR. Either system would result in only minor impacts to the top of the groundwater table and would not affect any supply wells. Additionally, no water supply wells exist on-site or within 1 mile of the Project Site, and the Project would not include the construction of water supply wells. Therefore, operation of the Project would 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 would be less than significant, and no mitigation measures would be required.

*(d) 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 this 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. Given that these cases are cleaned up and closed, there is a minimal chance that there would be any impact from the infiltration of stormwater occurring on the Project Site. Therefore, underground storage tanks would not have an impact on the Project Site or contribute to the spreading of underground contamination from adjacent cleanup sites.

The Project also proposes to use fuel storage tanks to power the emergency generators to be used for the Project. Although it is unknown if the tanks would be above or below ground at this time, their use would be subject to the applicable federal, state, and local requirements storage of hazardous substances in aboveground and underground tanks. With compliance with relevant regulations and requirements, Project use of fuel

storage tanks would 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 would involve 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 could increase the potential of hazardous releases into the groundwater, all potentially hazardous materials would 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 this Draft EIR. Compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste would reduce 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 would be less than significant, and no mitigation measures are required.

## **b. Cumulative Impacts**

### **(1) Surface Water Hydrology**

Cumulative growth in the Project 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 this 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.

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, as noted above, the Project, including the realignment of Las Palmas Avenue, would have no net impact on stormwater flows. Also, in accordance with City requirements, related projects and other future development projects would be required to implement BMPs to manage stormwater in accordance with LID guidelines. Furthermore, the City of Los Angeles Department of Public Works would review 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 would not be cumulatively considerable, and cumulative impacts would be less than significant.

## (2) Surface Water Quality

Future growth in the Santa Monica Bay Watershed would be 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. As noted above, the Project would not have an adverse impact on water quality and would improve the quality of on-site flows due to the introduction of new BMPs that would collect, treat, and discharge runoff from the Project Site. Also, it is anticipated that the Project and other future development projects would 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 would improve regional water quality over time. Therefore, because the Project would 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 would not be cumulatively considerable. As such, cumulative impacts would be 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 would 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 would extract or otherwise directly use groundwater would be speculative. As with the Project, any related project would be required to evaluate its individual impacts to groundwater hydrology due to temporary or permanent dewatering operations.

Other proposed projects within the groundwater basin would 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 would be regulated by State Water Resources Control Board (SWRCB) permit requirements. As mentioned, Project operation would not incrementally increase or reduce the imperviousness of the Project Site that could affect groundwater recharge rates on-site. As a result, the Project would 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 would not be cumulatively considerable. As such, cumulative impacts would be less than significant.

#### (4) Groundwater Quality

As described above, compliance with all applicable existing regulations at the Project Site would prevent 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 would be unlikely to cause or increase groundwater contamination because compliance with existing statutes and regulations would 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 would not be cumulatively considerable. As such, cumulative impacts would be less than significant.

### **c. Project Design Features**

No specific Project Design Features are proposed with regard to hydrology, surface water quality, and groundwater.

### **d. Mitigation Measures**

Project-level and cumulative impacts with regard to surface and groundwater hydrology and water quality would be less than significant. Therefore, no mitigation measures are required.

### **e. Level of Significance After Mitigation**

Project-level and cumulative impacts with regard to surface and groundwater hydrology and water quality would be less than significant without mitigation.

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## H. Land Use

### a. Analysis of Project Impacts

#### (1) Consistency with Local Plans and Applicable Policies

##### (a) *Los Angeles General Plan*

##### (i) *Los Angeles General Plan Framework Element*

##### Land Use Chapter

The Project would support and be generally consistent with the General Plan Framework Element's Land Use Chapter. The Project would 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. The Project would 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 would 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 would 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 would 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 FARs 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 proposes a mixed-use development that would create a new urban district, while retaining the historic setting of the Crossroads of the World complex. The Project would integrate Crossroads of the World into a new, mixed-use development that would 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 would include a new hotel, multi-family residential, retail commercial, and office 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 would comply with the General Plan Framework Element's Land Use Chapter.

### Housing Chapter

The Project would be consistent with the relevant objectives that support the goals of the General Plan Framework's Housing Chapter. The Project would 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, consisting of 190 condominiums and 760 apartment units. Of the 760 apartment units, 84 units would be dedicated as affordable housing units (i.e., Very Low Income household dwelling units) to replace the existing 84 rent-stabilized units that would be removed. The residential units would include a mix of studio, one-, and two-bedroom units. In addition, the Project would 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 would 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

The Project would 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 would 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 would 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 would 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. The Project would include building design features in a contemporary architectural style. The Project would also consist of landscaped public walkways that would 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 would 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 would 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.

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### Open Space and Conservation Chapter

The Project would also be consistent with the relevant objectives and policies that support the goals of the General Plan Framework's Open Space and Conservation Chapter. The Project would seek new opportunities for private development to enhance the open space resources of the neighborhoods by providing a total of 108,648 square feet of open space and recreational amenities, including approximately 12,199 square feet of interior amenity space, approximately 75,470 square feet of residential common open space (including the portion of the pedestrian paseo between McCadden Place and Las Palmas Avenue), approximately 21,029 square feet of additional pedestrian paseo (between Las Palmas Avenue and Crossroads of the World), and approximately 20,979 square feet of private open space (i.e., balconies). In addition, the 44,177 square feet of existing courtyards within Crossroads of the World site would be retained as part of the Project. The Project would also promote 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 would include a pool and pool terrace, club room, lounge, entertainment terrace, and artificial turf game lawn. Landscaped courtyards would be located on the podium level and roof level; private patios and balconies would be provided within the residential units; and a private gym is proposed along the Las Palmas Avenue frontage. Landscaped planters and hardscape features would be distributed throughout the podium and rooftop levels, and perimeter landscaping would be installed at the ground level. 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 would generally 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 would 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 would be consistent with the relevant objectives and policies that support the goals of the General Plan Framework's Economic Development Chapter. The Project would support the City's objective to establish a balance of land uses through the development of a mixed-use project with residential, hotel, office, and commercial/retail uses in an area well-served by public transit. The proposed neighborhood-serving retail and restaurant uses would 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 would 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 uses, including a supermarket, that would serve the surrounding neighborhood. In addition, the Project would concentrate office development in regional mixed-use centers, around transit stations, and within community centers by developing approximately 95,000 square feet of office uses in proximity to public transit. Thus, the Project would 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 would 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 would support the City's objective to mitigate the impacts of traffic growth through the implementation of a Transportation Demand Management Plan that would include strategies to promote non-auto travel and reduce the use of single-occupant vehicle trips. The Project would 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 1,239 bicycle parking spaces. With respect to Mobility Plan 2035, the Project would 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 would 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 would 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 would recognize 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 would provide all residents, guests, employees, and visitors with convenient access to transit services. Therefore, the Project would 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 would 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 would 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 SWPPP during construction that would include BMPs and other erosion control measures to minimize the discharge of pollutants

in stormwater runoff. During operation, the Project would 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 would 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 this Draft EIR, the Los Angeles Department of Water and Power would be able to meet the water demand for the Project, as well as existing and planned water demands of its future service area. As discussed in Section IV.M.2, Utilities and Service Systems—Wastewater, of this Draft EIR, on-site and off-site improvements to the existing sanitary sewer system related to the realignment of Las Palmas Avenue would be required, and new sewer mains would be constructed in accordance with Los Angeles Department of Public Works Bureau of Sanitation (BOS) requirements. Therefore, the Project would 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 would be consistent with the relevant goals, objectives, and policies of the General Plan Framework.

*(ii) 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 would 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 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 would demolish six properties that have been determined to be eligible for listing on the California Register through survey evaluation. As discussed in Section IV.D, Cultural Resources, of this Draft EIR, Mitigation Measure D-9 is recommended to document these six properties in accordance with 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 would, therefore, be significant and unavoidable. Consequently, the demolition of these six properties would not be consistent

with the objective and policy for the conservation of cultural and historic resources set forth in the Conservation Element.

*(iii) Los Angeles General Plan Housing Element*

The Project would be consistent with the applicable policies set forth in the Housing Element of the General Plan. The Project would 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 would develop a total of 950 residential units, including 190 condominiums and 760 apartments, 84 of which would be Low Income Household rental units to replace the existing 84 rent-stabilized units located in Development Parcel B. Therefore, although the 84 existing multi-family dwelling units on-site would be removed, they would be replaced to maintain provision of quality rental housing for households of all income levels. The Project would 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 would be consistent with the applicable policies set forth in the Housing Element.

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

The Project would 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 would 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 would provide a total of approximately 108,648 square feet of open space, consisting of approximately 12,199 square feet of interior amenity space, 75,470 square feet of common open space (including the portion of the pedestrian paseo between McCadden Place and Las Palmas Avenue), and approximately 20,979 square feet of private open space (i.e., balconies). Furthermore, the existing Crossroads of the World courtyards and the continuation of the plaza between Buildings C1 and C2 would provide an additional 44,177 square feet of open space, as well as approximately 21,029 square feet of additional pedestrian paseo (between Las Palmas Avenue and Crossroads of the World). 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 would total approximately

173,854 square feet. The Project would also provide approximately 246 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 would 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 that forms the spine of the Project. In addition, the Project would create multimodal transit options for Project users by providing ample bicycle parking.

The Project would also incorporate elements that would promote individual and community safety. Specifically, as provided in Section IV.K.1, Public Services—Police Protection, of this Draft EIR, the Project would incorporate design strategies established in the City’s initiative, “Design Out Crime,” which includes the techniques of CPTED. These design strategies within the Project design would include, but not be 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 this Draft EIR. Therefore, the Project would 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.

*(v) Hollywood Community Plan*

The Project would be consistent with the objectives and policies set forth in the Community Plan. Specifically, the Project would 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 would result in significant and unavoidable impacts at five study intersections, the Project would 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 would consist of new residential, hotel, office, 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 would 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 would 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 this Draft

EIR, the agencies that provide services and utilities to the Project Site would have capacity to serve the Project. The Project would 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 would 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 a 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 would develop new residential, hotel, office, and commercial/retail uses as encouraged by the Redevelopment Plan. As such, the types of land uses proposed by the Project would 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 would meet Objectives (a), (c), (d) and (e) and, therefore, would be 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 would 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<sup>2</sup> would include 78 residential units to meet Objective (d). The Project would also include substantial, well-designed public open space to meet Objective (e).

The proposed FAR averaged across the Project Site would be 4.72:1. 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 would be consistent with the allowable FAR for the Regional Center Commercial land use designation on these parcels.

The Project would also be consistent with the goals set forth in the Redevelopment Plan. The Project would meet the needs of the residential, commercial, arts, and entertainment sectors. In addition, the Project would provide new housing opportunities, including affordable housing units, and office, hotel, and commercial/retail uses. The Project would promote the development of sound residential neighborhoods through mechanisms, such as land use, density and design standards, public improvements, property rehabilitation, sensitive in-fill housing, development of open spaces and other support services necessary to enable residents to live and work in Hollywood. Although the Project would result in significant and unavoidable impacts at five study intersections, the Project would support and encourage a circulation system that would improve the quality of life in Hollywood, including pedestrian, automobile, parking, and mass transit

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<sup>2</sup> *The Project would include a total of 950 residential units, including 872 condominiums and rental units in Development Parcel B; however only Development Parcel D is located within the Redevelopment Plan Area.*

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 would be consistent with the Hollywood Redevelopment Plan.

*(c) Los Angeles Municipal Code (LAMC)*

The Project would consist 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 stand-alone one-story commercial/retail 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 would include approximately 1,432,500 square feet of developed floor area (including existing uses to be retained) with a total FAR of approximately 4.72:1 averaged across the Project Site. Thus, the Project would be developed within the allowable density of the underlying zone but, because of the Development “D” Limitation, would 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 would 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 would be consistent with surrounding buildings and would be consistent with the LAMC.

As discussed in Section IV.L, Traffic, Access, and Parking, of this 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 would require a total of 2,302 parking spaces. The Project would provide a total of 2,494 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 would provide the required number of spaces, including 1,052 long-term spaces and 187 short-term spaces, to comply with the bicycle parking requirements of the LAMC.

The Project would also meet the requirements set forth in Section 12.21 of the LAMC concerning the provision of on-site open space. Specifically, based on the proposed dwelling unit types, the Project would be required to provide 107,975 square feet of usable open space. The Project would provide approximately 108,648 square feet of open space, consisting of approximately 12,199 square feet of interior amenity space, approximately 75,470 square feet of common open space (including the portion of the pedestrian paseo between McCadden Place and Las Palmas Avenue), and approximately 20,979 square feet of private open space (i.e., balconies) exceeding 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 would provide an additional 44,177 square feet of open space, as well as approximately 21,029 square feet of additional pedestrian paseo (between Las Palmas Avenue and Crossroads of the World). 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 would total approximately 173,854 square feet.

In accordance with the LAMC Section 12.24-W,1, the Project is seeking a Conditional Use Permit for Alcohol (on-site consumption) to permit the sales and/or dispensing of alcoholic beverages for a total of 22 on-site and off-site full line permits, with the option for these full line permits to instead be for beer/wine only, within the Project's proposed hotel and restaurant spaces (83,200 square feet). The service and sale of alcoholic beverages would 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 would 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 would 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 would comply 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. Proposed signage would include 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 would be located at parking garage entrances, elevator lobbies, vestibules, and residential corridors. Illuminated signage would include identification signs, digital message boards, and tenant retail signs. Therefore, the Project would be consistent with the applicable signage requirements in the HSSUD.

## (2) Consistency with Regional Plans

As detailed in Section IV.H, Land Use, of this Draft EIR, the Project would be 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 would maximize mobility and accessibility by providing a mixed-use development that would 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 would 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, consistent with the vision of the RCP. The Project would also include a pedestrian paseo, which would feature areas (e.g., interactive water features, seating, planting, fire places, and/or movie screens), and would include the revitalized historic Crossroads of the World complex. Therefore, by focusing new housing opportunities and mixed-use development that would contribute to a walkable and "people-scaled" community in a High-Quality Transit Area (HQTA) and a Transit Priority Area

(TPA), the Project would be consistent with primary goals of the applicable regional plans identified above.

### (3) Conclusion Regarding Impacts Relative to Land Use Consistency

Based on the analysis provided above, the Project would be substantially consistent with applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site. Therefore, the Project would be 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 would be less than significant.

### (4) Land Use Compatibility

The Project proposes a mix of residential, hotel, office and commercial/retail uses that would be compatible with the surrounding area and would 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 this 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 would represent 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 would be 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 would not create any division of land or divide an established community. The Project would improve and enhance 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 would be linked by a pedestrian paseo that would run diagonally between the proposed hotel on the northwestern portion of the Project Site and the historic Crossroads of the World along the eastern end of the Project Site to promote and enhance pedestrian activity. Additional landscaped public walkways would connect the entire Project Site, while promoting access from Sunset Boulevard, Las Palmas Avenue, Selma Avenue, and McCadden Place. The Project also includes the realignment of Las Palmas Avenue at Sunset Boulevard that would create a continuous street at Sunset Boulevard and thereby establishing a stronger north-south connection with clearer circulation for pedestrians and automobiles.

Based on the analysis above, the Project would 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 would be less than significant.

## **b. Cumulative Impacts**

As indicated in Section III, Environmental Setting, of this 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 vicinity are shown in Figure III-1 in Section III, Environmental Setting, of this 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 would 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, would 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 would not have cumulatively significant land use impacts. The balance of the related projects would 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 would be 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 this Draft EIR, the Project would be 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 would be less than significant.

### **c. Project Design Features**

No specific Project Design Features beyond the Project improvements discussed in Section II, Project Description, of this Draft EIR are proposed with regard to land use.

### **d. Mitigation Measures**

Impacts to land use would be less than significant. Thus, no mitigation measures would be necessary.

### **e. Level of Significance After Mitigation**

Project-level and cumulative impacts with regard to land use would be less than significant without mitigation.

## **I. Noise**

### **a. Analysis of Project Impacts**

#### **(1) Construction Noise**

As discussed in Section II, Project Description, of this Draft EIR, construction of the Project is anticipated to occur over approximately 48 months and be completed in 2022 (i.e., commencing in January 2018 and ending in December 2021 for Project occupancy at the beginning of 2022). Construction of the Project would commence with demolition of the existing buildings and surface parking lots, followed by grading and excavation for the subterranean parking garages. Building foundations would then be constructed, followed by building construction, paving/concrete installation, and landscape installation. It is estimated that approximately 643,753 cubic yards of soil would be hauled from the Project Site during the grading and excavation phase, as well as an additional 1,490 cy during off-site improvements to the existing sanitary sewer system related to the realignment of Las Palmas Avenue. Construction delivery/haul trucks would 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. In accordance with Section 2485 of Title 13 of the California Code of Regulations, idling of all diesel-fueled commercial vehicles weighing over 10,000 pounds during construction would be limited to 5 minutes at any location.

*(a) On-Site Construction Noise*

Noise impacts from Project-related construction activities occurring within or adjacent to the Project Site would be 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 to noise-sensitive receptors. Construction activities for the Project would generally include demolition, site grading and excavation for the subterranean parking garage, and building construction. Each stage of construction would involve the use of various types of construction equipment and would, 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, pumps, and delivery trucks. Noise from construction equipment would generate both steady-state and episodic noise that could be heard within and adjacent to the Project Site.

Individual pieces of construction equipment anticipated to be used during construction of the Project could produce maximum noise levels ( $L_{max}$ ) of 74 dBA to 90 dBA at a reference distance of 50 feet from the noise source. These maximum noise levels would 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. To more accurately characterize construction-period noise levels, the average (Hourly  $L_{eq}$ ) noise level associated with each construction phase was calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction phase. These noise levels are typically associated with multiple pieces of equipment operating on part power, simultaneously.

To present a conservative impact analysis of construction noise levels for phases at the off-site noise-sensitive receptors, the estimated noise levels were calculated for a scenario in which all pieces of construction equipment were assumed to operate simultaneously and to be located at the construction area within the Project Site nearest to the affected receptors. These assumptions represent a worst-case noise scenario because construction activities would typically be spread out throughout the Project Site, and, thus, some equipment would be farther away from the affected receptors. In addition,

the noise modeling assumes that construction noise would be constant when, in fact, construction activities and associated noise levels are periodic and fluctuate based on the construction activities.

Since construction activities would occur over a period longer than 10 days, the corresponding thresholds of significance used in the construction noise analysis is an increase in the ambient  $L_{eq}$  noise level of 5 dBA at a noise-sensitive use. In addition, as discussed above, LAUSD uses a significance threshold of 3 dBA, which has been incorporated into the analysis for the two nearby LAUSD schools. During the building construction stage, construction activities would generate the highest level of noise as it is anticipated to have the highest number of construction equipment in the construction area compared to the Project's other construction stages. Construction noise levels during the other phases of construction would be approximately 1 to 6 dBA lower than the building construction phase. The maximum estimated noise levels associated with Project construction would exceed the significance threshold at each of the 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 would be significant at receptor locations R3, R4, and R7 through R16. Mitigation Measure I-1 would be implemented to reduce on-site construction noise impacts and would reduce the Project's on-site construction noise impacts during construction; however, significant impacts would remain at some of the off-site receptor locations (i.e., R3, R4, and R12 through R15). Impacts at the nearby LAUSD schools (i.e., R11 and R16) would be reduced to less-than-significant levels.

#### *(b) Off-Site Construction Noise*

In addition to on-site construction noise sources, other noise sources may include materials delivery, concrete mixing, and haul trucks (construction trucks), as well as construction worker vehicles accessing the Project Site during construction. Typically, construction trucks generate higher noise levels than construction worker vehicles. The major noise sources associated with off-site construction trucks would be associated with delivery/haul trucks. As described above, construction delivery/haul trucks would 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.

Based on the Traffic Study prepared for the Project, which is included in Appendix I of this Draft EIR, the peak period of construction with the highest number of construction trucks would occur during the grading phase. During this phase, there would be a maximum of 420 construction trucks (400 haul trucks and 20 delivery trucks) coming to and leaving the Project Site (equal to 420 round trips or 840 total trips [i.e., 2 trips per round trip] per day). The hourly truck trips were calculated based on an 8-hour period (typical workday) and a uniform distribution of trips, which would result in a maximum of 106 truck

trips (53 trucks inbound and 53 trucks outbound) per hour. In addition, there would be a total of 76 worker trips to and from the Project Site on a daily basis during the grading phase. There would also be construction delivery truck trips (up to 75 truck trips per day) during other construction phases of the Project, but such trips would be significantly less than the 840 truck trips under the grading phase.

During the grading period, construction-related traffic noise levels would be below the 5 dBA significance threshold along Sunset Boulevard and Santa Monica Boulevard. However, the estimated noise levels along Highland Avenue would 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 would require access through these streets and based on a worst-case assumption that all haul trucks would access the same street, the noise levels from the haul trucks would 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 would exceed the 5 dBA significance threshold. Therefore, temporary noise impacts from off-site construction traffic would be significant.

### *(c) Summary of Construction Noise Impacts*

Under the most conservative noise impact assumptions, temporary noise impacts associated with the Project's on-site construction would be significant at receptor locations R3, R4, and R7 through R16. Implementation of Mitigation Measure I-1 would reduce the Project's on-site construction noise impacts during construction by up to 15 dBA. However, significant impacts resulting from on-site construction noise would remain for some of the off-site receptor locations (receptor locations R3, R4, R12, R13, R14 and R15). Temporary noise impacts from off-site construction traffic would be significant at receptor locations R10, R11 R13, R14 and R15 during the 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. Overall, Project construction would result in the exposure of persons to or generation of noise levels in excess of standards established by the City or result in a substantial temporary or periodic increase in ambient noise levels at noise-sensitive uses in the vicinity of the Project Site above levels existing without the Project.

## (2) Construction Vibration

Construction activities can generate varying degrees of ground vibration, depending on the construction procedures and the type of construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in

amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site often varies, depending on soil type, ground strata, and construction characteristics of the receptor buildings. The results from vibration can range from no perceptible effects at the lowest vibration levels to low rumbling sounds and perceptible vibration at moderate levels. However, ground-borne vibrations from construction activities rarely reach levels that damage structures.

*(a) Building Damage Impacts from On-Site Construction*

With regard to potential building damage, the Project would 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, would be used. The Federal Transit Administration (FTA) has published standard vibration velocities for various construction equipment operations in terms of vibration levels measured as inches per second (peak particle velocity [PPV]). Since impact pile driving methods would not be used during construction of the Project, in accordance with Project Design Feature I-2 provided below, impact pile driving vibration is not included in the on-site construction vibration analysis. Installation of piles for shoring and foundation would utilize a drilling method to minimize ground-borne vibration.

The estimated vibration velocity levels from all construction equipment would 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 would 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) would 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 would 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) would exceed the relevant building damage significance thresholds and vibration impacts (pursuant to the threshold of

significance for building damage) during construction of the Project would be significant without mitigation. This potential vibration impact would only occur when heavy construction equipment operates within a minimum of 15 feet of the buildings. Based on the FTA's reference vibration levels and calculation procedure, the estimated vibration from the construction equipment would diminish to below the 0.2 PPV threshold for building damage at a lateral distance of 15 feet or greater. Therefore, mitigation measures would be required to ensure that construction activities would not adversely impact the existing on-site and off-site structures.

Mitigation Measure I-2 would be implemented to reduce vibration impacts on the potentially impacted buildings to a less-than-significant level. More specifically, Mitigation Measure I-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 at adjacent buildings to the south of Development Parcel A and to the north and east of Development Parcel C, 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. Furthermore, implementation of Mitigation Measure I-2 would reduce the Project's vibration impacts (pursuant to the threshold of significance for building damage) during construction to a less-than-significant level.

*(b) Human Annoyance Impacts from On-Site Construction*

Per 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 would be 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 would be 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) would be above the 75-VdB significance threshold for the church uses. Therefore, vibration impacts during construction of the Project would also be significant pursuant to the threshold of significance for human annoyance.

*(c) Building Damage and Human Annoyance Impacts from Off-Site Construction*

Construction delivery/haul trucks would 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 would 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.

Regarding building damage, based on FTA data, the vibration generated by a typical heavy-duty truck would 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." 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 would be exposed to ground-borne vibration levels of approximately 0.022 PPV, as provided in the noise calculation worksheets included in Appendix I of this Draft EIR. This estimated vibration generated by construction trucks traveling along the anticipated haul route(s) would 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) would be less than significant.

Per FTA 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 indicated in the noise calculation worksheets included in Appendix I of this 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 would be exposed to ground-borne vibration above the 72-VdB significance threshold from the construction trucks. While there are no residential uses which could 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 would result from temporary and intermittent vibration from construction trucks traveling along the anticipated haul route(s) could be significant.

*(d) Summary of Construction Vibration Impacts*

The estimated vibration levels from some of the construction equipment would exceed the building damage significance threshold of 0.12 PPV at the Crossroads of the

World buildings, the First Baptist Church, and the Blessed Sacrament Church and 0.2 PPV for the off-site buildings (i.e., commercial and residential buildings immediately south of Development Parcel A, and commercial buildings immediately south and west of Development Parcel B north of Sunset Boulevard). Vibration impacts (pursuant to the threshold of significance for building damage) during construction of the Project would be significant without mitigation. This potential vibration impact would 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. However, implementation of Mitigation Measure I-2 would reduce these vibration impacts at all locations during construction to a less-than-significant level.

Vibration impacts from on-site construction activities would be significant pursuant to the threshold of significance for human annoyance. There are no feasible mitigation measures that could 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 would be significant and unavoidable.

Pursuant to the threshold of significance for building damage, vibration impacts (pursuant to the threshold of significance for building damage) from off-site construction trucks would be less than significant. Vibration impacts associated with temporary and intermittent vibration from construction trucks traveling along the anticipated haul route(s) would be significant with respect to human annoyance. There are no feasible mitigation measures that would reduce the potential vibration impacts with respect to human annoyance. Therefore, vibration impacts with respect to human annoyance as a result of off-site construction truck travel would be significant and unavoidable.

### (3) Noise from Project Operation

This section addresses potential noise impacts on nearby noise-sensitive receptors from Project operation. Specific noise sources include: (1) on-site stationary noise sources, including outdoor mechanical equipment (e.g., HVAC equipment), activities within the proposed outdoor spaces (e.g., outdoor courtyards, roof level pool decks), parking facilities, loading docks, and trash collection areas; and (2) off-site mobile (roadway traffic) noise sources.

(a) *On-Site Stationary Noise Sources*

(i) *Mechanical Equipment*

As part of the Project, new mechanical equipment (e.g., air ventilation equipment) would be located at the roof level. Although operation of this equipment would generate noise, Project-related outdoor mechanical equipment would be designed so as not to increase the existing ambient noise levels by 5 dBA in accordance with the City's Noise Regulations. Specifically, the Project would comply with the requirements of 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 described below in Project Design Feature I-3, all outdoor mounted mechanical equipment would be enclosed or screened from off-site noise-sensitive receptors. The estimated noise levels from the Project's mechanical equipment would range from 43.0 dBA ( $L_{eq}$ ) at receptor location R11 to 56.0 dBA ( $L_{eq}$ ) at receptor location R10, which would 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 would 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 would be less than significant.

(ii) *Outdoor Spaces*

As discussed in Section II, Project Description, of this Draft EIR, the Project would provide 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 this noise analysis, reference noise levels of 65 dBA for a male and 62 dBA for a female speaking in a raised voice were used for analyzing 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 would be male and the other half female) would 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 would result from the Project, particularly on the pool deck and roof deck in Building A1, along the pedestrian paseo, and on the deck of Building C1, which may include the use of such facilities in the early morning hours and at nighttime until 2:00 A.M.

An additional potential noise source associated with outdoor uses (e.g., hotel pool decks and plazas/courtyards) would 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, would 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 I-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 outdoor areas, the estimated noise levels calculated from off-site sensitive receptors would 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 outdoor areas would be significant. However, implementation of Mitigation Measure I-3 below would reduce the Project's potential noise impacts from the outdoor areas to a less-than-significant level.

### *(iii) Parking Facilities*

Proposed parking for the Project would consist of new primarily subterranean parking garages. Development Parcel A would have six levels of subterranean parking with 307 parking spaces to serve the hotel building. Development Parcel B would have five levels of subterranean parking connected under the realigned Las Palmas Avenue to Development Parcel C with 2,083 parking spaces to accommodate all the uses in Buildings B1, B2, B3, B4, C1, C2, C3, and the Crossroads of the World complex. Development Parcel D would have three levels of subterranean parking and an at-grade enclosed parking level that together would provide approximately 104 parking spaces to serve the uses on this development parcel. A total of 2,494 vehicle parking spaces would be provided in the three subterranean parking garages. Sources of noise within the parking garages would primarily include vehicular movements and engine noise, doors opening and closing, people talking, and intermittent car alarms. Noise levels within the parking garages would fluctuate with the amount of automobile and human activity. Since the subterranean parking levels would be fully enclosed on all sides, noise generated within the parking garages would 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 would 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 would 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 parking facilities would be less than significant.

*(iv) Loading Dock and Trash Collection Areas*

As discussed in Section II, Project Description, of this Draft EIR, the Project would be serviced through three loading areas. Since Development Parcel A is a stand-alone parcel, it would have a dedicated loading area below grade (i.e., P1 Level of the subterranean parking structure) served by a ramp from McCadden Place. A centralized and enclosed loading dock would be provided at-grade in Development Parcel B. This loading dock would be accessed from Las Palmas Avenue and would serve all uses on Development Parcels B and C through at-grade and below-grade service corridors and elevators. Development Parcel D is also a stand-alone parcel with loading space at ground level, which would be accessed from inside of the parking garage entrance at Las Palmas Avenue.

Noise sources associated with the loading dock and trash collection area would 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 A-6 in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of this Draft EIR, trash collector areas would be fully enclosed during Project operation. Since the loading dock and trash collection area would be fully enclosed, noise generated within the loading dock and trash collection area would be 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 would be 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 would be less than significant

*(b) Off-Site Mobile Noise Sources**(i) Future Plus Project*

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 Project, which is included in Appendix O of this Draft EIR. As the Project is expected to generate a net increase of 15,005 daily weekday trips, Project-related traffic would 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 would 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 would result 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 would be 2.2 dBA or lower. The increase in traffic noise levels would be 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, 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 would be less than significant.

*(ii) Existing Plus Project*

The analysis of traffic noise impacts provided above was based on the incremental increase in traffic noise levels attributable to the Project as compared to Future Without Project conditions. An additional analysis was performed 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 would result in a maximum of 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 would be 2.4 dBA or lower. In addition, the Existing Plus Project traffic noise analysis is 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, would increase without the Project due to ambient growth, as well as other related projects that would be completed by that year). Nevertheless, the estimated increase in traffic noise levels as compared to existing conditions would be 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 would be less than significant.

*(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 would include mechanical equipment and outdoor areas. Other noise sources include parking facilities and trash collection areas; however, parking and trash collection areas would be located in the subterranean parking garages or enclosed areas, which would 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 would result 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 would be 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 would be 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) would be below the 3-dBA increase LAUSD significance threshold. The composite noise levels, however, would 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 would be significant without mitigation measures. With implementation of Mitigation Measure I-3, this impact would be reduced to a less-than-significant level.

*(d) Summary of Operational Noise Impacts*

As discussed above, the Project's operation noise impacts from off-site sources would be less than significant. However, operation noise impacts from on-site sources would be significant. Therefore, the Project would result in the exposure of persons to or generation of noise levels in excess of standards established by the City or in a substantial

permanent increase in ambient noise levels in the vicinity of the Project Site above existing levels.

#### (4) Land Use Compatibility

Based on the measured ambient noise levels, the existing exterior noise levels at the Project Site varied; measurements indicated 57.0 dBA CNEL at the eastern boundary of the Project Site (measured at receptor location R4), 64.5 dBA CNEL at the northern boundary of the Project Site (measured at receptor location R2), 73.8 dBA CNEL at the western property line facing Highland Avenue (measured at receptor location R1), and 74.1 dBA CNEL at the southern property line facing Sunset Boulevard (measured at receptor location R6). According to the City of Los Angeles Guidelines for Noise Compatible Land Use, the Project Site would be considered “conditionally acceptable” for commercial development (up to 75 dBA CNEL) and “normally unacceptable” for multi-family residential/hotel development (between 70 and 75 dBA CNEL). In accordance with Section 91.1207.11.2 of the LAMC and Section 5.507 of the 2013 California Green Building Standards Code, the Project would include necessary noise insulation features, such as insulated glass windows and doors, to achieve an interior noise environment that does not exceed 45 dBA CNEL for residential uses and 50 dBA  $L_{eq}$  for non-residential uses. Therefore, noise impacts associated with land use compatibility would be less than significant.

### b. Cumulative Impacts

The Project, together with the related projects and future growth, could contribute to cumulative noise impacts. The potential for cumulative noise impacts to occur is specific to the distance between each related project and their stationary noise sources, as well as the cumulative traffic that these projects would add to the surrounding roadway network.

#### (1) Construction Noise

##### (a) On-Site Construction Noise

As indicated in Section III, Environmental Setting, of this Draft EIR, a total of 145 related projects have been identified in the vicinity of the Project Site. Noise from construction of development projects is typically localized and has the potential to affect noise-sensitive uses within 500 feet from the construction site, based on the *L.A. CEQA Thresholds Guide* screening criteria. 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, the following eight related projects are within 1,000 feet of the Project Site:

- Related Project No. 30 is a 17,717-square-foot restaurant development located at 6757 Hollywood Boulevard and is located approximately 750 feet north of the Project Site. There are no noise-sensitive receptors located between the Project Site and this related project. Furthermore, there are multiple buildings located between the Project Site and the related project site, which would provide adequate noise reduction from construction activities at the two locations. No cumulative noise impacts would be expected in the event of concurrent construction of the Project and Related Project No. 30.
- Related Project No. 37 (Selma Community Housing) is a residential development located at 1603 Cherokee Avenue, which is located adjacent to the Project Site to the east. However, construction of this related project is completed. Therefore, this related project would not contribute to cumulative construction-related noise impacts.
- Related Project No. 45 is a mixed-use development located at 1610 Highland Avenue, immediately north of the Project Site across Selma Avenue. There are existing noise-sensitive uses, including the residential use on Selma Avenue across from the Project Site (represented by receptor location R14) and Hollywood High School on the east side of Highland Avenue (represented by receptor location R11), in proximity to Related Project No. 45 and the Project. As discussed above, the estimated Project-related construction noise levels at the receptor locations R11 and R14 would be up to 80.2 and 85.1 dBA, respectively, and would exceed the ambient noise levels by more than 5 dBA. Thus, in the event concurrent construction activities occur, cumulative construction noise impacts associated with the Project and Related Project No. 45 would exceed the 3-dBA significance threshold (per LAUSD) at receptor location R11 and the 5-dBA significance threshold at receptor location R14. Therefore, construction noise impacts resulting from both projects would be cumulatively considerable and would be considered significant.
- Related Project No. 50 is a residential development located at 1411 Highland Avenue, approximately 720 feet southwest of the Project Site. However, this related project has been constructed and, as such, would not contribute to cumulative construction-related noise impacts.
- Related Project No. 80 (Las Palmas Residential) is a mixed-use development located at 1718 Las Palmas Avenue, approximately 750 feet north of the Project Site. There are existing noise-sensitive uses, including the residential use on Las Palmas Avenue across from Related Project No. 80 and the Egyptian Theater located on the south side of Hollywood Boulevard (represented by receptor location R12). There are existing commercial buildings located along the north and south sides of Hollywood Boulevard, which would reduce construction noise resulting from both the Project (to the sensitive receptor north of Hollywood Boulevard) and from the Related Project No. 80 (to the noise-sensitive receptor located south of Hollywood Boulevard). However, as

discussed above, the estimated Project-related construction noise levels at receptor location R12 would be up to 78.5 dBA and would exceed the ambient noise level by more than 5 dBA. Thus, in the event concurrent construction activities occur, cumulative construction noise impacts associated with the Project and Related Project No. 45 would exceed the 5-dBA significance threshold. Therefore, construction noise impacts resulting from both projects would be cumulatively considerable and could be considered significant.

- Related Project No. 94 (Hyatt House Hotel & Retail) is a mixed-use development located at 6611 Hollywood Boulevard, approximately 500 feet northeast of the Project Site. There are existing noise-sensitive uses, including the Selma Elementary School (represented by receptor location R16) located at the north corner of Cherokee Avenue and Selma Avenue. There are existing commercial buildings located along the south side of Hollywood Boulevard, which would provide measurable noise shielding, to reduce construction noise from Related Project No. 94 to the Selma Elementary School. However, as discussed above, the estimated Project-related construction noise levels at receptor location R16 would be up to 68.8 dBA and would exceed the ambient noise level by more than 3 dBA. Thus, in the event concurrent construction activities occur, construction noise impacts resulting from both the Project and Related Project No. 94 would exceed the 3-dBA significance threshold (applicable at receptor location R16, per LAUSD) and would be cumulatively considerable and significant.
- Related Project No. 137 is a commercial development (mix of office and retail) located at 6904 Hollywood Boulevard, approximately 650 feet northwest of the Project Site. Hollywood High School (represented by receptor location R11) is located approximately 200 feet south of this related project. As discussed above, the estimated Project-related construction noise level at receptor location R11 would be up to 80.2 dBA and would exceed the ambient noise level by more than 3 dBA. Although Related Project No. 137 is a remodeling/rehabilitation project, which is not anticipated to generate substantial construction noise associated with the use of heavy equipment, construction noise impacts from both the Project and Related Project No. 137 would exceed the 3-dBA significance threshold (primarily due to the Project) and would be cumulatively considerable and significant.
- Related Project No. 139 is a hotel project located at 6600 Sunset Boulevard, approximately 750 feet east of the Project Site. The nearest noise-sensitive receptors to this related project are the multi-family residential uses located one block south of Sunset Boulevard on Leland Way (represented by receptor location R7), which are immediately adjacent to the south and southwest of this related project. As discussed above, the estimated Project-related construction noise level at receptor location R7 would be up to 69.8 dBA and would exceed the ambient noise level by more than 5 dBA. However, rehabilitation of the existing building (former location of The Mercantile) and construction of the new

addition for this related project are currently underway. Therefore, this related project would not contribute to cumulative construction-related noise impacts.

Based on the above, 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 would be intermittent and temporary, and it is anticipated that, as with the Project, the related projects would comply with the construction hours and other relevant provisions set forth in the LAMC. Noise associated with cumulative construction activities would 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.

*(b) Off-Site Construction Noise*

In addition to the cumulative impacts of on-site construction activities, off-site construction haul trucks would 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 would occur if the cumulative construction truck volumes from the Project and the related projects were to result in 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. As discussed above, the primary haul routes include Sunset Boulevard, Highland Avenue, and Santa Monica Boulevard. As analyzed above, the estimated off-site noise levels from Project construction trucks would 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 would be significant along Highland Avenue. In addition, impacts would 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 would exceed the ambient noise levels by 5 dBA and exceed the significance thresholds. Since the Project would generate up to 105 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, would cumulatively add up to these amounts, at a minimum, along Sunset Boulevard and Santa Monica Boulevard, respectively. Thus, the 5-dBA threshold would be exceeded along these roadways. In addition, the haul trucks would access the primary haul route via adjacent local streets, including McCadden Place, Las Palmas Avenue, and Selma

Avenue. As discussed above, Project-related haul truck noise levels along these locations would be significant. Thus, to the extent that other related projects also use these streets, cumulative impacts would occur. As such, cumulative noise impacts from off-site construction would be cumulatively considerable and would be significant.

*(c) Summary of Cumulative Construction Noise Impacts*

As discussed above, 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 I-1 provided below would serve to reduce the Project's construction noise impacts from on-site activities at all receptor locations by up to 15 dBA, which would reduce the noise impacts to a less-than-significant level at receptor locations R7, R8, R9, R10, R11, and R16. However, noise impacts at receptor locations R3, R3, R12, R13, R14 and R15 would remain significant. While it is anticipated that nearby related projects would 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 would be significant and unavoidable.

Cumulative noise impacts from off-site construction activities would also be significant. Therefore, on-site and off-site construction activities from the Project and related projects would result in the exposure of persons to or generation of noise levels in excess of standards established by the City or result in a substantial temporary or periodic increase in ambient noise levels in the vicinity of the Project Site above levels existing without the Project and related projects.

## (2) Construction Vibration

*(a) On-Site Construction 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 would be a minimum of 55 feet between the Project 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.

With regard to human annoyance, there are residential uses within 80 feet of the Project Site (receptor location R14), which would be impacted due to cumulative construction vibration impacts. Therefore, cumulative construction vibration impacts pursuant to the threshold for human annoyance would be significant in the event concurrent construction of the Project and Related Project No. 45 were to occur.

*(b) Off-Site Construction Vibration*

As previously discussed, based on FTA data, the vibration generated by a typical heavy truck would 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) would 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 would be less than significant.

As discussed above, potential vibration impacts associated with temporary and intermittent vibration from Project-related construction trucks traveling along the anticipated haul route(s) would be significant with respect to human annoyance. As related projects would be anticipated to use similar trucks as the Project, it is anticipated that construction trucks would 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 would be significant.

*(c) Summary of Cumulative Construction Vibration Impacts*

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. In addition, potential cumulative vibration impacts with respect to building damage from off-site construction would be less than significant. Therefore, on-site and off-site construction activities associated with the Project and related projects would not generate excessive ground-borne vibration levels with respect to building damage.

Cumulative construction vibration impacts pursuant to the threshold for human annoyance would be significant in the event concurrent construction of the Project and Related Project No. 45 were to occur. In addition, 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 would also be significant. There are no feasible mitigation measures that could be implemented to reduce the temporary vibration impacts from on-site and off-site construction associated with human annoyance to a less-than-significant level. Therefore, vibration impacts from on-site and off-site construction activities with respect to human annoyance would be significant and unavoidable.

### (3) Noise from Project Operation

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 mechanical equipment (e.g., HVAC systems), outdoor activity areas, and vehicle travel. Similar to the Project, each of the related projects that has been identified in the vicinity of the Project Site would 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 would produce traffic volumes that are capable of generating roadway noise impacts. The potential cumulative noise impacts associated with on-site and off-site noise sources are addressed below.

#### *(a) On-Site Stationary Noise Sources*

Due to provisions set forth in the LAMC that limit stationary source noise from items, such as roof-top mechanical equipment, noise levels would be less than significant at the property line for each related project. In addition, noise impacts associated with operations within the Project Site would be less than significant with implementation of Mitigation Measure I-3 below. Therefore, based on the distance of the related projects from the Project Site and the operational noise levels associated with the Project and compliance with the existing regulatory requirements, cumulative stationary source noise impacts associated with operation of the Project and related projects would be less than significant.

#### *(b) Off-Site Mobile Noise Sources*

The Project and related projects in the area would produce traffic volumes (off-site mobile sources) that would generate roadway noise. Cumulative noise impacts due to off-site traffic were analyzed 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 would result in a maximum increase of 2.9 dBA (CNEL) along the roadway segment of McCadden Place between Selma Avenue and Sunset Boulevard, which would 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 would 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 would be less than significant.

*(c) Summary of Cumulative Operational Noise Impacts*

As discussed above, cumulative operational noise impacts from on-site and off-site sources would be less than significant. Therefore, the Project and related projects would not result in the exposure of persons to or generation of noise levels in excess of standards established by the City or in a substantial permanent increase in ambient noise levels in the vicinity of the Project Site above levels existing without the Project and the related projects.

### **c. Project Design Features**

The following Project Design Features are proposed with regard to noise and vibration:

**Project Design Feature I-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.

**Project Design Feature I-2:** Project construction will not include the use of driven (impact) pile systems.

**Project Design Feature I-3:** All outdoor mounted mechanical equipment will be enclosed or screened from off-site noise-sensitive receptors.

**Project Design Feature I-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 Parcel C (Paseo East and Crossroads outdoor courtyards). A noise consultant will provide written documentation that the design of the system complies with these noise levels.

In addition, Project Design Feature A-6 in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of this Draft EIR is also applicable to reduce noise associated with trash collection areas.

## d. Mitigation Measures

### (1) Construction

As analyzed above, construction of the Project would have the potential to result in significant noise impacts at the off-site sensitive receptor locations from on-site construction activities. Thus, the following measures are included to minimize construction-related noise impacts:

**Mitigation Measure I-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 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, and C) between the construction areas and existing residential use located on Selma Avenue, Hollywood High School to the west, Egyptian Theater to the north, 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, and C) between the construction area and residential use south of Development Parcel A and the motels on the south side of Sunset Boulevard. 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 Parcel C. The temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at ground level.

Additionally, as analyzed above, Project-related on-site construction activities would have the potential to result in significant vibration impacts with respect to building damage at the Crossroads of the World historic buildings on-site, as well as the single- 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 Parcel C, both of which were found eligible for listing in the California Register and, thus, are considered as historic buildings under CEQA. Thus, the following mitigation measure is included to minimize construction-related vibration impacts:

**Mitigation Measure I-2:** Prior to start of construction, the Project Applicant shall retain the services of a structural engineer or a qualified professional to visit the on-site historic buildings (Crossroads of the World) 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.

## (2) Operation

Operation of the Project would result in a significant impact associated with the outdoor uses, to off-site noise-sensitive receptors. Therefore, the following mitigation measure is required.

**Mitigation Measure I-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.

## **e. Level of Significance After Mitigation**

### **(1) Construction Noise**

#### *(a) On-Site Construction Noise*

Implementation of Mitigation Measure I-1 provided above would reduce the Project's and cumulative construction noise levels to the extent feasible. Specifically, implementation of Mitigation Measure I-1 (installation of temporary sound barriers) would reduce the noise generated by on-site construction activities at the off-site sensitive uses by up to 15 dBA. The estimated construction-related noise levels at off-site sensitive receptor locations R7, R8, R9, R10, R11 (Hollywood High School) and R16 (Larchmont School West) would be reduced to a level below significance with implementation of Mitigation Measure I-1. However, construction-related noise levels at receptor locations R3, R4, R12, R13, R14, and R15 would still exceed the 5 dBA significance threshold above the ambient noise levels. Therefore, construction noise impacts associated with on-site noise sources would remain significant and unavoidable. In addition, cumulative construction noise impacts associated with on-site noise sources would remain significant and unavoidable if nearby Related Project No. 45, Related Project No. 80, Related Project No. 94, and Related Project No. 137 were constructed concurrently with the Project.

#### *(b) Off-Site Construction Noise*

Project and cumulative construction noise due to construction truck traffic from the Project and other related projects would likely exceed the ambient noise levels along the haul route by 5 dBA and 3 dBA along Highland Avenue. 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, would not be feasible as the barriers would obstruct the access to the properties. However, in accordance with Project Design Feature L-1 included in Section IV.L, Traffic of this Draft EIR, the Project would implement a Construction Management Plan that would include advanced notification to property owners and occupants, including nearby schools, of construction activities; scheduling of construction activities to reduce the effect on traffic flow; scheduling of construction activities to not interfere with LAUSD drop-off and pick-up activities and pedestrian routes; and coordinating with LAUSD site administrators and/or designated representatives to ensure that effective measures are employed to reduce construction-related impacts on nearby LAUSD facilities. Nonetheless, Project and cumulative noise impacts from off-site construction would be significant and unavoidable.

## (2) Construction Vibration

### *(a) On-Site Construction Vibration*

Implementation of Mitigation Measure I-2 would 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 and the on-site historic buildings to a less-than-significant level. Specifically, with implementation of Mitigation Measure I-2, vibration levels at the affected buildings would be below the 0.12 and 0.2 PPV thresholds.

Additional mitigation measures considered to reduce vibration impacts from on-site construction activities 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 are not considered cost effective for temporary applications, such as construction. In addition, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate ground-borne vibration from the excavation equipment. Thus, it is concluded that there are no feasible mitigation measures that could be implemented to reduce the temporary vibration impacts from on-site construction associated with human annoyance to a less-than-significant level. Therefore, Project-level and cumulative vibration impacts from on-site construction activities with respect to human annoyance would remain significant and unavoidable.

### *(b) Off-Site Construction Vibration*

Vibration levels generated by construction trucks (i.e., haul, delivery, and concrete trucks) along the Project's haul route (i.e., Sunset Boulevard, Highland Avenue, and Santa Monica Boulevard) would be below the significance threshold for building damage. Therefore, vibration impacts with respect to building damage would be less than significant under both Project-level and cumulative-level.

Vibration levels from construction trucks would exceed the significance threshold for human annoyance at sensitive receptors (e.g., residential, hotel and theater uses) along Sunset Boulevard, Highland Avenue, and Santa Monica Boulevard, resulting in significant Project-level and cumulative construction vibration impacts. There are no feasible mitigation measures that would reduce the potential vibration human annoyance impacts. Even though impacts would be temporary, intermittent, and limited to daytime hours when the haul truck is traveling within 20 feet of a sensitive receptor, Project-level and cumulative vibration impacts from off-site construction with respect to human annoyance would remain significant and unavoidable.

### (3) Operational Noise

Implementation of Mitigation Measure I-3 would reduce noise levels from on-site operation associated with the outdoor uses at the Blessed Sacrament Church (receptor location R4) immediately east of the Project Site from 58.5 dBA ( $L_{eq}$ ) to 52.9 dBA ( $L_{eq}$ ). Thus, the Project-related noise plus ambient noise level would be reduced from 59.1 dBA ( $L_{eq}$ ) to 54.6 dBA ( $L_{eq}$ ), which would result in a maximum noise increase of 4.8 dBA ( $L_{eq}$ ) above the existing ambient noise level of 49.8 dBA ( $L_{eq}$ ). The noise increase associated with the outdoor uses would be below the 5 dBA significance threshold and the noise impacts would be reduced to a less-than-significant level. Therefore, Project-level and cumulative impacts with regard to operational noise would be less than significant.

## J.1 Employment

### a. Analysis of Project Impacts

#### (1) Construction

Project development would generate 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 would, therefore, support the regional pool of construction workers and also contribute additional indirect jobs in a wide range of industries throughout the region resulting from purchases of construction-related supplies, goods and services, and household expenditures by direct and indirect employees. Overall, since construction employment related to the Project would be temporary and would not exceed expected growth, construction-related employment impacts would be less than significant.

#### (2) Operation

Development of the Project would result in approximately 1,453 employment positions on the Project Site. When accounting for the removal of existing uses, a net increase of approximately 1,000 on-site jobs would be anticipated to occur. This would 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,

Project-related employment generation would be within and, thus, consistent with SCAG's employment forecasts for the SCAG Region and the City of Los Angeles.

In addition, the Project would be consistent with applicable employment growth plans and policies of SCAG and the City. The Project would: (1) concentrate growth in one of the City's most urbanized areas, proximate to numerous regional and local transit lines; (2) support the creation of new jobs; and (3) include a mix of retail, office, 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. As such, Project impacts with respect to employment would be less than significant.

## **b. Cumulative Impacts**

As identified in Section III, Environmental Setting, of this 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 would 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 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 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 2.16 percent. Therefore, the Project's incremental employment impact is not "cumulatively considerable" per CEQA, and, as such, its cumulative employment impact would be less than significant.

## **c. Project Design Features**

No specific project design features are proposed for the Project with regard to employment.

## **d. Mitigation Measures**

Project-level and cumulative impacts with regard to employment would be less than significant. Therefore, no mitigation measures are required.

## **e. Level of Significance After Mitigation**

Project-level and cumulative impacts related to employment would be less than significant.

## **J.2 Housing**

### **a. Analysis of Project Impacts**

#### **(1) Construction**

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 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.

Based on these factors, it is reasonable to assume, therefore, that Project-related construction workers would not relocate their households' places of residence as a direct consequence of working on the Project. Thus, there would not be any significant housing impacts on household growth in the City of Los Angeles due to Project construction. Therefore, construction-related impacts related to housing would be less than significant.

#### **(2) Operation**

The Project would remove the existing 84 dwelling units on-site and construct 950 new dwelling units, including 190 condominiums and 760 rental apartments. The apartments would include 84 affordable units. Therefore, implementation of the Project would result in a net increase of 866 housing units on-site. Based on 2012–2035

RTP/SCS, the Project's residential units would represent 0.23 percent of SCAG's forecasted housing growth for the SCAG Region and 1.04 percent for the City of Los Angeles between 2015 and 2022.

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 would not eliminate the housing shortage in the City, it would incrementally advance the goal of generating more housing for the region.

The Project would not cause housing growth to exceed projected/planned levels for the Project's buildout year. As such, development of the Project would not result in an adverse physical change in the environment. Impacts relating to housing growth would be less than significant, and no mitigation measures are required.

In addition to 950 new dwelling units, the Project proposes to construct a 308-room hotel, approximately 167,000 square feet of commercial/retail uses, and approximately 95,000 square feet of offices uses. The retail, hotel, and office uses would 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 would 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. As such, the Project's indirect housing demand would not cause housing growth to exceed projected/planned levels for the Project's buildout year, and the Project's indirect impacts on housing would be less than significant.

Furthermore, the Project's net increase in housing represents about 0.013 percent of the households forecasted by SCAG for the SCAG Region in 2022, and 0.23 percent of forecasted household growth between 2015 and 2022. The Project's net increase in households represents about 0.059 percent of the households forecasted by SCAG for the City of Los Angeles in 2022, and 1.04 percent of forecasted household growth between 2015 and 2022. Therefore, the Project would not result in any significant adverse impacts in terms of the growth-related significance threshold. The Project is also compatible with adopted local and regional housing growth policies. The Project would also assist the City in meeting its fair share of regional housing need, have a neutral impact on regional jobs-housing balance, provide new housing opportunities, and conform to City policies supporting higher density, compact, infill housing development. The Project would also add to the City's housing supply while meeting other smart growth environmental objectives, consistent with the SCAG Compass Growth Visioning principles. Therefore, the Project would not cause substantial growth (i.e., new housing or employment generators) or accelerate development in an

undeveloped area that exceeds projected/planned levels for the year of Project occupancy/buildout.

## **b. Cumulative Impacts**

As noted above, the Project would generate 866 net new housing units. The related projects would generate approximately 14,950 housing units within the SCAG Region, of which 13,678 housing units would 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 about 0.23 percent of the households forecasted in the SCAG Region in 2022 and 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 1.04 percent. Therefore, the Project’s incremental households impact is not cumulatively considerable per the CEQA Guidelines, and its cumulative household impact would be less than significant.

## **c. Project Design Features**

No specific project design features are proposed for the Project with regard to housing.

## **d. Mitigation Measures**

Project-level and cumulative impacts with regard to housing would be less than significant. Therefore, no mitigation measures are required.

## **e. Level of Significance After Mitigation**

Project-level and cumulative impacts related to housing would be less than significant.

## **J.3 Population**

### **a. Analysis of Project Impacts**

#### **(1) Construction**

For the same reasons as presented in Subsection J.2.a.(1) above, Project-related construction workers would not relocate their households' places of residence as a direct consequence of working on the Project. Thus, there would not be any significant population impacts related to household growth in the SCAG Region or the City of Los Angeles due to Project construction. Therefore, construction-related impacts related to population would be less than significant, and no mitigation measures are required.

#### **(2) Operation**

The Project includes 866 net new multi-family residential units and, thus, is estimated to generate a net new residential population of 2,113 additional persons at full buildout. Based on 2012–2035 RTP/SCS, the net new increase of 2,113 permanent residents would represent approximately 0.2 percent of the projected growth in the SCAG Region between 2015 and 2022, and 1.55 percent of the projected growth in the City of Los Angeles during the same period. As such, the 2,113 net new residents constitute only a small portion of City and regional growth and could easily be absorbed at these levels.

In addition, jobs associated with the Project's commercial and office uses would be filled to some extent by employees already residing in the vicinity of the Project. As such, the Project would not induce substantial population growth or exceed SCAG's population forecast for the City of Los Angeles or the SCAG Region. Therefore, Project impacts related to population growth would be less than significant, and no mitigation measures are required.

### **b. Cumulative Impacts**

As noted above, a population growth of 2,113 persons is associated with Project's residential uses. The related projects would generate a population of approximately 36,478 within the SCAG Region, of which 33,734 persons would be within the City of Los Angeles. Based on forecasts in 2012–2035 RTP/SCS, (1) the Project's cumulative population for the SCAG Region (i.e., total Project population plus "related projects" population for the City of Los Angeles and the City of West Hollywood, which is located to the southwest of the Project Site) accounts for about 0.18 percent of the population forecasted in the SCAG Region in 2022 and 3.44 percent of the forecasted growth in population between 2015 and 2022; (2) the Project's cumulative population for City of Los

Angeles (i.e., total Project population plus “related projects” population for the City of Los Angeles) represents approximately 0.83 percent of 2022 population in the City of Los Angeles; and (3) the cumulative population impact accounts for 24.54 percent of the 2015–2022 population growth forecast in the City of Los Angeles. However, of the 24.54 percent, the Project’s incremental contribution is only 1.55 percent. Therefore, the Project’s incremental population impact is not “cumulatively considerable” under CEQA, and, as such, its cumulative population impact would be less than significant.

### **c. Project Design Features**

No specific project design features are proposed for the Project with regard to population.

### **d. Mitigation Measures**

Project-level and cumulative impacts with regard to population would be less than significant. Therefore, no mitigation measures are required.

### **e. Level of Significance After Mitigation**

Project-level and cumulative impacts related to population would be less than significant.

## **K.1 Public Services—Police Protection**

### **a. Analysis of Project Impacts**

#### **(1) Construction**

Construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. As provided below in Project Design Feature K.1-1, the Project Applicant would implement temporary security measures, including security fencing, lighting, and locked entry to secure the Project Site during construction. With implementation of these measures, potential impacts associated with theft and vandalism during construction activities would be less than significant.

Project construction could also potentially impact the provision of Los Angeles Police Department (LAPD) services and police response in the Project vicinity as a result of construction impacts to the surrounding roadways. Specifically, temporary lane closures would be necessary to construct roadway/access improvements, including the realignment

of Las Palmas Avenue between Selma Avenue and Sunset Boulevard, and to install utility lines and connections, including the proposed sewer main relocation along Las Palmas Avenue from Selma Avenue to Sunset Boulevard, Selma Avenue from Las Palmas Avenue to Cassil Place, Cassil Place from Selma Avenue to Sunset Boulevard, and Sunset Boulevard from Cassil Place to Las Palmas Avenue to accommodate the realignment of Las Palmas Avenue. Construction activities also would 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 trips. Thus, although construction activities would be short-term and temporary, Project construction activities could temporarily affect emergency vehicles response along Sunset Boulevard and Highland Avenue, in addition to other main connectors, due to travel time delays caused by traffic during the Project's construction phase.

However, construction-related traffic, including hauling activities and construction worker trips, would occur outside the typical weekday commuter morning and afternoon peak periods, thereby reducing the potential for traffic-related conflicts. In addition, a Construction Management Plan would be implemented during Project construction pursuant to Project Design Feature L-1 in Section IV.L, Traffic, Access, and Parking, of this Draft EIR, to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The Project would also employ temporary traffic controls, such as flag persons to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to 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.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow are maintained on adjacent right-of-ways, particularly along designated disaster/emergency routes, such as Highland Avenue. Furthermore, Section 21806 of the California Vehicle Code (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.

Therefore, upon implementation of the project design features and compliance with state law, construction-related impacts would be minimized and would not generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site. Project construction would 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 would not result in adverse physical impacts associated with the construction of new or altered facilities. Accordingly, impacts on police protection services during Project construction would be less than significant.

## (2) Operation

The Project would be served by the Hollywood Community Police Station. The Project would 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 would be 3,598 persons, which would increase the existing service population of the Hollywood Community Police Station service area from 165,000 persons to 168,598 persons. With the increase of residents and visitors to the Project Site, the officer-to-resident ratio would decrease from 2.13 officers per 1,000 residents to 2.09 officers per 1,000 residents within the Hollywood Community Police Station service area. This would represent a net change of approximately 2 percent, which would be considered minimal. The Hollywood Community Police Station service area officer-to-resident ratio would still be lower than the Citywide ratio of 2.61 officers per 1,000 residents. Therefore, the Project would not represent a significant change in the officer-to-resident ratio of the Hollywood Community Police Station service area.

Assuming that the annual crime rate would remain constant at 0.032 crime per capita, the net service population of the Project could potentially generate approximately 115 crimes per year. The total annual number of reported crimes in the service area of the Hollywood Community Police Station could, therefore, increase from 5,352 crimes to approximately 5,467 crimes, an increase of approximately 2 percent. However, the Project would implement several design features that would deter certain types of crime and enhance safety within and immediately surrounding the Project Site, as shown in Project Design Features K.1-2 through K.1-4. 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 K.1-2 would ensure 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 would provide 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 would also design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites. The Project's design features would help offset the Project-related increase in demand for police services. In addition to the implementation of the Project Design Features, the Project would 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 would 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 would 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 would be maintained at all times, and the increase in traffic generated by the Project would 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, would not cause a substantial effect on emergency response as a result of increased traffic congestion.

Therefore, the Project is not anticipated to generate a demand for additional police protection services that could exceed the LAPD's capacity to serve the Project Site. Project operation would 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 would not result in adverse physical impacts associated with the construction of new or altered facilities. Thus, impacts to police protection services would be less than significant.

## **b. Cumulative Impacts**

Each related project would be 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 would 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 would be identified and monies allocated according to the priorities at the time. In addition, it is anticipated that the related projects would implement project design features similar to the Project, which would reduce cumulative impacts to police protection services.

With regard to emergency response, the Project and related projects would introduce new uses to the Project Site which would generate additional traffic in the vicinity of the Project Site. Traffic from the Project and related projects would 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. As discussed above, the Project is not anticipated to substantially affect existing emergency response in the service areas of the Hollywood Community Police Station, and the Project would not contribute to a cumulative impact regarding emergency response. As is the case under existing conditions, emergency vehicles would access the Project Site and each of the related projects directly from the surrounding roadways. As such, emergency access to the Project vicinity would be maintained at all times, and the increase in cumulative traffic generated by the Project and related projects would not significantly impact emergency vehicle response to the Project 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.

### **c. Project Design Features**

The following Project Design Features are proposed with regard to police protection:

**Project Design Feature K.1-1:** During construction, the Project Applicant will implement temporary security measures, including security 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. Regular daily and multiple security patrols during non-construction hours (e.g., nighttime hours, weekends, and holidays) will also be provided. During construction activities, the Contractor will document the security measures; and the documentation will be made available to the Construction Monitor.

**Project Design Feature K.1-2:** 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.

**Project Design Feature K.1-3:** Prior to the issuance of a building permit, the Project Applicant shall 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, including applicable features in the Los Angeles Police Department's "Design Out Crime" Guidelines, 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.

**Project Design Feature K.1-4:** Prior to the issuance of a certificate of occupancy, the Project Applicant shall 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 that might facilitate police response.

## **d. Mitigation Measures**

Project-level and cumulative impacts with regard to police protection would be less than significant. Therefore, no mitigation measures are required.

It should be noted that a Construction Management Plan will be implemented during Project construction pursuant to Project Design Feature L-1 in Section IV.L, Traffic, Access,

and Parking, of this Draft EIR, to ensure that adequate and safe access remains available within and near the Project Site during construction activities.

### **e. Level of Significance After Mitigation**

Project-level and cumulative impacts with regard to police protection would be less than significant.

## **K.2 Public Services—Fire Protection**

### **a. Analysis of Project Impacts**

#### **(1) Construction**

Construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. In compliance with Occupational Safety and Health Administration (OSHA) and Fire and Building Code requirements, construction managers and personnel would be 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 would be maintained on-site. Project construction would also comply with applicable codes and ordinances relating to fire safety practices. Furthermore, Project construction would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for Project construction activities to expose people to the risk of fire or explosion related to hazardous materials.

Project construction could also potentially impact the provision of Los Angeles Fire Department (LAFD) services in the Project vicinity as a result of construction impacts to the surrounding roadways. Specifically, temporary lane closures would be necessary to construct roadway/access improvements, including the realignment of Las Palmas Avenue between Selma Avenue and Sunset Boulevard, and to install utility lines and connections, including the proposed sewer main replacements along Las Palmas Avenue from Selma Avenue to Sunset Boulevard, Selma Avenue from Las Palmas Avenue to Cassil Place, Cassil Place from Selma Avenue to Sunset Boulevard, and Sunset Boulevard from Cassil Place to Las Palmas Avenue. Construction activities also would 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 trips. Thus, although construction

activities would be short-term and temporary, travel time delays caused by traffic during the Project's construction phase could temporarily increase response times for emergency vehicles along Sunset Boulevard and Highland Avenue, in addition to other main connectors. However, construction-related traffic, including hauling activities and construction worker trips, would occur outside the typical weekday commuter morning and afternoon peak periods, thereby reducing the potential for traffic-related conflicts. In addition, a Construction Management Plan would be implemented during Project construction pursuant to Project Design Feature L-1 in Section IV.L, Traffic, Access, and Parking, of this Draft EIR, to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The Project would also employ temporary traffic controls, such as flag persons to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to 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.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent right-of-ways. Furthermore, Section 21806 of the California Vehicle Code allows drivers of emergency vehicles to 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.

Therefore, Project construction would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service and would not significantly inhibit emergency response. As such, impacts to fire protection during Project construction would be less than significant, and no mitigation measures are required.

## (2) Operation

### *(a) Facilities and Equipment*

The Project Site is currently and would 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, would continue to be available to serve the Project Site in the event of an emergency.

Upon buildout, the Project would include approximately 950 residential units, 308 hotel rooms, approximately 95,000 square feet of office uses, and approximately 185,000 square feet of commercial/retail uses, totaling approximately 1,432,500 square feet of floor area (including existing uses to be retained). The Project would result in a net increase of approximately 2,113 residents on the Project Site. Because it would increase the residential service population and the amount and scale of structural development

on-site, the Project would increase the Project Site's demand for LAFD fire protection. However, the Project would implement 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 would be demonstrated as part of a plot plan that would be 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 K.2-1, automatic fire sprinkler systems would be installed in all new non-high-rise buildings (i.e., Buildings B2, B4, C1, C2, C3, and D1) ; high-rise buildings (i.e., Buildings A1, B1, and B3) are already required to install such systems. Compliance with applicable regulatory requirements that are enforced through the City's building permitting process would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment. Therefore, impacts with regard to LAFD facilities and equipment would be less than significant.

*(b) Response Distance and Emergency Access*

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. As discussed above, Fire Station No. 27, located at 1327 North Cole Avenue, approximately 0.5 mile away and is equipped with two engines, one truck, and two ambulances. Therefore, the Project would fall within the LAFD's maximum prescribed response distances. Additionally, as set forth in Project Design Feature K.2-1, automatic fire sprinkler systems would be 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 vicinity, would 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 would 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 would be maintained at all times, and the increase in traffic generated by the Project would not significantly impact emergency vehicle response to the Project Site and 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. Therefore, Project-related traffic is not anticipated to impair the LAFD from responding to emergencies at the Project Site or the

surrounding area. Impacts with regard to response distance and emergency access would be less than significant.

*(c) Fire Flow*

Domestic and fire water service to the Project Site would continue to be supplied by the Los Angeles Department of Water and Power (LADWP). Fire flow to the Project would be required to meet City of Los Angeles fire flow requirements, as determined by the LAFD. As previously discussed, Section 57.507.3.1 of the LAMC establishes fire flow standards by development type. As discussed above, 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. Therefore, impacts with regard to fire flow would be less than significant.

## **b. Cumulative Impacts**

The increase in development and residential service populations from the Project and related projects would result in a cumulative increase in the demand for LAFD services. However, similar to the Project, the related projects would 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 would be required to comply with regulatory requirements related to fire protection. Each of the related projects identified in the area would 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 would 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 would continue to monitor population growth and land development throughout the City 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 would continue to provide services in response to cumulative growth. As a result, the Project's contribution to cumulative impacts to fire protection would not be cumulatively considerable. As such, cumulative impacts on fire protection would be less than significant.

### **c. Project Design Features**

The following Project Design Feature is proposed with regard to fire protection:

**Project Design Feature K.2-1:** Automatic fire sprinkler systems will be installed in all new non-high-rise buildings (i.e., Buildings B2, B4, C1, C2, C3, and D1).

Additionally, as discussed in Section IV.L, Traffic, Access, and Parking, of this Draft EIR, pursuant to Project Design Feature L-1, the Project Applicant will prepare and submit a Construction Management Plan to LADOT prior to the start of construction that would include provisions for maintaining emergency access to the Project Site during construction.

### **d. Mitigation Measures**

Project-level and cumulative impacts with regard to fire protection would be less than significant. Therefore, no mitigation measures are required.

It should be noted that a Construction Management Plan will be implemented during Project construction pursuant to Project Design Feature L-1 in Section IV.L, Traffic, Access, and Parking, of this Draft EIR, to ensure that adequate and safe access remains available within and near the Project Site during construction activities.

### **e. Level of Significance After Mitigation**

Project-level and cumulative impacts with regard to fire protection would be less than significant.

## **K.3 Public Services—Schools**

### **a. Analysis of Project Impacts**

#### **(1) Construction**

The Project would involve the development of approximately 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 Project would generate part-time and full-time jobs associated with construction of the Project 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 would 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 would be less than significant.

## (2) Operation

Taking into consideration the existing uses that would be removed, the Project's residential and non-residential components would generate a total net increase of 875 school-aged students, consisting of 500 elementary students, 125 middle school students, and 250 high school students.

Based on existing enrollment and capacity data from LAUSD, Bancroft Middle School and Hollywood High School would have adequate capacity to accommodate the new students generated by the Project under existing conditions. However, Selma Elementary School would 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 would have a seating shortage of 443 students, while Bancroft Middle School and Hollywood High School would 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 would continue to have a projected seating shortage, while Bancroft Middle School and Hollywood High School would be operating within capacity. Specifically, Selma Elementary School would have a seating shortage of 160 students, Bancroft Middle School would have a seating overage of 427 students, and Hollywood High School would 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 would likely be less than the above estimate because this analysis does not include LAUSD options that would 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 would move to

the Project Site. Other LAUSD options that may be available to Project students include the following:

- Open enrollment that enables students anywhere within LAUSD to apply to any regular, grade-appropriate LAUSD school with designated open enrollment seats;
- Magnet schools and magnet centers (such as Bancroft Middle School Visual and Performing Arts and Gifted/Highly Gifted/High Ability Magnets; Le Conte Middle School Communication Arts and International Humanities, Health/Engineering/Applied Sciences/Technology Magnets; Hollywood High School Performing Arts and Communication/Technology Magnets, Melrose Elementary School Science/Technology/Math Magnet, and Fairfax High School Visual and Performing Arts Magnet), which are open to qualified students in LAUSD;
- The Permits With Transportation Program, which allows students to continue to go to the schools within the same feeder pattern of the school they were enrolled in from elementary through high school. LAUSD provides transportation to all students enrolled in the Permits With Transportation Program regardless of where they live within LAUSD;
- Intra-district parent employment-related transfer permits that allow students to enroll in a school that serves the attendance area where the student's parent is regularly employed if there is adequate capacity available at the school;
- Sibling permits that enable students to enroll in a school where a sibling is already enrolled; and
- Child care permits that allow students to enroll in a school that serves the attendance area where a younger sibling is cared for every day after school hours by a known child care agency, private organization, or a verifiable child care provider.

Pursuant to SB 50, the Project Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of the Project's building permit. Pursuant to Government Code Section 65995, the payment of these fees is considered full and complete mitigation of Project-related school impacts. Therefore, payment of the applicable school fees to LAUSD would 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 would be less than significant, and mitigation measures would not be required.

## **b. Cumulative Impacts**

There are 145 related projects located in the Project 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 would have the potential to combine with the Project and cumulatively generate new students who would attend Selma Elementary School, Bancroft Middle School, or Hollywood High School. These related projects would 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 would generate a net total of approximately 875 new students, consisting of 500 elementary students, 125 middle school students, and 250 high school students. Therefore, the Project, in combination with the 96 applicable related projects, would have the potential to generate a cumulative total of 6,794 new school-aged students. This cumulative total would consist of 1,777 elementary school students, 1,171 middle school students, and 3,846 high school students. Based on existing 2013–2014 enrollment and capacity data from LAUSD, the schools serving the Project and the 96 applicable related projects would 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 would have a seating shortage of 1,720 students, Bancroft Middle School would have a seating shortage of 988 students, and Hollywood High School would have a seating shortage of 3,160 students (existing seating overages reported from LAUSD minus students generated by the Project in combination with the 96 applicable related projects).

With regard to the projected future capacity during the 2018–2019 academic year, Selma Elementary School would have a seating shortage of 1,437 students, Bancroft Middle School would have a seating shortage of 619 students, and Hollywood High School would have a seating shortage of 2,593 students. Therefore, the students generated by the Project, in combination with the related projects located within the school attendance boundaries, would cause a shortage when compared to existing conditions and projected school capacity at Selma Elementary School, Bancroft Middle School, and Hollywood High School.

This degree of cumulative growth would substantially increase the demand for LAUSD services in the Project area. The Project would comprise approximately 13 percent of the total estimated cumulative growth in students. However, as with the Project, future development, including the related projects, would 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 would be considered full and complete mitigation of school impacts generated by the related projects. Therefore, the

Project's incremental contribution towards school impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

### **c. Project Design Features**

No Project Design Features are proposed with regard to schools.

### **d. Mitigation Measures**

Project-level and cumulative impacts with regard to schools would be less than significant with the payment of development fees for schools to LAUSD prior to the issuance of building permits pursuant to SB 50. Therefore, no mitigation measures are required.

### **e. Level of Significance After Mitigation**

Project-level and cumulative impacts related to schools would be less than significant.

## **K.4 Public Services—Libraries**

### **a. Analysis of Project Impacts**

#### **(1) Construction**

The Project would result 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 would 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 would visit Project area libraries on their way to/from work or during their lunch hours. Construction workers would likely 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 would utilize library facilities on their way to work as 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 would be less than significant, and no mitigation measures are required.

## (2) Operation

Based on information provided by the Los Angeles Public Library (LAPL), the primary library that serves 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 could also provide library service to the Project.

The net increase in residential units as a result of the Project would generate a net increase of approximately 2,113 residents on the Project Site, which would increase 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 would increase to 81,057 persons, and the 19,000-square-foot Hollywood Regional Branch Library would 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. In addition, the service population of the Hollywood Regional Branch Library would be below 90,000 persons and would not require consideration of adding a second branch to the area.

With regard to future library service, 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 would 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 would be 83,812 persons, and the library would 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 would be below 90,000 persons and would not require 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 would 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, would serve to alleviate the demand placed on the Hollywood Regional Branch Library from Project residents. The Project's residential units would also be 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 would 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 would 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, office, and hotel uses would generate approximately 1,000 net new employees on the Project Site. It is anticipated that these new uses would 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 would already be taken into account in library services provisions.

Therefore, operation of the Project would 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 would not result in the need for new or altered library facilities. Impacts on library facilities during Project operation would be less than significant, and no mitigation measures are required.

## **b. Cumulative Impacts**

Of the 145 related projects, 111 are within the City of Los Angeles and are served by the City of Los Angeles Public Library system, and 62 projects are residential in nature or have residential components. Implementation of these 62 related projects would result in the development of 12,812 new residential units, which would generate a service population of approximately 31,261 residents. Therefore, these related projects and the Project's net generation of 2,113 residents would add a total of 33,374 residents to the Hollywood Regional Branch Library's future 2022 service population of 81,699 residents, for a future service population of 115,073 residents. The future service population of 115,073 residents would 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 would provide library services to the 33,374 service population generated by the Project and the related projects, and not all the 33,374 new residents would 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 is already accounted for in the service population projections based on SCAG 2022 projections.

Additionally, residents from 14 of the related projects would reside closer to the Will and Ariel Durant Branch Library as compared to the Hollywood Regional Branch Library. Similarly, residents from 18 of the related projects would reside closer to the John C. Fremont Branch Library. Therefore, these residents would 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 area. Therefore, the Project's contribution to cumulative impacts on libraries would not be cumulatively considerable, and cumulative impacts on libraries would be less than significant. Similar to the Project, each related project would also 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.

### **c. Project Design Features**

No Project Design Features are proposed with regard to libraries.

### **d. Mitigation Measures**

Project-level and cumulative impacts to library services would be less than significant. Therefore, no mitigation measures are required.

### **e. Level of Significance After Mitigation**

Project-level and cumulative impacts to library services would be less than significant.

## **K.5 Public Services—Parks and Recreation**

### **a. Analysis of Project Impacts**

#### **(1) Construction**

Construction of the Project would result 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 would relocate their households as a consequence of working on the Project is negligible. Therefore, the construction workers associated with the Project would not result in a notable increase in the residential population of the Project 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 would be 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. There is a potential for construction workers to 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 would be temporary and would 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 would 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 would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site or interfere with existing park usage. The Project's proposed haul route options to/from the US-101 from the Project Site would 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 would not travel adjacent to any City park or recreational facility. If Santa Monica Boulevard were to be used, Project-related construction trucks would pass the Hollywood Recreation Center located at 1122 Cole Avenue. However, such use would be temporary and intermittent throughout construction. In addition, construction trucks would only drive by the recreational facility and would not stage adjacent to the recreational facility. Therefore, use of this haul route would not be 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 would 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 would be less than significant, and mitigation measures would not be required.

## (2) Operation

While the Project's estimated 2,113 net new residents would be expected to utilize off-site public parks and recreational facilities to some degree, the Project would provide on-site public and private open space. The Project would provide 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. Proposed additional landscaped public walkways and the pedestrian paseo that would traverse diagonally through the Project Site would also promote access and connectivity to and through the Project Site from Sunset Boulevard, Las Palmas Avenue, Selma Avenue, and McCadden Place. The Project would also provide 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 would 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 would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities.

Similarly, the Project's commercial component, which is estimated to generate approximately 1,000 net new employees, could result in a demand for parks and recreational facilities. There is a potential for Project employees to 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 would not be 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 would utilize on-site open space, resulting in a negligible demand for

surrounding parks and recreational facilities. Furthermore, as noted above and discussed further below, the Project would pay in-lieu fees in accordance with Section 17.12 of the LAMC. Therefore, the Project would 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 would generally utilize on-site open space to meet their recreational needs. Furthermore, the Project would meet the applicable requirements set forth in Section 12.21, Section 17.12, and Section 12.33 of the LAMC. However, the Project would not meet the parkland provision goals set forth in the Public Recreation Plan. Nonetheless, these are Citywide goals and are not requirements for individual development projects. Additionally, implementation of existing regulatory requirements would ensure that the intent of the Public Recreation Plan's parkland standards would be 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 would be less than significant, and no mitigation measures are required.

## **b. Cumulative Impacts**

Cumulative growth in the greater Project 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 would 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 would contribute towards meeting the demand for park and recreational space in the Project 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 area, increased demand would 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 would meet the recreational needs of Project residents, the Project would not meet all of the 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 would make a substantial positive contribution toward meeting these goals. However, it is unknown whether the Hollywood Central Park would 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. Furthermore, as with the Project, the related projects would undergo discretionary review on a case-by-case basis and would be expected to coordinate with the City of Los Angeles Department of Recreation and Parks. Future development projects would 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 would be less than significant. Furthermore, based on the above, the Project's contribution to cumulative impacts to parks and recreational facilities would not be cumulatively considerable.

### **c. Project Design Features**

No specific Project Design Features beyond the open space and recreation features described in Section II, Project Description, of this Draft EIR are proposed with regard to parks and recreation.

### **d. Mitigation Measures**

Project-level and cumulative impacts with regard to parks and recreational facilities would be less than significant. Therefore, no mitigation measures are required.

### **e. Level of Significance After Mitigation**

Project-level and cumulative impacts related to parks and recreational facilities would be less than significant.

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## L. Traffic, Access, and Parking

### a. Analysis of Project Impacts

#### (1) Construction Impacts

Potential traffic impacts from Project construction activities could occur as a result of the following types of activities:

- Increases in truck traffic associated with export or import of fill materials and delivery of construction materials;
- Increases in automobile traffic associated with construction workers traveling to and from the Project Site;
- Reductions in existing street capacity from temporary lane closures necessary for the construction of roadway/access improvements, utility connections, and drainage facilities; and
- Blocking existing vehicle or pedestrian access to other parcels fronting streets.

Each of these potential impacts is discussed below based on the construction characteristics of the Project. 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.

#### *(a) Shoring/Excavation—Vehicle Trips*

During the peak excavation and grading period, it is estimated that approximately 705,500 cubic yards of material would 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 would 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 would be exported each workday, requiring approximately 400 haul trucks per work day.

In addition, an average of 20 delivery trucks per day is expected during the excavation and grading period. Thus, up to 840 daily truck trips (420 inbound, 420 outbound) are forecast to 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 applied to equate larger trucks to passenger vehicles during the peak hours. Accordingly, the Project's estimated 840 truck trips would be equivalent to 1,680 daily PCE trips. The 106 hourly truck trips would be equivalent to 212 PCE trips (106 inbound, 106 outbound) per hour. In addition, during this period, a maximum of 30 construction workers would work at the Project Site. Assuming minimal carpooling amongst workers, an average vehicle occupancy (AVO) of 1.135 persons per vehicle was applied. Therefore, 30 workers would result 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 would be arriving to and departing from the Project Site before the commuter weekday peak periods and would, therefore, not impact traffic during the A.M. and P.M. peak periods. Furthermore, construction-related traffic is anticipated to be less than the trips associated with the existing uses of the Project Site that would be removed from the Study Area during construction.

Haul trucks would 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 would 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, it is anticipated that outbound traffic from the Project Site would travel on Highland Avenue to access US-101 northbound or on Sunset Boulevard to access US-101 southbound. Inbound traffic would take the reverse route from US-101.

*(b) Building Construction—Construction Worker Trips and Parking*

Construction worker traffic would depend on the number of construction workers employed during various construction phases, as well as the mode and time of travel of the workers. 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 construction worker trips would occur outside the typical weekday commuter A.M. and P.M. peak periods. Furthermore, construction-related traffic is anticipated to be less than the trips associated with the existing uses of the Project Site that would be removed from the Study Area during construction.

During the peak building construction period, it is estimated that the Project would generate a combined average of approximately 144 workers per day. Since the different building components would not be constructed or installed simultaneously, and since on most days during the construction period there would be far fewer than 144 workers, the construction workers trip estimate is conservative. By applying an average vehicle occupancy (AVO) of 1.135 persons per vehicle, 144 workers would result in a total of 127 vehicles that would arrive and depart from the Project Site each day. The estimated

number of daily trips associated with construction workers during the peak construction building period would be approximately 254 (127 inbound and 127 outbound trips). As previously noted, these trips would occur outside of the A.M. and P.M. peak periods.

During construction, adequate parking for construction workers would 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 would be prepared pursuant to Project Design Feature L-1. Project construction may require the temporary use of off-site parking areas for material storage and truck staging.

*(c) Realignment of Las Palmas Avenue*

The Project proposes the realignment of Las Palmas Avenue, adjacent to the Project Site north of Sunset Boulevard, in order to align the segment north of Sunset Boulevard with the segment south of Sunset Boulevard to create a continuous street. As part of the improvement, the southbound approach would be restriped to provide one left-turn lane and one shared through/right lane. The realignment would also include on-site and off-site improvements to the existing sanitary sewer system. Specifically, the on-site 30-inch sewer main under Las Palmas Avenue between Selma Avenue and Sunset Boulevard would be removed and rerouted with new sewer mains in the following locations:

- Selma Avenue between Las Palmas Avenue to Cassil Place
- Cassil Place between Selma Avenue and Sunset Boulevard
- Sunset Boulevard between Cassil Place to Las Palmas Avenue

To reroute the sewer mains to Sunset Boulevard and Selma Avenue, on-street parking spaces would be temporarily removed during construction to provide an additional travel lane to accommodate traffic rerouted by the closure of the center travel lanes. The rerouting of the sewer mains on Cassil Place would require complete closures of the segment during daytime hours only.

*(d) Potential Impacts of Construction Traffic*

*(i) Temporary Traffic Impacts*

During the excavation and grading phase, given that the haul truck trips would be spread out over a typical eight-hour workday (see Project Design Feature L-1) and since nearly all haul truck activity and construction worker trips would occur outside of the A.M. and P.M. peak periods, haul truck and construction worker activity during the excavation

and grading phase is not anticipated to contribute a substantial amount of traffic during the weekday A.M. and P.M. peak periods. With regard to potential impacts during the building construction phase associated with construction workers, most of the construction worker trips would also occur outside the typical weekday commuter A.M. and P.M. peak periods. However, while construction activities are expected to be primarily contained within the Project Site boundaries, the curb lanes on Highland Avenue and Sunset Boulevard adjacent to the Project Site would 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. McCadden Place adjacent to the Project Site would be partially closed, with the removal of on-street parking and one travel lane; and Las Palmas Avenue between Selma Avenue and Sunset Boulevard would be completely closed during a portion of the construction period, which would result in temporary traffic shifts to adjacent streets (i.e., Highland Avenue and Wilcox Avenue). In addition, it is expected that construction fences could encroach into the public right-of-way (e.g., sidewalk and roadways) adjacent to the Project Site. Temporary traffic controls, such as flag persons to control traffic movement during temporary traffic flow disruptions, would be provided to direct traffic around any closures as required in the Construction Management Plan (see Project Design Feature L-1). Traffic management personnel would be trained to 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.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow are maintained on adjacent right-of-ways.

For the purposes of providing a conservative analysis, all lane and road closures were assumed to occur simultaneously. It was also assumed that all existing uses at the Project Site would not be in operation during construction. Thus, the traffic volumes associated with the existing uses were removed from the Study Area. The proposed lane closures would result in a temporary significant impact at the following intersections:

- Intersection No. 37: Highland Avenue and Hollywood Boulevard (P.M. peak hour)
- Intersection No. 65: Highland Avenue and Sunset Boulevard (A.M. and P.M. peak hour)

Therefore, the Project would result in a temporary, but significant, traffic impact during construction.

### *(ii) Access and Safety Impacts*

The curb lanes on Highland Avenue and Sunset Boulevard adjacent to the Project Site would be used intermittently during the construction period for equipment staging,

concrete pumping, etc. In addition, it is expected that 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 would 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 would require temporary rerouting of pedestrian traffic. As set forth in Project Design Feature L-1, the Project would implement a Construction Management Plan that would include 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 would be less than significant.

Construction activities associated with the Project could 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 would 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 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 during the Project's construction phase. However, as discussed above, most of the construction worker trips would occur outside the weekday peak traffic periods, thereby reducing the potential for traffic-related conflicts. These temporary and short-term construction activities would have a less-than-significant impact on emergency response times because appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would 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 would prepare and submit a Construction Management Plan to LADOT prior to the start of construction pursuant to Project Design Feature L-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.) would 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 would not require substantial roadway and/or sidewalk closures to the extent that a hazard to roadway travelers and/or pedestrians

would occur. Similarly, implementation of appropriate construction traffic control measures would ensure 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 would be less than significant.

*(iii) Bus/Transit Impacts*

There are no bus stops immediately adjacent to the Project Site along Highland Avenue or Sunset Boulevard, where construction activities would 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 would not require relocating bus stops or rerouting bus lines. Construction of the Project would also not impede transit service to the bus stop located adjacent to the Blessed Sacrament Church. As such, the Project would not result in significant impacts to transit during construction.

*(iv) 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 L-1, the Project would implement a Construction Management Plan that would include providing advanced notification of temporary parking removals and duration of removals. In addition, per the provisions of SB 743 and PRC Section 21099, which supersede the *L.A. CEQA Thresholds Guide*, this impact to on-street parking during the construction of the Project would not be considered significant.

## (2) Impacts during Operation

*(a) Intersection Levels of Service*

*(i) Existing with Project Conditions*

Signalized Intersections

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.

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 would result in a change to the volume-to-capacity ratio that would exceed the significance thresholds set forth above. Under Existing with Project Conditions, significant impacts would 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)

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 would not result in a change to the volume-to-capacity ratio that would exceed the significance thresholds set forth above.

#### Unsignalized Intersections

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

#### *(ii) Future with Project Conditions*

#### Signalized Intersections

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. Under Future with Project Conditions, 78 of the 111 Study Area intersections are projected to operate at LOS D or better during both the weekday A.M. and P.M. peak hours. The remaining 33 Study

Area intersections are projected to operate at LOS E or F during at least one of the peak hours. The addition of traffic from the Project to 22 of the signalized intersections would result in a change to the volume-to-capacity ratio that would exceed significance thresholds. Under Future with Project Conditions, the following intersections would have a significant traffic impact:

- 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)

Six of the Study Area intersections located in the City of West Hollywood were also analyzed as required by the City of West Hollywood. Two of the six analyzed intersections are projected to operate at LOS D or better during both the A.M. and P.M. periods under Future with Project Conditions. The remaining four 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 would not result in a change to the volume-to-capacity ratio that would exceed the significance thresholds set forth above.

#### Unsignalized Intersections

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

*(b) Regional Transportation System*

*(i) 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, the Project would not add 150 trips in either direction during either A.M. or P.M. peak hour. Therefore, Project impacts to a Congestion Management Program (CMP) mainline freeway monitoring location would be less than significant.

Although the Project would not add 150 trips in either direction during either peak hour to the CMP mainline freeway monitoring location, this monitoring location was evaluated for potential impacts. The freeway mainline segment would operate at LOS F in the southbound direction under both Existing with Project and Future with Project Conditions. However, the addition of Project traffic would not cause the D/C ratio to increase by 0.02 at this monitoring location. Therefore, based on this CMP criterion, the Project would not result in a significant impact on the CMP mainline freeway monitoring location at US-101 south of Santa Monica Boulevard.

*(ii) CMP Arterial Monitoring Station Analysis*

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 number of peak-hour Project trips expected at each arterial monitoring intersection is 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 would add 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 is required.

A significant impact analysis was done 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 would not result in an increase in V/C ratio of 0.02 or more. Therefore, this intersection would not be 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 would result in an increase in V/C ratio of 0.02 or more, during the A.M. peak hour. Thus, the Project would result in a significant impact at this CMP arterial monitoring intersection under Future with Project Conditions.

*(iii) Public Transit*

Accounting for the existing use credit but prior to mitigation and trip reduction adjustments, the Project is anticipated to generate approximately 1,304 A.M. peak-hour vehicle trips and 2,030 P.M. peak-hour vehicle trips. Assuming an average vehicle occupancy of 1.4 (based on the methodology in Section B.8.4 of the CMP), the Project's vehicle trips would result in an estimated increase of 1,826 person trips during the A.M. peak hour and 2,842 person trips during the P.M. peak hour. Using the assumption in the trip-generation estimates, a 15-percent transit/walk adjustment was applied to account for the use of non-auto travel modes (e.g., rail, light rail, bicycling, walking, etc.). For the purpose of this analysis, all transit/walk trip estimates were conservatively assumed to be generated by travel via public transit. Using the 15-percent mode split adjustment, the Project would generate approximately 274 net new transit trips during the A.M. peak hour and 426 net new transit trips in the P.M. peak hour. As shown in the Traffic Study, 28 transit lines operate adjacent to or in close proximity of the Project Site, and the total capacity of the 28 transit lines serving the Project vicinity is approximately 11,112 riders during the A.M. peak hour and approximately 11,003 riders during the P.M. peak hour. Overall, the total residual transit capacity of the numerous bus lines and Metro lines can accommodate the Project's transit trips. Therefore, Project impacts to the existing transit system in the Study Area would be less than significant. Furthermore, it is assumed that public transit providers would expand their services when required in order to accommodate cumulative demand in the region. Therefore, cumulative impacts on public transit would be less than significant.

*(c) Residential Neighborhood Analysis*

Arterial corridors with projected congested conditions (LOS E or F) at key intersections may be sufficient to cause motorists to seek alternative routes. Unless congestion is severe (e.g., LOS F conditions), travel along arterial streets is generally faster than through neighborhoods since arterial streets typically provide greater capacities, higher travel speeds, less driveways, fewer stop signs, etc. The arterial corridors providing access to the Project

Site include Highland Avenue, Hollywood Boulevard, and Sunset Boulevard, which may be considered congested.

Based on LADOT policy, a project would meet the condition for assessing neighborhood intrusion impacts if it is projected to add 1,200 or more daily trips to any arterial corridor. The Project is estimated to add 1,200 or more trips at the following arterial corridors:

- Highland Avenue between Odin Street and Santa Monica Boulevard
- Hollywood Boulevard between Las Palmas Avenue and Wilcox Avenue
- Sunset Boulevard between Gardner Street and Van Ness Avenue

The following seven intersections along arterial corridors identified above are projected to operate at LOS E or F under Existing with Project Conditions:

- Intersection 12: Highland Avenue and Franklin Avenue (South) (A.M. and P.M. peak period)
- Intersection 13: Highland Avenue and Franklin Avenue (North) (A.M. and P.M. peak period)
- Intersection 37: Highland Avenue 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)

The following eight intersections along arterial corridors identified above are projected to operate at LOS E or F under Future with Project Conditions:

- Intersection 12: Highland Avenue and Franklin Avenue (South) (A.M. and P.M. peak period)
- Intersection 13: Highland Avenue and Franklin Avenue (North) (A.M. and P.M. peak period)

- Intersection 37: Highland Avenue 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 74: Gower Street and Sunset Boulevard (P.M. peak period)

Based on the locations of these intersections and LADOT policy, 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.

*(iv) Potential Neighborhood Intrusion Impacts*

Based on the alternative routes identified above, the neighborhoods that were identified according to LADOT criteria (see Section IV.L, Traffic, Access, and Parking, of this Draft EIR)

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.

Therefore, the Project would result in significant impacts to residential street segments in the Study Area.

*(d) Access and Circulation*

The Project would provide for on-site parking within four subterranean parking garages. Primary vehicular access to the subterranean garages would be provided via driveways along Selma Avenue, McCadden Place, and Las Palmas Avenue; there are no driveways proposed on Sunset Boulevard. These full access driveways would include right- and left-turn ingress and egress movements to and from the Project Site. A secondary driveway on Highland Avenue would provide for right-turn only egress movements from the hotel use proposed for the Project. In addition, a driveway along Las Palmas Avenue for the commercial uses and a driveway on McCadden Place for the hotel uses would provide access to the truck loading area. All the above driveways would be designed in accordance with LADOT standards. Therefore, the Project would 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.

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 under Existing with Project and Future with Project Conditions. The signalized intersection at Las Palmas Avenue and Sunset Boulevard (Intersection 66) is anticipated to operate at LOS A and LOS B during the A.M. and P.M. peak hours, respectively, under Existing with Project Conditions and LOS A and LOS D during the A.M. and P.M. peak hours, respectively, under Future with Project Conditions. Therefore, as the intersections of Highland Avenue and Selma Avenue and Las Palmas Avenue and Sunset Boulevard provide direct access to the Project Site, which are anticipated to operate at LOS D or better under Existing with Project Conditions and under Future with Project Conditions, the Project would not result in significant access and circulation impacts in the Study Area.

*(e) Bicycle, Pedestrian, and Vehicular Safety*

Vehicular access to the Project Site would be provided primarily via driveways along Selma Avenue, McCadden Place, and Las Palmas Avenue, and a secondary driveway would be located along Highland Avenue. The Project's access locations would be required to conform to City standards and would be designed to provide adequate sight distance, sidewalks, and/or pedestrian movement controls that would meet the City's requirements to protect pedestrian safety. In addition, the proposed driveways would be

designed to limit potential impediments to visibility and incorporate pedestrian warning systems, as required by City standards.

The Project would also include highly visible and properly marked/signed pedestrian entrances designed for safety that would 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 would maintain existing sidewalks and provide a direct and safe path of travel with minimal obstructions to pedestrian movement within and around the Project Site.

The Project would establish a new pedestrian paseo that would extend diagonally 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 would be linked through landscaped public walkways and connect the entire Project Site, while promoting pedestrian access to and from Sunset Boulevard, Las Palmas Avenue, Selma Avenue, and McCadden Place. This feature would also be consistent with the high walkability rating for the Project area.

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 would 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 in the Study Area and create a more integrated network. However, the proposed dedicated bicycle lanes are not scheduled for implementation. Nevertheless, as the Project would maintain the existing sidewalks and circulation system, Project operation would not disrupt bicycle flow along those streets. In addition, visitors, patrons, and employees arriving by bicycle would 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) would be provided within the Project Site. Therefore, the Project would not substantially increase hazards to bicyclists, pedestrians, or vehicles, and potential impacts related to bicycle, pedestrian and vehicular safety would be less than significant.

(f) *Parking*

Based on the parking requirements for residential, hotel, office, 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 would be required to provide a total of 2,027 parking spaces. As described in Section II, Project Description, of this Draft EIR, the Project would provide a total of 2,494 parking spaces, exceeding the requirement by 467 parking spaces. Therefore, the Project would comply with the applicable parking requirements of the LAMC. As such, impacts related to parking would be less than significant. As mentioned above, in accordance with SB 743, this impact would not be 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. Based on Section 12.21A,16(a) of the LAMC, the Project is required to and would provide a minimum of 1,239 bicycle parking spaces, including 1,052 long-term and 187 short-term bicycle parking spaces. Therefore, the Project would comply with the applicable bicycle parking requirements of the LAMC, and bicycle parking impacts would be less than significant. In addition, in accordance with SB 743, this impact would not be considered significant.

### (3) Caltrans Facilities Analysis

This analysis addresses the Project's potential impact on Caltrans facilities 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 detailed in the Memorandum of Understanding (MOU) (Appendix A to the Traffic Study), the Project 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. The analysis below follows the guidelines found in the Caltrans Traffic Impact Study (TIS) Guide.

*(a) Freeway Mainline Segments*

The following eight freeway mainline segments on US-101 were analyzed using the 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

*(i) 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 would not increase the V/C ratio by 0.020 or more that worsens an LOS F condition. Therefore, the Project would not significantly impact any of the freeway mainline segments under both Existing and Existing with Project Conditions.

*(ii) 2022 Conditions*

Based conservatively on CMP significance criteria, the Project would not increase the V/C ratio by 0.020 or more that worsens an LOS F condition. Therefore, the Project would not significantly impact any of the freeway mainline segments, under both Future and Future with Project Conditions in year 2022.

*(iii) 2035 Conditions and Proportionate Share of the Project*

Based conservatively on CMP significance criteria, the Project would not increase the V/C ratio by 0.020 or more that worsens an LOS F condition. Therefore, the Project would 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 would be further reduced with implementation of the mitigation measures described further below, the above analysis is conservative.

*(b) 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 under the partial 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 for this analysis.

*(i) 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.

*(ii) 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.

*(iii) 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.

*(c) 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

*(i) 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 would 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 would not exceed the capacity of the approach lanes or the ramps.

*(ii) 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 would have queues exceeding the available storage capacity during the A.M. peak hour without and with Project traffic; therefore, a significant cumulative impact would occur. The Project would 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 would not exceed the capacity of the approach lanes or the ramps. Furthermore, Project traffic at these off-ramps would be further reduced with implementation of the mitigation measures described further below.

*(iii) 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 would 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 would exceed the available storage capacity without and with the addition of Project traffic, a significant cumulative impact would be identified at the three freeway off-ramps. The Project would 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 would not exceed the capacity of the approach lanes or the ramps. Furthermore, Project traffic on the off-ramps would be further reduced with implementation of the mitigation measures described further below.

*(d) 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

*(i) 2015 Conditions*

The on-ramp analysis for Existing Conditions and Existing with Project Conditions for year 2015 shows the Project would 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.

*(ii) 2022 Conditions*

The on-ramp analysis for Future without Project Conditions and Future with Project Conditions for year 2022 shows the Project would 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 would be further reduced with implementation of the mitigation measures described further below.

*(iii) 2035 Conditions*

The on-ramp analysis for Future without Project Conditions and Future with Project Conditions for year 2035 shows the Project would 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 would be further reduced with implementation of the mitigation measures described further below.

*(e) 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

*(i) 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.

*(ii) 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 would be further reduced with implementation of the mitigation measures described further below.

*(iii) 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 would be further reduced with implementation of the mitigation measures described further below.

## **b. Cumulative Impacts**

### **(1) Construction Impacts**

The construction of 145 related projects is assumed in the Study Area. These 145 related projects are dispersed throughout the Study Area and would draw upon a workforce from all parts of the Los Angeles region. Most, if not all, of the construction workers are anticipated to 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 would 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 would take into consideration overlapping construction projects and would balance 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 above, the Project would result 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.

The Project would 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 would occur. Furthermore, no transit stops are located in or adjacent to the Project Site, where construction activities would 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 would not be cumulatively considerable and would be less than significant.

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 would

implement a Construction Management Plan that would include providing advanced notification of temporary parking removals and duration of removals. Therefore, the Project's impact to on-street parking would not be cumulatively considerable and would be less than significant.

## (2) Impacts from Operation

### *(a) Intersection Levels of Service*

Under Future with Project Conditions, the Project would result in significant impacts to 22 of the 111 signalized intersections. Therefore, the Project's contribution to impacts that would occur under the future cumulative conditions would be considerable, and cumulative impacts would be significant at those intersections impacted by the Project. The proposed mitigation would reduce several of the significant traffic impacts to less-than-significant levels. However, significant impacts at five of the signalized intersections would remain significant and unavoidable. Thus, the Project's impacts with regard to the five intersections identified below would make a cumulatively considerable contribution to a significant impact, and, therefore, the Project would have a significant cumulative impact.

### *(b) Regional Transportation System*

#### *(i) 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 would 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, this monitoring location was further evaluated for significant impacts. The freeway mainline segment would 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, would 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 would be less than significant and would not be cumulatively considerable.

#### *(ii) 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 would result 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. Therefore, Project impact at this location would be cumulatively considerable.

*(iii) 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 would be less than significant. Furthermore, public transit providers would 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 would not be cumulatively considerable. Therefore, cumulative impacts on public transit would be less than significant.

*(c) Residential Neighborhood Analysis*

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 would be significant and cumulatively considerable.

*(d) Access and Circulation*

The Project would result in less-than-significant impacts related to vehicular access and circulation. Therefore, the Project's impacts to access and circulation would not be cumulatively considerable and would be less than significant.

*(e) 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, would 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 would 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 would be 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 would be less than significant. Thus, the Project would not significantly contribute to a cumulative impact with regard to bicycle, pedestrian, and vehicular safety.

*(f) Parking*

The automobile and bicycle parking demand associated with the Project would 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 vicinity if the Project in combination with the related projects in the Project vicinity would result in a significant loss of parking. The Project in and of itself would not result in a significant impact on parking. Specifically, the Project would exceed the automobile parking requirements set forth in the LAMC for the proposed uses by providing a total of 2,494 parking spaces, exceeding the requirement by 192 parking spaces on-site. In addition, in accordance with SB 743, this impact would not be considered significant. The Project would also meet the bicycle parking requirements of 1,239 parking spaces. In addition, related projects would be subject to City review to ensure that adequate parking be provided for each of the related projects. In conclusion, the Project would not result in a significant contribution with regard to automobile and bicycle parking impacts, and cumulative impacts would be less than significant.

*(g) 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 would result in significant traffic impacts on the evaluated freeway mainline segments. Therefore, it is recognized that the Project would contribute to the future cumulative traffic volumes on Caltrans facilities. As summarized in the supplemental Caltrans analysis, the Project would contribute to the total projected growth on the freeway mainline segments over the next

20 years until year 2035. The Project would 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 would directly reduce mainline impacts to a less-than-significant level. Consequently, it is conservatively concluded that a significant unavoidable cumulative impact on Caltrans facilities would occur.

### c. Project Design Features

**Project Design Feature L-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 worker parking on adjacent residential streets.
- 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 construction-related vehicles' parking on surrounding public streets.
- Safety precautions for pedestrians and bicyclists 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 impacts 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.

## d. Mitigation Measures

### (1) Construction

No specific mitigation measures are proposed with regard to the construction of the Project. However, as described in Project Design Feature L-1 above, the Project would implement a Construction Management Plan subject to the review and approval of LADOT to reduce any potential traffic impacts in the vicinity of the Project during its construction.

### (2) Operation

#### **Mitigation Measure L-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.

LADOT recommends that the TDM Program also include the following:

- 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.

**Mitigation Measure L-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.

**Mitigation Measure L-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.

The following mitigation measure is included to provide for the development of neighborhood traffic management plan(s) to address potential neighborhood intrusion impacts.

**Mitigation Measure L-4: 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.

## **e. Level of Significance After Mitigation**

### **(1) Construction**

Project construction would result in temporary traffic impacts associated with lane closures. However, as described in Project Design Feature L-1, the Project would implement a Construction Management Plan to reduce the traffic impacts during construction. Nevertheless, traffic impacts associated with these proposed lane closures would remain temporarily significant and unavoidable at the following intersections:

- Intersection No. 37: Highland Avenue and Hollywood Boulevard (P.M. peak hour)
- Intersection No. 65: Highland Avenue and Sunset Boulevard (A.M. and P.M. peak hour)

In addition, cumulative impacts associated with lane closures and potential overlap of haul routes from related projects would also be significant and unavoidable. As described previously, 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. Thus, Project impacts and cumulative impacts related to parking during the construction of the Project would be significant. However, construction-related traffic impacts associated impacts to access, safety and transit during construction would be less than significant. Cumulative impacts associated with access, safety and transit would also be less than significant.

### **(2) Operation**

#### *(a) TDM Program (Mitigation Measure L-1)*

Implementation of Mitigation Measure L-1, and its various TDM Program strategies, would have a combined effect that would result in a reduction in 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, an overall TDM trip reduction credit of 15 percent was assumed on the office uses of the Project and a credit of 10 percent was assumed on the residential, hotel, commercial, and supermarket uses of the Project.

The TDM Program is expected to result in a reduction of 1,730 daily trips, including 110 trips during the A.M. peak period and 154 trips during the P.M. peak period. The Project, when built and occupied, and with implementation of the TDM Program, would generate a total of 13,275 daily trips, including 769 trips during the A.M. peak period (317 inbound, 452 outbound) and 1,129 trips during the P.M. peak period (662 inbound, 465 outbound). Therefore, implementation of Mitigation Measure L-2 would reduce Project trips; however, this reduction in trips would still result in significant impacts at five study intersections, as identified below.

The implementation of the TDM program would also further reduce the VMT of the Project by 10 percent. With implementation of the TDM program, traffic generated by the Project would total 126,227 daily VMT, including 7,684 VMT during the A.M. peak hour (3,156 VMT inbound, 4,528 VMT outbound) and 10,739 VMT during the P.M. peak hour (6,513 VMT inbound, 4,226 VMT outbound). Thus, the combined effects of the Project's urban infill location along major corridors, proximity to transit, and proposed TDM program would reduce the Project's anticipated VMT by approximately 65 percent as compared to a comparable mixed-use project in the Hollywood area.

*(b) Transit System Improvements (Mitigation Measure L-2)*

Transit System Improvements described in Mitigation Measure L-2 are focused along the Hollywood Boulevard and Santa Monica Boulevard corridors. With the Project's financial contribution to supplement the current LADOT DASH bus service, approximately 25 vehicle trips could be removed from the street system during the weekday A.M. and P.M. peak hours, assuming a capacity of 30 riders on a LADOT DASH bus with average vehicle occupancy (AVO) of 1.2 persons per vehicle. However, there would still be significant impacts at five study intersections, as identified below.

*(c) TSM Improvements (Mitigation Measure L-3)*

LADOT has determined that TSM improvements proposed under Mitigation Measure L-3 could improve traffic operations and increase intersection capacity by approximately one percent along a corridor. The TSM improvements would target the Franklin Avenue,

Hollywood Boulevard, Sunset Boulevard, Santa Monica Boulevard, and Highland Avenue corridors. However, even with this increase in intersection capacity, significant impacts at five study intersections would still remain, as identified below.

*(d) Intersection Levels of Service*

*(i) Existing with Project with Mitigation*

Implementation of Mitigation Measures L-1 through L-4 would result in peak-hour trip reductions and operational improvements. Under Existing With Project Conditions, and after the implementation of the relevant mitigation measure(s), the significant traffic impact at the following six intersections would be fully reduced to a less-than-significant level:

- Intersection No. 13: Highland Avenue and Franklin Avenue (North) (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. 95: Cahuenga Boulevard and Santa Monica Boulevard (P.M. peak period)
- Intersection No. 96: Vine Street and Santa Monica Boulevard (P.M. peak period)

While the mitigation measures would reduce the Project's impacts at the above intersections to less-than-significant, traffic impacts at the following five study intersections would remain significant and unavoidable after mitigation:

- 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)

*(ii) Future with Project with Mitigation*

Under Future with Project Conditions, and after the implementation of the relevant mitigation measure(s), the significant traffic impact at the following 17 intersections would be 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)

The traffic impacts at the following five study intersections would 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)

*(e) Regional Transportation System*

Based on CMP criteria, impacts to CMP freeway segments and impacts to transit would be less than significant.

Project impacts to the CMP arterial monitoring intersection at Santa Monica Boulevard and Western Avenue would also be less than significant.

With the implementation of Mitigation Measures L-1 through L-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 would be reduced to a less-than-significant level.

*(f) Residential Neighborhood Analysis*

The neighborhood intrusion analysis presented above identified those neighborhoods where residential streets could be impacted as a result of the Project. 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 Mitigation Measure L-4, which would fund and coordinate 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 would remain significant.

*(g) Access and Circulation*

Access and circulation impacts would be less than significant without mitigation.

*(h) Bicycle, Pedestrian, and Vehicular Safety*

Project access impacts related to bicycle, pedestrian, and vehicular safety would be less than significant without mitigation.

*(i) Parking*

In accordance with SB 743, Project-level and cumulative impacts related to automobile and bicycle parking would be less than significant without mitigation.

*(j) Caltrans Facilities Analysis*

The Project Applicant will work with Caltrans to determine an equitable share of a feasible improvement for potential Project impacts, if any. There is the potential that feasible mitigation for any such impacts is not available; therefore, it is conservatively concluded that a cumulative impact on Caltrans facilities would be significant and unavoidable.

## **M.1 Utilities and Service Systems—Water Supply and Infrastructure**

### **a. Analysis of Project Impacts**

#### **(1) Water Supply**

##### *(a) Construction*

Construction activities for the Project would 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. These activities would occur incrementally throughout construction of the Project (from the start of construction to Project buildout). The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed. However, given the temporary nature of construction activities, the short-term and intermittent water use during construction of the Project would be less than the net new water consumption of the Project at buildout. In addition, water use during construction would be offset by the water currently consumed by the existing uses, many of which would be removed as part of the Project. Water for construction activities would be conveyed using the existing water infrastructure at the Project Site. No infrastructure improvements would be needed to provide water during the construction of the Project. Furthermore, as concluded in LADWP's 2015 UWMP, projected water demand for the City would 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 would occur over approximately 48 months and would be completed in 2022. Therefore, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of project construction. As such, construction-related impacts to water supply and infrastructure would be less than significant.

##### *(b) Operation*

It is estimated that the Project would generate an average daily water demand of approximately 413,242 gallons per day (gpd). The Project would implement Project Design Feature M.1-1, which includes implementation of additional water conservation measures beyond those required by the LAMC, as amended by Ordinance No. 184,248. When accounting for water savings due to water conservation measures included as Project Design Features M.1-1 and M.1-2, as well as the existing uses to be removed, the Project would result in a net average daily water demand of approximately 392,454 gpd (439.62 acre-feet per year [AFY]). As concluded in LADWP's 2015 Urban Water Management Plan (UWMP), projected water demands in the City through the year 2040

would 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 would 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 would be less than significant.

## (2) Water Infrastructure

### *(a) Construction*

The existing LADWP water infrastructure would 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 would be required. However, the Project would require 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 would be required to meet applicable City standards. Installation of the new water distribution lines would primarily involve 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 this Draft EIR, a Construction Management Plan would be implemented during construction pursuant to Project Design Feature L-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 would coordinate with LADWP to identify the locations and depths of existing water lines in the Project Site vicinity to avoid disruption of water service.

Overall, construction activities associated with the Project would 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 would be adequate to serve the Project. As such, construction-related impacts to water infrastructure would be less than significant.

*(b) Operation*

Water service to the Project Site would continue to be supplied by LADWP for domestic and fire protection uses. Fire flow to the proposed buildings of the Project would be required to meet City fire flow requirements. Specifically, the Project would 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 this 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 K.2-1, the Project would include 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 would help reduce the public hydrant demands. Installation of the proposed automatic fire sprinklers would be 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 would 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 this Draft EIR, the LADWP water infrastructure would have adequate capacity to serve the Project's fire flow demand and its domestic water demand.

The Project would provide new metered service connections to existing water mainlines, which have the capacity of serve the Project's water demand. These connections would meet all applicable City requirements, and the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site. Therefore, the Project's impacts on water infrastructure during operation would be less than significant.

## **b. Cumulative Impacts**

### **(1) Water Supply**

The 145 related projects located in the project vicinity would 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. In conjunction with the Project's net water demand of 392,454 gpd, the cumulative average water demand would be approximately 5,362,498 gpd.

As previously stated, 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 the City 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 would 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, would 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 would not be cumulatively considerable, and cumulative impacts on water supply would be less than significant.

## (2) Water Infrastructure

The geographic context for the cumulative impact analysis on water infrastructure is the water infrastructure that would serve both the Project and specific related projects. Development of the Project and future new development in the vicinity of the Project Site would cumulatively increase demands on the existing water infrastructure system. However, as with the Project, other new development projects would be subject to LADWP review to assure that the existing public infrastructure would be adequate to meet the domestic and fire water demands of each project, and individual projects would be 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 would serve the Project exceed LAMC requirements, and LADWP would 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 LAFD would conduct on-going evaluations of its infrastructure to ensure facilities are adequate. Therefore, Project impacts on water infrastructure would not be cumulatively considerable, and cumulative impacts on the water infrastructure system would be less than significant.

### **c. Project Design Features**

The following project design features are proposed with regard to water supply and infrastructure:

**Project Design Feature M.1-1:** 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
- High Efficiency Clothes Washers (Residential)—water factor of 13 gallons/load or less
- High Efficiency Dishwasher (Residential)—3.5 gallons/cycle or less
- Domestic Water Heating System located close proximity to point(s) of use
- Tankless and on-demand Water Heaters
- Cooling Tower Conductivity Controllers or Cooling Tower pH Conductivity Controllers
- 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 controller for irrigation

**Project Design Feature M.1-2:** 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.

#### **d. Mitigation Measures**

Project-level and cumulative impacts with regard to water and infrastructure would be less than significant. Therefore, no mitigation measures are required.

#### **e. Level of Significance After Mitigation**

Project-level and cumulative impacts related to water and infrastructure would be less than significant without any mitigation measures.

### **M.2 Utilities and Service Systems—Wastewater**

#### **a. Analysis of Project Impacts**

##### **(1) Construction**

Construction activities for the Project would result in a temporary increase in wastewater generation as a result of on-site construction workers. Wastewater generation would occur incrementally throughout the construction duration of the Project (i.e., up to 2022). However, such use would be temporary and nominal when compared with the wastewater generated by the Project during operation. In addition, construction workers would typically utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater conveyance system. As such, wastewater generation from Project construction activities is not anticipated to 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 would 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 this 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. If a temporary dewatering system is installed, adherence to applicable NPDES Permit and industrial user sewer discharge permit requirements would ensure operation of the temporary system would have a minimal effect on on-site wastewater conveyance infrastructure and treatment plant capacity. Furthermore, Project construction

is not anticipated to generate wastewater flows that would 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 (IRP).

Moreover, construction activities associated with the installation of new or relocated sewer line connections would be confined to trenching in order to place the sewer lines below surface. Such activities would be 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. These activities would be coordinated through City of Los Angeles BOS so as to not interrupt existing service to other users.

Overall, construction activities would result in a negligible and temporary wastewater generation and are not anticipated to have any adverse impact on wastewater conveyance or treatment infrastructure. Therefore, Project construction impacts to the wastewater conveyance or treatment system would be less than significant.

## (2) Operation

### *(a) Wastewater Generation*

The Project would generate a net increase of approximately 261,805 gpd of average daily wastewater flow, based on wastewater generation factors provided by the BOS. In accordance with the wastewater reduction requirements for new non-residential and high-rise residential construction set forth in the LAMC (Chapter IX, Article 9, Section 99.05.303.4 of the LAMC), the Project would be 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 would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Treatment Plant, which has a capacity of 450 million gallons per day (mgd). With current wastewater flow levels at 275 mgd, the remaining available capacity at the Hyperion Treatment Plant is 175 mgd.

The Project would generate a net increase in wastewater flow from the Project Site of approximately 261,805 gpd, or 0.26 mgd, which would represent approximately 0.15 percent of the current 175 mgd remaining available capacity of the Hyperion Treatment Plant. Therefore, the Project-generated wastewater would be accommodated

by the existing capacity of the Hyperion Treatment Plant, and a less-than-significant impact would occur.

Various factors, including future development of new treatment plants, upgrades and improvements to existing treatment capacity, development of new technologies, etc., would ultimately determine the available capacity of the Hyperion Service Area in 2022, the Project's buildout year. While it is anticipated that future IRP updates would provide for improvements beyond 2020 to serve future population needs, it is conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to 2022. Thus, the 2022 effective capacity of the Hyperion Service Area would continue to be approximately 550 mgd, and the capacity of the Hyperion Treatment Plant would continue to be 450 mgd.

The Project's net increase in average daily wastewater generation of 0.26 mgd would represent approximately 0.05 percent of the Hyperion Service Area's assumed future capacity of 550 mgd and approximately 0.06 percent of the Hyperion Treatment Plant's capacity of 450 mgd. The Project's net increase in average daily wastewater generation of 0.26 mgd plus the current flows of approximately 275 mgd to the Hyperion Treatment Plant would represent approximately 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 0.26 mgd plus the current flows of approximately 338.2 mgd to the Hyperion Service Area would represent approximately 62 percent of the Hyperion Service Area's assumed future capacity of 550 million gallons per day. However, as mentioned above, the Project's contribution is only 0.05 percent of this future capacity. Thus, the Project's additional wastewater flows would not substantially or incrementally exceed the future scheduled capacity of any treatment plant. Impacts with respect to wastewater treatment capacity would be less than significant, and mitigation measures are not 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. Specifically, the off-site 30-inch sewer main in Las Palmas Avenue from Selma Avenue to Sunset Boulevard would be removed and replaced with new sewer mains in the following off-site locations: Selma Avenue from Las Palmas Avenue to Cassil Place, Cassil Place from Selma Avenue to Sunset Boulevard, and Sunset Boulevard from Cassil Place to Las Palmas Avenue. Based on the response to the Wastewater Service Information (WWSI) request by the BOS (see Appendix Q of this Draft EIR), the system would be able to handle the increased flow from the Project. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permitting for the Project. All Project-related sanitary sewer connections and on-site infrastructure would

be designed and constructed in accordance with applicable BOS and California Plumbing Code standards.

A Sewer Capacity Availability Request, included in Appendix D of the Utility Infrastructure Report (see Appendix Q of this Draft EIR), was obtained from the 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 following lines would adequately accommodate the additional wastewater infrastructure demand: 12-inch line on Highland Avenue; the 8-inch line on Selma Avenue; the 8-inch line on Sunset Boulevard; the 8-inch sewer main on McCadden Place. Therefore, the Project would not cause a measurable increase in wastewater flows that would constrain a sewer's capacity. Thus, impacts with regards to wastewater generation and infrastructure capacity would be less than significant.

## **b. Cumulative Impacts**

The geographic context for the cumulative impact analysis on wastewater treatment facilities is the Hyperion Service Area. The Project, in conjunction with growth forecasted in the Hyperion Service Area through 2022 (i.e., the Project buildout year), would generate wastewater, potentially resulting in cumulative impacts on wastewater conveyance and treatment facilities. Cumulative growth in the greater Project area through 2022 includes specific known development projects and projected ambient growth.

### **(1) Wastewater Generation**

Development of the Project, in conjunction with the related projects, would result in an increased demand for sanitary sewer service in the BOS' Hyperion Service Area. Assuming that each of the 145 related projects would connect to some or all of the City sewers serving the Project Site, forecasted growth from the related projects would generate an average daily wastewater flow of approximately 4,867,728 gpd or approximately 4.87 mgd. 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.

### **(2) Wastewater Treatment**

Based on the BOS' average flow projections for the Hyperion Service Area, it is anticipated that the average flow in 2022 would be approximately 362.9 mgd. In addition, the Hyperion Service Area's total treatment capacity would be approximately 550 mgd in 2022, which is the same as its existing capacity.

The Project wastewater flow of approximately 0.26 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 would result in a total cumulative wastewater flow of approximately 367.8 mgd. Based on the Hyperion Service Area's estimated future capacity of approximately 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 would represent 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 would not be cumulatively considerable, and cumulative impacts would be less than significant.

### (3) Wastewater Infrastructure

As with the Project, new development projects occurring in the Project vicinity would be required to coordinate with the BOS and request a sewer capacity availability report to determine adequate sewer capacity. In addition, new development projects would 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 would also be subject to payment of the City's Sewerage Facilities Charge, which helps to offset the costs associated with infrastructure improvements that would be 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 would be made and coordinated between the related project and the BOS. Furthermore, similar to the Project, each related project would 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 would not be cumulatively considerable, and cumulative impacts would be less than significant.

## **c. Project Design Features**

The Project would include Project Design Feature M.1-1 designed to minimize water use as set forth in Section IV.M.1, Utilities and Service System—Water Supply and Infrastructure. This Project Design Feature would also apply to the wastewater analysis.

## **d. Mitigation Measures**

Project-level and cumulative impacts with regard to wastewater would be less than significant with compliance with regulatory measures and implementation of Project Design Feature M.1-1. Therefore, no mitigation measures are required.

## e. Level of Significance After Mitigation

Project-level and cumulative impacts related to wastewater would be less than significant without mitigation.

## M.3 Utilities and Service Systems—Solid Waste

### a. Analysis of Project Impacts

#### (1) Construction Impacts

##### (a) *Solid Waste*

##### (i) *Solid Waste Collection Routes*

Project construction would involve demolition and building construction activities that would generate waste (e.g., wood, concrete, asphalt, cardboard, brick, glass, plastic, and metal). The waste would 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 would be hauled by a private construction contractor permitted by the City, the Project would not result in the need for an additional solid waste collection route.

##### (ii) *Solid Waste Recycling and Disposal Facilities*

The existing uses on the Project Site consists of approximately 181,656 gross square feet of built area, including the Crossroads of the World. The Project would retain, preserve, and rehabilitate Crossroads of the World and remove all other existing uses on the Project Site. The Project would remove a total of approximately 131,656 gross square feet of existing uses, consisting of 84 residential units (80 multi-family dwelling units and two duplexes), as well as commercial/retail, restaurant and office uses. Upon buildout, the Project (including existing uses to be retained and/or rehabilitated) would include approximately 1,432,500 square feet of floor area, consisting of 950 residential units (804,000 square feet), 308 hotel rooms (348,500 square feet), approximately 95,000 square feet of office uses, approximately 101,800 square feet of commercial/retail uses, and 83,200 square feet of restaurant uses.

Based on construction and debris rates established by the U.S. Environmental Protection Agency (USEPA), it is anticipated that construction of the Project would generate a total of approximately 18,912 tons of demolition debris and 5,646 tons of construction debris, for a combined total of 24,558 tons of construction-related waste generation. Soil export is not typically included in the calculation of construction waste to

be landfilled, since soil is not disposed of as waste but, rather, is typically used as a cover material.

In accordance with Project Design Feature M.3-3, the Project's construction contractor would be required to implement a construction waste management plan to achieve a minimum 75 percent diversion from landfills. Furthermore, pursuant to LAMC Sections 66.32–66.32.5 (Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a Certified Construction and Demolition Waste Processing Facility. Thus, although the total diversion rate would likely exceed 75 percent, this analysis conservatively assumes a diversion rate of 75 percent. Applying this rate, the Project would dispose of approximately 6,140 tons of construction-related waste in Los Angeles County's inert landfill throughout the construction period. This amount of construction and debris waste would represent approximately 0.01 percent of the Azusa Land Reclamation Landfill's existing remaining disposal capacity of 59.83 million tons. As such, the total amount of construction and demolition waste generated by the Project would represent a fraction of the remaining capacity at the unclassified landfill serving the County. Since the County's unclassified landfill generally does not face capacity shortages, and the County's unclassified landfill would be able to accommodate Project-generated waste, construction of the Project would not result in the need for an additional disposal facility to adequately handle Project-generated construction-related waste. Therefore, construction impacts to solid waste facilities would be less than significant.

*(iii) Consistency with Applicable Regulations*

The Project would provide recycling containers on-site in accordance with City Ordinance No. 171,687, and the Project's construction contractor would 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 would implement the waste reduction measures outlined in Project Design Features M.3-2 and M.3-3. 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 would promote 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 would 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, 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 would 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 would need to be properly handled and disposed. These materials would be taken to the Kettleman Hills Facility for disposal.

In addition, construction activities would 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 would 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 this Draft EIR, would reduce the potential for a Project impact associated with disposal of construction-related hazardous waste to a less-than-significant level.

## (2) Operational Impacts

*(a) Solid Waste Collection Routes*

Operation of the Project would generate municipal solid waste typically associated with residential and commercial developments. This solid waste would 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 would continue to occur along existing solid waste routes of travel. As such, the Project would not result in the need for additional solid waste collection routes to adequately handle Project-generated waste.

*(b) Solid Waste Recycling and Disposal Facilities*

Operation of the new uses on the Project Site would generate solid waste. When accounting for the removal of the existing uses, operation of the Project would result in a net increase of approximately 4,316 tons of solid waste generated on the Project Site annually, or 11 tons per day. Conservatively assuming a minimum diversion rate of approximately 50 percent, the net increase in solid waste disposal associated with the Project would be approximately 2,158 tons per year. This net increase in solid waste

disposal associated with the Project would represent an approximate 0.10 percent increase in the City's annual solid waste disposal quantity based on the 2015 disposal of approximately 2.66 million tons.

Project-generated solid waste would 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. The estimated remaining capacity for County Class III landfills open to the City is approximately 93.47 million tons as of December 31, 2014. Thus, the Project's net increase of 2,158 tons of annual solid waste disposal would represent approximately 0.002 percent of the estimated remaining Class III landfill capacity available to the City. In addition, the Project's net increase of approximately 5.9 tons of daily solid waste would represent between 0.049 and 0.32 percent of the maximum permitted daily intake capacity at the Sunshine Valley City/County Landfill (Maximum Permitted Daily Capacity of 12,100 tons) and Antelope Valley Landfill (Maximum Permitted Daily Capacity of 1,800 tons). As it is not known which landfill would serve the Project Site, the Antelope Valley Landfill and Sunshine Valley City/County Landfill are used to represent the range of available capacities because these landfills have the least and the most remaining daily intake capacity among the County's Class III landfills open to the City.

Thus, based on the existing available capacities of landfills that serve the City, the Project's solid waste disposal demands could be met without the need for additional landfill capacity.

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 would be consistent with and would further City policies that reduce landfill waste streams. Therefore, given the Project's net solid waste generation of 2,158 tons per year, the Project would not result in the need for an additional recycling or disposal facility to adequately handle Project-generated waste.

*(c) Consistency with Applicable Regulations*

In addition to complying with the City's Green Building Ordinance, as applicable, the Project would provide 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 would likely be diverted at a rate greater than the current diversion rate of 76 percent. Therefore, the Project would 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 would be consistent with and would 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 would not conflict with solid waste policies and objectives in the County Integrated Waste Management Plan.

## **b. Cumulative Impacts**

### **(1) 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.

*(a) Solid Waste*

*(i) Solid Waste Collection Routes*

Construction of the Project, in combination with the related projects described in Section III, Environmental Setting, of this Draft EIR, would involve demolition and building construction activities. These activities would generate construction and demolition wastes that would 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 would be hauled by a private construction contractor permitted by the City, the Project and each of the related projects would not result in the need for an

additional solid waste collection route. Therefore, cumulative impacts on solid waste collection routes would be less than significant.

*(ii) Solid Waste Recycling and Disposal Facilities*

Construction of the Project, in conjunction with forecasted growth in the County through 2029 (inclusive of the related projects), would generate construction and demolition waste, resulting in a cumulative increase in the demand for unclassified landfill capacity. The Project would dispose of approximately 6,140 tons of construction and demolition waste in the County's unclassified landfill after accounting for recycling pursuant to Project Design Feature M.3-3. 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 would 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 would be exhausted in 189 years based on the current average disposal rate of 1,215 tons per day. Accordingly, the unclassified landfill would be expected to have sufficient capacity to accommodate cumulative demand. Therefore, cumulative impacts on the unclassified landfill would be less than significant, and no mitigation measures are required.

*(iii) Consistency with Applicable Regulations*

The Project and related projects in the vicinity would provide recycling containers on-site in accordance with City Ordinance No. 171,687. Additionally, the construction contractor for the Project and each related project would 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, would 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 would 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 would 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.

*(b) Hazardous Waste*

As discussed in Section IV.F, Hazards and Hazardous Materials, development of the Project and the related projects would 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 would be demolished to accommodate site redevelopment, suspect materials would 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 this Draft EIR. In addition, soils with concentrations of hazardous substances above acceptable levels may be present, which would need to be properly handled and disposed. These materials would be taken to the Kettleman Hills Facility for disposal, with a projected remaining life of 30-plus years.

Construction activities would 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 would 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 would, therefore, have 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 would reduce the potential for cumulative impacts associated with disposal of construction-related hazardous waste to a less-than-significant level.

**(2) Operation**

*(a) Solid Waste Collection Routes*

Operation of the Project and each of the related projects in the vicinity would generate municipal solid waste typical of residential and commercial developments. Solid waste generated by cumulative development in the area would 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 would continue to occur along existing solid waste routes of travel. As such, the Project and each of the related projects would 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 would be less than significant.

*(b) 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), would 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 2,158 tons of waste per year would represent only 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 would not be cumulatively considerable.

*(c) 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 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 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 would 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 would 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 would not conflict with these regulations but would be consistent with the policies and plans identified above in promoting source reduction and recycling. Thus, cumulative impacts with regard to solid waste would be less than significant, and no mitigation measures are required.

### **c. Project Design Features**

The following Project Design Features are proposed with regard to solid waste:

**Project Design Feature M.3-1:** 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.

**Project Design Feature M.3-2:** Building materials with a minimum of 10 percent recycled-content will be used for the construction of the Project.

**Project Design Feature M.3-3:** 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.

### **d. Mitigation Measures**

Project-level and cumulative impacts with regard to solid waste would be less than significant. Therefore, no mitigation measures are required.

### **e. Level of Significance After Mitigation**

Project-level and cumulative impacts with regard to solid waste would be less than significant without mitigation.

## **M.4 Utilities and Service Systems—Energy**

### **a. Analysis of Project Impacts**

#### **(1) Construction**

During Project construction, energy would be 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 would also consume 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 Study, electricity would be 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 would be 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 is anticipated to be consumed during Project construction. The electricity demand would vary at any given time would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Therefore, the use of electricity during Project construction would not be wasteful, inefficient, or unnecessary.

Construction of the Project's electrical infrastructure would 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 may also require the removal or relocation of overhead electric lines along Las Palmas Avenue between Sunset Boulevard and Selma Avenue, where the street would be realigned. The Project Applicant would be required to coordinate electrical infrastructure removals or relocations with LADWP and comply with site-specific requirements set forth by LADWP, which would ensure 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 is not anticipated to 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, would be within the supply and infrastructure service capabilities of LADWP. Moreover, construction electricity usage would replace the existing electricity usage at the Project Site during construction. Therefore, construction of the Project would 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 would be less than significant.

*(b) Natural Gas*

Construction activities for new buildings and facilities typically do not involve the consumption of natural gas. Accordingly, there would be no demand generated by Project construction. Therefore, construction of the Project would not result in an increase in demand for natural gas so as to affect available supply or distribution infrastructure capabilities and would 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 would 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, it is anticipated that the Project would not require extensive off-site infrastructure improvements to serve the Project Site. Construction impacts associated with the installation of natural gas connections are expected to be confined to trenching in order to place the lines below surface. The Project may also require the removal or relocation of underground gas lines along Las Palmas Avenue between Sunset Boulevard and Selma Avenue, where the street would be re-aligned. However, prior to ground disturbance, Project contractors would 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 would be less than significant.

*(c) Transportation Energy*

During Project construction, on- and off-road vehicles used for transportation would 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 would 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 this 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 M.3-2 would require building materials with a minimum of 10 percent recycled-content to be used for Project construction, while Project Design Feature M.3-3 would require 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 would reduce fuel-related energy consumption. Project construction would not result in the wasteful, inefficient, and unnecessary consumption of transportation-related energy resources.

## (2) Operation

During operation of the Project, energy would be 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 would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. The Project's net new energy demand would 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 would 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 would implement Project Design Features, as further described below. Specifically, these would include Project Design Feature C-1, Project Design Feature C-3, Project Design Feature M.1-1, and Project Design Feature M.1-2.

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 would meet the Project's energy demand. Furthermore, the Project would comply with state energy standards Section 110.10 of Title 24, which includes mandatory requirements for solar-ready buildings, and, as such, would not preclude the potential use of alternate fuels. Therefore, the Project would 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 would 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 would 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 would be able to adequately serve the Project. Therefore, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand. Accordingly, operation of the Project would 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 would be less than significant.

*(b) Natural Gas*

In compliance with applicable 2013 CALGreen requirements, buildout of the Project is projected to generate 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 would implement Project Design Features to further reduce energy use. Specifically, the Project Applicant would implement Project Design Feature C-1, which entails building features for LEED<sup>®</sup> Silver status and, thus, conservation features to reduce natural gas usage. Therefore, the Project would 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 would account 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 would incorporate a variety of energy conservation measures to reduce energy usage and would implement any necessary connections and upgrades required by SoCalGas to ensure that SoCalGas would be able to adequately serve the Project. Therefore, it is anticipated that SoCalGas' existing and planned natural gas supplies would be sufficient to support the Project's net increase in demand for natural gas.

Based on the above, operation of the Project would 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 would be less than significant.

*(c) Transportation Energy*

During operation, Project-related traffic would result 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 would provide employees, residents, and guests with various public transportation opportunities. Pursuant to Mitigation Measure L-1 in Section IV.L, Traffic, Access, and Parking, of this Draft EIR, the Project would include vehicular trip reduction measures as part of a TDM Program. The TDM Program would promote the use of public transportation to reduce vehicle miles traveled (VMT) and would result in a corresponding reduction in the consumption of petroleum-based fuels. Bicycle amenities, such as racks and personal lockers, would be 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 HQTAs, 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 this 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 would 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 would not cause wasteful, inefficient, and unnecessary consumption of petroleum-based fuel during operation. Impacts associated with operational transportation-related energy use would be less than significant.

**(3) Regulatory Consistency**

The Project would comply 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 have been incorporated into the City of Los Angeles Green Building Code.

Furthermore, the Project would be 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 this 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 would offer a mixed-use development along two commercial corridors characterized by a high degree of pedestrian activity. Located in a designated HQTAs, the Project would also provide greater proximity to neighborhood services, jobs, and residences and would 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 would also be consistent with the 2012–2035 RTP/SCS. All of these features would serve to reduce the consumption of electricity, natural gas, and transportation fuel associated with VMT. In addition, the Project would comply with state energy efficiency requirements, would be capable of achieving at least Silver certification under LEED<sup>®</sup>, and would use electricity from LADWP. LADWP has a current renewable energy mix of 20 percent. Furthermore, the Project would be 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 would be less than significant.

## **b. Cumulative Impacts**

### **(1) Electricity**

Buildout of the Project, related projects, and additional forecasted growth in LADWP's service area would 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 would account for approximately 0.05 percent of LADWP's projected sales for the Project's buildout year. Thus, although Project development would result in the use of renewable and non-renewable electricity resources during construction and operation, which could limit future availability, the use of such resources would be on a relatively small scale, would be reduced by measures rendering the Project more energy-efficient, and would be consistent with growth expectations for LADWP's service area. Accordingly, the Project's contribution to cumulative impacts related to electricity consumption would not be cumulatively considerable and, thus, would be less than significant. Furthermore, other future development projects would 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 would 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 would 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 would not be cumulatively considerable and would be less than significant.

## (2) Natural Gas

Buildout of the Project, related projects, and additional forecasted growth in SoCalGas' service area would 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 would account 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 would be relatively small-scaled and reduced by measures rendering the Project more energy-efficient. As the Project would be consistent with regional and local growth expectations for SoCalGas' service area, future development projects would 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 would not be cumulatively considerable and would be 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 would also be anticipated to incorporate site-specific infrastructure improvements. As such, the Project's contribution to cumulative impacts with respect to natural gas infrastructure would not be cumulatively considerable and, thus, would be less than significant.

## (3) Transportation Energy

Buildout of the Project, related projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the state and region. At buildout, the Project would 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 would 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 this 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 would be expected to reduce VMT by implementing design features and encouraging the use of alternative modes of transportation.

Furthermore, the Project would be 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 would also introduce new housing and job opportunities within a HQT, 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 would serve to reduce VMT and associated transportation fuel consumption. Therefore, the Project's contribution to cumulative impacts related to transportation energy consumption would not be cumulatively considerable and, thus, would be less than significant.

### **c. Project Design Features**

The Project would include Project Design Features designed to improve energy efficiency as set forth in Section IV.C, Greenhouse Gas Emissions, Section IV.M.1, Utilities and Service System—Water Supply and Infrastructure, and Section IV.M.3, Utilities and Service System—Solid Waste, of this Draft EIR. Those Project Design Features would also apply to the energy analysis.

#### **d. Mitigation Measures**

Project-level and cumulative impacts with regard to energy use would be less than significant. Therefore, no mitigation measures are required.

#### **e. Level of Significance After Mitigation**

Project-level and cumulative energy impacts would be less than significant.