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Decision Date: June 29, 2018

Last Day to Appeal: July 9, 2018

Shaul Kuba (A/O)
5929 Sunset (Hollywood), LLC
4700 Wilshire Boulevard
Los Angeles, CA 90010

Katherine Casey (R)
Craig Lawson & Co., LLC
3221 Hutchison Avenue, Suite #D
Los Angeles, CA 90034

RE: Vesting Tentative Tract No. 74172
Related Case: CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR
5929-5945 West Sunset Boulevard and 1512-1540 North Gordon Street
Hollywood Community Plan Area
Zone: (T)(Q)C2-2D-SN and (T)(Q)R4-1VL
District Map: 147A191
Council District: 13 – Mitch O'Farrell
CEQA: ENV-2015-1923-EIR
Legal Description: Lots 12-19, Bagnoli Tract No. 2; and Lot FR6 (Arb1), Paul and Angel Reyes Subdivision of the East 5 Acres of the South East ¼ of the North West ½ of Section 11 Township 1 South Range 14 West SBM

The Advisory Agency has reviewed and considered the information contained in the Environmental Impact Report prepared for this project, which includes the Draft Supplemental EIR, No. ENV-2015-1923-EIR (State Clearinghouse No. 2006111135), dated August 24, 2017, and the Final Supplemental EIR, May 25, 2018 (Sunset and Gordon Mixed-Use Project Supplemental EIR), as well as the whole of the administrative record.

CERTIFY the following:

1. The Sunset and Gordon Mixed-Use Project Supplemental EIR has been completed in compliance with the California Environmental Quality Act (CEQA);
2. The Sunset and Gordon Mixed-Use Project Supplemental EIR was presented to the Advisory Agency as a decision-making body of the lead agency; and
3. The Sunset and Gordon Mixed-Use Project Supplemental EIR reflects the

independent judgment and analysis of the lead agency.

ADOPT all of the following:

1. The related and prepared Sunset and Gordon Mixed-Use Project Supplemental EIR Environmental Findings;
2. The Statement of Overriding Considerations; and
3. The Mitigation Monitoring Program prepared for the Sunset and Gordon Mixed-Use Project Supplemental EIR.

In accordance with provisions of Section 17.03 of the Los Angeles Municipal Code (LAMC), the Advisory Agency conditionally approved Vesting Tentative Tract Map No. 74172 composed of **one (1) master lot** and **one (1) airspace lot** (above and below grade), and for the **limited dedication and merger of Gordon Street below-grade** at a width of four feet and depth of 48.33 feet, approximately 0.3 feet below the finished grade of the public sidewalk, located at 5929-5945 West Sunset Boulevard and 1512-1540 North Gordon Street for a 22-story residential development consisting of an 18-floor residential tower above a four-level above-grade podium structure including three levels of subterranean parking and three levels of above-grade parking, and containing a maximum of 299 apartment units, 46,110 square feet of commercial space, and an 18,962-square-foot public park, as shown on revised map stamp-dated June 20, 2018, in the Hollywood Community Plan. (The subdivider is hereby advised that the LAMC may not permit this maximum approved density. Therefore, verification should be obtained from the Department of Building and Safety which will legally interpret the Zoning Code as it applies to this particular property.) The Advisory Agency's approval is subject to the following conditions:

NOTE on clearing conditions: When two or more **agencies** must clear a condition, subdivider should follow the sequence indicated in the condition. For the benefit of the applicant, subdivider shall maintain record of all conditions cleared, including all material supporting clearances and be prepared to present copies of the clearances to each reviewing agency as may be required by its staff at the time of its review.

BUREAU OF ENGINEERING - SPECIFIC CONDITIONS

1. That the existing parking structure area below the public sidewalk along **Gordon Street** 4-foot wide measured from the existing property line and approximately 0.3-foot below finished sidewalk grade and as shown on the revised Vesting Tentative Map stamp dated June 20, 2018 be permitted to be merged with the remainder of the tract map pursuant to Section 66499.20.2 of the State Government Code, and in addition, the following conditions be executed by the applicant and administered by the City Engineer:

    a. That consents to the area being merged and waivers of any damages that may accrue as a result of such mergers be obtained from all property owners who might have certain rights in the area being merged.

b. That satisfactory arrangements be made with all public utility agencies maintaining existing facilities within the area being merged.

2. That a Covenant and Agreement be recorded satisfactory to the City Engineer binding the subdivider and all successors to the following:

   a. That the owners shall be required to maintain all elements of the structure below the rights-of-way (Gordon Street) in a safe and usable condition to the satisfaction of the City Engineer. The City shall be given reasonable access to the structure within and adjacent to the below street rights-of-way area for any necessary inspection, upon request during normal business hours. The City may request the owners to repair or replace damaged, defective or unsafe structural elements or to correct unacceptable conditions at the owner's expense if owner elects not to do so. Owner shall grant reasonable access to City's contractor to make said repairs.

   b. The owner shall be required to limit use and occupancy of the structures below the rights-of-way for **parking use** only. **No combustible material** shall be stored in the merger area.

   c. The owners shall obtain a B-permit from the City Engineer for any substantial structural modification below the street right-of-way area and for any structural modification areas and for any structural element outside said areas which provides lateral or vertical support to structures within the areas.

3. That the subdivider execute and record an agreement satisfactory to the City Engineer to waive any right to make or prosecute any claims or demands against the City for any damage that may occur to the proposed structure underneath the of public right-of-way (Gordon Street) in connection with the use and maintenance operations within said right-of-way.

4. That any surcharge fee in conjunction with the street merger request be paid.

5. That a Certified Survey Plan showing detail below grade information for the structure being merged be submitted for the Final Map check purposes.

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

   a. Plan view at different elevations.

   b. Isometric views.

   c. Elevation views.

   d. Section cuts at all locations where air space lot boundaries change.

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

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

Any questions should be directed to Mr. Georgic Avanesian of the Land Development Section, located at 201 North Figueroa Street, Suite 200, or by calling (213) 202-3484.

DEPARTMENT OF BUILDING AND SAFETY, GRADING DIVISION

9. Per Section 17.56 of the LAMC, each approved Tract Map recorded with the County Recorder shall contain the following statement: "The approval of this Tract Map shall not be construed as having been based upon geological investigation such as will authorize the issuance of building permits on the subject property. Such permits will be issued only at such time as the Department of Building and Safety has received such topographic maps and geological reports as it deems necessary to justify the issuance of such building permits."

10. The applicant shall comply with any requirements with the Department of Building and Safety, Grading Division for recordation of the final map and issuance of any permit.

DEPARTMENT OF BUILDING AND SAFETY, ZONING DIVISION

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

    a. Provide a copy of CPC case CPC-2015-1922-GPA-ZC-HD-CUB-SPP-SPR. Show compliance with all the conditions/requirements of the CPC case as applicable.

    b. Provide a copy of affidavit AFF-6193, AFF-12591, AFF-45853, and AFF-45997. Show compliance with all the conditions/requirements of the above affidavits as applicable. Termination of above affidavits may be required after the Map has been recorded. Obtain approval from the Department, on the termination form, prior to recording.

    c. Zone Change must be recorded prior to obtaining Zoning clearance.

    d. Comply with applicable (T) and (Q) conditions.

e. Show all street dedication(s) as required by Bureau of Engineering and provide net lot area after all dedication. "Area" requirements shall be re-checked as per net lot area after street dedication.

f. Obtain Bureau of Engineering approval for the proposed street mergers.

g. Record a Covenant and Agreement to treat the buildings and structures located in an Air Space Subdivision as if they were within a single lot.

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

The Proposed project site is within the Regional Center Commercial Area.

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

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

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

DEPARTMENT OF TRANSPORTATION

12. That prior to recordation of the final map, satisfactory arrangements shall be made with the Department of Transportation to assure:

a. A minimum of 60-foot reservoir space be provided between any security gate(s) and the property line or to the satisfaction of the Department of Transportation.

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

c. A parking area and driveway plan be submitted to the Citywide Planning

Coordination Section of the Department of Transportation for approval prior to issuance of building permits by the Department of Building and Safety. Transportation approvals are conducted at 201 N. Figueroa St., Room 550. For an appointment, call (213) 482-7024.

d. That a fee in the amount of $205 be paid for the Department of Transportation as required per Ordinance No. 180,542 and LAMC Section 19.15 prior to recordation of the final map. Note: the applicant may be required to comply with any other applicable fees per this new ordinance.

FIRE DEPARTMENT

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

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

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

c. One or more Knox Boxes will be required to be installed for LAFD access to project - location and number to be determined by LAFD Field inspector. (Refer to FPB Req # 75).

d. 505.1 Address identification. New and existing buildings shall have approved building identification placed in a position that is plainly legible and visible from the street or road fronting the property.

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

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

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

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

i. 2014 CITY OF LOS ANGELES FIRE CODE, SECTION 503.1.4

(EXCEPTION)

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

ii. It is the intent of this policy that in no case will the maximum travel distance exceed 150 feet inside the structure and 150 feet outside the structure. The term "horizontal travel" refers to the actual path of travel to be taken by a person responding to an emergency in the building.

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

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

k. Building designs for multi-storied residential buildings shall incorporate at least one access stairwell off the main lobby of the building; But, in no case greater than 150ft horizontal travel distance from the edge of the public street, private street or Fire Lane. This stairwell shall extend onto the roof.

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

m. Any required Fire Annunciator panel or Fire Control Room shall be located within 20ft visual line of site of the main entrance stairwell or to the satisfaction of the Fire Department.

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

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

p. Electric Gates approved by the Fire Department shall be tested by the Fire

Department prior to Building and Safety granting a Certificate of Occupancy.

q. All public street and fire lane cul-de-sacs shall have the curbs painted red and/or be posted "No Parking at Any Time" prior to the issuance of a Certificate of Occupancy or Temporary Certificate of Occupancy for any structures adjacent to the cul-de-sac.

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

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

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

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

v. Adequate off-site public and on-site private fire hydrants may be required. Their number and location to be determined after the Fire Department's review of the plot plan.

w. The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

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

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

z. 5101.1 Emergency responder radio coverage in new buildings. All new buildings shall have approved radio coverage for emergency responders

within the building based upon the existing coverage levels of the public safety communication systems of the jurisdiction at the exterior of the building. This section shall not require improvement of the existing public safety communication systems.

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

bb. Recently, the Los Angeles Fire Department (LAFD) modified Fire Prevention Bureau (FPB) Requirement 10. Helicopter landing facilities are still required on all High-Rise buildings in the City. However, FPB's Requirement 10 has been revised to provide two new alternatives to a full FAA-approved helicopter landing facilities.

cc. Each standpipe in a new high-rise building shall be provided with two remotely located FDC's for each zone in compliance with NFPA 14-2013, Section 7.12.2.

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

DEPARTMENT OF WATER AND POWER

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

BUREAU OF STREET LIGHTING – SPECIFIC CONDITIONS

15. Street Lighting clearance for this Street Light Maintenance Assessment District condition is conducted at 1149 S. Broadway Suite 200. Street Lighting improvement condition clearance will be conducted at the Bureau of Engineering District office, see condition S-3. (c).

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

BUREAU OF SANITATION

16. Wastewater Collection Systems Division of the Bureau of Sanitation has inspected the sewer/storm drain lines serving the subject tract and found no/or potential problems to their structure or potential maintenance problem, as stated in the memo dated June 4, 2018. Upon compliance with its conditions and requirements, the Bureau of Sanitation, Wastewater Collection Systems Division will forward the necessary clearances to the Bureau of Engineering. (This condition shall be deemed cleared at the time the City Engineer clears Condition No. S-1. (d).)

DEPARTMENT OF RECREATION AND PARKS

17. That the Quimby fee be based on the C2 Zone.

INFORMATION TECHNOLOGY AGENCY

18. To assure that cable television facilities will be installed in the same manner as other required improvements, please email cabletv.ita@lacity.org that provides an automated response with the instructions on how to obtain the Cable TV clearance. The automated response also provides the email address of three people in case the applicant/owner has any additional questions.

DEPARTMENT OF CITY PLANNING – SITE SPECIFIC CONDITIONS

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

    a. Limit the proposed development to a maximum of 299 residential units and 46,110 square feet of commercial floor area.

    b. Parking shall be provided pursuant to LAMC Sections 12.21 A.4 and 12.22 A.25 and/or as modified by Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR. The final tract map shall show the required number of parking spaces pursuant to LAMC Sections 12.21 A.4 and 12.22 A.25 and/or modified by Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR.

c. The applicant shall install an air filtration system(s) to reduce the effects of diminished air quality on occupants of the project.

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

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

f. INDEMNIFICATION AND REIMBURSEMENT OF LITIGATION COSTS.

Applicant shall do all of the following:

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

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

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

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

(v) If the City determines it necessary to protect the City's interest,

execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

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

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

For purposes of this condition, the following definitions apply:

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

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

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

20. That prior to the issuance of the building permit or the recordation of the final map, a copy of Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR shall be submitted to the satisfaction of the Advisory Agency. In the event that Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR is not approved, the subdivider shall submit a tract modification.

21. Prior to the recordation of the final map, the owner shall execute a covenant to the satisfaction of the Los Angeles Housing and Community Investment Department (HCIDLA) to make the number of affordable housing units approved by Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR available for rental solely to Very Low Income households at a rental price determined to be affordable to Very Low Income households by HCIDLA, for a period of 55 years. Said units shall be comparable in size, number of bedrooms, distribution, and amenities to the non-income-restricted units in the development.

DEPARTMENT OF CITY PLANNING - ENVIRONMENTAL MITIGATION MEASURES

22. Prior to recordation of the final map, the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770 and Exhibit CP-6770.M), in a manner satisfactory to the Planning Department requiring the subdivider to identify (a) mitigation monitor(s) who shall provide periodic status reports on the implementation of mitigation items required by Mitigation **Condition No. 23 and 26** of the Tract's approval satisfactory to the Advisory Agency. The mitigation monitor(s) shall be identified as to their areas of responsibility, and phase of intervention (pre-construction, construction, post construction/ maintenance) to ensure continued implementation of the above mentioned mitigation items.

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

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

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

The City of Los Angeles is the Lead Agency for the project and therefore is responsible for administering and implementing the MMP. Where appropriate, the project's Draft and Final EIRs identified mitigation measures and project design features to avoid or to mitigate potential impacts identified to a level where no significant impact on the environment would occur, or impacts would be reduced to the extent feasible. The MMP is designed to monitor implementation of the project's mitigation measures as well as its project design features. Each required mitigation measure and proposed project design feature for the project is listed and categorized by impact area, with an accompanying identification of the following:

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

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

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

After review and approval of the final MMP by the City, minor changes and modifications to the MMP are permitted, but can only be made by the applicant subject to the approval by the City. The City, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed changes or modification. The flexibility is necessary due to the nature of the MMP, the need to protect the environment in the most efficient manner, and the need to reflect changes in regulatory conditions, such as but not limited to changes to building code requirements. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the City.

24. **Mitigation Monitor (Construction).** During the construction phase and prior to the issuance of building permits, the applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant),

approved by the Department of City Planning, who shall be responsible for monitoring implementation of project design features and mitigation measures during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

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

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

Aesthetics Views/Light and Glare

Mitigation Measures

MM A.1-1: If any street tree removals are required for the Modified Project's additional construction activities, the street trees to be removed shall be replaced on a 2:1 replacement ratio in compliance with the City of Los Angeles Department of Public Works' Bureau of Street Services, Urban Forestry Division's policies.

Enforcement Agency: City of Los Angeles Department of Public Works and Los Angeles Department of Building and Safety
Monitoring Agency: City of Los Angeles Department of Public Works and Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing
Action Indicating Compliance: None – ongoing construction compliance required

MM A.1-2: Construction equipment, debris, and stockpiled equipment shall be enclosed within a fenced or visually screened area to effectively block the line of sight from the ground level of neighboring properties. Such barricades or enclosures shall be maintained in appearance throughout the construction period. Graffiti shall be removed immediately upon discovery.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing
Action Indicating Compliance: None – ongoing construction compliance required

Certified EIR MM IV.A-3.1: The proposed park shall be actively operated and maintained for the life of the Modified Project by the Applicant or designated non-profit organization with the experience and ability to maintain the park in accordance with the public health and safety standards employed by the Department of Parks and Recreation.

Enforcement Agency: City of Los Angeles Department of City Planning and City of Los Angeles Department of Recreation and Parks
Monitoring Agency: City of Los Angeles Department of City Planning and City of Los Angeles Department of Recreation and Parks
Monitoring Phase: Operation
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.A-4.1: The Modified Project shall include low-level directional lighting at ground, podium, and tower levels of the exterior of the proposed structures to ensure that architectural, parking and security lighting does not spill onto adjacent residential properties, nor is visible from above.

Enforcement Agency: City of Los Angeles Department of City Planning and Los Angeles Department of Building and Safety
Monitoring Agency: City of Los Angeles Department of City Planning and Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.A-4.2: The Modified Project's façades and windows shall be constructed with non-reflective materials such that glare impacts on surrounding residential properties and roadways are minimized.

Enforcement Agency: City of Los Angeles Department of City Planning and Los Angeles Department of Building and Safety
Monitoring Agency: City of Los Angeles Department of City Planning and Los Angeles Department of Building and Safety
Monitoring Phase: Pre-Construction, Site Plan Review, Operation
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Air Quality

Mitigation Measures

Certified EIR MM IV.B-1: All construction-related work orders shall specify that any clearing, grading, earth moving, or excavation activities shall be performed pursuant to the requirements under SCAQMD Rule 403.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Pre-Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Geology and Soils

Mitigation Measures

Certified EIR MM IV.C-2.1: The Modified Project shall be designed and constructed in accordance with the recommendations provided in the CRA Approved Project's Geotechnical Report, the Modified Project's Geotechnical Report, and the Modified Project's Structural Narrative or as they may be amended by request of the City.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Pre-Construction, Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.C-2.2: The Modified Project Applicant shall ensure geotechnical testing and observation be conducted on-site by a state certified geotechnical engineer during any excavation and earthwork activities to ensure that recommendations provided in the CRA Approved Project's Geotechnical Report and the Modified Project's Geotechnical Report are implemented where applicable or as they may be amended by request of the City.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.C-5: Appropriate erosion control and drainage devices shall be incorporated, such as interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code. Outlets of culverts, conduits or channels shall be protected from erosion by

discharge velocities by installing rock outlet protection. (Rock outlet protection is physical devise composed of rock, grouted riprap, or concrete rubble placed at the outlet of a pipe.) Sediment traps shall be installed below the pipe-outlet. Outlet protection shall be inspected, repaired, and maintained after each significant rain.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Greenhouse Gases

Project Design Features

PDF D-1: To encourage carpooling and the use of electric vehicles by Modified Project residents and visitors, at least 20% of the Code required parking spaces shall be constructed to accommodate the future placement of facilities for the recharging of electric vehicle (electric vehicle supply equipment (EVSE)) with five (5) percent of these stalls being equipped with the electrical vehicle charging stations. Plans shall 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 electric vehicle charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating ampacity. Only raceways and related components are required to be installed at the time of construction. When the application of the 20% results in a fractional space, the required number of spaces would be rounded up to the next whole number. A label stating "EVCAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Pre-Construction
Monitoring Frequency: Once during plan check
Action Indicating Compliance: Issuance of building permit

Noise

Mitigation Measures

MM F-1.1: Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

MM F-1.2: The Modified Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

MM F-1.3: The construction contractor for the Modified Project's additional construction activities shall use on-site electrical sources or solar generators to power equipment rather than diesel or gasoline generators where feasible.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

MM F-1.4: The Modified Project's contractor shall retain the services of a qualified noise consultant to monitor noise at the Modified Project's property line when the Modified Project's additional construction activities and Related Project 46's (located at 5901 Sunset Boulevard) construction activities occur concurrently. If the measured noise levels during concurrent construction exceed the existing ambient noise levels by 4.9 dBA at the Modified Project's property line, the Modified Project's contractor shall evaluate and employ alternative construction methods to ensure that the Modified Project's additional construction activities shall not exceed the existing ambient noise levels by 5 dBA at the Modified Project's property line.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

MM F-1.5: The Modified Project's contractor shall retain the services of a qualified vibration consultant to monitor vibration at the Modified Project's property line closest to Sensitive Receptor No. 9 (i.e., 1527 – 1533 ¾ Bronson Street) when the Modified Project's additional construction activities and Related

Project 46's (located at 5901 Sunset Boulevard) construction activities occur concurrently. If the measured vibration levels during concurrent construction exceed0.035 PPV (in./sec.) at the Modified Project's property line closest to Sensitive Receptor No. 9, the Modified Project's contractor shall halt groundborne vibration-generating construction activities and evaluate and employ alternative construction methods to ensure that vibration at the Modified Project's property line closest to Sensitive Receptor No. 9 (i.e., 1527 – 1533 ¾ Bronson Street) does not exceed 0.04 PPV (in./sec.).

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

MM F-1.6: Prior to the issuance of building permits for the development of the Modified Project, the Applicant shall provide proof satisfactory to the City Department of Public Works or Department of Building and Safety, as applicable, that all related construction contractors have been required in writing to comply with the City Noise Ordinance, and prior to the development of the Modified Project, the Applicant shall design a Construction Noise Mitigation Plan to minimize the construction-related noise impacts to off-site noise- sensitive receptors. The intent of the Construction Noise Management Plan is to provide the contractor with measures to reduce noise impacts by at least 10 dBA through implementation of the following:

- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously.
- The Modified Project contractor shall use power construction equipment with state- of-the-art noise shielding and muffling devices.
- The construction contractor for the Modified Project's additional construction activities shall use on-site electrical sources or solar generators to power equipment rather than diesel or gasoline generators where feasible.
- All construction equipment engines shall be properly tuned and muffled according to manufacturers' specifications.
- Noise construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers or temporary sound barrier) shall be used to screen such activities from these land uses to the maximum extent possible and the unnecessary idling of such construction activities shall be prohibited.

- To the maximum extent feasible, the use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized.
- If noise levels from construction activity are found to exceed 75 dBA at the property line of an adjacent property and construction equipment is left stationary and continuously operating for more than one day, a temporary noise barrier, shall be erected between the noise source and receptor.
- An information sign shall be posted at each entrance to the construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any reasonable complaints shall be rectified within 24 hours of their receipt.

Enforcement Agency: Los Angeles Department of Building and Safety and City of Los Angeles Department of Public Works
Monitoring Agency: Los Angeles Department of Building and Safety and City of Los Angeles Department of Public Works
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM F-1.1: All construction equipment engines shall be properly tuned and muffled according to manufacturers' specifications.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM F-1.2: Noise construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen such activities from these land uses to the maximum extent possible.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM F-1.3: To the maximum extent feasible, the use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM F-1.4: If noise levels from construction activity are found to exceed 75 dBA at the property line of and adjacent property and construction equipment is left stationary and continuously operating for more than one day, a temporary noise barrier shall be erected between the noise source and receptor.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM F-1.5: An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any reasonable complaints shall be rectified within 24 hours of their receipt.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.F-3: All exterior windows within the Modified Project shall be constructed with double-pane glass and use exterior wall construction which provides a Sound Transmission Class of 50 or greater as defined in UBC No. 35-1, 1979 edition or any amendment thereto. The applicant, as an alternative, may retain an acoustical engineer to submit evidence, along with the application for a building permit, any alternative means of sound insulation sufficient to mitigate interior noise levels below a CNEL of 45 dBA in any habitable room.

Enforcement Agency: Los Angeles Department of Building and Safety and City of Los Angeles Department of City Planning
Monitoring Agency: Los Angeles Department of Building and Safety and City of Los Angeles Department of City Planning
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.F-5.1: The air inlets of HVAC units installed at the project site shall be oriented to the east away from the residential neighborhood to the west of the site.

Enforcement Agency: Los Angeles Department of Building and Safety and City of Los Angeles Department of City Planning
Monitoring Agency: Los Angeles Department of Building and Safety and City of Los Angeles Department of City Planning
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.F-5.2: Concrete, not metal, shall be used for construction of parking ramps. The interior ramps shall be textured to prevent tire squeal at turning areas.

Enforcement Agency: Los Angeles Department of Building and Safety and City of Los Angeles Department of City Planning
Monitoring Agency: Los Angeles Department of Building and Safety and City of Los Angeles Department of City Planning
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Land Use Planning

Project Design Feature

PDF IV-H-1: The Modified Project shall install air filtration systems in compliance with the minimum MERV filtration rating requirements of ZI. No. 2427 and Clean UP Green Up Ordinance (Ord. No. 184,245), as applicable to the Modified Project's proposed land uses and regularly occupied areas.

Enforcement Agency: Los Angeles Department of Building and Safety and City of Los Angeles Department of City Planning
Monitoring Agency: Los Angeles Department of Building and Safety and City of Los Angeles Department of City Planning
Monitoring Phase: Pre-Construction
Monitoring Frequency: Once prior to issuance of building permit, Once prior to issuance of Final Certificate of Occupancy
Action Indicating Compliance: Issuance of building permit, Field inspection sign-off

Mitigation Measures

Certified EIR MM IV.B-1: All construction-related work orders shall specify that any clearing, grading, earth moving, or excavation activities shall be performed pursuant to the requirements under SCAQMD Rule 403.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Pre-Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM F-1.1: All construction equipment engines shall be properly tuned and muffled according to manufacturers' specifications.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM F-1.2: Noise construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen such activities from these land uses to the maximum extent possible.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM F-1.3: To the maximum extent feasible, the use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM F-1.4: If noise levels from construction activity are found to exceed 75 dBA at the property line of and adjacent property and construction equipment is left stationary and continuously operating for more than one day, a temporary noise barrier shall be erected between the noise source and receptor.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM F-1.5: An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any reasonable complaints shall be rectified within 24 hours of their receipt.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

MM F-1.1: Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

MM F-1.2: The Modified Project contractor shall use power construction equipment with state-of- the-art noise shielding and muffling devices.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

MM F-1.3: The construction contractor for the Modified Project's additional construction activities shall use on-site electrical sources or solar generators to power equipment rather than diesel or gasoline generators where feasible.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

MM F-1.4: The Modified Project's contractor shall retain the services of a qualified noise consultant to monitor noise at the Modified Project's property line when the Modified Project's additional construction activities and Related Project 46's (located at 5901 Sunset Boulevard) construction activities occur concurrently. If the measured noise levels during concurrent construction exceed the existing ambient noise levels by 4.9 dBA at the Modified Project's property line, the Modified Project's contractor shall evaluate and employ alternative construction methods to ensure that the Modified Project's additional construction activities shall not exceed the existing ambient noise levels by 5 dBA at the Modified Project's property line.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

MM F-1.5: The Modified Project's contractor shall retain the services of a qualified vibration consultant to monitor vibration at the Modified Project's property line closest to Sensitive Receptor No. 9 (i.e., 1527 – 1533 ¾ Bronson Street) when the Modified Project's additional construction activities and Related Project 46's (located at 5901 Sunset Boulevard) construction activities occur concurrently. If the measured vibration levels during concurrent construction exceed 0.035 PPV (in./sec.) at the Modified Project's property line closest to Sensitive Receptor No. 9, the Modified Project's contractor shall halt groundborne vibration-generating construction activities and evaluate and employ alternative construction methods to ensure that vibration at the Modified Project's property line closest to Sensitive Receptor No. 9 (i.e., 1527 – 1533 ¾ Bronson Street) does not exceed 0.04 PPV (in./sec.).

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

MM F-1.6: Prior to the issuance of building permits for the development of the Modified Project, the Applicant shall provide proof satisfactory to the City Department of Public Works or Department of Building and Safety, as applicable, that all related construction contractors have been required in writing to comply with the City Noise Ordinance, and prior to the development of the Modified Project, the Applicant shall design a Construction Noise Mitigation Plan to minimize the construction-related noise impacts to off-site noise- sensitive receptors. The intent of the Construction Noise Management Plan is to provide

the contractor with measures to reduce noise impacts by at least 10 dBA through implementation of the following:

- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously.
- The Modified Project contractor shall use power construction equipment with state- of-the-art noise shielding and muffling devices.
- The construction contractor for the Modified Project's additional construction activities shall use on-site electrical sources or solar generators to power equipment rather than diesel or gasoline generators where feasible.
- All construction equipment engines shall be properly tuned and muffled according to manufacturers' specifications.
- Noise construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers or temporary sound barrier) shall be used to screen such activities from these land uses to the maximum extent possible and the unnecessary idling of such construction activities shall be prohibited.
- To the maximum extent feasible, the use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized.
- If noise levels from construction activity are found to exceed 75 dBA at the property line of and adjacent property and construction equipment is left stationary and continuously operating for more than one day, a temporary noise barrier, shall be erected between the noise source and receptor.
- An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any reasonable complaints shall be rectified within 24 hours of their receipt.

Enforcement Agency: Los Angeles Department of Building and Safety and City of Los Angeles Department of Public Works
Monitoring Agency: Los Angeles Department of Building and Safety and City of Los Angeles Department of Public Works
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Parking

Mitigation Measures

Certified EIR MM IV.K.1-2: If it is necessary for the Applicant to obtain a haul route permit for the Modified Project's additional construction activities, prior to the issuance of a grading permit, the Applicant shall record and execute a Covenant and Agreement (Planning Department General Form CP-6770), binding the Applicant to the following haul route conditions:

i. All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors to the extent feasible.
ii. Hours of operation shall be from 9:00 A.M. to 4:00 P.M.
iii. Days of the week shall be Monday through Saturday. No hauling activities are permitted on Sundays or Holidays.
iv. Trucks shall be restricted to 18-wheel trucks or smaller.
v. The Traffic Bureau of the Los Angeles Police Department shall be notified prior to the start of hauling (213.485.3106).
vi. Streets shall be cleaned of spilled materials at the termination of each work day.
vii. The final approved haul routes and all the conditions of approval shall be available on the job site at all times.
viii. The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
ix. Hauling and grading equipment shall be kept in good operating condition and muffled as required by law.
x. All loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
xi. All trucks are to be watered only when necessary at the job site to prevent excessive blowing dirt.
xii. All trucks are to be cleaned of loose earth at the job site to prevent spilling. Any material spilled on the public street shall be removed by the contractor.
xiii. The applicant shall be in conformance with the State of California, Department of Transportation policy regarding movements of reducible loads.
xiv. All regulations set forth in the State of California Department of Motor Vehicles pertaining to the hauling of earth shall be complied with.
xv. "Truck Crossing" warning signs shall be placed 300 feet in advance of the exit in each direction.
xvi. One flag person(s) shall be required at the job site to assist the trucks in and out of the Project area. Flag person(s) and warning signs shall be in compliance with Part II of the 1985 Edition of "Work Area Traffic Control Handbook."
xvii. The City of Los Angeles, Department of Transportation, telephone 213.485.2298, shall be notified 72 hours prior to beginning operations in

order to have temporary "No Parking" signs posted along the route.

xviii. Any desire to change the prescribed routes must be approved by the concerned governmental agencies by contacting the Street Use Inspection Division at (213) 485- 3711 before the change takes place.

xix. The permittee shall notify the Street Use Inspection Division, at (213) 485-3711, at least 72 hours prior to the beginning of hauling operations and shall also notify the Division immediately upon completion of hauling operations.

xx. A surety bond by Contractor shall be posted in an amount satisfactory to the City Engineer for maintenance of haul route streets. The forms for the bond will be issued by the Valley District Engineering Office, 6262 Van Nuys Boulevard, Suite 251, Van Nuys, CA 91401. Further information regarding the bond may be obtained by calling 818.374.5090; or the West Los Angeles District Engineering Office, 1828 Sawtelle Boulevard, 3rd Floor, Los Angeles, CA 90025. Further information regarding the bond may be obtained by calling 310.575.8388; or by the Central District Engineering Office, 201 N. Figueroa Street, Room 770, Los Angeles, CA 90012. Further information regarding the bond may be obtained by calling 213.977.6039; or by the Harbor District Engineering Office, 638 S. Beacon Street, 4th Floor, San Pedro, CA 90731. Further information regarding the bond may be obtained by calling 310.732.4677.

Enforcement Agency: LADOT and Los Angeles Department of Building and Safety
Monitoring Agency: LADOT and Los Angeles Department of Building and Safety
Monitoring Phase: Pre-Construction, Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.K.2-1: In order to mitigate potential parking impacts from construction workers the Project shall, prior to commencing construction, develop a Construction Parking Plan requiring construction workers to park off-street and not use on-street parking spaces. The Project contractor shall develop a temporary off-street parking plan to ensure a sufficient supply of off-street spaces is provided for the construction workers.

Enforcement Agency: LADOT
Monitoring Agency: LADOT
Monitoring Phase: Pre-Construction, Construction Monitoring
Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.H-7: The Applicant shall procure all necessary entitlements and land use approvals from the City of Los Angeles Department of City

Planning, including but not limited to the various discretionary actions as listed above in Section 3, Item B of Section IV.H. Land Use Planning in the Draft Supplemental EIR.

Enforcement Agency: Los Angeles Department of Building and Safety and City of Los Angeles Department of City Planning
Monitoring Agency: Los Angeles Department of Building and Safety and City of Los Angeles Department of City Planning
Monitoring Phase: Pre-Construction
Monitoring Frequency: Once prior to issuance of building permit, Once prior to issuance of Final Certificate of Occupancy
Action Indicating Compliance: Issuance of building permit, Issuance of Final Certificate of Occupancy

Solid Waste

Mitigation Measures

Certified EIR MM IV.H-4-1: The Applicant shall develop a construction and demolition debris recycling program to divert construction related solid waste and demolition debris from area landfills.

Enforcement Agency: Los Angeles Department of Building and Safety and Bureau of Sanitation
Monitoring Agency: Los Angeles Department of Building and Safety and Bureau of Sanitation
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.H-4-2: The Applicant shall develop an operational project recycling plan that includes the design and allocation of recycling collection and storage space in the project. As a result of the City's space allocation ordinance, the Los Angeles Municipal Code (LAMC) includes provisions for recycling areas or rooms in all new development projects.

Enforcement Agency: Los Angeles Department of Building and Safety and Bureau of Sanitation
Monitoring Agency: Los Angeles Department of Building and Safety and Bureau of Sanitation
Monitoring Phase: Operational
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Issuance of Final Certificate of Occupancy

Public Services

Police Services

Mitigation Measures

MM IV.J.1-1.1: During construction, the Modified Project shall include the following measures:

i. A Construction Traffic Control/Management Plan shall be submitted to LADOT for review and approval.
ii. The bulk of the work shall be conducted on site. If temporary lane closures are necessary, Street Services approval shall be obtained and closures shall be limited to non-peak commute hours from 9:00 AM to 3:00 PM.
iii. Existing access for the site shall be maintained for construction access.
iv. Deliveries of construction material shall be coordinated to non-peak travel periods, to the extent possible.
v. Construction workers shall be prohibited from parking on adjacent streets and construction workers shall be directed to park on-site.

Enforcement Agency: LADOT
Monitoring Agency: LADOT
Monitoring Phase: Pre-Construction, Construction
Monitoring Frequency: Once at plan check; Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.J.1-1.1: The Applicant shall erect temporary fencing suitable to prevent trespassers from entering the project site during construction activities to secure the project site and discourage trespassers.

Enforcement Agency: Los Angeles Department of Building and Safety and LAPD
Monitoring Agency: Los Angeles Department of Building and Safety and LAPD
Monitoring Phase: Pre-Construction, Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.J.1-1.2: The Applicant shall employ security guards to monitor and secure the project site after hours during the construction process to secure the site and deter any potential criminal activity.

Enforcement Agency: Los Angeles Department of Building and Safety and LAPD
Monitoring Agency: Los Angeles Department of Building and Safety and LAPD
Monitoring Phase: Pre-Construction, Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.J.1-2.1: In order to mitigate the potential temporary and short-term traffic impacts of any necessary lane and/or sidewalk closures during the construction period, the Project shall, prior to construction, develop a Construction Traffic Control/Management Plan to be approved by LADOT to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project. The Plan should include temporary roadway striping and signage for traffic flow as necessary, as well the identification and signage of alternative pedestrian routes in the immediate vicinity of the project if necessary.

Enforcement Agency: LADOT
Monitoring Agency: LADOT
Monitoring Phase: Pre-Construction, Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.J.1-3.1: The proposed security plan shall incorporate low-level and directional security lighting features to effectively illuminate project entryways, seating areas, lobbies, elevators, locker rooms, service areas, and parking areas with good illumination and minimum dead space to eliminate areas of concealment. Full cut-off fixtures shall be installed that minimize glare from the light source and provide light downward and inward to structures to maximize visibility.

Enforcement Agency: Los Angeles Department of Building and Safety and LAPD
Monitoring Agency: Los Angeles Department of Building and Safety and LAPD
Monitoring Phase: Operation
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Issuance of Final Certificate of Occupancy

Certified EIR MM IV.J.1-3.2: The Applicant shall develop and implement a Security Plan in consultation with the LAPD, outlining the security services and features to be provided in conjunction with the Modified Project. The plan shall be coordinated with the LAPD and a copy of said plan shall be filed with the LAPD

West Bureau Commanding Officer. Said security plan may include some or all of the following components:

i. Provisions for on-site private security personnel for the commercial and residential areas. Through individual lease agreements for the proposed retail/commercial uses and property management services for the residential uses, private on-site security services shall be provided. Security officers shall be responsible for patrolling all common areas including the back service corridors and alleys, parking garages, and stairwells. All security officers shall patrol the grounds primarily by foot; however, bike patrol may be implemented in the parking garages and on the surrounding roadways.
ii. The parking garages shall be designed to cordon off residential and commercial serving parking areas to provide increased security for residents of the Modified Project. Both residential and commercial parking areas shall be fitted with emergency features such as closed circuit television (CCTV) or emergency call boxes that will provide a direct connection with the on-site security force or the LAPD 911 emergency response system.

Enforcement Agency: Los Angeles Department of Building and Safety and LAPD
Monitoring Agency: Los Angeles Department of Building and Safety and LAPD
Monitoring Phase: Operation
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Issuance of Final Certificate of Occupancy

Fire Protection

Project Design Features

PDF IV.J-1: Good housekeeping procedures would be implemented during the additional construction required for the Modified Project and would include: the maintenance of mechanical equipment in good operating condition; careful storage of flammable materials in appropriate containers; and the immediate and complete cleanup of spills of flammable materials when they occur.

Enforcement Agency: Los Angeles Department of Building and Safety and LAFD
Monitoring Agency: Los Angeles Department of Building and Safety and LAFD
Monitoring Phase: Pre-Construction, Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Schools

Mitigation Measures

Certified EIR MM IV.J.3-1.1: School Bus Access

- Prior to construction, contact the LAUSD Transportation Branch at (323) 342- 1400 regarding potential impact to school bus routes.
- Maintain unrestricted access for school buses during construction.
- Comply with Provisions of the California Vehicle Code by requiring construction vehicles to stop when encountering school buses using red flashing lights.

Enforcement Agency: Los Angeles Department of Building and Safety and LAFD
Monitoring Agency: LAFD
Monitoring Phase: Pre-Construction, Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.J-3.1.2: School Pedestrian/Traffic Safety Access

- Not endanger passenger safety or delay student drop-off or pickup due to changes in traffic patterns, lane adjustments, altered bus stops, or traffic lights.
- Maintain safe and convenient pedestrian routes to LAUSD schools (LAUSD will provide School Pedestrian Route Maps upon your request).
- Maintain ongoing communication with school administration at affected schools, providing sufficient notice to forewarn students and parents/guardians when existing pedestrian and vehicle routes to school may be impacted.
- Not haul past affected school sites, except when school is not in session. If that is infeasible, not haul during school arrival and dismissal times.
- Not staging or parking of construction-related vehicles, including worker-transport vehicles, adjacent to school sites.
- Provide crossing guards when safety of students may be compromised by construction-related activities at impacted school crossings.
- Install barriers and/or fencing to secure construction equipment and site to prevent trespassing, vandalism, and attractive nuisances.
- Provide security patrols to minimize trespassing, vandalism, and short-cut attractions.

Enforcement Agency: Los Angeles Unified School District and Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Unified School District and Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Traffic/Transportation

Project Design Features

PDF K.1-2: The Modified Project shall improve the intersections of Gower Street and Sunset Boulevard (North, South, East and West Legs) and Bronson Street and Sunset Boulevard (North, South, East and West Legs) with Continental Crosswalks.

Enforcement Agency: LADOT and City of Los Angeles Department of City Planning
Monitoring Agency: LADOT and City of Los Angeles Department of City Planning
Monitoring Phase: Pre-Construction, Construction
Monitoring Frequency: Once at plan check, Once prior to issuance of Final Certificate of Occupancy
Action Indicating Compliance: Plan approval and issuance of building permits, Issuance of Final Certificate of Occupancy

PDF K.1-3 The Applicant shall contact Los Angeles County Metropolitan Transportation Authority (LACMTA) Bus Operations Control Special Events Coordinator at 213-922-4632 regarding construction activities that may impact LACMTA bus lines at least 30 days in advance of initiating the Modified Project's additional construction activities. For closures that last more than six months, LACMTA's Stops and Zones Department will also need to be notified at 213-922-5188, 30 days in advance of initiating the Modified Project's additional construction activities. Other municipal bus operators may also be impacted and should be included in construction outreach efforts.

Enforcement Agency: Los Angeles County Metropolitan Transportation Authority
Monitoring Agency: Los Angeles County Metropolitan Transportation Authority
Monitoring Phase: Pre-Construction
Monitoring Frequency: Once at plan check
Action Indicating Compliance: Issuance of building permit

Mitigation Measures

MM K.1-1: Gower Street & Sunset Boulevard. The Modified Project shall improve the Gower Street & Sunset Boulevard intersection to provide an operational northbound right turn lane by improving the northbound approach from a left turn lane and shared through/ right turn lane to a left turn lane, through lane and operational right turn lane. Because this improvement requires the relocation of an existing passenger loading zone southerly on Gower Street south of Sunset Boulevard and removal of two to three metered parking spaces, the Modified Project shall set aside up to 3 spaces for public parking to replace these parking spaces on-site. Additionally, the Modified Project shall install additional system detector loops along the west side of Gower Street.

Enforcement Agency: LADOT and City of Los Angeles Department of City Planning
Monitoring Agency: LADOT and City of Los Angeles Department of City Planning
Monitoring Phase: Pre-Construction, Construction
Monitoring Frequency: Once at plan check, Once prior to issuance of Final Certificate of Occupancy
Action Indicating Compliance: Plan approval and issuance of building permits, Issuance of Final Certificate of Occupancy

MM K.1-2: Bronson Avenue & Sunset Boulevard. The Modified Project shall improve the Bronson Avenue and Sunset Boulevard intersection to provide an operational southbound right turn lane by improving the southbound approach from a left turn lane and shared through/ right turn lane to a left turn lane, through lane and an operational right turn lane. Because this improvement requires the removal of up to 4 parking spaces on the west side of Bronson Avenue north of Sunset Boulevard, the Modified Project shall set aside 4 spaces for public parking to replace these parking spaces on-site. Additionally, the Modified Project shall install additional system detector loops along the west side of Bronson Avenue.

Enforcement Agency: LADOT and City of Los Angeles Department of City Planning
Monitoring Agency: LADOT and City of Los Angeles Department of City Planning
Monitoring Phase: Pre-Construction, Construction
Monitoring Frequency: Once at plan check, Once prior to issuance of Final Certificate of Occupancy
Action Indicating Compliance: Plan approval and issuance of building permits, Issuance of Final Certificate of Occupancy

MM K.1-3: The Modified Project shall implement a Transportation Demand Management (TDM) Plan, consistent with the recommendations of LADOT that would achieve a least a 10% reduction in the Modified Project's P.M. Peak Hour trips. While multiple methods of compliance may be available for certain

measures, the final TDM Plan shall be reviewed and approved by LADOT prior to the certificate of occupancy for the Modified Project to ensure that the TDM Plan will provide at minimum a 10% reduction in the Modified Project's P.M. Peak Hour trips. Potential measures that could achieve a 10% reduction in the Modified Project's P.M. Peak Hour trips include the following elements:

i. Establish an on-site Transportation Management Office (TMO) as part of the management office to assist residents and employees in finding alternate travel modes and strategies.
ii. Provide a visible on-site kiosk with options for ridesharing, bus routes, bike routes in a prominent area(s) in view for residents, employees and patrons of the commercial components;
iii. Provide car sharing service for residents and employees;
iv. Encourage alternative work arrangements for residents and employees;
v. Improve the existing bus stop on the north side of Sunset Boulevard, east of Gordon Street;
vi. Provide transit pass reductions of at least 25% for residents and employees;
vii. Provide carpool and vanpool matching and preferential parking for carpools/vanpools that register with the TMO;
viii. Provide secure bicycle facilities and bicycle sharing service for residents and employees;
ix. Provide transit and ridesharing incentives such as points or coupons for merchandise;
x. Provide guaranteed rides home for employees that use alternative modes of transportation or rideshare in the event of an emergency;
xi. Provide unbundled parking for residents; and
xii. Encourage office tenants to establish workplace parking for employees (i.e. charging employees of office tenants for some or all of their parking costs) or to establish an employee parking cash-out program.

Enforcement Agency: LADOT
Monitoring Agency: LADOT
Monitoring Phase: Pre-Construction, Construction
Monitoring Frequency: Once prior to issuance of Final Certificate of Occupancy
Action Indicating Compliance: Issuance of Final Certificate of Occupancy

Certified EIR MM IV.K.1-2 If it is necessary for the Applicant to obtain a haul route permit for the Modified Project's additional construction activities, prior to the issuance of a grading permit, the Applicant shall record and execute a Covenant and Agreement (Planning Department General Form CP-6770), binding the Applicant to the following haul route conditions:

i. All construction truck traffic shall be restricted to truck routes approved by

the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors to the extent feasible.

ii. Hours of operation shall be from 9:00 A.M. to 4:00 P.M.

iii. Days of the week shall be Monday through Saturday. No hauling activities are permitted on Sundays or Holidays.

iv. Trucks shall be restricted to 18-wheel trucks or smaller.

v. The Traffic Bureau of the Los Angeles Police Department shall be notified prior to the start of hauling (213.485.3106).

vi. Streets shall be cleaned of spilled materials at the termination of each work day.

vii. The final approved haul routes and all the conditions of approval shall be available on the job site at all times.

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

ix. Hauling and grading equipment shall be kept in good operating condition and muffled as required by law.

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

xi. All trucks are to be watered only when necessary at the job site to prevent excessive blowing dirt.

xii. All trucks are to be cleaned of loose earth at the job site to prevent spilling. Any material spilled on the public street shall be removed by the contractor.

xiii. The applicant shall be in conformance with the State of California, Department of Transportation policy regarding movements of reducible loads.

xiv. All regulations set forth in the State of California Department of Motor Vehicles pertaining to the hauling of earth shall be complied with.

xv. "Truck Crossing" warning signs shall be placed 300 feet in advance of the exit in each direction.

xvi. One flag person(s) shall be required at the job site to assist the trucks in and out of the Project area. Flag person(s) and warning signs shall be in compliance with Part II of the 1985 Edition of "Work Area Traffic Control Handbook."

xvii. The City of Los Angeles, Department of Transportation, telephone 213.485.2298, shall be notified 72 hours prior to beginning operations in order to have temporary "No Parking" signs posted along the route.

xviii. Any desire to change the prescribed routes must be approved by the concerned governmental agencies by contacting the Street Use Inspection Division at (213) 485- 3711 before the change takes place.

xix. The permittee shall notify the Street Use Inspection Division, at (213) 485-3711, at least 72 hours prior to the beginning of hauling operations and shall also notify the Division immediately upon completion of hauling operations.

xx. A surety bond by Contractor shall be posted in an amount satisfactory to

the City Engineer for maintenance of haul route streets. The forms for the bond will be issued by the Valley District Engineering Office, 6262 Van Nuys Boulevard, Suite 251, Van Nuys, CA 91401. Further information regarding the bond may be obtained by calling 818.374.5090; or the West Los Angeles District Engineering Office, 1828 Sawtelle Boulevard, 3rd Floor, Los Angeles, CA 90025. Further information regarding the bond may be obtained by calling 310.575.8388; or by the Central District Engineering Office, 201 N. Figueroa Street, Room 770, Los Angeles, CA 90012. Further information regarding the bond may be obtained by calling 213.977.6039; or by the Harbor District Engineering Office, 638 S. Beacon Street, 4th Floor, San Pedro, CA 90731. Further information regarding the bond may be obtained by calling 310.732.4677.

Enforcement Agency: LADOT and Los Angeles Department of Building and Safety
Monitoring Agency: LADOT and Los Angeles Department of Building and Safety
Monitoring Phase: Pre-Construction, Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.K.2-1: In order to mitigate potential parking impacts from construction workers the Project shall, prior to commencing construction, develop a Construction Parking Plan requiring construction workers to park off-street and not use on-street parking spaces. The Project contractor shall develop a temporary off-street parking plan to ensure a sufficient supply of off-street spaces is provided for the construction workers.

Enforcement Agency: LADOT
Monitoring Agency: LADOT
Monitoring Phase: Pre-Construction, Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Hazardous Materials/Risk of Upset

Mitigation Measures

Certified EIR MM IV.D-1: Implementation of the Code-Required Measures IV.D-1.1 and IV.D-1.2, would ensure potential impacts related to the release of hazardous materials resulting from the potential release of asbestos containing materials and lead-based paint during construction would be mitigated to less than significant levels. No additional mitigation measures are required.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Pre-Construction, Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Issuance of demolition permit, Field inspection sign-off

Certified EIR MM IV.D-2: Implementation of the Code-Required Measures IV.D-1.1 and IV.D-1.2, would ensure potential impacts related to the potential release of hazardous materials from the routine transport, use, or disposal of potentially hazardous materials would be mitigated to less than significant levels.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Pre-Construction, Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Issuance of demolition permit, Field inspection sign-off

Certified EIR MM IV.D-3.1: The Modified Project shall maintain appropriate fire and police access to the project site during the construction process.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.D-3.2: To the maximum extent feasible, the Modified Project shall schedule all construction-related deliveries and haul trips to occur outside peak traffic hours.

Enforcement Agency: Los Angeles Department of Building and Safety
Monitoring Agency: Los Angeles Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.D-5: The Applicant shall prepare and submit an emergency response plan for approval by the City of Los Angeles Planning Department and the City of Los Angeles Fire Department. The emergency response plans shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments.

Enforcement Agency: Los Angeles Department of Building and Safety, LAFD, and City of Los Angeles Department of City Planning
Monitoring Agency: Los Angeles Department of Building and Safety and LAFD, City of Los Angeles Department of City Planning
Monitoring Phase: Pre-Construction
Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

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

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

- Locate the sign in a conspicuous place on the subject site or structure (if developed) so that it can be easily read by the public. The sign must be sturdily attached to a wooden post if it will be free-standing.

- Regardless of who posts the site, it is always the responsibility of the applicant to assure that the notice is firmly attached, legible, and remains in that condition throughout the entire construction period.

- If the case involves more than one street frontage, post a sign on each street frontage involved. If a site exceeds five (5) acres in size, a separate notice of posting will be required for each five (5) acres, or portion thereof. Each sign must be posted in a prominent location.

BUREAU OF ENGINEERING - STANDARD CONDITIONS

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

(b) That survey boundary monuments be established in the field in a manner satisfactory to the City Engineer and located within the California Coordinate System prior to recordation of the final map. Any alternative

measure approved by the City Engineer would require prior submission of complete field notes in support of the boundary survey.

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

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

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

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

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

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

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

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

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

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

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

(a) Survey monuments shall be placed and permanently referenced to the satisfaction of the City Engineer. A set of approved field notes shall be

furnished, or such work shall be suitably guaranteed, except where the setting of boundary monuments requires that other procedures be followed.

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

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

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

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

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

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

(b) Construct any necessary drainage facilities.

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

i. No street lighting improvements if no street widening per BOE improvement conditions. Otherwise, relocate and upgrade street lights:

1. two (2) on Gordon Street; and
2. three (3) on Sunset Boulevard.

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

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

(d) Plant street trees and remove any existing trees within dedicated streets or proposed dedicated streets as required by the Street Tree Division of the Bureau of Street Maintenance. All street tree plantings shall be brought up to current standards. When the City has previously been paid for tree planting, the subdivider or contractor shall notify the Urban Forestry Division ((213) 847-3077) upon completion of construction to expedite tree planting.

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

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

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

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

NOTES:

The Advisory Agency approval is the maximum number of units permitted under the tract action. However the existing or proposed zoning may not permit this number of units. This vesting map does not constitute approval of any variations from the Los Angeles Municipal Code (LAMC), unless approved specifically for this project under separate conditions.

Any removal of the existing street trees shall require Board of Public Works approval.

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

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

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

The subdivider should consult the Department of Water and Power to obtain energy saving design features which can be incorporated into the final building plans for the subject development. As part of the Total Energy Management Program of the

Department of Water and Power, this no-cost consultation service will be provided to the subdivider upon his request.

FINDINGS OF FACT (CEQA)

I. Introduction

The Supplemental Environmental Impact Report ("Supplemental EIR"), consisting of the Draft Supplemental EIR and Final Supplemental EIR, was prepared in accordance with the California Environmental Quality Act ("CEQA"), and the City of Los Angeles L.A. CEQA Thresholds Guide (2006) (ENV-2015-1923-EIR, State Clearinghouse Number: 2006111135). The Supplemental EIR is an informational document for public agency decision-makers and the general public regarding the objectives and components of the project. The project site is located at the northeast corner of the intersection of Sunset Boulevard and Gordon Street in the Hollywood Community Plan area in the City of Los Angeles. The project addresses include 5929-5945 W. Sunset Boulevard / 1512 – 1540 N. Gordon Street. The project site is currently improved with a vacant 22-story, approximately 250-foot high mixed use building of approximately 319,562 square feet of floor area, and a closed approximately 18,962 square-foot public park.

On October 18, 2007, the Community Redevelopment Agency of the City of Los Angeles ("CRA"), acting as the lead agency, certified the Environmental Impact Report ("Certified EIR") and adopted findings and a statement of overriding considerations for the Sunset and Gordon Mixed-Use Project ("CRA Approved Project"). The Certified EIR analyzed the demolition of existing uses on the project site and the development of an approximately 324,432 square-foot mixed use project including: 311 multi-family residences, approximately 53,500 square feet of commercial space consisting of 40,000 square feet of creative office space and 13,500 square feet of retail floor area (including 8,500 square feet of restaurant uses), approximately 508 parking spaces, a 21,177 square-foot public park on the north side of the project site along Gordon Street, and two supergraphic signs. The CRA Approved Project included a 23-story structure (260 feet high above grade) with an 18-floor residential tower above a five-level above-grade podium structure with three to four levels of subterranean parking.

5929 Sunset (Hollywood), LLC (the "Applicant") proposes to modify the CRA Approved Project to allow for the development of a 299 residential apartment units, including 284 market rate units and 15 affordable housing units at the "Very Low" income level (5 percent of total units), approximately 46,110 square feet of commercial space comprised of approximately 38,440 square feet of office space, approximately 3,700 square feet of ground floor restaurant space and approximately 3,970 square feet of ground floor community serving retail space (including up to a 1,475 square foot coffee shop), an approximately 18,962 square-foot public park, and one supergraphic sign (the "Modified Project"). In total, the Modified Project will contain approximately 324,693 square feet of floor area.

II. Environmental Documentation Background

Serving as Lead Agency, the Los Angeles Department of City Planning ("Planning Department") reviewed the Initial Study prepared for the Modified Project and determined that the project required a supplemental EIR. CEQA (California Public Resources Code §21000 *et seq.*) requires lead agencies to prepare supplemental EIRs when one or more of the following events occur: "(a) [s]ubstantial changes are proposed in the project which will require major revisions of the environmental impact report. (b) [s]ubstantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report. (c) [n]ew information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available" (CEQA § 21166.) Likewise, the CEQA Guidelines (California Code of Regulations (CCR) § 15000 *et seq.*) provide that a lead agency may prepare a supplemental EIR if "[o]nly minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation." (CEQA Guidelines, § 15163(a)(2).) Here, the Lead Agency determined that a supplemental EIR is warranted because only minor additions or changes to the CRA Approved Project are necessary to make the Certified EIR adequately apply to the Modified Project.

In compliance with CEQA Section 21080.4 and Section 15082 of the CEQA Guidelines, a Notice of Preparation ("NOP") was prepared by the Planning Department and distributed for public comment to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on October 15, 2015. The NOP was circulated for a 30-day review period starting on October 15, 2015 and ending on November 16, 2015. The purpose of the NOP was to formally inform the public that the City was preparing a Draft Supplemental EIR for the Modified Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft Supplemental EIR. The Initial Study attached to the NOP identified those environmental topics for which the proposed Modified Project could have adverse environmental effects and concluded that a supplemental EIR would need to be prepared to document these effects. A copy of the NOP and Initial Study and the NOP comment letters are included in Appendix A and B of the Draft Supplemental EIR and Appendix B of the Final Supplemental EIR. The City held a public scoping meeting on October 29, 2015, to present the proposed Modified Project and to solicit input from interested individuals regarding environmental issues that should be addressed in the Draft Supplemental EIR.

The Draft Supplemental EIR, including analyses of environmental issues raised during the public scoping process, was submitted to the State Clearinghouse, Office of Planning and Research, and circulated for a 46-day public review from August 24, 2017 to October 9, 2017. The Draft Supplemental EIR evaluated in detail the potential environmental effects of the proposed Modified Project. It also analyzed the effects of a reasonable range of alternatives including potential effects of a "No Project" alternative. Following the close of the public review period, written responses were prepared to the comments received on the Draft Supplemental EIR. The comments on the Draft Supplemental EIR and the responses to those comments are included within the Final Supplemental EIR.

The City released a Final Supplemental EIR for the Modified Project on May 25, 2018, which is hereby incorporated by reference in full. The Final Supplemental EIR is intended to serve as an informational document for public agency decision-makers and the general public regarding objectives and components of the Modified Project. The Final Supplemental EIR addresses the environmental effects associated with implementation of the Modified Project, identifies feasible mitigation measures and alternatives that may be adopted to reduce or eliminate these impacts, and includes written responses to all comments received on the Draft Supplemental EIR during the public review period. Responses were sent to all public agencies that made comments on the Draft Supplemental EIR at least 10 days prior to certification of the Final Supplemental EIR pursuant to CEQA Guidelines Section 15088(b). In addition, all individuals that commented on the Draft Supplemental EIR also received a copy of the Final Supplemental EIR. The Final Supplemental EIR was also made available for review on the Planning Department website. Copies of the Final Supplemental EIR were also made available at three libraries and the Planning Department. Notices regarding availability of the Final Supplemental EIR and the Notice of Public Hearing were sent to those within a 500-foot radius of the project site, as well as individuals who commented on the Draft Supplemental EIR, attended the NOP scoping meeting, or provided comments during the NOP comment period.

A duly noticed joint public hearing for the Modified Project was held by the Deputy Advisory Agency (DAA) and Hearing Officer on behalf of the City Planning Commission on June 20, 2018.

At the duly noticed joint public hearing, the DAA approved the No Automated Steel Parking Structure Alternative, which is identified as the Environmentally Superior Alternative in the Supplemental EIR. The No Automated Steel Parking Structure Alternative requires the adoption of an ordinance to reduce the clear space required at structural elements in the Modified Project's parking structure and to allow up to 66 percent of the Modified Project's parking stalls to be compact parking stalls.

The documents and other materials that constitute the record of proceedings on which the City's CEQA findings are based are located at the Planning Department, 200 North Main Street, Room 621, Los Angeles, California 90012. This information is provided in compliance with CEQA Section 21081.6(a)(2).

III. Findings required to be made by Lead Agency under CEQA

Section 21081 of CEQA and Section 15091 of the CEQA Guidelines require a public agency, prior to approving a project, to identify significant impacts of the project and make one or more of three possible findings for each of the significant impacts. The possible findings are:

- "Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (CEQA Guidelines, § 15091, subd. (a)(1))

- "Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency." (CEQA Guidelines, § 15091, subd. (a)(2))

- "Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR." (CEQA Guidelines, § 15091, subd. (a)(3))

The findings reported in the following pages incorporate the facts and discussions of the environmental impacts that are found to be significant or potentially significant in the Final Supplemental EIR for the Modified Project as fully set forth therein. Although Section 15091 of the CEQA Guidelines does not require findings to address environmental impacts that an EIR identifies as merely "potentially significant," these findings will nevertheless fully account for all such effects identified in the Final Supplemental EIR for the purpose of better understanding the full environmental scope of the proposed Modified Project. For each of the significant impacts associated with the Modified Project, either before or after mitigation, the following sections are provided:

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

Project Design Features – Identified project design features or actions that are included as part of the proposed Modified Project (numbering of the Project Design Features corresponds to the Mitigation Monitoring Program, which is included as Section IV of the Final Supplemental EIR).

Mitigation Measures – Identified Mitigation Measures or actions that are required as part of the Modified Project (numbering of the Mitigation Measures corresponds to the Mitigation Monitoring Program, which is included as Section IV of the Final Supplemental EIR).

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

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

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

IV. Description of the Proposed Modified Project

A. Project Overview

On October 18, 2007, the CRA certified the Certified EIR and adopted findings and a statement of overriding considerations for the Sunset and Gordon Mixed-Use Project.

The Certified EIR analyzed the demolition of existing uses on the project site and the development of an approximately 324,432 square-foot mixed use project including: 311 multi-family residences, approximately 53,500 square feet of commercial space consisting of 40,000 square feet of creative office space and 13,500 square feet of retail floor area (including 8,500 square feet of restaurant uses), approximately 508 parking spaces, a 21,177 square-foot public park on the north side of the project site along Gordon Street, and two supergraphic signs. The project analyzed in the Certified EIR included a 23-story structure (260 feet high above grade) with an 18-floor residential tower above a five-level above-grade podium structure with three to four levels of subterranean parking.

The Certified EIR explained that the applicant was exploring options to retain and restore the exterior façade and various interior treatments of the Old Spaghetti Factory building at 5939 Sunset Boulevard Building ("OSF Building") to memorialize the social significance of the building as it relates to the development of the Hollywood area. The Certified EIR further explained the proposal as a partial structural treatment plan to retain and incorporate a portion of the OSF Building as a prominent design element at the corner of Sunset Boulevard and Gordon Street. The Certified EIR explained that since none of the buildings located on the project site were deemed historically or culturally significant, demolition and/or remodel of these structures would not significantly impact any historic or cultural resource.

On October 18, 2007, the CRA adopted Resolution No. 7094 that certified that the Final EIR was completed in compliance with CEQA and the CEQA Guidelines, that the information contained in the Final EIR and the Erratum to the Final EIR had been reviewed and considered by the Commissioners of the CRA prior to considering the proposed project, and that the Final EIR and the Erratum to the Final EIR reflected the independent judgment and analysis of the CRA. On December 14, 2007, the CRA subsequently adopted Resolution No. 7095 approving CEQA findings for the approval of the project, a statement of overriding considerations, and a mitigation monitoring and reporting program. The CRA's actions were subsequently approved by the Los Angeles City Council. The project as analyzed in the Certified EIR is referred to as the "CRA Approved Project."

The Applicant proposes to modify the CRA Approved Project to allow for the development of the Modified Project which would contain 299 residential apartment units, including 284 market rate units and 15 affordable housing units at the "Very Low" income level (5 percent of total units), approximately 46,110 square feet of commercial space comprised of approximately 38,440 square feet of office space, approximately 3,700 square feet of ground floor restaurant space and approximately 3,970 square feet of ground floor community serving retail space (including up to a 1,475 square-foot coffee shop), an approximately 18,962 square-foot public park, and one supergraphic sign. In total, the Modified Project will contain approximately 324,693 square feet of floor area.

The Modified Project will include a 22-story structure consisting of an 18-floor residential tower above a four-level above-grade podium structure. The Modified Project's podium

structure will have three levels below grade and three levels above-grade parking and a new automated steel parking structure that is proposed to be located above the parking area on Level L3 (within the approximate height of Level L4 of the rest of the podium structure), which would include two floors of automated parking. The Modified Project will provide 353 residential parking spaces and 75 commercial parking spaces (for a total of 428 parking spaces). As an alternative related to parking, the Applicant may seek approval of an ordinance to reduce the clear space required at structural elements in the Modified Project's parking structure and to allow up to 66 percent of the Modified Project's parking stalls to be compact parking stalls to increase the available on-site parking supply to benefit the surrounding community in this area of Hollywood. Under this alternative, the Modified Project would provide approximately 508 parking spaces within the Modified Project's parking structure, which would have three levels below grade, three levels above-grade parking, and the new automated steel parking structure.

As compared to the CRA Approved Project, instead of possibly retaining and incorporating a portion of the OSF Building, the Modified Project would demolish the OSF Building and incorporate a replica of its façade in approximately the same position and dimensions of the demolished building. The replica of the façade would recreate the design elements of the OSF Building within the original footprint of the OSF Building, which includes two symmetrical wings embracing a wide centrally located opening supported by six massive Tuscan columns, as well as the façade's overall Spanish Colonial Revival style. Externally, the replica of the OSF Building façade would have the same height, size, and color as the OSF Building. The interior of the replica of the OSF Building façade would incorporate many of the same elements (height, size, and color). The interior space would also incorporate four of the building's original wood trusses and the fireplace mantle. Additionally, the windows and doors of the replica of the OSF Building would be designed to resemble the style of the OSF Building. The Modified Project's replica of the building façade is consistent with the Certified EIR's description of the option to not retain and/or restore the building façade, but instead to memorialize the social significance of this building as it relates to the development of the Hollywood area.

B. Project Location and Surrounding Uses

The project site is located at the northeast corner of the intersection of Sunset Boulevard and Gordon Street in the Hollywood Redevelopment Project and the Hollywood Community Plan Area in the City of Los Angeles. The project site is bounded by multi-family residential land uses to the north, Gordon Street to the west, Sunset Boulevard to the south, surface parking and multi-family residential land uses to the east. On a regional level, the project site is located approximately 0.25 miles west of the Hollywood Freeway (US-101), 3.8 miles south of the 134 Freeway, 4.5 miles northwest of the Harbor Freeway (SR 110), and 4.25 miles north of the Santa Monica Freeway (I-10). Locally, the project site is accessible via Sunset Boulevard and Gordon Street

The project site encompasses approximately 1.65 acres (72,154 sf) of total surface area and includes Lots 12, 13, 14, 15, and 16 of the Bagnoli Tract No. 2 (Assessor Parcel

No. (APN) 5545-009-035), the west 50 feet of Lot 6 of the Paul and Angel Reyes Subdivision (APN 5545-009-031), and Lots 17, 18, and 19 of the Bagnoli Tract No. 2 (APNs 5545-009-005, 5545-009-006, 5545-009-007).

Multiple public transportation opportunities are provided in the vicinity of the project site. Public transportation in the surrounding area is provided by Metropolitan Transit Authority (Metro) and the City of Los Angeles Department of Transportation Dash service (DASH), subway Metro Rail, and Metro Express.

C. Project Background

On October 18, 2007, the CRA, acting as the lead agency under CEQA, certified the EIR for the CRA Approved Project and adopted findings and a statement of overriding considerations. In September 2008 the City of Los Angeles approved the land use entitlements for the Sunset and Gordon Mixed-Use Project. As part of the approvals, the Los Angeles City Council, acting as the responsible agency under CEQA, considered the information contained in the Certified EIR pursuant to CEQA Guidelines section 15096 and adopted findings and a statement of overriding considerations in accordance with CEQA section 21081. Due to litigation challenging the City's entitlements, and a downturn in the national economy, the project was not immediately constructed. The original owner/developer went into bankruptcy and the property was taken over by a receiver. In August of 2011, the Applicant purchased the property from the receiver. The Applicant then undertook steps to move forward with development within the scope of the City's September 2008 approvals.

Since 2008, there have been ongoing lawsuits and appeals challenging the City's approvals. On March 20, 2009, the Los Angeles County Superior Court denied a petition for writ of mandate seeking to invalidate the City's approvals (*La Mirada Avenue Neighborhood Association of Hollywood v. City of Los Angeles*, BS 116355, Statement of Decision, pp. 2, 6). This decision was appealed and on September 22, 2010, the Court of Appeal of the State of California, Second Appellate District, upheld the Los Angeles County Superior Court's decision (*La Mirada Avenue Neighborhood Association of Hollywood v. City of Los Angeles*, B217060, Statement of Decision, p. 12). Since the City's September 2008 approvals were upheld, the Applicant was able to move forward with construction.

Between January and July 2012, the Los Angeles Department of Building and Safety issued demolition and building permits for construction including permits authorizing the demolition of the OSF Building and the construction of a replica of the OSF Building façade in approximately the same position and dimensions of the demolished building. Construction commenced in July 2012 and was substantially completed in September 2014.

After the City's issuance of the demolition and building permits, the demolition and building permits were challenged through the City's administrative appeal process and in court. In October 2014, the Los Angeles County Superior Court issued a final order that any permit issued in violation of Ordinance No. 180,094, establishing the project's

(Q) Conditions and "D" Development Conditions, and Los Angeles Municipal Code ("LAMC") Section 12.29 is void under LAMC Section 11.02. (*La Mirada Avenue Neighborhood Association of Hollywood v. City of Los Angeles*, BS 137262, Final Order, p. 17.) With respect to the OSF Building, the Los Angeles County Superior Court stated that "the City violated the conditions of approval by issuing a demolition permit for the entire OSF building." (*Id.* p. 18.) On September 9, 2015, the Court of Appeal of the State of California, Second Appellate District upheld the Los Angeles County Superior Court order. (*La Mirada Avenue Neighborhood Association of Hollywood v. City of Los Angeles,* B259672.) As a result of the Court's order, the Applicant seeks to re-entitle the completed building and public park so that all necessary permits can be considered for issuance by the City. To re-entitle this development, the Applicant is proposing certain modifications to the CRA Approved Project to allow for the development of the Modified Project, which would include the demolition of the OSF Building and construction of a replica of the OSF Building façade in approximately the same position and dimensions of the demolished building.

D. Existing Land Use and Zoning Designations

The project site is located within the Hollywood Community planning area. Prior to the City's September 2008 land use entitlements, the project site was located in two land use designations pursuant to the 1988 Hollywood Community Plan and two zoning designations. These consisted of a Highway Oriented Commercial land use designation and C4-1-SN zoning designation for all properties fronting on Sunset Boulevard, and a High Medium Density Residential land use designation and [Q]R4-1VL zoning designation for all properties fronting along Gordon Street.

The City's September 2008 land use entitlements resulted in new land use and zoning designations on the project site. The project site's current land use and zoning designations are: (1) Regional Center Commercial and (T)(Q)C2-2D-SN for all properties fronting on Sunset Boulevard and two parcels fronting Gordon Street; and (2) High Medium Density Residential and (T)(Q)R4-1VL for the remaining properties fronting along Gordon Street.

E. Current Site Conditions

The project site is currently improved with a vacant 22-story, approximately 250-foot high mixed use building of approximately 319,562 square feet of floor area, and a closed approximately 18,962 square-foot public park. The building and public park are closed in compliance with an Order to Vacate issued by the Los Angeles Department of Building and Safety on March 19, 2015. The building is comprised of an 18-floor residential tower above a four-level above-grade podium structure with three levels of subterranean parking and three levels of above-grade parking.

Prior to construction of the building and public park, the project site was developed with an approximately 15,252 square-foot existing restaurant use, its associated surface parking lots, and three parcels north of the parking lot were developed with multi-family

residential uses containing nine residential units. All of those previously existing uses were demolished starting in 2012.

F. Project Objectives

Section 15124(b) of the CEQA Guidelines states that the project description shall contain "a statement of the objectives sought by the proposed project." Section 15124(b) of the CEQA Guidelines further states that "the statement of objectives should include the underlying purpose of the project." The underlying purpose of the proposed Modified Project is to meet the demand for mid- to high-rise residential living and provide neighborhood-serving retail uses and additional office space in the Hollywood area of the City of Los Angeles.

To further this underlying purpose the following basic project objectives of the Modified Project are:

1. To contribute to the revitalization of the Hollywood Community Plan area by providing an example of "smart-growth" infill development consisting of a mixed-use residential building with office and neighborhood serving retail land uses which is consistent with the surrounding Sunset Boulevard corridor;

2. To provide housing in order to contribute to housing needs based on the current and projected housing demand in the City of Los Angeles;

3. To promote affordable housing by including 5 percent affordable housing units at the "Very Low" income level;

4. To provide a publicly accessible park in a manner that will provide a safe, attractive and well maintained open space environment; and

5. To provide a viable project that promotes the City's economic well-being by significantly increasing property and sales tax revenues.

The following Modified Project additional objectives have also been identified:

1. To provide on-site parking in a manner that is consistent with City requirements;

2. To provide opportunities for retail and office space in a manner that is complimentary to the existing character of the adjoining residential neighborhood;

3. To promote a safe pedestrian-oriented environment by providing extensive streetscape amenities and active retail storefronts along Sunset Boulevard;

4. To create a development with a high-quality urban design;

5. To enhance the visual appearance and appeal of the neighborhood by providing perimeter and interior landscaping;

6. To eliminate and prevent the spread of blight and deterioration by providing housing, retail and restaurant uses, and open space within a City-designated Redevelopment Area;

7. To orient housing and retail toward the street to make for a safer neighborhood ("eyes on the street");

8. To support traffic reduction transportation policies by providing high-density multi-family housing and jobs in a designated Transit Priority Area in close proximity to mass transit;

9. To promote a balanced community by providing a mix of land uses including commercial, residential, office and public open space; and

10. To encourage the use of alternative modes of transit including bus, subway, walking, and bicycles by enhancing pedestrian connections and providing bicycle storage facilities on site.

V. Environmental Impacts found in the Initial Study not TO BE significant

Section 15128 of the CEQA Guidelines states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the EIR. City Planning prepared and distributed an Initial Study for the Modified Project on October 15, 2015, included in Appendix A of the Draft Supplemental EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in the Draft Supplemental EIR. Therefore, these issue areas were not examined in detail in the Supplemental EIR. The rationale for the conclusion that no significant impact would occur in each of these issue areas is summarized below, and based on that rationale, and other evidence in the administrative record relating to the Modified Project, the City finds and determines that the following environmental impact categories will not result in any significant impacts. Further, the City finds and determines that the No Automated Steel Parking Structure Alternative would also not result in any significant impacts in these issue areas.

A. Agricultural Resources

Based upon CRA's (the Lead Agency for the CRA Approved Project) Initial Study Checklist for the CRA Approved Project, CRA determined that there was no substantial evidence the CRA Approved Project would cause significant environmental effects to agricultural resources and no further environmental review was necessary.

Like the CRA Approved Project, the Modified Project is located in a developed, urban area and would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use. The project site is currently

developed with commercial and residential uses and does not contain any agricultural uses. Additionally, the project site and immediately surrounding areas are zoned for commercial and multi-family residential use, and is not delineated or designated for use as agricultural land pursuant to the maps prepared for the Farmland Mapping and Monitoring Program. Therefore, consistent with the analysis in the Certified EIR for the CRA Approved Project, the development of the Modified Project would not convert any farmland to a non-agricultural use, and no impact would occur. Therefore, the proposed Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to agricultural resources.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not result in any significant impacts to agricultural resources and would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to agricultural resources.

B. Biological Resources

Based upon CRA's Initial Study Checklist for the CRA Approved Project, CRA determined that there was no substantial evidence the CRA Approved Project would cause significant environmental effects to biological resources and no further environmental review was necessary.

As discussed in the Certified EIR, the project site is located within an urban area and is fully developed. The project site is not expected to contain any species identified as candidate, sensitive, or special status by local or regional plans, policies, or regulation, or by the California Department of Fish and Game (CDFG) or U.S. Fish and Wildlife Service (USFWS). The project site does not contain any riparian habitat, wetlands or other sensitive natural community and is not within an area designated by an adopted habitat conservation plan, natural community conservation plan, or other approved habitat conservation plan. Furthermore, the existing vegetation on the project site is ornamental. The Certified EIR stated the CRA Approved Project must follow the Migratory Bird Treaty Act (MBTA) (16 USC 703) during development. The Certified EIR for the CRA Approved Project concluded no impact to biological resources would occur and no further analysis was required.

The Modified Project proposes some modifications to the CRA Approved Project but would be located on the same developed, urban infill project site, and therefore potential impacts associated with biological resources would be the same as the CRA Approved Project. Consistent with the CRA Approved Project, development of the Modified Project would be required to comply with the MBTA, and no impact to migratory birds would occur. Therefore, consistent with the analysis in the Certified EIR for the CRA Approved Project, development of the Modified Project would result in no impact to biological resources. Therefore, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to biological resources.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would result in no impact to biological resources and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to biological resources.

C. Hazards and Hazardous Materials

1. Routine Transport, Use or Disposal of Hazardous Materials

a. Description

The Certified EIR concluded the construction of the CRA Approved Project had the potential to result in significant impacts associated with the routine transport, use or disposal of hazardous materials. However, the Certified EIR stated the CRA Approved Project would implement Certified EIR Mitigation Measures MM IV.D-1 and MM IV.D-2, which ensure that all asbestos containing materials (ACMs) present in existing on-site structures shall be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other state and federal rules and regulations and ensures a licensed Lead-Based Paint (LBP) Inspector shall be retained to determine the presence of LBP and lead- based paint containing materials (LBPCM) within structures, which would result in a less than significant impact. Thus, the Certified EIR stated the CRA Approved Project would be required to comply with existing regulations applicable to all development projects, and that adherence to all applicable rules and regulations would reduce potentially significant impacts with respect to routine transport, use, and disposal of hazardous materials during construction to less-than-significant levels.

As compared to the CRA Approved Project, the Modified Project would require minimal additional on-site construction for the installation and retrofitting of the new automated steel parking structure and interior building renovations. These activities would not involve the demolition of any structures containing asbestos or lead-based paint and, therefore, would not involve the routine transport, use, or disposal of hazardous materials. Nevertheless, the Modified Project would implement Certified EIR Code Required (Regulatory Compliance) Measure MM IV.D-1.1 , and Certified EIR Mitigation Measure MM.IV.D-1, which ensure that all asbestos containing materials (ACMs) present in existing on-site structures shall be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other state and federal rules and regulations, and Certified EIR Code Required (Regulatory Compliance) Measure MM IV.D-1.2, (which ensure that a licensed Lead-Based Paint (LBP) Inspector shall be retained to determine the presence of LBP and lead-based paint containing materials (LBPCM) within structures. Additionally, the Modified Project would implement Certified EIR Mitigation Measure MM IV.D-2, which ensures, through implementation of Code-Required Measure MM IV.D-1.1 and Code-Required Measure MM IV.D-1.2, that potential impacts related to the release of hazardous materials from the routine transport, use, or disposal of potentially hazardous materials would be mitigated to less-than-significant levels. Implementation of Certified EIR Code Required Measure MM IV.D-1.1, Certified EIR Code-Required Measure MM IV.D-1.2, Certified EIR Mitigation

Measure MM IV.D-1, and Certified EIR Mitigation Measure MM IV.D-2 would ensure impacts are less than significant.

Regarding operations, the Certified EIR concluded operation of the CRA Approved Project would result in a less than significant impact with respect to the release of hazardous materials resulting from the routine transport, use, or disposal of potentially hazardous materials. During operation, project-related activities would not involve the use or storage of potentially hazardous materials and would not have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The limited quantities of hazardous materials (cleaning products) that would be used would be handled, transported, and disposed in accordance with all applicable local, State, and federal regulations, and impacts would be less than significant.

The Modified Project involves the same uses as the CRA Approved Project (residential and commercial uses), and would not introduce new uses that would involve the transport, use, or disposal of potentially hazardous materials beyond those analyzed in the Certified EIR. Consistent with the CRA Approved Project, the limited quantities of hazardous materials (cleaning products) that would be used in operation of the Modified Project would be handled, transported, and disposed in accordance with all applicable local, State, and federal regulations, and impacts would be less than significant.

Therefore, the Modified Project would result in less than significant impacts related to routine transport, use, or disposal of hazardous materials both during construction and operation. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to routine transport, use, or disposal of hazardous materials.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would result in less than significant impacts related to routine transport, use, or disposal of hazardous materials both during construction and operation and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to routine transport, use, or disposal of hazardous materials.

Therefore, no further analysis of this issue is required.

b. Mitigation Measures

Certified EIR Mitigation Measure MM IV.D-1: Implementation of the Code-Required Measures IV.D-1.1 and IV.D-1.2, would ensure potential impacts related to the release of hazardous materials resulting from the potential release of asbestos containing materials and lead-based paint during construction would be mitigated to less than significant levels. No additional mitigation measures are required.

Certified EIR Mitigation Measure MM IV.D-2: Implementation of the Code-Required Measures IV.D-1.1 and IV.D-1.2, would ensure potential impacts related to the potential

release of hazardous materials from the routine transport, use, or disposal of potentially hazardous materials would be mitigated to less than significant levels.

2. Release of Hazardous Materials into the Environment

a. Description

The Certified EIR concluded that construction of the CRA Approved Project had the potential to result in significant impacts associated with the release of asbestos and lead based paint during demolition, but that such impacts would be reduced to less than significant levels with the implementation of mitigation measures. Furthermore, during the construction phase, the CRA Approved Project was anticipated to require the routine transport, use, and disposal of cleaning solvents, fuels, and other hazardous materials commonly associated with construction projects. The Certified EIR stated all hazardous materials encountered or used during demolition, grading/excavation, and construction activities would be handled in accordance with all applicable local, State, and federal regulations, which include requirements for disposal of hazardous materials at a facility licensed to accept such waste. The Certified EIR stated the CRA Approved Project would implement Certified EIR Code-Required (Regulatory Compliance) Measure MM IV.D-1.1, and Certified EIR Mitigation Measure MM IV.D-1, which ensure that all asbestos containing materials (ACMs) present in existing on-site structures shall be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other state and federal rules and regulations, and Certified EIR Code-Required (Regulatory Compliance) Measure MM IV.D-1.2, and Certified EIR Mitigation Measure MM IV.D-1, which ensure that a licensed Lead-Based Paint (LBP) Inspector shall be retained to determine the presence of LBP and lead- based paint containing materials (LBPCM) within structures. Thus, the Certified EIR concluded adherence to all applicable rules and regulations would reduce potentially significant impacts with respect to routine transport, use, and disposal of hazardous materials during construction to less than significant levels. During operation, the Certified EIR stated cleaning solvents expected to be used would be similar in type and quantity to those currently used on-site. However, due to the size of the CRA Approved Project the storage and use of such materials is anticipated to increase in volume in conjunction with the routine day-to-day operations of the CRA Approved Project. The limited quantities of hazardous materials that would be used would be handled, transported, and disposed in accordance with all applicable local, State, and federal regulations. Therefore, the CRA Approved Project concluded impacts related to routine transport, use, and disposal of hazardous materials during operation would be less than significant.

As compared to the CRA Approved Project, the Modified Project would require minimal additional on-site construction for the installation and retrofitting of the new automated steel parking structure and interior building renovations. These activities would not involve the demolition of any structures containing asbestos or lead-based paint. Nevertheless, the Modified Project would implement Code Required Measure MM IV.D-1.1 and Certified EIR Mitigation Measure MM IV.D-1, which ensure that all asbestos containing materials (ACMs) present in existing on-site structures shall be abated in

compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other state and federal rules and regulations, and Certified EIR Code Required Measure MM IV.D-1.2 and Certified EIR Mitigation Measure MM IV.D-1, which ensure that a licensed Lead-Based Paint (LBP) Inspector shall be retained to determine the presence of LBP and lead- based paint containing materials (LBPCM) within structures. Additionally, the Modified Project would implement Certified EIR Mitigation Measure MM IV.D-2, which ensures, through implementation of Code Required Measure MM IV.D-1.1 and Code-Required Measure MM IV.D-1.2, that potential impacts related to the release of hazardous materials from the routine transport, use, or disposal of potentially hazardous materials would be mitigated to less than significant levels. Implementation of Certified EIR Code Required Measure MM IV.D-1.1, Certified EIR Code Required Measure MM IV.D-1.2, Certified EIR Mitigation Measure MM IV.D-1, and Certified EIR Mitigation Measure MM IV.D-2 would ensure impacts are less than significant.

Operation of the Modified Project would be substantially the same as the CRA Approved Project analyzed in the Certified EIR. The Modified Project contains all of the same uses as the CRA Approved Project (residential and commercial uses) would not involve the use or storage of potentially hazardous materials and would not have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The limited quantities of hazardous materials that would be used during Modified Project operations, such as cleaning products, would be handled, transported, and disposed in accordance with all applicable local, State, and federal regulations. Therefore, operation of the Modified Project would not change the Certified EIR's conclusions regarding the release of hazardous materials into the environment and impacts would remain less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the release of hazardous materials into the environment.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would result in less than significant impacts related to the release of hazardous materials into the environment and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the release of hazardous materials into the environment.

Therefore, no further analysis of this issue is required as a result of the Modified Project.

b. Mitigation Measures

See Certified EIR Mitigation Measure MM IV.D-1 and Certified EIR Mitigation Measure MM IV.D-2.

3. Emission of Hazardous Emissions or Handle of Hazardous or Acutely Hazardous Materials, Substances, or Waste within One-Quarter Mile of an Existing or Proposed School

The Certified EIR concluded the project site was not located within one-quarter mile of an existing school and, therefore, impacts associated with the emission of hazardous

emissions or handle of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school was not analyzed. The Modified Project is located on the same project site as the CRA Approved Project. Thus, the project site for the Modified Project is not located within one-quarter mile of a primary or secondary school and therefore, the Modified Project would result in no impacts involving schools related to the accidental release of potentially hazardous materials. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to emission of hazardous emissions or handle of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would also result in no impacts involving schools related to the accidental release of potentially hazardous materials and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to emission of hazardous emissions or handle of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

4. Site Included on a List of Hazardous Materials Sites

The Certified EIR concluded the project site is not identified on any hazardous materials site databases. The Modified Project is located on the same project site as the CRA Approved Project. Thus, the project site is not located on a site included on a list of hazardous materials sites. Therefore, the Modified Project would not be located on a site included on a list of hazardous materials site databases and no impacts would occur. Additionally, as discussed in Section IV.D, Hazardous Materials/Risk of Upset of the Certified EIR, based on a Phase I Environmental Site Assessments (ESA) (Geocon Consultants Inc., 2003), and an Updated Phase I ESA, (West Coast Environmental and Engineering, 2005), several properties reportedly located within a ½ mile radius of the project site were listed on federal, State, and local environmental regulatory agency databases. However, the Certified EIR concluded, based on the database results and upon further observations of on-and off-site properties, investigators did not observe physical evidence to suggest that any surrounding properties have the potential to impact the project site for the CRA Approved Project with hazardous waste or materials. As the Modified Project is located on the same project site as the CRA Approved Project these surrounding properties would not have the potential to impact the project site for the Modified Project. Furthermore, a review of the DTSC's EnviroStor database, was conducted in October 2017. Five properties were identified in the EnviroStor database within a ½ mile radius of the project site. None of these properties were identified in Section IV.D, Hazardous Materials/Risk of Upset of the Certified EIR. Of the five properties, four of the five properties were listed as school investigations and classified as "inactive – withdrawn". The fifth property, Central Los Angeles High School located at Sunset Boulevard and Van Ness Avenue, approximately 1,000 feet from the project site, was listed as a school cleanup and certified in 2002. As such, based on the database, the properties listed would not have the potential to impact the Modified

Project with hazardous waste or materials. Thus, consistent with the analysis in the Certified EIR for the CRA Approved Project, no properties listed on federal, State, and local environmental regulatory agency databases would have the potential to impact the Modified Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the Modified Project being located on a site included on a list of hazardous materials sites.

Like the Modified Project, no properties listed on federal, State, and local environmental regulatory agency databases would have the potential to impact the No Automated Steel Parking Structure Alternative and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to being located on a site included on a list of hazardous materials sites.

5. Within an Airport Land Use Plan, Two Miles of a Public or Public Use Airport

The Certified EIR concluded the project site was not located within two-miles of an airport and, therefore, impacts associated with being located within two-miles of an airport was not analyzed. The Modified Project is located on the same project site as the CRA Approved Project. Thus, the project site for the Modified Project is not located within two-miles of an airport and no impact would occur. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the Modified Project being located within 2-miles of an airport.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would result in no impact and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the being located within two-miles of an airport.

6. Within the Vicinity of a Private Airstrip

The Certified EIR concluded the project site was not located within two-miles of a private airstrip and, therefore, impacts associated with being located within two-miles of a private airstrip was not analyzed. The Modified Project is located on the same project site as the CRA Approved Project. Thus, the project site for the Modified Project is not located within two-miles of a private airstrip and no impact would occur. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the Modified Project being located within two-miles of a private airstrip.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would result in no impact and would not involve new significant environmental effects or a

substantial increase in the severity of previously identified significant effects related to being located within two-miles of a private airstrip.

7. Interference with an Emergency Response Plan or Emergency Evacuation Plan

a. Description

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts to an adopted emergency response plan or emergency evacuation plan. The Certified EIR determined though construction activities may require temporary and/or partial street closures on adjacent roadways due to construction activities and roadway widening improvements, the CRA Approved Project would implement Certified EIR Mitigation Measure MM IV.D-3.1 and Certified EIR Mitigation Measures MM IV.D-3.2. Certified EIR Mitigation Measure MM IV.D-3.1 ensures the CRA Approved Project shall maintain appropriate fire and police access to the project site during the construction process. Certified EIR Mitigation Measures MM IV.D-3.2 ensures, to the maximum extent feasible, the CRA Approved Project shall schedule all construction-related deliveries and haul trips to occur outside peak traffic hours. Thus, with implementation of mitigation measures, the CRA Approved Project would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan during construction. The Certified EIR also concluded operation of the CRA Approved Project would have a less than significant impact with respect to an emergency response plan or emergency evacuation plan. The Certified EIR stated the CRA Approved Project would implement Certified EIR Mitigation Measure MM IV.D-5, which ensures the CRA Approved Project applicant prepare and submit an emergency response plan for approval by the City of Los Angeles Planning Department and the City of Los Angeles Fire Department, and therefore the CRA Approved Project would result in a less than significant impact.

Compared to the CRA Approved Project, the Modified Project would require minimal additional construction associated with the installation and retrofitting of the new automated steel parking structure and interior building renovations. Thus, the additional construction activities for the Modified Project would not substantially increase the construction activities proposed by the CRA Approved Project and the additional construction activities associated with the Modified Project would not interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan. Nevertheless, the Modified Project would implement Certified EIR Mitigation Measure MM IV.D-3.1 and Certified EIR Mitigation Measures MM IV.D-3.2. Certified EIR Mitigation Measure MM IV.D-3.1 ensures the Modified Project shall maintain appropriate fire and police access to the project site during the construction process. Certified EIR Mitigation Measures MM IV.D-3.2 ensures, to the maximum extent feasible, the Modified Project shall schedule all construction-related deliveries and haul trips to occur outside peak traffic hours. Implementation of Certified EIR Mitigation Measure MM IV.D-3.1 and Certified EIR Mitigation Measures MM IV.D-3.2 would ensure impacts are less than significant. During operation, consistent with the CRA Approved Project, the Modified Project would not be expected to alter or interfere

with any off-site adopted emergency response plan or emergency evacuation plan. The Modified Project would not alter or change the driveways or vehicular traffic patterns in the project vicinity. Nevertheless the Modified Project would implement Certified EIR Mitigation Measure MM IV.D-5, which ensures the CRA Approved Project applicant prepare and submit an emergency response plan for approval by the City of Los Angeles Planning Department and the City of Los Angeles Fire Department, to ensure impacts are less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the Modified Project's potential to interfere with an emergency response plan or emergency evacuation plan.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would result in less than significant impacts to an adopted emergency response plan or emergency evacuation plan and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the potential to interfere with an emergency response plan or emergency evacuation plan.

b. Mitigation Measures

Certified EIR Mitigation Measure MM IV.D-3.1: The Modified Project shall maintain appropriate fire and police access to the project site during the construction process.

Certified EIR Mitigation Measure MM IV.D-3.2: To the maximum extent feasible, the Modified_Project shall schedule all construction-related deliveries and haul trips to occur outside peak traffic hours.

Certified EIR Mitigation Measure MM IV.D-5: The Applicant shall prepare and submit an emergency response plan for approval by the City of Los Angeles Planning Department and the City of Los Angeles Fire Department. The emergency response plans shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments.

8. Exposure of People or Structures to a Significant Risk, Injury or Death Involving Wildland Fires

The Certified EIR concluded the project site for the CRA Approved Project was not located within proximity to open space, brush or forested properties and was not susceptible to wildland fire hazards. Therefore, the Certified EIR stated no further analysis of the topic was required. The Modified Project is located on the same project site as the CRA Approved Project. Thus, the project site for the Modified Project is not located proximity to open space, brush or forested properties and is not susceptible to wildland fire hazards. Therefore, the Modified Project would have no potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project

would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the Modified Project's potential to expose people or structures to a significant risk, injury or death involving wildland fires.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would have no potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the potential to expose people or structures to a significant risk, injury or death involving wildland fires.

D. Hydrology and Water Quality

1. Violation of Any Water Quality Standards or Waste Discharge Requirements

The Certified EIR did not evaluate the issue of hydrology and water quality for the CRA Approved Project. However, the Certified EIR stated implementation of the Best Management Practices (BMPs) in the CRA Approved Project site specific Storm Water Pollution Prevention Plan (SWPPP) and compliance with the City's Low Impact Development (LID) Ordinance would ensure that the CRA Approved Project construction would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. The Certified EIR also concluded in Section IV.H. Land Use Planning that the CRA Approved Project would be consistent with the applicable water quality policies of the Regional Water Quality Control Board (RWQCB) and impacts upon water quality would be less than significant. As compared to the CRA Approved Project, the Modified Project would require minimal additional on-site construction activities associated with the installation and retrofitting of the new automated steel parking structure and interior building renovations. Any construction activity with the potential to create surface water runoff would be subject to the City's LID Ordinance and a site specific SWPPP. Operation of the Modified Project would involve the same uses as the CRA Approved Project analyzed in the Certified EIR (residential dwelling units, office and retail/restaurant uses). As was the case for the CRA Approved Project, wastewater from these uses would be discharged into the sanitary sewer in accordance with all applicable laws and regulations. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the Modified Project's potential to violate any water quality standards or waste discharge requirements.

Like the Modified Project, the No Automated Steel Parking Structure Alternative also would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the potential to violate any water quality standards or waste discharge requirements.

2. Substantially Deplete Groundwater Supplies or Interfere with Groundwater Recharge

The Certified EIR did not evaluate the issue of hydrology and water quality for the CRA Approved Project. The Certified EIR stated in Section IV.C, Geology/Soils, that groundwater within the region and beneath the project site is relatively deep below the surface, and its historic high depth is approximately 50 to 55 feet below grade surface. The Certified EIR concluded that construction of the CRA Approved Project during excavation and development of foundation footings would reach a depth of approximately 50 feet below ground surface and would not extend to the groundwater table. As compared to the CRA Approved Project, the Modified Project would require minimal additional on-site construction activities associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. Installation of footings associated with the parking structure would not extend beyond the depth of the existing footings of the vacant 22-story, approximately 250-foot high mixed use building on the project site and thus would not extend into the groundwater table. Therefore, the Modified Project would not interfere with the groundwater table and would not affect groundwater supplies or groundwater recharge. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the depletion of groundwater supplies or interference with groundwater recharge.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would result in no impact to biological resources and would not interfere with the groundwater table and would not affect groundwater supplies or groundwater recharge and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the depletion of groundwater supplies or interference with groundwater recharge.

3. Substantially Alter the Existing Drainage Pattern of the Site or Area Resulting in Substantial Erosion or Siltation

The Certified EIR did not evaluate the issue of hydrology and water quality for the CRA Approved Project. The Certified EIR concluded in Section IV.C, Geology/Soils, the CRA Approved Project would not result in substantial soil erosion. The Certified EIR determined that although construction of the CRA Approved Project had the potential to result in the erosion of soil during site preparation and construction activities, erosion would be reduced by implementation of appropriate erosion controls during grading. The Certified EIR also concluded the potential for soil erosion during the ongoing operation of the CRA Approved Project was relatively low due to the generally level topography of the project site. As compared to the CRA Approved Project, the Modified Project would require minimal additional on-site construction activities associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. No grading would occur during the additional construction required for the Modified Project and, therefore, the Modified Project's additional construction would not substantially alter the existing drainage pattern of the site or area resulting in

substantial erosion or siltation. The Modified Project is located on the same project site as the CRA Approved Project. Thus, similar to the CRA Approved Project, operation of the Modified Project would not have the potential for soil erosion due to the generally level topography of the project site. The Modified Project would not substantially alter the existing drainage pattern of the site or area resulting in substantial erosion or siltation during operation. Therefore, erosion and siltation impacts would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to erosion and siltation.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative erosion and siltation impacts would be less than significant and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to erosion and siltation.

4. Substantially Alter the Existing Drainage Pattern of the Site or Area Resulting in Flooding

The Certified EIR did not evaluate the issue of hydrology and water quality for the CRA Approved Project. The Certified EIR stated in Section IV.H, Land Use Planning that the project site for the CRA Approved Project is not located within an area subject to flooding hazards. The Modified Project is located on the same project site as the CRA Approved Project. Thus, similar to the CRA Approved Project, the Modified Project is not located within an area subject to flooding hazards. Further, no grading would occur during the additional construction required for the Modified Project and, therefore, the Modified Project's additional construction would not substantially alter the existing drainage pattern of the site or area. Therefore, potential flooding impacts would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to flooding.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative potential flooding impacts would be less than significant and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to flooding.

Therefore, no further analysis of this issue is required.

5. Creation or Contribution of Runoff Exceeding the Existing or Planned Stormwater Drainage Systems

The Certified EIR did not evaluate the issue of hydrology and water quality for the CRA Approved Project and did not directly address the CRA Approved Project's hydrology and water quality impacts during operation. The Certified EIR stated in Section IV.H,

Land Use Planning, prior to construction, the CRA Approved Project applicant would be required to obtain a National Pollution Discharge Elimination System (NPDES) statewide General Construction Activity Permit from the RWQCB. In accordance with the RWQCB requirements, the CRA Approved Project applicant would need to file a Notice of Intent and prepare a Storm Water Pollution Prevention Plan (SWPPP) prior to any construction activity. As part of the SWPPP, the CRA Approved Project would be required to implement effective best management practices (BMPs) to minimize water pollution to the maximum extent practical. In addition, the final drainage plans would be required to provide structural or treatment control BMPs to mitigate (infiltrate or treat) storm water runoff. Implementation of the BMPs in the CRA Approved Project SWPPP and compliance with the City's LID Ordinance would ensure that the CRA Approved Project construction would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Though the Certified EIR did not directly address the CRA Approved Project's hydrology and water quality impacts during operation, the Certified EIR did conclude in Section IV.H. Land Use Planning, that the CRA Approved Project would be consistent with the applicable water quality policies of the RWQCB and impacts upon water quality would be less than significant. Similar to the CRA Approved Project, during construction of the Modified Project, the Modified Project would implement the BMPs in the SWPPP and comply with the City's LID Ordinance to ensure that the Modified Project's construction would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Operation of the Modified Project would include stormwater catch basins and planters consistent with the City's LID Ordinance such that the Modified Project would not change the capacity of retention basins or increase the volume of surface water runoff which would adversely impact the quality of receiving waters. No changes to the current runoff patterns would occur under the Modified Project, and therefore impacts would remain less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to runoff exceeding the existing or planned stormwater drainage systems.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative impacts would remain less than significant and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to runoff exceeding the existing or planned stormwater drainage systems.

6. Substantially Degrade Water Quality

The Certified EIR did not evaluate the issue of hydrology and water quality for the CRA Approved Project. The Certified EIR stated in Section IV.H, Land Use Planning, implementation of the BMPs in the CRA Approved Project SWPPP and compliance with the City's LID Ordinance would ensure that the CRA Approved Project construction would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Similar to the CRA Approved Project, during construction of the Modified Project, the Modified Project would implement the BMPs in

the SWPPP and comply with the City's LID Ordinance to ensure that the Modified Project's construction would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. As compared to the CRA Approved Project, the Modified Project would include the same stormwater catch basins and planters consistent with the City's LID Ordinance such that the Modified Project would not change the capacity of retention basins or increase the volume of surface water runoff which would adversely impact the quality of receiving waters. No changes to the current runoff patterns would occur under the Modified Project. Therefore, the Modified Project would not substantially degrade water quality, and impacts would remain less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to substantially degrading water quality.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative would not substantially degrade water quality, and impacts would remain less than significant. The No Automated Steel Parking Structure Alternative would also not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to substantially degrading water quality.

7. Place Housing within a 100-year Flood Plain

The Certified EIR did not evaluate the issue of hydrology and water quality for the CRA Approved Project. The Certified EIR stated in Section IV.H, Land Use Planning, the project site for the CRA Approved Project is not located within an area subject to flooding hazards. The project site is not located within an area identified by Federal Emergency Management Agency (FEMA) as potentially subject to 100-year floods nor is it located within a City-designated 100year or 500-year flood plain. Further, the project site is not located in a Tsunami Hazard Area, and it is located at least 12 miles from the Pacific Ocean and is not near any other major water bodies. The Modified Project is located on the same project site as the CRA Approved Project. Thus, similar to the CRA Approved Project, the Modified Project is not located within an area subject to flooding hazards and the Modified Project would not place housing within a 100-year flood plain. Therefore, no impact would occur. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to placing housing within a 100-year flood plain.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative, no impact would occur related to place housing within a 100-year flood plain and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to placing housing within a 100-year flood plain.

8. Place Structures within a 100-year Flood Plain

The Certified EIR did not evaluate the issue of hydrology and water quality for the CRA Approved Project. The Certified EIR stated in Section IV.H, Land Use Planning, the project site for the CRA Approved Project is not located within an area subject to flooding hazards. The project site is not located within an area identified by Federal Emergency Management Agency (FEMA) as potentially subject to 100-year floods nor is it located within a City-designated 100year or 500-year flood plain. The Modified Project is located on the same project site as the CRA Approved Project. Thus, similar to the CRA Approved Project, the Modified Project is not located within an area subject to flooding hazards. Further, the project site is not located in a Tsunami Hazard Area, and it is located at least 12 miles from the Pacific Ocean and is not near any other major water bodies. Therefore, the Modified Project would not place structures within a 100-year flood plain. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to placing structures within a 100-year flood plain.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not place structures within a 100-year flood plain and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to placing structures within a 100-year flood plain.

9. Exposure of People or Structures to a Significant Risk of Loss, Inquiry or Death Involving Flooding, as a Result of the Failure of a Levee or Dam

The Certified EIR did not evaluate the issue of hydrology and water quality for the CRA Approved Project. The Certified EIR stated in Section IV.H, Land Use Planning, the project site for the CRA Approved Project is not located within an area subject to flooding hazards. The project site is not located within an area identified by Federal Emergency Management Agency (FEMA) as potentially subject to 100-year floods nor is it located within a City-designated 100year or 500-year flood plain. The Modified Project would be constructed on the same project site as the CRA Approved Project analyzed in the Certified EIR. Therefore, consistent with the CRA Approved Project, the Modified Project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam, and no impact would occur. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to exposing people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam, and no impact would occur. the No The No Automated Steel Parking Structure Alternative would also not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to exposing people or structures to a

significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam.

10. Inundation by Seiche, Tsunami, or Mudflow

The Certified EIR did not evaluate the issue of hydrology and water quality for the CRA Approved Project. The Certified EIR stated in Section IV.H, Land Use Planning, the project site for the CRA Approved Project is not located within an area subject to flooding hazards. The Modified Project would be constructed on the same project site as the CRA Approved Project analyzed in the Certified EIR. The project site is not located in a Tsunami Hazard Area, and it is located at least 12 miles from the Pacific Ocean and is not near any other major water bodies; therefore, risks associated with seiches or tsunamis would be considered extremely low at the project site. Furthermore, the project site is located within a developed area of Hollywood where little open space exists. Therefore, the Modified Project would have no impact with regard to seiches, tsunamis, or mudflows. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to inundation by seiche, tsunami, or mudflow.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would have no impact with regard to seiches, tsunamis, or mudflows and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to inundation by seiche, tsunami, or mudflow.

E. Mineral Resources

Based upon CRA's Initial Study Checklist, CRA determined that there was no substantial evidence the CRA Approved Project would cause significant environmental effects to mineral resources and no further environmental review was necessary. The project site is not located on any oil fields and no oil extraction activities are presently conducted on the project site. Further, the Certified EIR stated, that the City has not identified any locally significant mineral resources on the project site that would be of value to the region and the residents of the State. The Certified EIR determined implementation of the CRA Approved Project would not result in a loss of the availability of a known resource and would have no impact on mineral resources.

The Modified Project proposes some modifications to the CRA Approved Project but would be located on the same developed, urban infill project site, where no oil fields or other mineral resource extraction activities exist. Therefore, potential impacts associated with mineral resources would be the same as for the CRA Approved Project, and no impact would occur.

As a result, consistent with the analysis in the Certified EIR for the CRA Approved Project, development of the Modified Project would not result in a loss of the availability of a known resource and would have no impact on mineral resources. Therefore, the

Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to mineral resources.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not result in a loss of the availability of a known resource and would have no impact on mineral resources and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to mineral resources.

VI. Environmental Impacts analyzed in the Supplemental EIR and determined not to be SIGNIFICANT per Senate Bill (SB) 734

A. Aesthetics (Views/Light & Glare)

1. Description

Subsequent to the certification of the Certified EIR, SB 743 was enacted which amended CEQA Section 21099 (d)(1) to state that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if: (1) the project is a residential, mixed-use residential, or employment center project, and (2) the project is located on an infill site within a transit priority area. Accordingly, because the Modified Project is a mixed-use residential project on an infill site within a transit priority area, the Modified Project's aesthetic impacts shall not be considered significant. Nevertheless, the Supplemental EIR provided an analysis of aesthetics for informational purposes.

The Certified EIR for the CRA Approved Project concluded that impacts to Aesthetics (Views/Light & Glare) would be: less than significant related to scenic vistas; no impact related to scenic resources; less than significant with mitigation related to visual character; less than significant with mitigation related to light and glare; and less than significant for cumulative impacts.

While the Modified Project's aesthetics impacts shall not be considered significant pursuant to SB 743, the Supplemental EIR conservatively identified mitigation measures that would be implemented as part of the Modified Project, which are provided below.

Like the Modified Project, the No Automated Steel Parking Structure Alternative is a mixed-use residential project on an infill site within a transit priority area and accordingly, the No Automated Steel Parking Structure Alternative's aesthetic impacts shall also not be considered significant.

2. Mitigation Measures

MM A.1-1: If any street tree removals are required for the Modified Project's additional construction activities, the street trees to be removed shall be replaced on a 2:1 replacement ratio in compliance with the City of Los Angeles Department of Public Works' Bureau of Street Services, Urban Forestry Division's policies.

MM A.1-2: Construction equipment, debris, and stockpiled equipment shall be enclosed within a fenced or visually screened area to effectively block the line of sight from the ground level of neighboring properties. Such barricades or enclosures shall be maintained in appearance throughout the construction period. Graffiti shall be removed immediately upon discovery.

Certified EIR Mitigation Measure MM IV.A-3.1: The proposed park shall be actively operated and maintained for the life of the Modified Project by the Applicant or designated nonprofit organization with the experience and ability to maintain the park in accordance with the public health and safety standards employed by the Department of Parks and Recreation.

Certified EIR Mitigation Measure MM IV.A-4.1: The Modified Project shall include low-level directional lighting at ground, podium, and tower levels of the exterior of the proposed structures to ensure that architectural, parking and security lighting does not spill onto adjacent residential properties, nor is visible from above.

Certified EIR Mitigation Measure MM IV.A-4.2: The Modified Project's façades and windows shall be constructed with non-reflective materials such that glare impacts on surrounding residential properties and roadways are minimized.

3. Finding

Although the Modified Project and No Automated Steel Parking Structure Alternative would not result in significant impacts to Aesthetics (Views/Light & Glare) pursuant to SB 743, mitigation measures have nonetheless been conservatively incorporated.

4. Rationale for Finding

As discussed above, subsequent to the certification of the Certified EIR, SB 743 was enacted which amended CEQA Section 21099 (d)(1) to state that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if: (1) the project is a residential, mixed-use residential, or employment center project, and (2) the project is located on an infill site within a transit priority area. Accordingly, because the Modified Project is a mixed-use residential project on an infill site within a transit priority area, the Modified Project's aesthetic impacts shall not be considered significant.

Like the Modified Project, the No Automated Steel Parking Structure Alternative is a mixed-use residential project on an infill site within a transit priority area and accordingly, the No Automated Steel Parking Structure Alternative's aesthetic impacts shall also not be considered significant.

Therefore, as compared to the CRA Approved Project, the proposed Modified Project and No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to Aesthetics (Views/Light & Glare). However, the Modified

Project and No Automated Steel Parking Structure Alternative would implement the above-described mitigation measures.

5. Reference

For a complete discussion of Aesthetics see Sections IV.A.1 Aesthetics (Views/Light and Glare) and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

B. Aesthetics (Shade/Shadow)

1. Description

Subsequent to the certification of the Certified EIR, SB 743 was enacted which amended CEQA Section 21099 (d)(1) to state that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if: (1) the project is a residential, mixed-use residential, or employment center project, and (2) the project is located on an infill site within a transit priority area. Accordingly, because the Modified Project is a mixed-use residential project on an infill site within a transit priority area, the Modified Project's aesthetic impacts shall not be considered significant. Nevertheless, the Supplemental EIR provided an analysis of aesthetics for informational purposes.

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts related to shade and shadow upon nearby residential properties during the summer months and cumulatively. During the winter months, the Certified EIR concluded the CRA Approved Project would result in significant and unavoidable shade and shadow impacts upon nearby residential properties. Compared to the CRA Approved Project, the summer and winter solstice shadows created by the Modified Project would fall entirely within the previous shadow pattern projected for the CRA Approved Project analyzed in the Certified EIR. As such, the Modified Project would not increase the severity of the previously disclosed significant and unavoidable shade and shadow impact identified in the Certified EIR for the CRA Approved Project.

Pursuant to SB 743 and the provisions set forth by CEQA § 21099, the Modified Project is classified as a mixed-use residential project located on a project site that is considered an infill site within a Transit Priority Area as defined by CEQA. As such, the Modified Project's aesthetic impacts shall not be considered significant impacts on the environment. Thus, the Modified Project would result in less than significant shade and shadow impacts upon nearby residential properties pursuant to SB 743. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to shade and shadow.

Like the Modified Project, the No Automated Steel Parking Structure Alternative is a mixed-use residential project on an infill site within a transit priority area and accordingly, the No Automated Steel Parking Structure Alternative's shade and shadow impacts shall also not be considered significant and would not involve new significant

environmental effects or a substantial increase in the severity of previously identified significant effects related to shade and shadow.

a. Cumulative Shade/Shadow Impacts

The Certified EIR for the CRA Approved Project concluded the CRA Approved Project in combination with the related projects identified in the Certified EIR would result in less than significant cumulative shade and shadow impacts. The related projects list was updated for the Modified Project and the nearest related project, Related Project 46, located at 5901 Sunset Boulevard immediately east of the project site, is a 15-story mixed-use building approximately 240 feet above grade and is the only related project relevant to the cumulative shade/shadow analysis. The combined shadows from the Modified Project and Related Project 46, could potentially result in cumulatively significant shade and shadow impacts during the winter months on the multi-family residential uses to the north of the Modified Project. However, as discussed above, pursuant to SB 743 and the provisions set forth by CEQA § 21099, the Modified Project is classified as a mixed-use residential project located on a project site that is considered an infill site within a Transit Priority Area as defined by CEQA. As such, the Modified Project's aesthetic impacts shall not be considered significant impacts on the environment. Therefore, the Modified Project would not add any incremental contribution to a cumulatively significant impact with respect to shade and shadow, and the Modified Project's impacts would not be cumulatively considerable. (See CEQA Guidelines §§ 15130, 15064(h).) Additionally, Related Project 46 is classified as an employment center project located on a project site that is considered an infill site within a Transit Priority Area as defined by CEQA. Thus, Related Project 46's aesthetic impacts shall also not be considered significant impacts on the environment and, therefore, would not add any incremental contribution to a cumulatively significant impact with respect to shade and shadow. Therefore, the Modified Project's cumulative shade and shadow impacts would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative shade and shadow.

Like the Modified Project, the No Automated Steel Parking Structure Alternative is a mixed-use residential project on an infill site within a transit priority area and accordingly, the No Automated Steel Parking Structure Alternative's cumulative shade and shadow impacts shall also not be considered significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative shade and shadow.

2. Reference

For a complete discussion of Aesthetics Shade/Shadow see Section IV.A.2 Aesthetics Shade/Shadow of the Draft Supplemental EIR.

C. Parking

1. Description

Subsequent to the certification of the Certified EIR, SB 743 was enacted which amended CEQA Section 21099 (d)(1) to state that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if: (1) the project is a residential, mixed-use residential, or employment center project, and (2) the project is located on an infill site within a transit priority area. Accordingly, because the Modified Project is a mixed-use residential project on an infill site within a transit priority area, the Modified Project's parking impacts shall not be considered significant. Nevertheless, the Supplemental EIR provided an analysis of parking for informational purposes.

The Certified EIR for the CRA Approved Project concluded that impacts to Parking would be less than significant with mitigation for both construction and operation and cumulatively less than significant.

Regarding public parking the Certified EIR did not analyze public parking impacts. As discussed in Section IV.K.1 Traffic / Transportation of the Draft Supplemental EIR, Mitigation Measures K.1-1 and K.1-2 would be implemented as part of the Modified Project to reduce the significant traffic impacts at the Gower Street and Sunset Boulevard intersection during the P.M. peak hour and the Bronson Avenue and Sunset Boulevard intersection during the A.M. peak hour. With implementation of the Mitigation Measures K.1-1 and K.1-2 up to 7 public parking spaces would be removed. However, the Modified Project would set aside up to 7 spaces within the parking structure for public parking on-site, which would be provided to the public for one hour free. Thus, the Modified Project would not result in a deficiency in public parking availability in the project site vicinity and impacts related to public parking would be less than significant. As such, the Modified Project's parking impacts shall not be considered significant impacts on the environment. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to parking.

While the Modified Project's parking impacts shall not be considered significant pursuant to SB 743, the Supplemental EIR conservatively identified mitigation measures that would be implemented as part of the Modified Project, which are provided below.

Like the Modified Project, the No Automated Steel Parking Structure Alternative is a mixed-use residential project on an infill site within a transit priority area and accordingly, the No Automated Steel Parking Structure Alternative's parking impacts shall also not be considered significant.

a. Cumulative

The Certified EIR concluded cumulative parking impacts would be less than significant. For the Modified Project, parking impacts would not be considered significant impacts on the environment, and the Modified Project's parking impacts would not be

cumulatively considerable. Accordingly, consistent with the analysis in the Certified EIR for the CRA Approved Project, cumulative parking impacts would be less than significant, and the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative parking impacts.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's cumulative parking impacts would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative parking impacts.

2. Mitigation Measure

Certified EIR Mitigation Measure MM IV.K.2-1: In order to mitigate potential parking impacts from construction workers the Project shall, prior to commencing construction, develop a Construction Parking Plan requiring construction workers to park off-street and not use on-street parking spaces. The Project contractor shall develop a temporary off-street parking plan to ensure a sufficient supply of off-street spaces is provided for the construction workers.

3. Findings

Although the Modified Project and No Automated Steel Parking Structure Alternative would not result in significant impacts to Parking pursuant to SB 743, mitigation measures have nonetheless been conservatively incorporated.

4. Rationale for Finding

As discussed above, subsequent to the certification of the Certified EIR, SB 743 was enacted which amended CEQA Section 21099 (d)(1) to state that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if: (1) the project is a residential, mixed-use residential, or employment center project, and (2) the project is located on an infill site within a transit priority area. Accordingly, because the Modified Project is a mixed-use residential project on an infill site within a transit priority area, the Modified Project's parking impacts shall not be considered significant.

Like the Modified Project, the No Automated Steel Parking Structure Alternative is a mixed-use residential project on an infill site within a transit priority area and accordingly, the No Automated Steel Parking Structure Alternative's parking impacts shall also not be considered significant.

Therefore, as compared to the CRA Approved Project, the proposed Modified Project and No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to Parking. However, the Modified Project and No Automated

Steel Parking Structure Alternative would implement the above-described mitigation measure.

5. Reference

For a complete discussion of Parking see Sections IV.K.2 Parking and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

VII. Environmental Impacts analyzed in the Supplemental EIR and determined to have no impact or be less than significant PRIOR to Mitigation

Based on the analysis in the Supplemental EIR and other evidence in the administrative record relating to the Modified Project, the City finds and determines that the following environmental impact categories will not result in any significant impacts and that no mitigation measures are needed.

Further, based on the analysis in the Supplemental EIR and other evidence in the administrative record, the City finds and determined that the following environmental impact categories will also not result in any significant impacts and that no mitigation measures are needed for the No Automated Steel Parking Structure Alternative.

A. Air Quality (Consistency with Applicable Plans and Policies, Operations, Cumulative)

1. Description

a. Consistency with Applicable Plans and Policies

(1) Consistency with the Final 2016 AQMP

The Certified EIR concluded that because the CRA Approved Project would be consistent with the regional population forecasts for the City of Los Angeles and the Hollywood area, it would not jeopardize attainment of State and national ambient air quality standards in the South Coast Air Basin (Basin) and the Los Angeles County portion of the Basin. In addition, the Certified EIR determined the increase in population growth associated with the CRA Approved Project would produce vehicle miles traveled/population ratio that was consistent with the forecasts in the 2003 Air Quality Management Plan (AQMP). Accordingly, the Certified EIR concluded the CRA Approved Project would be consistent with the South Coast Air Quality Management Plan District's (SCAQMD) 2003 AQMP growth assumptions and impacts would be less than significant.

The Draft Supplemental EIR evaluated the Modified Project's consistency with the adopted Final 2016 AQMP, and found that the Modified Project would not result in construction or operational air quality emissions that would exceed any of the SCAQMD thresholds of significance at the project level. Furthermore, the Modified Project would be required to comply with applicable SCAQMD rules and regulations for new or modified sources. By meeting SCAQMD rules and regulations, Modified Project

construction activities would be consistent with the goals and objectives of the Final 2016 AQMP to improve air quality in the Basin. Thus, the Modified Project would not have the potential to increase the frequency or severity of existing air quality violations or cause or contribute to new air quality violations.

In addition, projects that are consistent with the projections of employment, population and housing forecasts identified by Southern California Association of Governments (SCAG) are considered to be consistent with the Final 2016 AQMP. For purposes of consistency with the Final 2016 AQMP, the Modified Project is consistent with the growth projections contained in the 2016-2040 RTP/SCS. The Modified Project would not exceed the population and housing projections of the 2016-2040 RTP/SCS for the Los Angeles subregion and would not jeopardize attainment of the air quality conditions projected in the Final 2016 AQMP. Accordingly, through evaluation of the Modified Project for consistency with regional plans and the regional Final 2016 AQMP, impacts with respect to regional plans and AQMP consistency would be less than significant.

Therefore, the Modified Project's impacts with respect to consistency with the applicable AQMP would be less than significant and would not substantially increase impacts identified in the Certified EIR for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the applicable AQMP.

Like the Modified Project, the No Automated Steel Parking Structure Alternative impacts with respect to consistency with the applicable AQMP would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the applicable AQMP.

(2) Consistency with General Plan Air Quality Element

The City's Air Quality Element sets forth the goals, objectives, and policies that would guide the City in the implementation of its air quality improvement programs and strategies. While the Certified EIR did not analyze the CRA Approved Project's consistency with the City's General Plan Air Quality Element, a detailed analysis of the consistency of the Modified Project with relevant policies in the City's General Plan Air Quality Element is presented in Draft Supplemental EIR Section IV.B, Air Quality, Table IV.B-8, Project Consistency with Applicable Policies of the General Plan Air Quality Element. As shown therein, the Modified Project would be consistent with the goals, objectives, and policies set forth in the City's General Plan Air Quality Element. Therefore, the Modified Project's impacts related to consistency with the applicable air quality policies in the General Plan would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with applicable plans and policies.

Like the Modified Project, the No Automated Steel Parking Structure Alternative impacts related to consistency with the applicable air quality policies in the General Plan would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with applicable plans and policies.

b. Operation

(1) Regional Operational Air Quality Impacts

The Certified EIR analyzed the daily operational emissions from the CRA Approved Project and determined that operational emissions would not exceed the established SCAQMD threshold levels for VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ during both the summertime (smog season) and wintertime (non-smog season). Therefore, impacts associated with regional operational emissions from the CRA Approved Project were found to be less than significant.

The Draft Supplemental EIR analyzed the daily operation emissions from the Modified Project and determined that the estimated gross daily regional operational emissions associated with the Modified Project would not exceed the established SCAQMD threshold levels for ROG, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ during both the summertime (smog season) and wintertime (nonsmog season). Therefore, impacts associated with regional operational emissions from the Modified Project would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to operational emissions.

Like the Modified Project, impacts associated with regional operational emissions from the No Automated Steel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to operational emissions.

(2) Local Operational Air Quality Impacts

The Certified EIR analyzed daily operational emissions generated by the CRA Approved Project against SCAQMD's Localized Significance Thresholds and on-site emissions generated by the CRA Approved Project during operation would not exceed the established SCAQMD localized thresholds for NO_x, CO, PM_{10}, and $PM_{2.5}$ at a receptor distance of 25 meters. Thus, the on-site operational emissions would also not exceed the SCAQMD localized thresholds at receptor distances beyond 25 meters. The Certified EIR concluded that localized operational impacts of the CRA Approved Project would have been considered less than significant.

To determine whether operational emissions would result in localized air quality impacts, the operational emissions of the Modified Project have been analyzed against the SCAQMD's LSTs for a receptor location of 25 meters. On-site operational emissions generated by the Modified Project would not exceed the established SCAQMD localized

thresholds for NO_x, CO, PM_{10}, and $PM_{2.5}$. Thus, the localized air quality impacts resulting from operational emissions associated with the Modified Project would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to operational emissions for NO_x, CO, PM_{10}, and $PM_{2.5}$.

Like the Modified Project, localized air quality impacts resulting from operational emissions associated with the No Automated Steel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to operational emissions for NO_x, CO, PM_{10}, and $PM_{2.}$

(3) Localized CO Emissions

At the time the Certified EIR was written, the Basin was a designated national non-attainment area for CO concentrations. Therefore, the Certified EIR analyzed localized CO impacts for the CRA Approved Project. The Certified EIR concluded that future CO concentrations near the study intersections would not exceed national or State ambient air quality standards. Therefore, the Certified EIR determined CO hotspots would not occur near these intersections in the future with operation of the CRA Approved Project. Therefore, the Certified EIR concluded impacts related to local CO concentrations at these intersections would have been less than significant.

For the Modified Project, the Air Basin is currently designated as a CO attainment area for both the CAAQS and NAAQS. Ambient CO levels in the Source Receptor Area (SRA) 1 are substantially below the federal and state standards. Because the Basin remains in attainment and existing congested intersections at the four heaviest congested intersections (exceeding 100,000 vehicles per day) do not exceed state thresholds, CO concentrations have been demonstrated to be less than significant under extreme conditions. As such, no further analysis for CO hotspots is warranted for the Modified Project. Therefore, the Modified Project's impacts associated with localized CO operational emissions would be less than significant and would not substantially increase impacts identified in the Certified EIR for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to localized CO operational emissions.

Like the Modified Project, impacts associated with localized CO operational emissions would be less than significant for the No Automated Steel Parking Structure Alternative and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to localized CO operational emissions.

(4) Odors

The Certified EIR did not address potential impact associated with odors.

The Modified Project does not include any of the uses identified by the SCAQMD as being associated with odors. Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents. SCAQMD Rule 1113 limits the amount of volatile organic compounds from architectural coatings and solvents. Based on mandatory compliance with SCAQMD Rules, no construction activities or materials that would be used during the Modified Project's additional construction activities would create a significant level of objectionable odors.

With respect to long-term project operations, the Modified Project would not create objectionable odors affecting a substantial number of people. Odors from garbage shoots and refuse containers would be controlled through standard best management practices and ongoing building maintenance procedures pursuant to the applicable regulations of LAMC Section 12.21.19, which provides building specifications for trash chutes and recycling rooms in multi-family dwellings. While restaurant-related uses have the potential to generate odors from cooking and disposal of organic waste, restaurant operators would be subject to LAMC Section 91.6302.3, which requires mechanical exhaust ventilation systems capable of effectively removing cooking odors, smoke, steam, grease and vapors at or above cooking equipment in dwellings, and SCAQMD Rule 1138, which requires the installation of adequate ventilation systems and odor-reducing equipment for restaurants. Therefore, a less than significant impact would occur with respect to the creation of objectionable odors.

Like the Modified Project, a less than significant impact would occur with respect to the creation of objectionable odors for the No Automated Steel Parking Structure Alternative.

c. Cumulative

(1) Construction

The Certified EIR concluded that the construction emissions associated with the CRA Approved Project would not exceed the SCAQMD's thresholds of significance. Consequently, the Certified EIR concluded that the contribution of daily construction emissions by the CRA Approved Project would have not been cumulatively considerable, and that construction emission impacts would have been less than significant. Construction emissions associated with the Modified Project's construction activities, which includes the same construction activities as the CRA Approved Project as well as additional construction associated with the installation and retrofitting for the new automated steel parking structure and interior building operation, would not exceed the SCAQMD's thresholds of significance. Therefore, the Modified Project's cumulative construction emissions would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to construction emissions.

Like the Modified Project, cumulative construction air quality impacts of the No Automated Steel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to construction emissions.

(2) Operation

Because the CRA Approved Project would not exceed the SCAQMD's thresholds of significance for the criteria pollutants, the Certified EIR concluded that the CRA Approved Project's operational emissions would not be cumulatively considerable. The CRA Approved Project would have been consistent with the growth forecasts for the Hollywood area of the City of Los Angeles, and would have been consistent with the 2003 AQMP. Thus, the cumulative impact of the CRA Approved Project for operational emissions would have been less than significant. Operational emissions associated with the Modified Project would not exceed the SCAQMD's thresholds of significance. In addition, the Modified Project would be consistent with the growth forecasts for the Hollywood area of the City of Los Angeles, and would be consistent with the Final 2016 AQMP consequently, the contribution of daily operational emissions by the Modified Project would not be cumulatively considerable. Therefore, cumulative impacts operational air quality impacts of the Modified Project would be considered less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to daily operational emissions.

Like the Modified Project, cumulative impacts operational air quality impacts of the No Automated Steel Parking Structure Alternative would be considered less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to daily operational emissions.

2. Reference

For a complete discussion of Air Quality (Consistency with Applicable Plans and Policies, Operation, and Cumulative) see Sections IV.B Air Quality and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

B. Geology/Soils

1. Description

a. Seismic Hazards (Fault Rupture)

The Certified EIR for the CRA Approved Project stated that the project site is located in the seismically active region of Southern California. The Certified EIR stated no active surface fault traces identified by the State as delineated on the 1999 Alquist-Priolo

Earthquake Fault Zoning Map, were known to be present beneath the project site. The CRA Approved Project's Geotechnical Report found splays of the Hollywood Fault Zone located approximately 2,500 feet north-northwest of the project site. The Certified EIR concluded the CRA Approved Project would result in less than significant impacts related to exposing people or structures to the risk of loss, injury, or death involving the rupture of a known earthquake fault.

The Modified Project would be located on the same project site as the CRA Approved Project. Therefore, similar to the CRA Approved Project, the Modified Project is located in the seismically active region of Southern California. Modern, wellconstructed buildings are designed to resist the rupture of a known earthquake fault through the use of shear walls and reinforcements. The Modified Project, including the additional construction of the new automated steel parking structure, would be consistent with all applicable provisions of the City of Los Angeles Building Code, as well as the seismic design criteria contained within the Uniform Building Code. Thus, the additional construction and operation of the new automated steel parking structure would not impact this analysis related to exposing people or structures to the risk of loss, injury, or death involving the rupture of a known earthquake fault.

The CRA Approved Project's Geotechnical Report found splays of the Hollywood Fault Zone located approximately 2,500 feet north-northwest of the project site. The project site is not located within a designated Alquist-Priolo Earthquake Fault Zone or a fault rupture study zone. No known active faults trend through the project site. Furthermore, the closest active fault to the site capable of surface rupture is the Hollywood Fault, which lacks surface fault features and therefore, while capable of producing an earthquake, poses a low hazard risk with respect to surface rupture. Since the Certified EIR for the CRA Approved Project, an Alquist-Priolo special study zone was established for the active Hollywood Fault. The closest distance of the Hollywood Fault special study zone to the project site is approximately 700 feet north of the project site's northern property line and the closest mapped active fault trace is approximately 1,200 feet north of the project site's northern property line. The Modified Project's Geotechnical Report concluded that the project site is not located within a special study zone, is not subject to fault rupture, and the issuance of the Seismic Hazard Zone Hollywood Quadrangle Official Map showing the Hollywood Fault being located 1,200 feet north of the project site does not impact the development of the Modified Project or modify any recommendations, analysis, or conclusions in the CRA Approved Project's Geotechnical Report and associated addenda.

Furthermore, the Hollywood Fault lacks surface fault features and therefore, while capable of producing an earthquake, poses a low hazard risk with respect to surface rupture. Thus, the possibility of surface fault rupture affecting the project site would be considered remote. Therefore, consistent with the CRA Approved Project, development of the Modified Project would not expose people or property to hazardous conditions resulting from rupture of a known earthquake fault on the project site or exacerbate environmental conditions related to the potential rupture of a known earthquake fault and impacts would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant

environmental effects or a substantial increase in the severity of previously identified significant effects related to exposing people or structures to the risk of loss, injury, or death involving the rupture of a known earthquake fault.

Like the Modified Project, development of the No Automated Steel Parking Structure Alternative would not expose people or property to hazardous conditions resulting from rupture of a known earthquake fault on the project site or exacerbate environmental conditions related to the potential rupture of a known earthquake fault and impacts would be less than significant. Accordingly, the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to exposing people or structures to the risk of loss, injury, or death involving the rupture of a known earthquake fault.

b. Seismic-Induced Settlement and Liquefaction

The Certified EIR stated, soils on the project site would not be susceptible to liquefaction. The Certified EIR also determined the project site is not within an area of known subsidence associated with fluid withdrawal (groundwater or petroleum), peat oxidation or hydrocompaction. Therefore, the Certified EIR concluded the CRA Approved Project would have less than significant impacts with respect to seismic induced settlement and liquefaction.

The Modified Project is located on the same project site as the CRA Approved Project and would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-induced ground failure associated with settlement and/or liquefaction. Though the project site is located in a liquefiable area, the CRA Approved Project's Geotechnical Report concluded based on site conditions, data, and investigations, the soils on the project site would not be susceptible to liquefaction and the Modified Project's Geotechnical Report confirmed that issuance of the Seismic Hazard Zone Hollywood Quadrangle Official Map did not impact the Modified Project or modify any recommendations, analysis, or conclusions in the CRA Approved Project's Geotechnical Report and associated addenda. As stated in the CRA Approved Project's Geotechnical Report liquefaction generally occurs in saturated, loose to medium dense, granular soils and in saturated, soft to moderately firm slits as a result of strong ground shaking. The soils beneath the groundwater level at the project site are generally fine grained and are firm to stiff. Additionally, the CRA Approved Project's Geotechnical Report explained that the groundwater at the site is at a depth greater than 49 feet bgs and that the project site is not within an area of known subsidence associated with fluid withdrawal (groundwater or petroleum), peat oxidation or hydrocompaction. Therefore, because the Modified Project is located on the same project site as the CRA Approved Project, and the recommendations, analysis, and conclusions in the CRA Approved Project's Geotechnical Report are still applicable to the project site, the Modified Project would also not be susceptible to liquefaction. Therefore, consistent with the Certified EIR's conclusions for the CRA Approved Project, the Modified Project's impacts associated with liquefaction and seismic-induced settlement would be less than significant. Accordingly, as compared to the CRA

Approved Project, the proposed Modified Project would not involve new significant environmental effects or exacerbate existing environmental conditions that would cause a substantial increase in the severity of previously identified significant effects related to seismic induced settlement and liquefaction.

Like the Modified Project, impacts associated with liquefaction and seismic-induced settlement for the No Automated Steel Parking Structure Alternative would be less than significant. Accordingly, the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or exacerbate existing environmental conditions that would cause a substantial increase in the severity of previously identified significant effects related to seismic induced settlement and liquefaction.

c. Landslides

The Certified EIR concluded that the CRA Approved Project would result in less than significant impacts with respect to landslides. The project site is relatively level and ranges from elevation 370 to 360 feet above msl (from north to south). The project site is not located within a City-designated landslide area. Therefore, consistent with the CRA Approved Project analyzed in the Certified EIR, due to the relatively flat topography of the project site and surrounding area, there is no potential for impacts associated with landslides to occur for the Modified Project. Like the Modified Project, due to the relatively flat topography of the project site and surrounding area, there is no potential for impacts associated with landslides to occur for the No Automated Steel Parking Structure Alternative.

d. Septic Tanks or Alternative Waste Water Disposal Systems

The Certified EIR did not evaluate septic tanks or alternative waste water disposal systems. The project site is located in an urban area served by a wastewater collection, conveyance, and treatment system operated by the City of Los Angeles. No septic tanks or alternative disposal systems are necessary for the Modified Project, nor are they proposed. Therefore, no impact would occur. Like the Modified Project, no septic tanks or alternative disposal systems are necessary or proposed for the No Automated Steel Parking Structure Alternative and no impact would occur.

e. Cumulative Geology and Soils Impacts

The Certified EIR stated geotechnical impacts related to future development in the City of Los Angeles would involve hazards related to site-specific soil conditions, erosion, and ground-shaking during earthquakes. The Certified EIR explained these impacts would be site-specific and would not be common to (nor shared with, in an additive sense) the impacts on other sites. Thus, while cumulative development in the project area would increase the overall population for exposure to seismic hazards, adherence to applicable State and Federal regulations, buildings codes and sound engineering practices, geologic hazards could be reduced to less than significant levels. Additionally, the Certified EIR determined the development of the related projects and the CRA Approved Project would be subject to uniform site development and construction review

standards that are designed to protect public safety. Therefore, the Certified EIR concluded cumulative geotechnical impacts would be less than significant.

Similar to the CRA Approved Project, for the Modified Project, cumulative development in the area would increase the overall population for exposure to seismic hazards by increasing the number of people potentially exposed. However, with adherence to applicable State and Federal regulations, buildings codes and sound engineering practices, geologic hazards could be reduced to less-than-significant levels. Furthermore, similar to the CRA Approved Project and its related projects, development of each of the related projects and the Modified Project would be subject to uniform site development and construction review standards that are designed to protect public safety. Thus, consistent with the analysis in the Certified EIR, the Modified Project and the related projects' cumulative geotechnical impacts would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant cumulative environmental effects or a substantial increase in the severity of previously identified cumulative effects related to geology and soils.

Like the Modified Project, the No Automated Steel Parking Structure and the related projects' cumulative geotechnical impacts would be less than significant and would not involve new significant cumulative environmental effects or a substantial increase in the severity of previously identified cumulative effects related to geology and soils.

2. Reference

For a complete discussion of Geology and Soils see Sections IV.C Geology and Soils and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

C. Greenhouse Gas Emissions

1. Description

The Certified EIR preceded the adoption of the 2010 CEQA amendments requiring the consideration of a project's greenhouse gas (GHG) emissions and their effect on global climate change in CEQA documents. For purposes of providing a comparative analysis of the Modified Project's GHG emissions, the GHG analysis included an assessment of the CRA Approved Project.

The CRA Approved Project exhibits several characteristics that are inherently consistent with the green building policies and practices that contribute to a reduction in GHG emissions and thus would have been consistent with these policies had they been applicable to the CRA Approved Project. For example, the CRA Approved Project is a mixed-use, high-density residential/commercial redevelopment project located in a urbanized portion of the Hollywood area near mass transit and a broad mix of land uses. Therefore, the CRA Approved Project would be consistent with plans, programs, and regulations that reduce GHG emissions with respect to reducing mobile source emissions associated with trip generation.

The Modified Project is located on the same project site as the CRA Approved Project. Thus, similar to the CRA Approved Project, the Modified Project would be consistent with plans, programs, and regulations that reduce GHG emissions with respect to reducing mobile source emissions associated with trip generation.

In addition, both the CRA Approved Project and the Modified Project would be consistent with applicable policies and regulations that have been adopted for the purpose of meeting the State's goals to reduce statewide GHG emissions in the future. The CRA Approved Project and the Modified Project's consistency with applicable policies and regulations is summarized below.

- Regarding the AB 32 Scoping Plan policies, both the CRA Approved Project and the Modified Project are substantially consistent with the applicable GHG reduction policies for new development. Due to the enhanced building efficiency associated with updates to Title 24 building energy efficiency standards, and the adoption of the LA Green Building Code, GHG emissions under the Modified Project would be less than those generated under the CRA Approved Project.

- Regarding Executive Orders S-3-05 and B-30-15, as the CRA Approved Project and the Modified Project are consistent with the plans, policies and regulations enacted by the State, regional and local entities in furtherance of GHG reduction efforts, the CRA Approved Project and the Modified Project would not conflict with the states implementation of Executive Orders S-3-05 and B-30-15.

- Regarding SB 375 and Consistency with the 2016-2040 RTP/SCS both the CRA Approved Project and the Modified Project would be consistent with the strategies outlined in the 2016-2040 RTP/SCS which encourage infill and mixed-use developments in high quality transit areas.

- Regarding the L.A. Green Building Code the Modified Project would be consistent with the applicable provisions of the LA Green Building Code, would provide additional support for alternative fuel vehicles, would be consistent with applicable requirements related to source reduction and recycling efforts to minimize the projects solid waste disposal needs, and would provide on-site bicycle storage to facilitate and encourage alternative modes of transit. Specifically, to encourage the use of electric and hybrid-electric vehicles by the Modified Project's residents and visitors the Modified Project would implement PDF D-1 which provides that at least twenty (20)% of the Code required parking stalls will be constructed to accommodate the future placement of facilities for the recharging of electric vehicles (electric vehicle supply equipment (EVSE)) with five (5)% of these stalls being equipped with the electrical vehicle charging stations.

Therefore, both the CRA Approved Project and the Modified Project would be consistent with applicable policies and regulations that have been adopted for the purpose of

meeting the State's goals to reduce statewide GHG emissions in the future. In addition, the Modified Project's post-2020 emissions trajectory is expected to follow a declining trend, consistent with the 2030 and 2050 targets. Further, the Modified Project's GHG impacts would be less than the CRA Approved Project by approximately 847 $MTCO_2e/Yr$. The Modified Project would be substantially consistent with the goals and policies set forth in AB 32, SCAG's 2016-2040 SCS/RTP, SB 375, and applicable provisions of the City's Green Building Code, which are intended to reduce GHG emissions associated with new development. Thus, the Modified Project's GHG impacts would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of GHG impacts that would have resulted under the CRA Approved Project.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's GHG impacts would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of GHG.

Regarding cumulative impacts, given the Modified Project's consistency with State, regional, and City GHG emissions reduction goals and objectives, it would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Similarly, related projects would also be subject to these emissions reduction goals and objectives. Therefore, per CEQA Guidelines Section 15064(h)(3), the Modified Project's cumulative impacts with respect to GHG emissions would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of GHG emissions that would have otherwise resulted under the CRA Approved Project.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's cumulative impacts with respect to GHG emissions would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of GHG emissions.

2. Project Design Feature

The following Project Design Feature is relevant to GHG emissions:

PDF D-1: To encourage carpooling and the use of electric vehicles by Modified Project residents and visitors, at least 20 percent of the Code required parking spaces shall be constructed to accommodate the future placement of facilities for the recharging of electric vehicle (electric vehicle supply equipment (EVSE)) with five (5) percent of these stalls being equipped with the electrical vehicle charging stations. Plans shall 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 electric vehicle charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating ampacity. Only raceways and related components are required to be installed at the time of construction. When the application of the 20% results in a fractional space, the required number of spaces

would be rounded up to the next whole number. A label stating "EVCAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

3. Reference

For a complete discussion of Greenhouse Gas Emissions see Sections IV.D Greenhouse Gas Emissions and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

D. Cultural Resources

1. Description

a. Historic Resources

The Certified EIR for the CRA Approved Project concluded the CRA Approved Project would have no impact on historic resources as none of the buildings on the project site are classified as a historic resource pursuant to CEQA. The Certified EIR in Section IV.E Historic Resources explained that the CRA Approved Project's applicant was exploring options to retain and restore the exterior façade and various interior treatments of the OSF Building or alternatively would seek other methods that would not require retention and/or restoration but would memorialize the social significance of this building as it relates to the development of the Hollywood area.

Compared to the CRA Approved Project, instead of possibly retaining and incorporating the OSF Building into the architecture of the CRA Approved Project, the Modified Project would demolish the OSF Building and would create a replica of its façade in approximately the same position and dimensions of the demolished OSF Building. Though the Modified Project would not retain or restore the OSF Building, since the Certified EIR's analysis determined the OSF Building was not historically significant, the Modified Project would have no impact upon historic resources. The improvements proposed under the Modified Project, which include a new automated steel parking structure and interior building renovations do not impact this analysis. As such, consistent with the analysis in the Certified EIR for the CRA Approved Project, the Modified Project would not significantly impact any historic or cultural resource and no mitigation measures are required. Therefore, as compared to the CRA Approved Project, the Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to historic resources.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not significantly impact any historic or cultural resource and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to historic resources.

b. Selma-LaBaig Historic District

As concluded in the Certified EIR, the project site is not adjacent to the Selma – LaBaig Historic District, nor is it on the same street as the Historic District. Because the immediate setting of the Historic District would not be affected by the CRA Approved Project and the general setting of the area would not dramatically change, the Certified EIR determined the CRA Approved Project would have no impact on the Selma-LaBaig Historic District.

The Modified Project is located on the same project site as the CRA Approved Project and there has been no change to the boundaries of the Selma – LaBaig Historic District. Therefore, similar to the CRA Approved Project, as the project site is not adjacent to nor across the street from the Selma – LaBaig Historic District, the immediate setting of the Historic District would not be directly affected by the Modified Project. In addition, similar to the CRA Approved Project, the general setting of the area also would not dramatically change with the Modified Project. The Modified Project would not directly affect the setting of the Selma–LaBaig Historic District due to two factors: the distance and intervening built environment between the project site and the Historic District, and the fact that the improvements proposed under the Modified Project would not be out of character for the existing setting of high-rise developments on Sunset Boulevard. Therefore, the buildings within the Historic District would continue to be considered eligible for listing in the National Register. As such, consistent with the analysis in the Certified EIR for the CRA Approved Project, the Modified Project will have no impact on the historic resources in the vicinity of the project site. Therefore, the Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to historic resources in the vicinity of the project site.

Like the Modified Project, the No Automated Steel Parking Structure Alternative will have no impact on the historic resources in the vicinity of the project site and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to historic resources in the vicinity of the project site.

c. Archeological Resources, Paleontological Resources, Human Remains, and Tribal Resources

The Certified EIR did not analyze the CRA Approved Project's potential impacts upon archeological, paleontological, human remains, or tribal resources. In Section V. General Impact Categories of the Certified EIR for the CRA Approved Project, the Certified EIR stated discovery of any archaeological resources would be found during earthwork activities. Though no archaeological sites were known to exist beneath the project site, the Certified EIR concluded potential impacts associated with the accidental discovery of unknown archaeological or paleontological resources would be mitigated to a less than significant level by implementing standard City mitigation measure during the earthwork and excavation phase. The Certified EIR did not provide conclusions specific to human remains or tribal resources.

The project site is currently improved with a vacant 22-story, approximately 250-foot high mixed use building of approximately 319,562 square feet of floor area, and a closed approximately 18,962 square foot public park. Compared to the CRA Approved Project, the Modified Project includes minimal additional construction associated with the automated steel parking structure and interior building renovations. As discussed in Section IV. C, Geology and Soils of the Draft Supplemental EIR, installation of the automated steel parking structure would not extend below the areas of prior excavations and thus the Modified Project's additional construction activities will present no potential to impact archaeological resources, paleontological resources, human remains, or tribal resources. In addition, in compliance with AB 52, the City of Los Angeles (lead agency) distributed AB 52 tribal consultation notices related to the Modified Project to tribes within the greater Los Angeles and Southern California region. No tribes on the NAHC tribal consultation list responded to the AB 52 tribal consultation notices. Therefore, because the Modified Project's minimal additional construction would not extend below the areas of prior excavations, the project site is not known to be associated with archaeological sites, and no tribes on the NAHC tribal consultation list have requested consultation, the probability for the discovery of an unknown site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe is considered low. As such, the Modified Project's additional construction activities would have no impact upon archaeological resources, paleontological resources, human remains, or tribal resources.

Furthermore, similar to the CRA Approved Project, the Modified Project would implement the standard City mitigation measure as Regulatory Compliance Measure CM E-1, which ensures that Modified Project development will be halted if any archaeological or paleontological materials are encountered, a professional archaeologist or paleontologist will be secured to assess the resources and evaluate the impact, and any required archaeological or paleontological surveys, studies or reports shall be submitted to the UCLA Archaeological Information Center. Regulatory Compliance Measure CM E-1 would ensure that the Modified Project's impacts to archaeological resources, paleontological resources, and tribal resources would be less than significant. Additionally, the Modified Project would comply with Section 15064.5(d) of the CEQA Guidelines, Health and Safety Code Section 7050.5, and California Public Resources Code Section 5097.9, which address treatment of human remains in the event of accidental discovery, to ensure impacts to human remains would be less than significant. Therefore, the Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to archaeological resources, paleontological resources, human remains or tribal resources.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would have a less than significant impact upon archaeological resources, paleontological resources, human remains, or tribal resources and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to archaeological resources, paleontological resources, human remains or tribal resources.

d. Cumulative

The Certified EIR for the CRA Approved Project concluded the CRA Approved Project would result in less than significant cumulative impacts to cultural resources. Impacts related to historic resources would be site-specific and would not be common to (nor shared with, in an additive sense) the impacts on other sites. No historical resources were found on the project site and the project site would continue to be physically and visually separated from the Selma – LaBaig Historic District. In addition, there are no related projects between the project site and the Selma – LaBaig Historic District. Therefore, the Modified Project would have no impact upon historical resources, and the Modified Project in combination with the related projects would not have the potential to impact the Selma – LaBaig Historic District.

Furthermore, impacts to archeological resources, paleontological resources, human remains, or tribal resources tend to be site specific and are assessed on a site-by-site basis. Similar to the Modified Project, each of the related projects would be subject to the CEQA review process to identify and assess the potential for discovery of archaeological resources, paleontological resources, human remains, and tribal resources within the respective area of impact. Related projects would also be required to initiate the AB 52 tribal consultation process with local tribal representatives to assess the potential likelihood of tribal resources in a given area as part of the CEQA review. Similar to the Modified Project, such determinations would be made on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement the appropriate mitigation measures. As such, impacts related to archaeological resources, paleontological resources, human remains, and tribal resources would be site-specific and would not be common to (nor shared with, in an additive sense) the impacts on other sites. Thus, cumulative impacts associated with the accidental discovery of archaeological resources, paleontological resources, human remains, or tribal resources would be reduced to less than significant levels with the incorporation of standard city measures. Therefore, the Modified Project and the related projects' cumulative archaeological resources, paleontological resources, human remains, and tribal resources impacts would be less than significant. Accordingly, consistent with the analysis in the Certified EIR for the CRA Approved Project, cumulative cultural resources impacts would be less than significant, and the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative cultural resources impacts.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's cumulative cultural resources impacts would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative cultural resources impacts.

2. Reference

For a complete discussion of Cultural Resources see Sections IV.E Cultural Resources and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

E. Noise

1. Description

a. Operational Traffic Noise

The Certified EIR concluded the CRA Approved Project would result in a less-than-significant noise impact related to increased traffic volumes. The Modified Project would result in a slight reduction to the CRA Approved Project's residential units and commercial floor area for retail and office spaces which, in turn, would alter the number of generated vehicle trips and traffic volumes that were analyzed in the Certified EIR. Thus, locations in the vicinity of the project site could experience slight changes in noise levels between the CRA Approved Project's operational traffic noise levels and the Modified Project's operational traffic noise levels. The Modified Project would increase local noise levels by a maximum of 0.1 dBA CNEL at all roadway segments with the exception of Gordon Street north of Sunset Boulevard, which would have an increase of 1.3 dBA. This increase would be below the 3 dBA significance threshold. Therefore, these increased noise levels from the Modified Project, consistent with the analysis in the Certified EIR for the CRA Approved Project, would not expose persons to or generation of noise levels in excess of established standards or result in a substantial temporary or permanent increase in ambient noise levels in the project vicinity. As such, the Modified Project would result in a less than significant impact related to operational traffic noise. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to operational traffic noise.

b. Cumulative Operational Noise Impacts

(1) HVAC Equipment Noise

The Certified EIR did not evaluate cumulative operational noise impacts from HVAC Equipment.

The Modified Project's operational noise impacts associated with the HVAC equipment would be less than significant due to noise attenuation and required compliance with the regulations under Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dBA. The related projects would also be required to comply with the regulations under Section 112.02 of the LAMC. Further, like the Modified Project the related projects would also be required to comply with the existing Noise Ordinance (Ordinance No. 144,331), which prohibits unnecessary, excessive, and annoying noise. Noise impacts are localized in nature and decrease substantially with distance. Accordingly, the cumulative operational noise impact analysis for HVAC Equipment Noise focused on the nearest related project. The Modified Project and the nearest related project, Related Project 46, located at 5901 Sunset Boulevard, immediately east of the project

site, could potentially result in cumulative operational noise impacts from HVAC equipment to 1527 – 1533 ¾ Bronson Street (Sensitive Receptor No. 9). The Modified Project's HVAC equipment would not increase existing ambient noise levels at the nearest sensitive receptors by 3 dBA or more. For Related Project 46, the HVAC mechanical equipment would be located at the roof level, approximately 15 stories above grade level. At this distance to 1527 – 1533 ¾ Bronson Street (Sensitive Receptor No. 9), the HVAC equipment noise would be imperceptible. Thus, the cumulative HVAC equipment noise from the Modified Project and Related Project 46, located at 5901 Sunset Boulevard, would not increase existing ambient noise levels by 3 dBA or more. Additionally, for the other related projects, there are intervening structures between the Modified Project and the related projects. Thus, the resulting stationary noise levels from the Modified Project and the related projects at nearby land uses would not increase existing ambient noise levels. Therefore, cumulative impacts from HVAC equipment noise would be less than significant.

Like the Modified Project, cumulative impacts from HVAC equipment noise would be less than significant for the No Automated Steel Parking Structure Alternative.

(2) Parking Structure Noise

The Certified EIR did not evaluate cumulative operational noise impacts from the parking structure. Noise impacts are localized in nature and decrease substantially with distance. Accordingly, the cumulative operational noise impact analysis for parking structure noise focused on the nearest related project.

The Modified Project and the nearest related project, Related Project 46, located at 5901 Sunset Boulevard, immediately east of the project site, could potentially result in cumulative operational noise impacts from operations occurring in the above-ground components of the parking structures to nearby sensitive receptors. The Modified Project's parking structure, including the addition of the automated steel parking structure would not generate noise that would increase ambient noise levels at the nearby sensitive receptors by 3 dBA or more. Because of the distance between the Modified Project and Related Project 46's parking structure access points, and the orientation of the openings facing opposite directions, the cumulative noise from the Modified Project and Related Project 46's parking structures would not generate noise that would increase ambient noise levels at the nearby sensitive receptors by 3 dBA or more. Therefore, cumulative impacts from parking structure noise would be less than significant.

Like the Modified Project, the No Automated Steel Parking Structure Alternative and Related Project 46's parking structures would not generate noise that would increase ambient noise levels at the nearby sensitive receptors by 3 dBA or more. Therefore, cumulative impacts from parking structure noise would be less than significant.

(3) Noise from People

The Certified EIR did not evaluate cumulative noise from people utilizing outdoor areas. Noise impacts are localized in nature and decrease substantially with distance. Accordingly, the cumulative operational noise impact analysis from people utilizing outdoor areas focused on the nearest related project.

The Modified Project and the nearest related project, Related Project 46, located at 5901 Sunset Boulevard, immediately east of the project site, could potentially result in cumulative operational noise impacts related to people utilizing the projects' outdoor areas. The Modified Project would result in less-than-significant impacts related to people utilizing the Modified Project's outdoor areas. Due to the orientation and shielding of Related Project 46's outdoor courtyards, the cumulative noise from people utilizing the Modified Project and Related Project 46's outdoor areas would not generate noise that would increase ambient noise levels at the nearby sensitive receptors by 3 dBA or more. Therefore, the cumulative impacts from noise from people utilizing outdoor areas would be less than significant.

Like the Modified Project, the No Automated Steel Parking Structure Alternative and Related Project 46's outdoor areas would not generate noise that would increase ambient noise levels at the nearby sensitive receptors by 3 dBA or more. Therefore, the cumulative impacts from noise from people utilizing outdoor areas would be less than significant.

(4) Cumulative Operational Traffic Noise

The Certified EIR concluded the CRA Approved Project would result in significant and unavoidable impacts related to cumulative roadway noise. For the Modified Project, cumulative traffic-generated noise impacts have been assessed based on the difference between current roadway noise levels and future noise levels with the Modified Project and cumulative development. Cumulative development along with the Modified Project would increase local noise levels by a maximum of 1.4 dBA CNEL, which would not exceed the 3.0 dBA CNEL threshold. Because the resulting noise levels would be under 3 dBA, the resulting roadway noise level increase would not be considered significant. Therefore, compared to the analysis in the Certified EIR for the CRA Approved Project, the Modified Project and the related projects would not constitute a significant cumulative impact related to roadway noise.

Like the Modified Project, the No Automated Steel Parking Structure Alternative and the related projects would not constitute a significant cumulative impact related to roadway noise.

2. Reference

For a complete discussion of Noise (Operational Traffic and Cumulative) see Sections IV.F Noise and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

F. Population and Housing

1. Description

a. Population and Employment Growth Forecasts of the RTP/SCS Due to Construction Jobs

The Certified EIR for the CRA Approved Project did not provide construction job forecasts. While the Certified EIR did not discuss construction employment growth forecasts specifically, the Certified EIR concluded construction related population growth impacts as a result of the CRA Approved Project would be less than significant. As described in the Certified EIR for the CRA Approved Project, construction of the CRA Approved Project would result in increased employment opportunities during the CRA Approved Project's construction period. However, the Certified EIR determined the employment opportunities provided by the construction of the CRA Approved Project would not likely result in household relocation by construction workers to the vicinity of the project site. Thus, the Certified EIR concluded the generation of temporary construction jobs would not cause a permanent increase in local population.

To allow for the development of the Modified Project, minimal additional on-site construction is necessary associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations, including any renovations necessary to comply with the building code. It is anticipated that, due to different trades working at the project site at different times, the additional construction associated with the Modified Project would generate up to approximately 83 construction-related jobs on a daily basis during the Modified Project's additional three to four month construction period. With the Modified Project's minimal additional construction activities, it is expected that less than 100 additional short-term construction jobs would be generated by the Modified Project. The CRA Approved Project was expected to generate up to 200 – 250 daily construction workers during the construction period. Therefore, the Modified Project's additional construction jobs are not a substantial increase to the total number of construction jobs previously anticipated for the CRA Approved Project.

The employment opportunities provided by the additional construction associated with the Modified Project are not likely to result in any household relocation by construction workers to the vicinity of the project site. Based on the temporary nature and relatively short duration of the construction work involved, it is anticipated that the construction work force would be filled by the local resident population and skilled labor positions that already exist within the greater Los Angeles region.

Additionally, the approximately 83 daily construction workers for the Modified Project's additional construction would represent approximately 0.06 percent of the total workers employed in the construction industry in Los Angeles County in December 2015. Therefore, the Modified Project's projected construction workers could be accommodated by the existing regional supply of construction workers. Further, it is highly unlikely that any construction workers would relocate their place of residence as a consequence of working on the additional construction for the Modified Project given the temporary nature and short duration of the construction work involved. Therefore,

indirect population growth and employment growth impacts associated with construction of the Modified Project would be less than significant, which is consistent with the conclusions of the analysis in the Certified EIR for the CRA Approved Project. Accordingly, the proposed Modified Project would result in less than significant impacts to population growth and employment growth during construction and as compared to the CRA Approved Project, would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to indirect population growth and employment growth impacts during construction.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would result in less than significant impacts to population growth and employment growth during construction and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to indirect population growth and employment growth impacts during construction.

b. Population and Employment Growth Forecasts of the RTP/SCS Due to Permanent Jobs

The Certified EIR for the CRA Approved Project did not provide permanent job forecasts. While the Certified EIR did not discuss permanent employment growth forecasts specifically, the Certified EIR concluded that the CRA Approved Project would result in a less than significant impact with respect to population growth due to permanent jobs. The Certified EIR estimated the previous uses on the project site generated approximately 35 commercial retail jobs. The Certified EIR calculated the CRA Approved Project would be expected to generate approximately 181 employees at the project site, which resulted in a net increase of 146 jobs. As described in the Certified EIR for the CRA Approved Project, the jobs in the retail and restaurant industries do not generate indirect population growth within the region as such jobs are generally filled by residents that already reside within proximity to those jobs. As such, the Certified EIR concluded the CRA Approved Project's proposed uses would not generate substantial indirect population growth or demand for new housing.

The Modified Project would not induce substantial population growth as a result of providing permanent jobs on the project site. As compared to the CRA Approved Project, the Modified Project would result in a slight reduction to the amount of commercial floor area for retail and office spaces. The Modified Project would be expected to generate approximately 128 net new employees and approximately 163 gross new employees at the project site. For comparative purposes, the Modified Project's net and gross increase in employment would be 18 fewer employees than estimated in the Certified EIR.

On a Citywide basis, the Modified Project's anticipated employment generation would be well within the anticipated employment growth of 472,700 new jobs expected between 2012 and 2040, based on the 2016-2040 RTP/SCS employment growth forecast. Furthermore, on a regional scale, the Modified Project's employment generation would be well within the anticipated employment growth of 2,432,000 new jobs expected between 2012 and 2040, based on the 2016-2040 RTP/SCS employment

growth forecast. Therefore, the Modified Project's employees would be within the planned employment growth forecasts. Additionally, jobs in the retail and restaurant industries do not typically generate indirect population growth within the region as such jobs are generally filled by residents that already reside within proximity to those jobs. As such, the Modified Project would not generate substantial indirect population growth or demand for new housing, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. Accordingly, the Modified Project would result in less than significant impacts to population growth and employment growth during operation and as compared to the CRA Approved Project, would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to indirect population growth and employment growth impacts during operation.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would result in less than significant impacts to population growth and employment growth during operation and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to indirect population growth and employment growth impacts during operation.

c. Population Growth Due to Housing

The Certified EIR concluded that the CRA Approved Project would result in a less than significant impact with respect to population growth due to housing. As described in the Certified EIR for the CRA Approved Project, the CRA Approved Project would generate approximately 744 gross new residents to the project site or 722 net new residents to the project site. The Certified EIR stated, based on the forecast by the Los Angeles Citywide General Plan Framework EIR which the Hollywood Community Plan also utilized, the 722 net new residents would represent approximately 2.1 percent of the overall remaining population growth that was expected to occur in the Hollywood CPA between 2004 and 2010 and 0.4 percent of the overall population growth that was expected to occur in the City of Los Angeles between 2004 and 2010 based on the Regional Comprehensive Plan and Guide (RCPG). Thus, the Certified EIR determined the CRA Approved Project would be consistent with the population growth forecasts of the City's General Plan including the Hollywood Community Plan, and SCAG's RCPG.

Like the CRA Approved Project, the Modified Project would also directly increase population growth within the region as a result of the development of 299 new residential apartment units, including 284 market rate units and 15 affordable housing units at the "Very Low" income level (5 percent of total units). As compared to the CRA Approved Project, the Modified Project would result in a slight reduction to the CRA Approved Project's residential units (from 311 to 299), but would also provide affordable housing units. The provision of affordable housing is consistent with the goals and policies set forth in the City's RHNA and Housing Element.

The Modified Project is estimated to introduce approximately 693 net new or approximately 715 gross new permanent residents to the project site. For comparative purposes, the Modified Project's net and gross increase in residents would be 29 fewer

residents than estimated in the Certified EIR for the CRA Approved Project. On a regional scale, the Modified Project would represent less than 0.018 percent of the total population growth anticipated to occur within SCAG's regional population growth projection between 2012 and 2040, based on the 2016-2040 RTP/SCS. Accordingly, the population growth associated with the Modified Project is within the planned population growth for the citywide and regional population projections and consistent with the population growth forecasts of the City's General Plan and SCAG's 2016-2040 RTP/SCS.

Therefore, operation of the Modified Project would result in less than significant impacts related to population growth. As compared to the CRA Approved Project, the Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to population growth impacts.

Like the Modified Project, operation of the No Automated Steel Parking Structure Alternative would result in less than significant impacts related to population growth and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to population growth impacts.

d. Housing Growth Forecasts of the RTP/SCS

The Certified EIR concluded that the CRA Approved Project would result in a less than significant impact with respect to housing growth. The CRA Approved Project would generate a net increase of 302 housing units. The Certified EIR stated the 311 gross increase of dwelling units generated by the CRA Approved Project would represent approximately 4.4 percent of the overall residences expected to be constructed in the Hollywood CPA between 2004 and 2010. The Certified EIR determined the increase of housing units generated by the CRA Approved Project would be consistent with the housing growth forecasts of the General Plan, the City's Framework Element, the City's Housing Element, the Community Plan, the Redevelopment Plan, and the Regional Comprehensive Plan and Guide (RCPG).

Similar to the CRA Approved Project, the Modified Project would serve to implement the residential goals and objectives of the Community Plan by providing a high-density mixed-use development along the Sunset Boulevard corridor, thus minimizing impacts on lower-density residential neighborhoods elsewhere in the project area. The Modified Project would be expected to generate approximately 290 net new dwelling units or 299 gross new dwelling units at the project site. For comparative purposes, the Modified Project's net and gross increase in dwelling units would be 12 fewer dwelling units than estimated in the Certified EIR.

The residential apartment units generated by the Modified Project would represent approximately 0.082 percent of the total housing growth anticipated to occur within the City of Los Angeles between 2012 and 2040, based on the 2016-2040 RTP/SCS housing growth forecast. On a regional scale, the Modified Project would represent approximately 0.02 percent of the total population growth anticipated to occur within

SCAG's regional housing growth projection between 2012 and 2040, based on the 2016-2040 RTP/SCS housing growth forecast. As such, similar to the CRA Approved Project, the housing growth associated with the Modified Project is consistent with and has already been anticipated and planned for in the regional housing projections and would be consistent with the housing growth forecasts of the 2016-2040 RTP/SCS for the year 2040 and beyond. Consistent with the CRA Approved analyzed in the Certified EIR, the Modified Project would be consistent with applicable housing growth forecasts. Thus, the Modified Project's housing growth impacts would be less than significant. Therefore, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to housing growth impacts.

Like the Modified Project, the Modified Project's housing growth impacts would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to housing growth impacts.

(1) Consistency with Regional Housing Policies

The CRA Approved Project would be generally consistent with and would implement the growth and/or housing policies identified in SCAG's RCPG, the City's Framework Element, the City's Housing Element, the Community Plan, and the Redevelopment Plan.

Similar to the CRA Approved Project, the Modified Project would be generally consistent with and would implement the growth and/or housing policies identified in SCAG's 2016-2040 RTP/SCS, the City's General Plan Framework Element, the 2013 to 2021 Housing Element, the Community Plan, and the Redevelopment Plan. The 299 residential apartment units generated by the Modified Project would represent approximately 0.082 percent of the total housing growth anticipated to occur within the City of Los Angeles and approximately 0.02 percent of the total population growth anticipated to occur within SCAG's regional housing growth projection between 2012 and 2040, based on the 2016-2040 RTP/SCS housing growth forecast. Furthermore, the Modified Project would be consistent with the growth projections identified by SCAG, as well as the housing goals and policies for the Redevelopment Area pursuant the Redevelopment Plan. The Modified Project would be consistent with all applicable adopted City and regional housing plans, and the Modified Project's impacts related to the consistency with regional housing policies would be less than significant, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. Therefore, the Modified Project's housing growth impacts related to the consistency with regional housing policies would not substantially increase the housing growth impacts identified in the Certified EIR for the CRA Approved Project and the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to housing growth impacts and consistency with regional housing policies.

Like the Modified Project, the No Automated Steel Parking Structure's housing growth impacts related to the consistency with regional housing policies would not substantially increase the housing growth impacts identified in the Certified EIR for the CRA Approved Project and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to housing growth impacts and consistency with regional housing policies.

e. Cumulative Impacts

(1) Population and Employment Growth Due to Construction Jobs

The Certified EIR for the CRA Approved Project did not provide construction job forecasts and did not compare the CRA Approved Project combined with the related projects' employment generation during construction to job forecasts. The Certified EIR did state that while construction of the CRA Approved Project combined with the related projects would generate an increase in construction jobs, it was expected that most construction workers would already reside in the surrounding community or would commute from their existing place of residence. Therefore, the Certified EIR concluded a substantial number of permanent residents would not be generated as a result of the construction of the CRA Approved Project combined with the related projects, and therefore cumulative impacts would be less than significant.

Similar to the CRA Approved Project, construction of the Modified Project combined with the related projects would generate an increase in construction jobs in the project area. The Modified Project's 100 additional short-term construction jobs would be within the planned construction employment growth projections for the region. Furthermore, the Modified Project's construction jobs would be very limited as compared to the number of construction jobs that would be generated during the construction periods for the related projects. In addition, because of the limited additional construction period for the Modified Project, the overlap of construction activities between the Modified Project and related projects would be expected to be minimal. Similar to the Modified Project, each of the related projects would be subject to the CEQA review process to identify and assess the potential for impacts related to population and employment growth due to construction jobs. Further through the environmental review the related projects would be reviewed to ensure that construction jobs would be within the planned construction employment growth projections for the region. As such, it is expected that the construction jobs generated by the Modified Project and the related projects would be within the total construction jobs projected for the region. Accordingly, the Modified Project and its related projects are not anticipated to exceed the construction employment growth projections stated within the 20162040 RTP/SCS from 2015 through 2040 at the regional level.

With regard to the number of cumulative construction workers for the Modified Project and the related projects, while the construction of the Modified Project combined with the related projects would generate an increase in construction jobs in the project area, skilled construction jobs are typically filled by the existing regional supply of construction

workers. The Modified Project's additional 83 construction workers that would be on-site on a daily basis would represent approximately 0.06 percent of the existing regional supply of construction workers. Similar to the CRA Approved Project, it is anticipated that most construction workers would come from the existing construction industry workforce within Los Angeles County, and with contractors that already reside in the surrounding community or would commute from their existing place of residence within the region. The Modified Project's additional 83 construction workers that would be on-site on a daily basis for the additional three to four month construction period would be very limited as compared to the number of construction workers for the construction periods for the related projects. In addition, because of the limited additional construction period for the Modified Project, the overlap of construction activities between the Modified Project and related projects would be expected to be minimal. As a result, construction activities for the Modified Project are not anticipated to deplete the supply of available construction workers for a sufficient duration such that construction of the Modified Project and the related projects would require additional construction workers beyond the workforce supply available in Los Angeles County. As such, consistent with the CRA Approved Project, a substantial number of new permanent residents would not be generated as a result of the construction of the Modified Project combined with the related projects and impacts associated with cumulative population growth due to temporary jobs would be less than significant.

Thus, consistent with the Certified EIR's analysis of the CRA Approved Project, the Modified Project in combination with the identified related projects would result in less than significant cumulative impacts upon population and employment growth due to construction jobs. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative population and employment growth due to construction jobs.

Like the Modified Project, the No Automated Steel Parking Structure Alternative in combination with the identified related projects would result in less than significant cumulative impacts upon population and employment growth due to construction jobs and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative population and employment growth due to construction jobs.

(2) Population and Employment Growth Due to Permanent Jobs

The Certified EIR for the CRA Approved Project did not provide permanent job forecasts and did not compare the CRA Approved Project combined with the related projects employment generation during operation to job forecasts. The Certified EIR did state that, similar to the construction jobs created, it was expected that the permanent jobs would be filled by employees already residing in the surrounding community or would commute from their existing place of residence. Therefore, the Certified EIR concluded a substantial number of permanent residents would not be generated as a result of the

permanent jobs created by the CRA Approved Project combined with the related projects and cumulative impacts would be less than significant.

Similar to the CRA Approved Project, the Modified Project combined with the related projects would introduce new permanent jobs to the project area. The Modified Project plus the related projects would cumulatively contribute approximately 22,340 new employees to the project area. Of the 22,340 new cumulative employees, the Modified Project's 163 new employees would comprise approximately 0.7 percent. Additionally, the anticipated permanent employees in the Modified Project plus its related projects would represent approximately 4.73 percent of the total employment growth anticipated to occur within the City of Los Angeles between 2012 and 2040, based on the 2016-2040 RTP/SCS employment growth forecast. On a regional scale, the Modified Project plus its related projects would represent approximately 0.92 percent of the total employment growth anticipated to occur within SCAG's regional employment growth projection between 2012 and 2040, based on the 2016-2040 RTP/SCS employment growth forecast. Accordingly, the Modified Project and its related projects would not exceed the growth projections stated within the 2016-2040 RTP/SCS at a City or regional level. Therefore, the Modified Project and its related projects would be within the employment growth projections of the 2016-2040 RTP/SCS. As such, the cumulative employment growth associated with the Modified Project and the related projects is consistent with the employment growth forecasts and has already been anticipated and planned for.

Thus, consistent with the Certified EIR's analysis of the CRA Approved Project, the Modified Project in combination with the identified related projects would result in a less than significant cumulative impact related to population and employment growth due to permanent jobs. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative population and employment growth due to permanent jobs.

Like the Modified Project, the No Automated Steel Parking Structure Alternative in combination with the identified related projects would result in a less than significant cumulative impact related to population and employment growth due to permanent jobs and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative population and employment growth due to permanent jobs.

(3) Cumulative Population Growth

The Certified EIR concluded the new residents generated from the CRA Approved Project and the related projects would be consistent with the population growth forecast for the Hollywood CPA and impacts associated with cumulative population growth would be less than significant.

For comparative purposes, the Modified Project and its related projects would generate 22,162 new residents as compared to the CRA Approved Project and its related

projects' 14,137 new residents, though the residents resulting from the Modified Project and its related projects would be spread over a larger area that goes beyond the Hollywood CPA.[1] The 722 new residents anticipated to be generated by the CRA Approved Project's 311 new residents' would represent an approximately 5.2 percent contribution of the 14,137 new cumulative residents in the Hollywood CPA. Compared to the CRA Approved Project, the 661 new residents anticipated to be generated by the Modified Project would represent approximately 3 percent of the 22,162 new cumulative residents both within and outside of the Hollywood CPA. Thus, the Modified Project would contribute a smaller percentage of cumulative residents than the CRA Approved Project.

With respect to residents, the Modified Project plus its related projects would represent approximately 2.9 percent of the total population growth anticipated to occur within the City of Los Angeles between 2012 and 2040, based on the 2016-2040 RTP/SCS population growth forecast. On a regional scale, the Modified Project plus its related projects would represent approximately 0.58 percent of the total population growth anticipated to occur within SCAG's regional population growth projection between 2012 and 2040, based on the 2016-2040 RTP/SCS population growth forecast. Accordingly, the Modified Project and related projects would not exceed the growth projection stated within the 2016-2040 RTP/SCS at a City or regional level. As such, similar to the CRA Approved Project, the cumulative population growth associated with the Modified Project and the related projects is consistent with the population growth forecasts and has already been anticipated and planned for.

Thus, consistent with the Certified EIR's analysis of the CRA Approved Project, the Modified Project in combination with the identified related projects would result in a less than significant cumulative impact related to population growth. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative population growth.

Like the Modified Project, the No Automated Steel Parking Structure Alternative in combination with the identified related projects would result in a less than significant cumulative impact related to population growth and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative population growth.

(4) Cumulative Housing Growth

The Certified EIR concluded the new residential units generated from the CRA Approved Project and related projects would be consistent with the housing growth forecast for the Hollywood CPA and impacts associated with cumulative housing growth would be less than significant.

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[1] The Certified EIR only analyzed the cumulative new residents located in the Hollywood CPA, while the Modified Project's analysis analyzes the cumulative new residents located in a two mile radius, including related projects located outside the Hollywood CPA.

The Modified Project plus its related projects involving residential developments would cumulatively contribute approximately 10,028 new residential units to the area. For comparative purposes, the Modified Project and the related projects increase in dwelling units would be 10,028 new dwelling units as compared to the CRA Approved Project and its related projects' 6,283 new dwelling units, though the residential units resulting from the Modified Project and its related projects would be spread over a larger area that goes beyond the Hollywood CPA.[2] As compared to the CRA Approved Project, the Modified Project would result in a reduction in the number of residential dwelling units (from 311 to 299). Furthermore, the CRA Approved Project's 311 new residential units would represent approximately 5 percent of the 6,283 new cumulative residential units in the Hollywood CPA. Compared to the CRA Approved Project, the Modified Project's 299 new residential units would represent approximately 3 percent of the 10,028 new cumulative residential units both within and outside of the Hollywood CPA. Thus, the Modified Project would contribute a smaller percentage of cumulative residential units than the CRA Approved Project.

Based on the 2016-2040 RTP/SCS housing growth projection for City of Los Angeles subregion, the remaining projected housing growth for the City would be 364,800 housing units between 2012 and 2040. The Modified Project and related projects would not exceed the growth projection stated within the 2016-2040 RTP/SCS at a City or regional level. As such, similar to the CRA Approved Project, the cumulative housing growth associated with the Modified Project and the related projects is consistent with the housing growth forecasts and has already been anticipated and planned for. Thus, consistent with the Certified EIR's analysis of the CRA Approved Project, the Modified Project in combination with the identified related projects would have a less than significant impact on cumulative housing growth. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative housing growth.

Like the Modified Project, the No Automated Steel Parking Structure Alternative in combination with the identified related projects would have a less than significant impact on cumulative housing growth and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative housing growth.

2. Reference

For a complete discussion of Population, Housing, and Employment see Sections IV.E Population, Housing & Employment and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

G. Land Use Planning (Operation and Cumulative)

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[2] The Certified EIR only analyzed the cumulative new residents located in the Hollywood CPA, while the Modified Project's analysis analyzes the cumulative new residents located in a two mile radius, including related projects located outside the Hollywood CPA.

1. Description

a. Land Use Compatibility

The Certified EIR concluded the CRA Approved Project would be substantially compatible with the surrounding land uses and land use compatibility impacts would be less than significant. As described in the Certified EIR, the design, height and massing of the CRA Approved Project would be consistent with existing development in the area and would improve upon the project site's current aesthetics. The Certified EIR concluded that the CRA Approved Project's 23-story structure (including ground floor and parking uses) are compatible with the surrounding 2- to 22story commercial and multi-family residential buildings in this area of Hollywood.

The Modified Project would enhance a key public transportation center by providing high-density housing in a designated transit priority area. Consistent with SB 375, the Modified Project would also help revitalize the area by providing an example of "smart-growth" infill development consisting of a mixed-use residential building with office and neighborhood serving retail land uses. Furthermore, the Modified Project would include an approximate 18,962 square foot park, which would add much-needed green space and passive recreational open space opportunities for the neighborhood. The design, height and massing of the Modified Project would be consistent with those of the CRA Approved Project and the project site. The Modified Project is shorter than the CRA Approved Project (from 23 stories at 260 feet with a 65-foot parking podium to 22 stories at 250 feet with a 50-foot parking podium). In addition, consistent with the analysis in the Certified EIR, the project site is located on one of the largest mixed-use thoroughfares in the Hollywood Area; Sunset Boulevard, and the Modified Project would continue to be compatible with the scale and massing of the other structures along Sunset Boulevard and the project site's immediate vicinity. Further, the project site's location in close proximity to Metro Red Line Stations located at Hollywood Boulevard and Vine Street and Hollywood Boulevard and Western Avenue would make it an appropriate place for a mixed-use, multiple-family residential project. Through its proposed uses and architectural form, the Modified Project would become fully integrated into the existing streetscape and community. Thus, the Modified Project would be substantially compatible with the surrounding land uses and land use compatibility impacts would be less than significant, which is consistent with the analysis in the Certified EIR. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to compatibility with the surrounding land uses and land use compatibility impacts.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would be substantially compatible with the surrounding land uses and land use compatibility impacts would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to compatibility with the surrounding land uses and land use compatibility impacts.

b. Consistency with Regional Land Use Policies and Regulations

(1) Regional Comprehensive Plan

The Certified EIR concluded that the CRA Approved Project would be consistent with the Regional Comprehensive Plan and Guide (RCPG) and result in a less than significant impact. The Modified Project would be substantially consistent with the applicable 2008 Regional Comprehensive Plan (2008 RCP) policies including providing housing in close proximity to jobs and services, offering a variety of housing options, and creating more livable and safer neighborhoods. The Modified Project would offer residential units located adjacent to major bus routes and Metro Red Line stations. The Modified Project's close proximity to commercial uses would also provide opportunities for pedestrian travel to nearby jobs. For these reason, land use impacts associated with the Modified Project's consistency with the 2008 RCP policies are considered less than significant, which is consistent with the analysis in the Certified EIR for the CRA Approved Project.

Like the Modified Project, land use impacts associated with the No Automated Steel Parking Structure Alternative's consistency with the 2008 RCP policies are considered less than significant, consistent with the analysis in the Certified EIR for the CRA Approved Project.

(2) 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy (2016-2040 RTP/SCS)

The Certified EIR concluded that a less than significant impacts would occur with respect to population growth as the CRA Approved Project would be consistent with the population growth forecasts of the General Plan and the Regional Comprehensive Plan and Guide (RCPG). The Modified Project's net and gross increase in residents would be 29 fewer residents than estimated in the Certified EIR for the CRA Approved Project. Thus, the Modified Project reduces the number of new residents to the project site compared to the CRA Approved Project and the Modified Project would represent approximately 0.09 percent of the total population growth anticipated to occur within the City of Los Angeles and 0.018 percent of the total population growth anticipated to occur within region between 2012 and 2040, based on the 20162040 RTP/SCS. As compared to the CRA Approved Project, the Modified Project would result in a slight reduction to the CRA Approved Project's residential units (from 311 to 299). The 299 residential apartment units generated by the Modified Project would represent approximately 0.08 percent of the total housing growth anticipated to occur within the City of Los Angeles between 2012 and 2040. On a regional scale, the Modified Project would represent approximately 0.02 percent of the total population growth anticipated to occur within SCAG's regional housing growth projection. As such, it is reasonable to conclude that the housing growth associated with the Modified Project has already been anticipated and planned for in the citywide and regional housing projections and would be consistent with the housing growth forecasts of the General Plan and 2016-2040

RTP/SCS. Therefore, the Modified Project's residents would be well within SCAG's population projection for the subregion and land use consistency impacts would be less than significant, which is consistent with the analysis in the Certified EIR.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's residents would be well within SCAG's population projection for the subregion and land use consistency impacts would be less than significant, which is consistent with the analysis in the Certified EIR.

(3) South Coast Air Quality Management District

The Certified EIR concluded a less than significant impact would occur related to consistency with the AQMP. Consistent with the CRA Approved Project, the Modified Project would result in a less than significant impact with respect to Air Quality as it would not conflict with or obstruct implementation of the AQMP.

Consistent with the CRA Approved Project and the Modified Project, the No Automated Steel Parking Structure would result in a less than significant impact with respect to Air Quality as it would not conflict with or obstruct implementation of the AQMP.

(4) Regional Water Quality Control Board

The Certified EIR concluded that impacts related to consistency with the Regional Water Quality Control Board (RWQCB) regulatory requirements would be less than significant. As described in the Certified EIR, the CRA Approved Project would prepare a Storm Water Pollution Prevention Plan (SWPPP), implement the best management practices (BMPs) in the SWPPP, and comply with the City's surface water discharge requirements. Consistent with the CRA Approved Project, the Modified Project would obtain a National Pollution Discharge Elimination System (NPDES) statewide General Construction Activity Permit from the RWQCB, prepare a Storm Water Pollution Prevention Plan (SWPPP) prior to any construction activity, implement effective best management practices (BMPs) to minimize water pollution to the maximum extent practical, and the final drainage plans would be required to provide structural or treatment control BMPs to mitigate (infiltrate or treat) storm water runoff. Implementation of the BMPs in the project SWPPP and compliance with the City's surface water discharge requirements would ensure that the Modified Project's construction would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. As such the Modified Project would be consistent with the applicable water quality policies of the RWQCB and impacts upon water quality would be less than significant, which is consistent with the analysis in the Certified EIR for the CRA Approved Project.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would be consistent with the applicable water quality policies of the RWQCB and impacts upon water quality would be less than significant, which is consistent with the analysis in the Certified EIR for the CRA Approved Project.

(5) Congestion Management Plan

The Certified EIR concluded a less than significant impact related to consistency with the Congestion Management Plan (CMP) would occur. The Modified Project's Traffic Study, which is presented in greater detail in Section IV.K.1 (Traffic/Transportation) of the Draft Supplemental EIR, was prepared in accordance with the County of Los Angeles CMP and City of Los Angeles Department of Transportation (LADOT) Guidelines. As discussed in Section IV.K.1 of the Draft Supplemental EIR, the Modified Project would not significantly impact any CMP roadway segments or freeway on-/off-ramps. Therefore the Modified Project would be consistent with the CMP and the prior conclusion of the Certified EIR for the CRA Approved Project.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would be consistent with the CMP and the prior conclusion of the Certified EIR for the CRA Approved Project.

c. Consistency with Local Land Use Policies and Regulations

(1) Framework Element

As described in the Certified EIR, the CRA Approved Project would promote the general goals and policies of the Community Plan as it would encourage and contribute to the economic and social and physical health, safety, welfare, and convenience of the Community. Thus, the Certified EIR concluded a less than significant impact would occur with respect to consistency with the Hollywood Community Plan.

The Modified Project would be generally consistent with the General Plan Framework Land Use Chapter because it is located within a transit priority area, which would encourage visitors of the commercial uses and residents of the apartment units to use public transportation services and add green space and passive recreational open space opportunities for the neighborhood. The Modified Project's consistency with specific Goals and Objectives of the General Plan Framework Land Use Chapter are discussed in detail in Section IV.H, Land Use Planning, of the Draft Supplemental EIR. As detailed therein, the Modified Project would be consistent with the applicable objectives in the General Plan Framework Land Use Chapter. Therefore, no significant impacts related to consistency with the General Plan Framework Element would occur, which is consistent with the conclusion in the Certified EIR for the CRA Approved Project.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would be consistent with the applicable objectives in the General Plan Framework Land Use Chapter and no significant impacts related to consistency with the General Plan Framework Element would occur, consistent with the conclusion in the Certified EIR for the CRA Approved Project.

(2) Hollywood Community Plan

The Certified EIR concluded a less than significant impact would occur with respect to consistency with the Hollywood Community Plan. As described in the Certified EIR, the CRA Approved Project would promote the general goals and policies of the Community Plan as it would encourage and contribute to the economic and social and physical health, safety, welfare, and convenience of the Community.

The Modified Project is proposing a General Plan Amendment which would unify the Land Use Designations across the project site to Regional Center Commercial, allowing for floor area averaging and the provision of a public park; and bring the Land Use Designations into conformance with the requested Zone Change and Height District Change. The mixed-use nature of the Modified Project would serve to balance growth and stability by providing a mix of both jobs and housing in an underutilized area of Hollywood. The proposed mixed-use project would promote the general goals and policies of the Community Plan. A detailed analysis of the consistency of the Modified Project with the applicable objectives and policies of the Hollywood Community Plan is presented in Section IV.H, Land Use Planning, Table IV.H-3, of the Draft Supplemental EIR. As with the CRA Approved Project, the Modified Project would be consistent with the City's goals of encouraging development around transit systems and would promote the renewal and rehabilitation of an underutilized area. The addition of community-serving retail uses and housing to the area would enhance the positive characteristics of the neighborhood. Therefore, no significant impacts related to consistency with the Community Plan would occur, which is consistent with the analysis in the Certified EIR for the CRA Approved Project.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative no significant impacts related to consistency with the Community Plan would occur, which is consistent with the analysis in the Certified EIR for the CRA Approved Project.

(3) Air Quality Element

The Certified EIR concluded the CRA Approved Project would not conflict with the Air Quality Element of the General Plan. The Modified Project would support the goals of the Air Quality Element of the General Plan by developing a mixed-use residential apartment and commercial complex in proximity to transit. Additionally, the Modified Project would: implement an employer and site based Transportation Demand Management (TDM) program; incentivize carpooling; provide electric vehicle ready parking spaces and electric vehicle-charging stations; include bicycle parking spaces; and implement sustainable strategies. Thus, the Modified Project would not conflict with the Air Quality Element of the General Plan and is consistent with the analysis of the CRA Approved Project in the Certified EIR.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not conflict with the Air Quality Element of the General Plan and is consistent with the analysis of the CRA Approved Project in the Certified EIR.

(4) Conservation Element

The Certified EIR concluded that the CRA Approved Project would be consistent with the Conservation Element of the General Plan. The project site and vicinity contain no significant biological resources and the Modified Project would not have a significant impact on biological, cultural, or historical resources. The Modified Project would include measures (required by the LAMC) to prevent the destruction of any cultural or historical resources should they be found during construction of the Modified Project. Therefore, as with the CRA Approved Project, the Modified Project would be substantially consistent with the Conservation Element of the City of Los Angeles General Plan and the analysis in the Certified EIR.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would be substantially consistent with the Conservation Element of the City of Los Angeles General Plan and the analysis in the Certified EIR.

(5) Housing Element

The Certified EIR concluded that the CRA Approved Project would be substantially consistent with the Housing Element of the General Plan and would not conflict with any of the policies contained therein. The Modified Project would be consistent with many objectives of the Housing Element including providing housing in close proximity to jobs and services, offering a variety of housing options, and creating more livable and safer neighborhoods. The Modified Project would offer residential units located adjacent to major bus routes and Metro Red Line stations. The Project's close proximity to commercial uses would also provide opportunities for pedestrian travel to nearby jobs. In addition, the Modified Project would be a safe project for residents and the community. Therefore, consistent with the analysis in the Certified EIR, the Modified Project would be substantially consistent with the Housing Element and would not conflict with any of the policies contained therein.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would be substantially consistent with the Housing Element and would not conflict with any of the policies contained therein.

(6) Safety Element

The Certified EIR concluded, as the Safety Element is concerned with reducing risks to the maximum extent feasible and does not require risks to be absolutely eliminated, the CRA Approved Project would be substantially consistent with the Safety Element of the General Plan. The Modified Project would not be associated with risks including earthquakes, floods, fires, lead, asbestos, and underground storage tanks. Furthermore, the Modified Project would implement both LAMC-required mitigation and project mitigation measures to reduce any risks to less-than-significant levels. As the Safety Element is concerned with reducing risks to the maximum extent feasible, the Modified Project would be substantially consistent with the Safety Element and the analysis in the Certified EIR.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would be substantially consistent with the Safety Element and the analysis in the Certified EIR.

(7) Mobility Plan 2035

The Certified EIR concluded that the CRA Approved Project would not conflict with the Transportation Element of the City of Los Angeles General Plan. The Modified Project would be consistent with the goals of the Mobility Plan 2035, specifically: ensuring that 90 percent of households have access within one mile to the Transit Enhanced Network by 2035; ensuring that 90 percent of all households have access within one-half mile to high quality bicycling facilities by 2035; and increasing the combined mode split of persons who travel by walking, bicycling or transit to 50 percent by 2035. Therefore, consistent with the analysis in the Certified EIR, the Modified Project would not conflict with the Mobility Plan of the City of Los Angeles General Plan.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not conflict with the Mobility Plan of the City of Los Angeles General Plan.

d. Hollywood Redevelopment Plan Consistency

The Certified EIR concluded the CRA Approved Project would not conflict with the Redevelopment Plan and would result in less than significant land use impacts. As detailed in Section IV.H, Land Use Planning, Table IV.H-4, of the Draft Supplemental EIR, the Modified Project would serve to implement several Redevelopment Plan goals and objectives. The mixed-use nature of the project would promote a balanced community meeting the needs of the residential, commercial, industrial, arts and entertainment sectors. The Modified Project's mixed-use nature would also enable residents to live and work in Hollywood and would also serve to reduce regional traffic congestion. The Modified Project would provide 299 residential apartment units with 5 percent of the total units (15 units) reserved for the "Very Low" income level. The Modified Project's housing component would provide housing opportunities and increase the supply of market rate and affordable housing within the Redevelopment Plan Area.

The project site's location in proximity to public transportation systems would further promote sound development practices. As with the CRA Approved Project, the Modified Project proposes a public park. The Modified Project's public park would directly promote and encourage development of recreational facilities and open spaces necessary to support attractive residential neighborhoods and commercial centers. Therefore, consistent with the analysis in the Certified EIR, the Modified Project would not conflict with the Redevelopment Plan, and land use impacts would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the Redevelopment Plan.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not conflict with the Redevelopment Plan, and land use impacts would be less than significant and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the Redevelopment Plan.

e. Open Space Requirements

As with the CRA Approved Project, the Modified Project is subject to the open space requirement for six or more residential units. The Certified EIR determined the CRA Approved Project would fall short of providing the required open space area. However, the Certified EIR stated that with the approval of the variance, the CRA Approved Project would conform to the requirements of the LAMC. As with the CRA Approved Project, the Modified Project would fall short of providing the required open space area. In order to permit the open space proposed, the Applicant is requesting an Affordable Housing On-Menu Incentive, per LAMC Section 12.22 A.25(f)(6), to allow a 20 percent decrease in the total amount of open space required by Code. Therefore, in conjunction with the On-Menu Incentive and consistent with the analysis in the Certified EIR, the Modified Project would conform to the open space requirements of the LAMC, and land use impacts associated with the provision of open space would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the open space requirements of the LAMC.

Like the Modified Project, land use impacts associated with the provision of open space for the No Automated Steel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the open space requirements of the LAMC.

f. Parking

The Certified EIR concluded the CRA Approved Project would conform to LAMC parking requirements with the approval of requested actions and, thus, impacts would be less than significant with mitigation incorporated. The Modified Project is requesting confirmation of compliance with Affordable Housing Reduced Parking Option 1 for all residential units under LAMC Section 12.22 A.25(d)(1). In addition, pursuant to LAMC Section 12.21.A.4, a 10 percent reduction in residential parking spaces and a 20 percent reduction to the commercial parking spaces is allowed under the Municipal Code's bicycle parking reduction provision where automobile parking spaces required by the Code are replaced by bicycle parking at a ratio of one automobile parking space for every four bicycle parking spaces. As detailed in Section IV.H, Land Use Planning, of the Draft Supplemental EIR, the Modified Project would provide sufficient vehicle and bicycle parking to conform to LAMC requirements, and impacts would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed

Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the parking requirements of the LAMC.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would provide sufficient vehicle and bicycle parking with the adoption of an ordinance to reduce the clear space required at structural elements in the Modified Project's parking structure and to allow up to 66 percent of the Modified Project's parking stalls to be compact parking stalls, which would conform to LAMC requirements, and impacts would be less than significant. Accordingly, the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the parking requirements of the LAMC.

g. Hollywood Signage Supplemental Use District Consistency

The Certified EIR did not analyze the CRA Approved Project's consistency with the Hollywood Signage Supplemental Use District (SUD). However, the Certified EIR concluded that with implementation of mitigation measures, the CRA Approved Project's land use impacts would be less than significant.

Compared to the CRA Approved Project, the Modified Project proposes a reduction to the signage program by eliminating one sign and providing only one approximately 1,205 square-foot supergraphic sign located on the southwest corner of the podium structure at Sunset Boulevard and Gordon Street facing south. The Modified Project's one supergraphic sign would comply with all the requirements of the prior Hollywood Signage SUD Ordinance No. 176,172, pursuant to the grandfathering rights set forth in Section K.2 of the Amended Hollywood Signage SUD Ordinance No. 181,340. In addition to off-site advertising, consistent with the CRA Approved Project, the Modified Project would include informational signage to identify the proposed on-site uses and retail establishments, and directional signage to inform people of the appropriate parking areas, vehicular and pedestrian ingress/egress patterns, and emergency evacuation routes, as appropriate. Moreover, the Modified Project is consistent with the Amended Design for Development for Signs in Hollywood (Amended Sign DFD), which was adopted by the CRA Board on January 20, 2005. Similar to the CRA Approved Project, the Modified Project's proposed signage plan would comply with the LAMC Sign Regulations (Article 4.4, Section 14.4.) and the specific provisions identified by the Amended Hollywood Signage SUD and the Amended Sign DFD.

Therefore, the Modified Project would be consistent with the Hollywood Signage Supplemental Use District and the Amended Sign DFD, and land use impacts would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the Hollywood Signage Supplemental Use District and Amended Sign Supplemental Use District.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would be consistent with the Hollywood Signage Supplemental Use District and the Amended Sign DFD, and land use impacts would be less than significant and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the Hollywood Signage Supplemental Use District and Amended Sign Supplemental Use District.

h. ZI No. 2427 and Clean Up Green Up Ordinance

Both ZI No. 2427 (Freeway Adjacent Advisory Notice for Sensitive Uses) and the Clean Up Green Up Ordinance 184,246 became effective after the Certified EIR was prepared. As such, the Certified EIR did not address the CRA Approved Project's consistency with ZI No. 2427 or the Clean Up Green Up Ordinance.

Consistent with ZI No. 2427's recommendation to reduce exposure through project design, the Modified Project would reduce exposure to air pollution from the proximity to freeway through the design and orientation of the residential uses such that they are located on the portions of the project site furthest from the freeway. Furthermore, as provided for in PDF IV-H-1, the Modified Project is consistent with ZI-No. 2427's recommendation to improve indoor air quality with MERV-rated or HEPA Air Filtration Equipment. The Modified Project will at minimum install and maintain air filters meeting the ASHRAE Standard 52.2 Minimum Efficiency Reporting Value (MERV) of 11. Additionally, as may be required, the Modified Project will be consistent with the Clean Up Green Up Ordinance requirement to provide MERV 13 filters in regularly occupied areas of mechanically ventilated buildings within 1,000 feet of a freeway. Therefore, with the Modified Project's location of the residential uses and the installation and maintenance of MERV11 filters at minimum, the Modified Project would be consistent with ZI No. 2427 and would result in less than significant land use impacts. In addition, the Modified Project will be consistent with the Clean Up Green Up Ordinance as may be required. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with ZI No. 2427 and the Clean Up Green Up Ordinance.

Like the Modified Project, the No Automated Steel Parking Structure Alternative will be consistent with ZI No. 2427 and the Clean Up Green Up Ordinance as may be required and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with ZI No. 2427 and the Clean Up Green Up Ordinance.

i. Cumulative Impacts

The Certified EIR determined no significant cumulative land use impacts were anticipated. Cumulative land use impacts could occur if other related projects in the vicinity of the project site would result in land use incompatibility effects in conjunction with the impacts of the Modified Project. As with the CRA Approved Project, the

Modified Project would implement important local and regional goals and policies for the Hollywood area, which would assist the City of Los Angeles in achieving short- and long-term planning goals and objectives. Future development associated with the related projects would support the redevelopment of the Hollywood area, which is consistent with SCAG and City policies for promoting more intense land uses adjacent to transit stations and job centers, providing a variety of housing options, and increasing the diversity of uses. Furthermore, all related projects would be subject to the same applicable planning documents as the Modified Project, specifically with respect to the Hollywood Community Plan, the Planning and Zoning Code, the Hollywood Redevelopment Plan, and the other regional land use plans. All of the related projects would need to demonstrate consistency with the development standards in those applicable planning documents in order to be approved. Therefore, no significant cumulative land use and planning impacts are anticipated, and cumulative impacts would be considered less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to land use.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative cumulative impacts would be considered less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to land use.

2. Project Design Features

The following Project Design Feature is relevant to Land Use Planning:

PDF IV-H-1: The Modified Project shall install air filtration systems in compliance with the minimum MERV filtration rating requirements of ZI. No. 2427 and Clean Up Green Up Ordinance (Ord. No. 184,245), as applicable to the Modified Project's proposed land uses and regularly occupied areas.

3. Reference

For a complete discussion of Land Use Planning (Operation and Cumulative) see Sections IV.H Land Use Planning and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

H. Public Utilities (Water, Wastewater, Energy, Cumulative)

1. Description

a. Water

(1) Construction

The Certified EIR concluded the project area for the CRA Approved Project was supported by adequate potable water infrastructure and that related impacts resulting

from the CRA Approved Project would be less than significant during project construction. The Certified EIR stated that although the development of new service connections for the CRA Approved Project may occasionally result in service interruptions in water services for existing customers, temporary and short-term disruptions in local water service during the construction period would be limited, and any associated impacts would be less than significant.

Compared to the CRA Approved Project, construction of the Modified Project would include minimal additional construction for the installation and retrofitting for the new automated steel parking structure and interior building renovations. The Modified Project's additional construction period would last approximately four months, which is not a substantial increase from the CRA Approved Project's construction timeline. Similar to the CRA Approved Project, the Modified Project is also served by sufficient water conveyance infrastructure as the infrastructure in the vicinity of the project site has not substantially changed since the Certified EIR. Because the Modified Project's additional construction period would involve minimal water demand, the Modified Project's water demand during the additional construction period would be accommodated by the water conveyance infrastructure. Thus, the water demand during the additional construction period for the Modified Project would not result in a substantial increase to the water demand for construction of the CRA Approved Project.

Therefore, consistent with the analysis in the Certified EIR for the CRA Approved Project, the Modified Project's construction would not require the construction of new water treatment facilities or storm water drainage facilities and sufficient water supplies are available to serve the Modified Project from existing entitlements and resources during construction. Accordingly, the Modified Project would result in a less than significant impact with respect to water resources and/or water conveyance infrastructure for construction. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to water resources/water conveyance infrastructure for construction.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would result in a less than significant impact with respect to water resources and/or water conveyance infrastructure for construction and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to water resources/water conveyance infrastructure for construction.

(2) Operation

(a) Water Conveyance Infrastructure for Operation

The Certified EIR stated the CRA Approved Project's water consumption (quantity, size, and type of infrastructure) would be determined by the CRA Approved Project applicant's Engineering consultants based on the Los Angeles Department of Building and Safety and applicable building code requirements. The Certified EIR also explained

that the on-site (sprinkler system and private fire hydrants) and off-site (public fire hydrants) fire flow demands would be determined based on the Los Angeles City Fire Department (LAFD) and applicable building code requirements. Finally, the Certified EIR stated once a determination of the project's domestic and fire demands has been made, LADWP would assess the need for additional facilities. During construction of the vacant 22-story, approximately 250-foot high mixed-use building and closed approximately 18,962 square-foot public park on the project site, a new fire hydrant was installed on Sunset Boulevard as required by the LAFD.

Similar to the CRA Approved Project, final fire flow requirements for the Modified Project would be verified during the review and approval process for the Modified Project before a certificate of occupancy is issued. Overall, the Modified Project would be expected to follow the same process of water demand and need as the CRA Approved Project. However, it is not expected that any further improvements or additional facilities to the water system serving the project site or surrounding area would be needed for the Modified Project because it is expected that all required improvements to the water system were previously conducted during construction of the vacant building and closed public park on the project site. The modifications required for the Modified Project are not expected to require any additional water conveyance infrastructure, including water facilities and storm water drainage facilities, during operation from that which was necessary for the CRA Approved Project. Therefore, impacts to water conveyance infrastructure during the operation of the Modified Project would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to water conveyance infrastructure during operation.

Like the Modified Project, impacts to water conveyance infrastructure during the operation of the No Automated Steel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to water conveyance infrastructure during operation.

(b) Water Demand

Under the provisions defined in Section 10910-10915 of the State Water Code, the CRA Approved Project was not subject to a Water Supply Assessment (WSA). The Certified EIR concluded the CRA Approved Project's impacts would be less than significant related to increasing water demands within the LADWP service area during operation of the CRA Approved Project.

The Modified Project involves overall reductions to the water demand generating land uses analyzed for the CRA Approved Project, and consistent with the CRA Approved Project, a WSA is not required for the Modified Project. The Modified Project is estimated to generate a net demand of 48,999 gallons per day (gpd) or 55 acre-feet of water per year (AFY) and a gross demand of 60,138 gpd or 68 AFY and the Modified Project's net and gross increase in water demand would be less than the CRA

Approved Project's net and gross increase in water demand. In addition, since the Modified Project's population, housing, and employment growth projections are within the forecasts of the 2015 UWMP, it is anticipated that the Modified Project's water demands are within the LADWP's 25-year water demand growth projected in the 2015 UWMP. Therefore, the Modified Project's water demand would be consistent with the conclusion for the CRA Approved Project and would not substantially increase the water demand impacts identified in the Certified EIR for the CRA Approved Project.

Although water supplies are currently available and adequate to serve the needs of the Modified Project, several factors affect the long-term availability of projected water supplies for the City of Los Angeles as a whole. As such, the Modified Project would implement City of Los Angeles water conservation measures including Regulatory Compliance Measures CM I.1-1, CM I.1-2; and Certified EIR Code-Required Measure I.1-1 and Certified EIR Code-Required Measure I.1-2(Regulatory Compliance Measures), which ensure that the Modified Project would: comply with the City's Low Impact Development Ordinance (City Ordinance No. 181,899) and implement Best Management Practices that have stormwater recharge or reuse benefits as applicable; provide a reduction of overall use of potable water by 20 percent from that allowed under the California Building Code (CBC), pursuant to City Ordinance No. 181,480; comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance; state that if conditions dictate LADWP may postpone new water connections for the Modified Project until water supply capacity is adequate. With implementation of the regulatory compliance measures, the Modified Project's impact upon water demands within the LADWP service area would be less than significant, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. Moreover, the estimated water demands associated with the Modified Project during operation are less than the estimated water demands associated with operation of the CRA Approved Project. Therefore, sufficient water supplies are available to serve the Modified Project from existing entitlements and resources. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to water demands during operation.

Like the Modified Project, the No Automated Steel Parking Structure's impact upon water demands would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to water demands during operation.

(3) Cumulative

The Certified EIR did not calculate the water demand of the CRA Approved Project and related projects totals, but stated the projected water supplies included in the 20-year projection contained in the 2005 UWMP would be expected to meet water demands associated with the CRA Approved Project and the demands of the related projects. Therefore, the Certified EIR concluded impacts to water service and regional supplies would be less than significant.

Implementation of the Modified Project in conjunction with cumulative development within the City of Los Angeles would further increase cumulative demands for water supplies in the LADWP service area. The gross water demand of Modified Project and related projects totals approximately 4,178,261.2 gpd or 4.2 mgd. In terms of the City's overall water supply condition, the water demands for projects that are consistent with the City's General Plan have been taken into account in the planned growth of the Water System. For projects that are not consistent with the General Plan or that meet the requirements established in Sections 10910-10915 of the State Water Code, a Water Supply Assessment report demonstrating sufficient water availability would be required on a project-by-project basis.

As discussed in Section IV.G Population and Housing, of the Draft Supplemental EIR the Modified Project and the related projects would not exceed the growth projections stated within the 2016-2040 RTP/SCS. Because demographic data, including growth forecasts, from SCAG are used in the LADWP's forecasting future water demand growth in the 2015 UWMP, the LADWP's water supplies would meet the projected water demand associated with the Modified Project and the related projects. As such, the Modified Project and the related projects would result in a less than significant cumulative impact related to water resources, which is consistent with the CRA Approved Project and would not substantially increase the cumulative water demand impacts identified in the Certified EIR for the CRA Approved Project.

In addition, the analysis of the Modified Project's impacts to water resources impacts concluded that the Modified Project would result in less than significant impacts, which is consistent with the conclusion for the CRA Approved Project provided in the Certified EIR. Further, the Modified Project's contribution to cumulative water resources impacts will be less than the CRA Approved Project's contribution to cumulative water resources impacts because, the water demand associated with the Modified Project's operations is less than the CRA Approved Project's water demand from operations. The Certified EIR concluded that the CRA Approved Project would result in less than significant cumulative impacts to water resources, and the Modified Project would serve to further reduce those impacts. Therefore, the Modified Project's cumulative impact to water resources also would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to water resources.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's cumulative impact to water resources would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to water resources.

b. Wastewater

The Certified EIR concluded the CRA Approved Project would result in a less than significant impact related to wastewater treatment and/or conveyance infrastructure.

Nevertheless, the Certified EIR stated, should insufficient capacity exist, the applicant would be required to build a secondary line to connect to the flow to the nearest lines with capacity to serve the project. However, no additional lines were necessary for the construction of the vacant 22-story, approximately 250-foot high mixed-use building and closed approximately 18,962 square-foot public park on the project site.

The Modified Project is anticipated to generate approximately 40,040 gallons per day (gpd) of net wastewater, or 14.6 million gallons annually and approximately 49,439 gpd of gross wastewater, or 18 million gallons annually. The Modified Project's gross increase in wastewater generation would be 49,439 gpd of wastewater, or 18 million gallons annually as compared to the CRA Approved Project's gross increase of 58,362 gpd of wastewater, or 21.3 million gallons annually. For comparative purposes, the Modified Project's net and gross increase in wastewater generation would be less than the CRA Approved Project's net and gross increase in wastewater generation.

No further improvements to the wastewater system, including installation of a secondary line, serving the project site or surrounding area are anticipated to be required as a result of the Modified Project, as the modifications under the Modified Project would decrease wastewater flows as compared to the CRA Approved Project and the vacant 22-story, approximately 250 foot high mixed use building and closed approximately 18,962 square foot public park on the project site did not require improvements to the wastewater system. The Modified Project's projected gross increase of 49,439 gpd is within the gross increase estimated for the CRA Approved Project, and would represent a fraction of one percent of the excess treatment capacity presently available at the Hyperion Treatment Plant (450 mgd). Similar to the CRA Approved Project, sewage generated by the Modified Project would continue to be conveyed and treated at the Hyperion Treatment Plant, which has adequate capacity to accommodate the increased wastewater flows. Thus, the Regional Water Quality Control Board (RWQCB) treatment standards area would be maintained and impacts would be less than significant, which is consistent with the analysis in the Certified EIR for the CRA Approved Project.

Similar to the CRA Approved Project, water conservation measures required by City ordinance (e.g., installation of low flow toilets and plumbing fixtures that prevent water loss, limitations on hose washing of driveways and parking areas, etc.) would be implemented as part of the Modified Project and would help reduce the amount of wastewater generated by the Modified Project. As such, these measures would further reduce Modified Project impacts with respect to the wastewater treatment capacity. Furthermore, implementation of Regulatory Compliance Measure CM I.2-1, which ensures compliances with the 2010 L.A. Green Code, would further reduce the Modified Project's less than significant impacts related to wastewater services. Therefore, consistent with the analysis in the Certified EIR for the CRA Approved Project, the Modified Project would be consistent with the wastewater treatment requirements of the RWQCB, there is adequate capacity to serve the Modified Project, and the Modified Project would not require the construction of new wastewater treatment facilities or expansion of existing facilities. Accordingly, impacts with respect to the existing wastewater infrastructure would be less than significant. Moreover, the wastewater generation of the Modified Project is less than the wastewater generation of the CRA

Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to wastewater services.

Like the Modified Project, impacts with respect to the existing wastewater infrastructure for the No Automated Steel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to wastewater services.

(1) Cumulative

The Certified EIR determined the cumulative sewage generation with the related projects would be within the excess treatment capacity currently available and projected at HTP. Therefore, the Certified EIR concluded cumulative impacts on wastewater services would be less than significant.

The total gross sewage generation by the related projects and the Modified Project would be approximately 3,398,543.8 gpd, or about 3.4 mgd. The cumulative sewage generation for the Modified Project and the related projects would represent approximately 0.6 percent of HTP's daily effluent capacity (550 mgd), or approximately 1.7 percent of HTP's current excess capacity (190 mgd). Similar to the CRA Approved Project and its related projects' cumulative sewage generation, these increases would be well within the excess treatment capacity currently available and projected to be available at HTP. While the total sewage generation by the related projects and the Modified Project would be more than the total sewage generation analyzed in the Certified EIR for the previous list of related projects and the CRA Approved Project (from 1,260,662 gpd, or about 1.2 mgd to 3,398,543.8 gpd, or about 3.4 mgd), sewage generated by the Modified Project would contribute approximately 1.5 percent of the total cumulative sewage generation created by the related projects. The Modified Project in combination with the related projects would not require the construction of new wastewater treatment facilities or the expansion of existing wastewater treatment facilities.

Furthermore, the analysis of the Modified Project's impacts to wastewater services concluded that the Modified Project would result in a less than significant impacts, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. In addition, the Modified Project's contribution to cumulative wastewater services impacts will be less than the CRA Approved Project's contribution to cumulative wastewater services impacts because the wastewater services impacts associated with the Modified Project are less than the CRA Approved Project's wastewater services impacts. The Certified EIR concluded that the CRA Approved Project would result in less than significant cumulative impacts to wastewater services, and the Modified Project would serve to further reduce those impacts. Further, similar to the Modified Project, each related project would be evaluated on a case-by-case basis and would be required to consult with the Bureau of Sanitation and comply with all applicable City and State water conservation programs and sewer allocation ordinances. Therefore, cumulative

impacts on wastewater services would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to wastewater services.

Like the Modified Project, cumulative impacts on wastewater services for the No Automated Steel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to wastewater services.

c. Energy

(1) Construction

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts related to energy resources during construction. The Certified EIR determined that, due to the relatively short duration of the construction process, and the fact that the extent of fuel consumption is inherent to construction projects of the size and nature of the CRA Approved Project, fuel consumption impacts would not be considered excessive or substantial with respect to regional fuel supplies.

Construction of the Modified Project would consume approximately 186,492 gallons of fuel including approximately 62,645 gallons of diesel fuel and 123,847 gallons of gasoline. In comparison to the CRA Approved Project, the fuel consumed during the Modified Project's construction would be 15,520 gallons less than the fuel consumed during the CRA Approved Project's construction. Thus, it is anticipated the energy consumed during the construction period of the Modified Project would not substantially increase the energy from fuel consumed during the CRA Approved Project's construction period.

Furthermore, no analysis for electricity or natural gas during construction was done in the Certified EIR for the CRA Approved Project because the equipment during construction would consume a minimal amount of electricity and natural gas and, therefore, would not be substantial. Similarly, the equipment during the Modified Project's construction would consume a minimal amount of electricity and natural gas and, therefore, the need for electricity and natural gas during the Modified Project's construction would not be substantial. Therefore, the energy resources impacts as a result of construction of the Modified Project would not substantially increase the energy resources impacts identified in the Certified EIR for the CRA Approved Project, and impacts would remain less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy resources during construction.

Like the Modified Project, energy resources impacts as a result of construction of the No Automated Streel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy resources during construction.

(2) Operation

(a) Electricity

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts upon electricity. The Certified EIR stated that with modern energy-efficient construction materials and operating equipment, the CRA Approved Project would promote conservation in accordance with the policies identified in Title 24 and in the City of Los Angeles General Plan Framework. The Certified EIR determined that, should LADWP need to add facilities on-site to meet the needs of the CRA Approved Project, the LADWP is usually able to connect new customers without any disruptions in service to existing customers. Therefore, the Certified EIR determined the CRA Approved Project would not have an adverse impact on the electrical system and no significant impacts related to electricity would occur. No disruptions were caused by the construction of the vacant 22-story, approximately 250-foot high mixed-use building and closed approximately 18,962 square foot public park on the project site. During construction, a new on-site customer service station was placed on the project site in the closed approximately 18,962 square-foot public park.

Development of the Modified Project would increase the existing demand for electricity service in the project area. The Modified Project would continue to be served from the existing power grid. The Modified Project's net increase in electricity consumption would be approximately 2,933,723 kilowatts per year as compared to the CRA Approved Project's net increase of approximately 3,420,493 kilowatts per year. The Modified Project's gross increase in electricity consumption would be approximately 3,708,069 kilowatts per year as compared to the CRA Approved Project's gross increase of approximately 4,194,839 kilowatts per year. Therefore, Modified Project's net and gross increase in electricity consumption is less than the CRA Approved Project's net and gross increase in electricity consumption.

For purposes of assessing the Modified Project's consistency with the LADWP's future projections, the Modified Project's increase in electricity consumption was compared to the LADWP's future projections contained in the 2015 Power IRP. The electricity consumption as a result of operation of the Modified Project would represent approximately 0.015 percent of the LADWP's existing supply of electricity per year to the City and, therefore, would be within the LADWP's existing supply of 25 million megawatt-hours (MWh) of electricity per year to the City as of 2015. Additionally, while the Modified Project would consume approximately 2,933,723 net kilowatts per year of electricity, the Modified Project would consume 486,770 kilowatts per year of electricity less than the CRA Approved Project. Thus, the Modified Project's increase in electricity

consumption is less than the CRA Approved Project's increase in electricity consumption.

In addition, no further improvements to the electrical system serving the project site or surrounding area are anticipated to be required as a result of the Modified Project, as no disruptions were caused by the construction of the vacant 22-story, approximately 250-foot high mixed-use building and closed approximately 18,962 square-foot public park on the project site and a new on-site customer service station was already placed on the project site in the closed approximately 18,962 square-foot public park. Therefore, it is estimated that the increase in electrical demand due to the Modified Project would not have an adverse impact on its electrical system, which is consistent with the analysis in the Certified EIR for the CRA Approved Project and would not substantially increase the energy resources impacts identified in the Certified EIR for the CRA Approved Project.

The Modified Project would also implement Regulatory Compliance Measure CM I.3-1, which ensures compliance with the 2010 L.A. Green Code for all existing construction to remain on the project site, and compliance with the 2013 version of the L.A. Green Code for any additional construction activities necessary for the Modified Project. Therefore, the energy resources impacts as a result of operation of the Modified Project would be less than significant. While impacts upon regional energy resources are expected to be less than significant, the Planning Department imposes standard measures for all new projects to further reduce project impacts and promote conservation efforts. Therefore, with implementation of regulatory compliance measure CM I.3-1, the Modified Project would exceed Title 24 energy efficiency requirements and further reduce demand for electricity. Therefore, consistent with the analysis in the Certified EIR for the CRA Approved Project, no significant impacts related to electricity would occur due to the Modified Project. In addition, the Modified Project's increase in electricity consumption is less than the CRA Approved Project's increase in electricity consumption. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy resources during operation.

Like the Modified Project, no significant impacts related to electricity would occur due to the No Automated Steel Parking Structure Alternative and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy resources during operation.

(b) Natural Gas

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts upon natural gas during operation. The Certified EIR determined since the CRA Approved Project is located in an area already served by existing natural gas infrastructure, the CRA Approved Project would not require extensive infrastructure improvement to serve the project site. Thus, the Certified EIR concluded impacts

associated with utility upgrades or additional connections would be temporary in nature and thus result in less than significant impacts upon the environment.

The Modified Project would not substantially increase the demands for natural gas service in the project area identified in the Certified EIR for the CRA Approved Project. The Modified Project's net natural gas demands are estimated to be approximately 1,217,614 cubic feet (cf) per month and the Modified Project's gross natural gas demands are estimated to be approximately 1,299,478 cubic feet (cf) per month. The CRA Approved Project's was estimated to have a net increase of approximately 1,286,368 cubic feet (cf) per month and gross increase of approximately 1,368,232 cubic feet (cf) per month. Therefore, the Modified Project's net and gross increase in natural gas consumption is less than the CRA Approved Project's net and gross increase in natural gas consumption.

Natural gas for the project site is provided by SoCal Gas (SCG) and the natural gas consumption as a result of operation of the Modified Project is within the planned projections for natural gas in the area served by SCG. Furthermore, while the Modified Project would consume approximately 1,299,478 cubic feet (cf) per month, the Modified Project would consume 68,754 cubic feet (cf) per month less than the CRA Approved Project. Thus, the Modified Project's increase in natural gas consumption also would be less than the CRA Approved Project's increase in natural gas consumption.

Additionally, the Certified EIR stated the CRA Approved Project's impacts associated with utility upgrades or additional connections would be temporary in nature and thus result in less than significant impacts upon the environment. No improvements to the natural gas infrastructure serving the project site or surrounding area were required during construction of the vacant 22-story, approximately 250-foot high mixed-use building and closed approximately 18,962 square-foot public park on the project site. As such, no improvements to the existing natural gas infrastructure serving the project site or surrounding area are anticipated to be required as a result of the Modified Project. Therefore, the Modified Project's impacts associated with natural gas resources would therefore be less than significant, which is consistent with the analysis in the Certified EIR for the CRA Approved Project and would not substantially increase the natural gas resources impacts identified in the Certified EIR for the CRA Approved Project.

Further, the Modified Project would implement Regulatory Compliance Measure CM I.31, which ensures compliance with the 2010 L.A. Green Code for all existing construction to remain on the project site, and compliance with the 2013 version of the L.A. Green Code for any additional construction activities necessary for the Modified Project. Therefore, the natural gas consumption impacts as a result of operation of the Modified Project would not substantially increase the natural gas consumption impacts identified in the Certified EIR for the CRA Approved Project. In addition, the Modified Project's increase in natural gas consumption is less than the CRA Approved Project's increase in natural gas consumption. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to natural gas during operation.

Like the Modified Project, the No Automated Steel Parking Structure's impacts associated with natural gas resources would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to natural gas during operation.

(3) Cumulative

(a) Electricity

The Certified EIR determined that, while the CRA Approved Project and the related projects may require construction of additional distribution facilities, each of the related projects would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code, which would further reduce cumulative energy needs. The Certified EIR concluded cumulative impacts on electricity service would be less than significant.

The total electricity consumption by the Modified Project and related projects would be approximately 179,584,542.3 kilowatts per year, which would be less than the total electricity consumption by the CRA Approved Project and related projects (from 4,024,012,576 kilowatts per year to 179,584,542.3 kilowatts per year). Thus, the cumulative total electricity consumption by the Modified Project and the related project would not substantially increase the cumulative electricity resources impacts identified in the Certified EIR for the CRA Approved Project. While the Modified Project and the related projects would increase electricity consumption approximately 179,584,542.3 kilowatts per year, the electricity consumption as a result of operation of the Modified Project and the related projects would be within the LADWP's existing supply of 25 million megawatt-hours (MWh) of electricity per year to the City as of 2015.

Furthermore, the analysis of the Modified Project's impacts to electricity concluded that the Modified Project would result in a less than significant impacts, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. In addition, the Modified Project's contribution to cumulative electricity demands will be less than the CRA Approved Project's contribution to cumulative electricity demands because, the electricity demands associated with the Modified Project are less than the CRA Approved Project's electricity demands. The Certified EIR concluded that the CRA Approved Project would result in less than significant cumulative impacts to electricity service, and the Modified Project would serve to further reduce those impacts.

The cumulative effect of the Modified Project and related projects may require near term and/or future additions to the distribution system capacity. Any required near term and/or future additions to the distribution system will be carried out by LADWP and each addition will be completed subject to LADWP review and approval.

In addition, consistent with the analysis in the Certified EIR for the CRA Approved Project, in accordance with current building codes and construction standards, each of the related projects would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code. Compliance with Title 24

energy conservation standards and other energy conservation programs on the local level will further reduce cumulative energy demands.

Therefore, cumulative impacts to electricity service would be less than significant, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to electricity service.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative cumulative impacts to electricity service would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to electricity service.

(b) Natural Gas

The total natural gas consumption by the CRA Approved Project and related projects would be 31,680,654 cf per month. The Certified EIR stated that the SCG continuous increases in demand and compliance with Title 24 of the California Administrative Code would result in less-than-significant cumulative impacts on natural gas services.

The total natural gas consumption by the Modified Project and related projects would be 64,634,455.5 cf per month. While the total natural gas consumption by the Modified Project and related projects would be more than the total natural gas consumption analyzed in the Certified EIR for the CRA Approved Project and related projects, as a public utility provider, the SCG continuously analyzes increases in natural gas demands resulting from projected population and employment growth in its service area and it is anticipated that it would be able to meet the needs of future development within the region. Further, the natural gas consumption as a result of operation of the Modified Project and the related projects is within the planned projections for natural gas in the area served by SCG.

Furthermore, the analysis of the Modified Project's impacts to natural gas concluded that the Modified Project would result in a less than significant impacts, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. In addition, the Modified Project's contribution to cumulative natural gas demands will be less than the CRA Approved Project's contribution to cumulative natural gas demands because, the natural gas demands associated with the Modified Project are less than the CRA Approved Project's natural gas demands. The Certified EIR concluded that the CRA Approved Project would result in less than significant cumulative impacts to natural gas service, and the Modified Project would serve to further reduce those impacts.

In addition, each of the related projects would be reviewed on a case-by-case basis to determine the Gas Company's ability to serve each project. As such, it is anticipated the Modified Project and the related projects in the vicinity would likely also be

accommodated by SCG, which is consistent with the analysis in the Certified EIR for the CRA Approved Project and would not substantially increase the cumulative natural gas resources impacts identified in the Certified EIR for the CRA Approved Project. Additionally, consistent with the analysis in the Certified EIR for the CRA Approved Project, compliance with energy conservation standards pursuant to Title 24 of the California Administrative Code would reduce cumulative demands for natural gas resources. Therefore, cumulative impacts upon natural gas resources and infrastructure would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to natural gas service.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative cumulative impacts upon natural gas resources and infrastructure would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to natural gas service.

d. Solid Waste Cumulative

The Certified EIR determined the total solid waste generation by the CRA Approved Project and the related projects would be approximately 16.5 tons per year. This equated to approximately 0.045 tons per day, which was significantly less than 0.01 percent of the Sunshine Canyon and Chiquita Canyon landfills' daily excess permitted intake capacity. Therefore, the Certified EIR concluded the CRA Approved Project and the related projects would result in less than significant cumulative impacts on solid waste.

Implementation of the Modified Project in conjunction with the related projects, would increase regional demands on landfill capacity. The total solid waste generation by the Modified Project and the related projects would be approximately 39,719 tons per year. This equates to approximately 109 tons per day, which would be more than the cumulative solid waste tons per day generated by the CRA Approved Project and its related projects (from 0.045 tons to 109 tons). However, the generation rates used for the CRA Approved Project were different and less conservative than the generation rates used for the Modified Project. Nevertheless, the Modified Project and the related project's 109 tons per day is less than 0.01 percent of the Sunshine Canyon and Chiquita Canyon landfills' daily excess permitted intake capacity.

As with the CRA Approved Project, related projects would participate in regional source reduction and recycling programs, significantly reducing the number of tons deposited in area landfills. In addition, the Modified Project's contribution to cumulative solid waste impacts during operation is less than the CRA Approved Project's contribution to cumulative solid waste impacts during operation because the solid waste impacts associated with the Modified Project's operation are less than the CRA Approved Project's solid waste impacts during operation based on the more conservative generation rates used for the Modified Project. The Certified EIR concluded that the

CRA Approved Project would result in less than significant cumulative impacts to solid waste, and the Modified Project's reduction in the solid waste impacts during construction would serve to further reduce those impacts. Since there is currently adequate capacity to accommodate the cumulative disposal needs of the Modified Project and related projects, and the Modified Project would result in less operational waste than the CRA Approved Project, cumulative impacts with respect to solid waste would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to solid waste.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative cumulative impacts with respect to solid waste would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to solid waste.

2. Reference

For a complete discussion of Public Utilities (Water, Wastewater, Energy, Cumulative) see Sections IV.I Public Utilities and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

I. Public Services

1. Description

a. Fire Protection (Construction)

The Certified EIR concluded the CRA Approved Project would result in less-than-significant impacts related to increase demands upon Fire Department services during the construction period. The Certified EIR noted that the CRA Approved Project would implement good housekeeping procedures by the construction contractors and the work crews to minimize the potential for accidental onsite fire hazards.

The limited additional construction required for the Modified Project would not be expected to tax firefighting and emergency services to the extent that there would be a need for new or expanded fire facilities in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. In addition, the Modified Project would implement Certified EIR Code-Required Measures J.1.2-1, J.1.2-2, and J.1.2-6 through J.1.2-11, which are now Regulatory Compliance Measures, and ensure fire protection measures are achieved during the construction period, and would further reduce impacts related to fire protection services during construction. In addition, consistent with the CRA Approved Project, good housekeeping procedures would be implemented during the additional construction required for the Modified Project, as provided for in Project Design Feature IV.J-1, and would include: the maintenance of mechanical equipment in good operating condition; careful storage of flammable

materials in appropriate containers; and the immediate and complete cleanup of spills of flammable materials when they occur. Therefore, construction-related impacts to fire protection services as a result of the Modified Project would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to fire protection services during construction of the Modified Project.

Like the Modified Project, construction-related impacts to fire protection services as a result of the No Automated Steel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to fire protection services.

b. Recreation and Parks

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts upon parks and recreational facilities. The Certified EIR stated because the proposed on-site recreational and open space amenities would be open to the residents of the CRA Approved Project, this feature would help alleviate the City's existing substandard provision of parkland and recreational facilities. The Certified EIR concluded if and to the extent the proposed onsite recreational and outdoor facilities do not fully satisfy the requirements of the Quimby Act, the CRA Approved Project applicant would be required to pay Quimby fees to the City, to satisfy the balance of its obligations under the Quimby Act.

Based on the City General Plan ratio, the net increase of the Modified Project would generate a need for 2.8 acres of public parkland in the Redevelopment Area and the gross increase of the Modified Project would generate a need for 2.9 acres of public parkland in the Redevelopment Area. For comparative purposes, the Modified Project reduces the amount of acres of public parkland needed in the Redevelopment Area as compared to the CRA Approved Project's public parkland need (from 3.0 acres to 2.9 acres).

The Modified Project would also slightly decrease the size of the on-site public park (from 21,177 square feet to 18,962 square feet) as compared to the CRA Approved Project. The Modified Project's park would be approximately 0.4 acres. Additionally, the Modified Project's need for public parkland would be less than the need for the CRA Approved Project (from 3.0 acres to 2.9 acres), and the Modified Project's recreation and park facilities serving the Redevelopment Area are greater and larger (from 7 facilities and 3.27 acres to 8 facilities and 7.37 acres) than the CRA Approved Project. Of the 2.9 acres of public parkland needed in the Redevelopment Area for the Modified Project, the Modified Project itself provides 0.4 acres, approximately 14 percent of the total public parkland needed, and open space amenities.

Compared to the CRA Approved Project, the proposed Modified Project would provide approximately 35,234 square feet of open space, (including the 18,962 square-foot

public park), which is an increase from the 30,900 square feet of open space provided as part of the CRA Approved Project. Because the proposed on-site recreational and open space amenities would be open to the residents of the Modified Project, this feature would help alleviate the City's existing substandard provision of parkland and recreational facilities. The onsite recreational amenities would help reduce Modified Project-related impacts by providing onsite facilities that future residents may use in lieu of public parks.

Like the CRA Approved Project, if and to the extent that the proposed onsite recreational and outdoor facilities for the Modified Project do not fully satisfy the requirements of the Quimby Act and Zone Change Park Fee, the Applicant would pay fees to the City to satisfy the balance of its obligations under the Quimby Act and the Zone Change Park Fee. Therefore, the provision of the onsite recreational and outdoor facilities, together with the payment of Quimby fees or other applicable fees (see Certified EIR Code-Required Measure MM IV.J.4-1, which is now a Regulatory Compliance Measure), would ensure that the Modified Project's impact upon parks and recreational facilities is less than significant because the Modified Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities for the parks department or increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Moreover, because the Modified Project generates fewer residents than the CRA Approved Project, the Modified Project's public parkland need is less than the CRA Approved Project's public parkland need. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to recreation and parks.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's impact upon parks and recreational facilities is less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to recreation and parks.

c. Schools (Operation)

The Certified EIR concluded that the CRA Approved Project's operational impacts to school services would be less than significant with mitigation. The CRA Approved Project proposed to implement Certified EIR Mitigation Measure MM IV.J-3.2, which ensures the CRA Approved Project applicant shall pay all applicable school fees to the LAUSD to offset the impact of additional student enrollment at schools serving the project area. As compared to the CRA Approved Project, because the Modified Project would result in a decrease in dwelling units and commercial space, the potential number of students generated by the Modified Project would be the same or reduced from the CRA Approved. In addition, similar to the CRA Approved Project, the Modified Project would also implement Certified EIR Mitigation Measure MM IV.J-3.2 (now Regulatory Compliance Measure CM IV.J-3.2) to ensure the Modified Project Applicant shall pay all applicable school fees. Thus, the potential for the Modified Project to impact school

facilities and services will be the same or reduced under the Modified Project as compared to the Certified EIR, and would remain less than significant with the implementation of Regulatory Compliance Measure CM IV.J-3.2. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to schools.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's impact to school facilities and services would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to schools.

d. Other Public Facilities (Libraries)

The Certified EIR concluded that the CRA Approved Project's impacts to library services would be less than significant. As compared to the CRA Approved Project, the Modified Project would result in a decrease in dwelling units, commercial space, and public park space and accordingly the demand for library services generated by the Modified Project would be the same or reduced from the CRA Approved Project. Therefore, the Modified Project's impacts to library services would remain less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to library services.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's impacts to library services would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to library services.

e. Cumulative

(1) Police Impacts

The Certified EIR determined that demand for increased police services due to the related projects would be funded via existing mechanisms (e.g., sales taxes, government funding). The Certified EIR also stated the CRA Approved Project and the related projects would be subject to Los Angeles Police Department (LAPD) review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to address police protection service demands adequately. Therefore, the Certified EIR concluded cumulative impacts on police protection services would be less than significant.

Similar to the CRA Approved Project, tor the Modified Project, it is anticipated that the realized demand for increased policing services would be funded via existing mechanisms (e.g., sales taxes, government funding) to which the Modified Project and related projects would contribute. In addition, consistent with the analysis in the Certified EIR for the CRA Approved Project, each of the related projects would be individually

subject to LAPD review, and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to address police protection service demands adequately, similar to the Modified Project. Impacts created by new development would be reduced by the incorporation of required security measures into each proposed development. In addition, the Modified Project and most of the related projects are infill development, which would replace older and less secure buildings and facilities with newer development containing modern security and monitoring features, as well as new uses and residents that would revitalize the Hollywood Redevelopment Area. Ongoing revitalization efforts would help reduce the cumulative crime impacts in the Hollywood Area, as the revitalization efforts would provide an opportunity for people engaged in normal everyday activity to observe the space around them. In addition, the Modified Project and the related projects would improve the natural surveillance system consistent with the *Crime Prevention Through Environmental Design City of Los Angeles "Design Out Crime" Guidelines* (Design Out Crime Guidelines). Further, the LAPD monitors the need for police services and proposes appropriate service enhancements through the yearly budgetary process.

Furthermore, the analysis of the Modified Project's impacts to police services concluded that the Modified Project would result in less than significant impacts with mitigation incorporated, which is consistent with the conclusion for the CRA Approved Project provided in the Certified EIR. Further, the Modified Project's contribution to cumulative impacts on police services will be the same or less than the CRA Approved Project's contribution to cumulative impacts on police services because, the impacts on police services associated with the Modified Project are the same or less than those of the CRA Approved Project. In addition, and as with the Modified Project, the related projects would be expected to consult and submit a diagram of the respective properties to the Los Angeles Police Department's Crime Prevention Section prior to any Certificate of Occupancy in order to ensure impacts to police services would be mitigated. As such, when combined with the related projects, the Modified Project and the related projects would not significantly impact police services. Therefore, cumulative impacts on police protection services would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts on police services.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's cumulative impacts on police protection services would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts on police services.

(2) Fire Protection Impacts

The Certified EIR stated the CRA Approved Project and each of the related projects would be individually subject to LAFD review and would be required to comply with all applicable construction-related and operational fire safety requirements of the LAFD and the City in order to mitigate fire protection impacts adequately. Therefore, the

Certified EIR for the CRA Approved Project concluded cumulative impacts on fire protection services would be less than significant.

Consistent with the CRA Approved Project, each of the Modified Project's related projects would be individually subject to LAFD review and would be required to comply with all applicable construction-related and operational fire safety requirements of the LAFD and the City of Los Angeles in order to mitigate fire protection impacts adequately. Furthermore, the analysis of the Modified Project's impacts to fire protection services concluded that the Modified Project would result in less than significant impacts, which is consistent with the conclusion for the CRA Approved Project provided in the Certified EIR. Further, the Modified Project's contribution to cumulative impacts on fire protection services will be less than or the same as the CRA Approved Project's contribution to cumulative impacts on fire protection because the impacts on fire protection associated with the Modified Project are less than or the same as those of the CRA Approved Project. In addition, and as with the Modified Project, each of the related projects would be required to comply with all applicable construction-related and operational fire safety requirements of the LAFD and the City of Los Angeles in order to mitigate fire protection impacts adequately. As such, when combined with the related projects, the Modified Project and the related projects would not significantly impact fire protection services. Therefore, cumulative impacts on fire protection services would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts on fire protection services.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's cumulative impacts on fire protection services would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts on fire protection services.

(3) Recreation and Parks Impacts

The Certified EIR for the CRA Approved Project concluded, with the mandatory payment of the Quimby or other applicable fees, cumulative recreation and park impacts would be less than significant. The Modified Project's new residents would constitute approximately 3.5 percent of the cumulative demand for recreation and parks and the Modified Project would provide approximately 35,234 square feet of open space and additional recreational opportunities. Furthermore, similar to the Modified Project, the related projects that include residential units would be required to pay the applicable Quimby fees or other applicable parks and recreation fees, and/or would incorporate park and recreational facilities on-site. With the mandatory payment of the Quimby or other applicable fees by the residential related projects, cumulative parks and recreation impacts would be reduced to a less than significant level, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. Further, the Modified Project's contribution to cumulative impacts on recreation and parks will be less than the CRA Approved Project's contribution to cumulative impacts on recreation and parks

because, the impacts on recreation and parks associated with the Modified Project are less than those of the CRA Approved Project. The Certified EIR concluded that the CRA Approved Project would result in less than significant cumulative impacts to recreation and parks, and the Modified Project would serve to further reduce those impacts. Therefore, through compliance with regulatory requirements, the Modified Project and the related projects' associated cumulative impact on parks and recreational facilities would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts on recreation and parks.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's cumulative impacts on parks and recreational facilities would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts on recreation and parks.

2. Project Design Features

The following Project Design Feature is relevant to Public Services (Fire Protection):

Project Design Feature IV.J-1: Good housekeeping procedures would be implemented during the additional construction required for the Modified Project and would include: the maintenance of mechanical equipment in good operating condition; careful storage of flammable materials in appropriate containers; and the immediate and complete cleanup of spills of flammable materials when they occur.

3. Reference

For a complete discussion of Public Services see Sections IV.J Public Services and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

VIII. Environmental Impacts found to be less than significant and further reduced with Mitigation

A. Air Quality (Construction)

1. Description

a. Regional Emissions

The construction emissions estimated in the Certified EIR for the CRA Approved Project would not exceed the regional emissions thresholds recommended by the SCAQMD. As such, construction impacts of the CRA Approved Project would have been less than significant. Nevertheless, Certified EIR Mitigation Measure IV.B-1 was included in the Certified EIR to further reduce PM10 and PM2.5 emissions.

The analysis of the Modified Project's potential impacts includes the same construction activities as the CRA Approved Project as well as additional construction associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. The two sets of construction activities would not overlap. For the Modified Project's additional construction activities, it is anticipated that the emissions from the installation and retrofitting for the new automated steel parking structure and interior building renovations would occur during an approximate 4-month construction timeline. The Modified Project's construction emissions from the additional construction activities associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations would be below the SCAQMD's thresholds of significance for all six criteria pollutants. Furthermore, implementation of Regulatory Compliance Measures CM.B-1 through CM.B-4, which ensure compliance with SCAQMD District Rules and Sections 2485 in Title 13 and Section 93115 in Title 17 of the California Code of Regulations would further reduce the Modified Project's construction emissions from the additional construction activities. SCAQMD Rule 403 mandates the implementation of BMPs to control and limit fugitive dust emissions. SCAQMD Rule 1113 established minimum VOC content standards for architectural coatings and required contractors to close VOC containers when not in use. CCR Section 2485 in Title 13 prohibits the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction when equipment is not in use for more than five minutes. CCR Section 93115 in Title 17 specifies fuel and fuel additive requirements and emission standards for the operation of any stationary, diesel-fueled, compression-ignition engines. Compliance with these regulatory measures are mandated by existing laws and will be adhered to by all contractors.

The portion of the Modified Project's construction that includes the same construction activities as the CRA Approved Project would not overlap with the Modified Project's additional construction activities. Therefore, to determine the Modified Project's peak regional construction emissions, the estimated peak daily construction emissions of the Modified Project's additional construction activities were compared to the estimated peak daily construction emissions of the CRA Approved Project. This comparison evaluates whether the peak daily construction emissions of the Modified Project's additional construction activities would exceed the peak daily construction emissions of the CRA Approved Project. The Modified Project's additional construction activities' peak daily construction emissions would be fewer than the CRA Approved Project's peak daily construction emissions for all criteria pollutants. As a result, the portion of the Modified Project's construction that includes the same construction activities as the CRA Approved Project is the peak day of emissions to compare to applicable thresholds. As discussed above, the CRA Approved Project's peak daily construction emissions were determined to be less than significant in the Certified EIR for the CRA Approved Project.

Therefore, based on the temporary nature and relatively short duration of the additional construction work involved in the Modified Project's additional construction activities, and the fact that the Modified Project's additional construction activities would not overlap with the construction activities analyzed for the CRA Approved Project in the

Certified EIR in a manner that would increase construction emissions on a given day, the construction emissions impacts as a result of construction of the Modified Project would not substantially increase the construction emissions impacts for construction of the CRA Approved Project. Furthermore, implementation of Regulatory Compliance Measures CM.B-1 through CM.B-4, which ensure compliance with SCAQMD District Rules and Sections 2485 in Title 13 and Section 93115 in Title 17 of the California Code of Regulations would further reduce the Modified Project's construction emissions from the additional construction activities. Certified EIR Mitigation Measure IV.B-1 would be implemented as Regulatory Compliance Measure CM.B-1, during the additional construction activities of the Modified Project. Accordingly, the Modified Project's construction emissions would be less than significant and within the scope of the impacts analyzed for the CRA Approved Project. As compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to construction emissions.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's construction emissions would be less than significant and within the scope of the impacts analyzed for the CRA Approved Project and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to construction emissions.

b. Localized Air Quality Impacts

The Certified EIR determined that on-site emissions generated by the CRA Approved Project during the different phases of construction were below the established SCAQMD localized thresholds for NO_x, CO, PM_{10}, and $PM_{2.5}$ at a receptor distance of 25 meters. Therefore, the localized construction impacts of the CRA Approved Project were determined to be less than significant. Nevertheless, Certified EIR Mitigation Measure IV.B-1 was included in the Certified EIR to further reduce PM10 and PM2.5 emissions.

The analysis of the Modified Project's potential impacts includes the same construction activities as the CRA Approved Project as well as additional construction associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. Because the portion of the Modified Project's construction that includes the same construction activities as the CRA Approved Project would not overlap with the Modified Project's additional construction activities, evaluation of both sets of construction activities enables the determination of the Modified Project's on-site peak daily construction emissions.

On-site emissions generated by the Modified Project's additional construction activities associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations would not exceed the established SCAQMD localized thresholds for NO_x, CO, PM_{10}, and $PM_{2.5}$ at a receptor distance of 25 meters. The portion of the Modified Project's construction that includes the same construction activities as the CRA Approved Project would not overlap with the Modified Project's

additional construction activities. Therefore, to determine the Modified Project's on-site peak localized construction emissions, the estimated localized on-site peak daily construction emissions of the Modified Project's additional construction activities were compared to the estimated localized on-site peak daily construction emissions of the CRA Approved Project. This comparison evaluates whether the peak daily construction emissions of the Modified Project's additional construction activities would exceed the peak daily construction emissions of the CRA Approved Project.

The Modified Project's additional construction activities' peak daily construction emissions for all criteria pollutants analyzed with the exception of CO would be fewer than the CRA Approved Project's peak daily construction emissions. CO emissions from the Modified Project's additional construction activities would be slightly higher (by approximately 0.53 lbs/day) than the CRA Approved Project's localized emissions because equipment associated with the construction activities associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations are conservatively assumed to operate concurrently. Nevertheless, the slightly higher CO emission of the Modified Project's additional construction activities are well below the SCAQMD's localized thresholds of significance for CO emissions (900.8 lbs/day) with the marginally higher emissions of 0.53 lbs/day representing approximately 0.06 percent of the pertinent threshold. Therefore, the Modified Project's additional construction activities would not involve a substantial increase in the severity of previously identified significant effects related to air quality.

Based on the temporary nature and relatively short duration of the additional construction work involved in the Modified Project, and the fact that the Modified Project's construction activities would not overlap with the construction activities analyzed for the CRA Approved Project in the Certified EIR in a manner that would increase construction emissions on a given day, the construction emissions impacts as a result of construction of the Modified Project would not substantially increase the localized air quality impacts for construction emissions of the CRA Approved Project. Thus, the Modified Project's on-site construction emissions would also not exceed the SCAQMD localized thresholds at receptor distances beyond 25 meters. Accordingly, the localized air quality impacts resulting from construction emissions associated with the Modified Project would be less than significant and within the scope of impacts analyzed for the CRA Approved Project. As compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to localized air quality impacts resulting from construction emissions.

Like the Modified Project, the localized air quality impacts resulting from construction emissions associated with the No Automated Steel Parking Structure would be less than significant and within the scope of impacts analyzed for the CRA Approved Project and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to localized air quality impacts resulting from construction emissions.

2. Project Design Features

No Project Design Features are proposed for Air Quality (Construction).

3. Mitigation Measure

Certified EIR Mitigation Measure IV.B-1: All construction-related work orders shall specify that any clearing, grading, earth moving, or excavation activities shall be performed pursuant to the requirements under SCAQMD Rule 403.

4. Finding

Although the Modified Project and No Automated Steel Parking Structure Alternative would not result in significant impact to Air Quality (Construction), mitigation measures have nonetheless been incorporated which further reduce these less-than-significant environmental effects, as identified in the Draft Supplemental EIR.

5. Rationale for Finding

As discussed above, the construction emissions estimated in the Certified EIR for the CRA Approved Project would not exceed the regional or localized emissions thresholds recommended by the SCAQMD. As such, construction impacts of the CRA Approved Project are less than significant. Similarly, the construction emissions estimated in the Modified Project and the No Automated Steel Parking Structure Alternative would not exceed the regional or localized emissions thresholds recommended by the SCAQMD. As such, construction impacts of the Modified Project and the No Automated Steel Parking Structure Alternative are less than significant. As compared to the CRA Approved Project, the proposed Modified Project and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to construction emissions. However, the Modified Project and the No Automated Steel Parking Structure Alternative would implement the above-described mitigation measure to further reduce the Modified Project's and the No Automated Steel Parking Structure Alternative's less than significant impacts.

6. Reference

For a complete discussion of Air Quality (Construction) see Sections IV.B Air Quality and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

B. Noise

1. Description

a. Operational Impacts (Noise Compatibility Standards for Multi-Family Residential)

Based on the inclusion of double-pane windows in the CRA Approved Project to reduce exterior-to-interior noise, the Certified EIR concluded operational noise impacts associated with interior spaces would be less than significant. As set forth in the

Certified EIR, future noise levels on the project site would continue to be dominated by vehicular traffic on Sunset Boulevard and Gordon Street. The ambient noise levels that were recorded in the Certified EIR were between 60 and 68 dBA L_{eq}. L_{max} noise levels of 73-83 dBA were also recorded at these locations. Based on the City's Land Use Noise Compatibility Guidelines, the Certified EIR concluded that the CRA Approved Project's impacts related to exterior ambient noise would be significant and unavoidable for future residents of the CRA Approved Project.

Since certification of the Certified EIR for the CRA Approved Project, the Supreme Court of California unanimously determined that CEQA generally does not require an analysis of how existing environmental conditions will impact a project's future users or residents. (*California Building Industry Association v Bay Area Air Quality Management District*, S213478, Opinion, p. 14). However, the Supreme Court of California did find that impacts arising from exposure of future residents to existing environmental conditions should be evaluated in the context of whether the project would exacerbate existing environmental conditions that, in turn, would result in a significant impact upon the environment. Accordingly, to provide a comparison to the analysis in the Certified EIR the discussion below provides an analysis of the impact of the existing noise conditions on future residents of the Modified Project for informational purposes only and also provides a discussion of whether the Modified Project would exacerbate existing environmental noise conditions.

The Modified Project would contain exterior windows with double-pane glass and be designed and constructed to reduce interior noise levels for future Modified Project residents to acceptable noise levels in accordance with the Noise Element and CEQA regulations. In addition, the Modified Project would implement Regulatory Compliance Measure CM F-3, which ensures an acceptable interior noise environment under Noise Insulation Standards of Title 24 of the California Code Regulations and requires submittal of an acoustical report that demonstrates interior noise levels are no greater than 45 dBA CNEL prior to the issuance of building permits. Double pained windows and implementation of regulatory compliance measure CM F-3 is consistent with Certified EIR Mitigation Measure Impact IV.F-3, which requires that all exterior windows within the Modified Project be constructed with double-pane glass and uses exterior wall construction or allows the Applicant to retain an acoustical engineer to provide evidence that alternative sound insulation would mitigate interior noise levels below 45 dBA CNEL. With regulatory compliance measure CM F-3 and Certified EIR Mitigation Measure Impact IV.F-3, the Modified Project's operational noise impacts on future residents associated with locations for interior spaces would be less than significant.

Similar to the CRA Approved Project, future noise levels at the project site would continue to be dominated by vehicular traffic on Sunset Boulevard and Gordon Street for the Modified Project. The future noise levels from vehicular traffic on Sunset Boulevard and Gordon Street in the vicinity of the project site would range from 56.7 dBA to 72.0 dBA. Additionally, the current ambient noise levels generated in the vicinity of the Modified Project range from 60.9 dBA to 75.7 dBA Leq. Thus, similar to the CRA Approved Project, the Modified Project would expose future residents to "normally unacceptable" noise levels for multi-family uses. Therefore, the Modified Project would

conflict with the Noise/Land Use compatibility guidelines of the Noise Element of the General Plan, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. However, consistent with recent CEQA case law, impacts arising from exposure of future occupants of a project to existing environmental conditions is not a significant impact upon the environment. Instead, impacts arising from exposure of future residents to existing environmental conditions should be evaluated in the context of whether the project would exacerbate existing environmental conditions that, in turn, would result in a significant impact upon the environment.

The increase in exterior noise levels resulting from future roadway noise levels with the Modified Project would be between 0.5 dBA and 1.4 dBA. Accordingly, the increase in future roadway noise levels with the Modified Project would not exceed the 3.0 dBA CNEL significance threshold. In addition, the Noise/Land Use compatibility classifications from the Noise Element of the General Plan associated with the 2015 roadway noise levels would not change with the development of the Modified Project. Therefore, the Modified Project would not exacerbate existing noise levels in such a way as to modify the Noise/Land Use compatibility classifications of the Noise Element of the General Plan. Accordingly, the Modified Project would not exacerbate existing environmental conditions because future roadway noise levels with the Modified Project would not exceed the 3.0 dBA CNEL significance threshold and the Noise/Land Use compatibility classifications would remain the same with or without the development of the Modified Project.

Therefore the potential conflict arising from the Modified Project's inconsistency with the Noise/Land Use compatibility guidelines of the Noise Element of the General Plan would be considered a less than significant impact. As a result, operational noise levels associated with the Modified Project would not substantially increase impacts identified in the Certified EIR for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to noise levels for exterior spaces associated with the operation of the Modified Project.

Like the Modified Project, the impact regarding the Noise/Land Use compatibility guidelines of the Noise Element of the General Plan would be considered a less than significant impact for the No Automated Steel Parking Structure Alternative and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to noise levels for exterior spaces associated with operation.

b. Operational Impacts (Stationary Noise)

The Certified EIR concluded the CRA Approved Project's stationary and mobile source operational impacts would be less than significant.

(1) Noise from the HVAC Equipment

The Certified EIR stated rooftop mechanical HVAC equipment would be installed for the CRA Approved Project. As such, the HVAC noise levels were calculated based on the distances from the rooftop mechanical HVAC equipment to the nearest sensitive receptors. The Modified Project would use similar mechanical HVAC equipment as the CRA Approved Project, which would be located on the rooftop of the residential tower and on the ground floor in the public park. Therefore, the distances utilized for the Modified Project's HVAC noise levels were calculated based on the distances from the mechanical HVAC equipment on the rooftop and in the public park to the nearest sensitive receptors. This equipment would be shielded and appropriate noise muffling devices would be installed to reduce noise levels that affect nearby noise-sensitive uses. The design of the on-site HVAC units and exhaust fans would be required to comply with the regulations under Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dBA. The Modified Project's resulting HVAC noise levels at the nearest sensitive receptors would not exceed the existing ambient noise levels, by more than 3 dBA, which is in compliance with the regulations under Section 112.02 of the LAMC and the L.A. CEQA Thresholds Guide. Additionally, similar to the CRA Approved Project, the Modified Project would incorporate Certified EIR Mitigation Measure MM IV.F-5.1, which would ensure HVAC units are oriented to the east away from the residential neighborhood. This mitigation measure would further reduce the Modified Project's operational noise impacts associated with locations off-site. Thus, the operational noise impacts associated with the HVAC equipment would be less than significant. Thus, the Modified Project would not substantially increase the CRA Approved Project's operational noise impacts associated with the HVAC equipment.

Like the Modified Project, the operational noise impacts associated with the HVAC equipment from the No Automated Steel Parking Structure Alternative would be less than significant and would not substantially increase the operational noise impacts associated with the HVAC equipment.

(2) Noise from the Parking Structure

The Certified EIR determined that noise from the CRA Approved Project's parking structure would be similar to the existing conditions with vehicles parking in the lots north and east of the project site. The Certified EIR stated the parking structure's noise would not increase ambient noise levels at the nearby homes by 3 dBA CNEL or more. The Certified EIR concluded, based on this information, implementation of the CRA Approved Project would not result in a substantial permanent increase in ambient noise levels above future existing ambient noise levels without the CRA Approved Project. As such, operational noise impacts associated with locations offsite would be less than significant.

Similar to the Certified EIR, the Modified Project's parking podium would also generate noise from tires squealing, engines accelerating, doors slamming, car alarms, and people talking during the day and evening when the largest number of retail customers would enter and exit the parking podium. However, these conditions would be slightly

different than the conditions in the Certified EIR for the CRA Approved Project because the Modified Project's parking podium is smaller than the CRA Approved Project's parking podium. The CRA Approved Project proposed to develop a five-story, approximately 65-foot podium structure. Compared to the CRA Approved Project, the Modified Project's parking podium would be a four level above-grade, approximately 50-foot podium structure. Thus, similar to the CRA Approved Project, the activities within the parking podium for the Modified Project would not increase ambient noise levels as they would be similar to the current ambient noise levels generated in the vicinity of the Modified Project, which range from 60.9 dBA to 75.7 dBA Leq.

The Modified Project would also include the addition of a new automated steel parking structure located above the parking area on Level L3 (within the approximate height of Level L4 of the rest of the podium structure), which would include two floors of automated parking. Unlike the three levels of subterranean parking and three levels of above-grade parking in the Modified Project's parking podium, the new automated steel parking structure mechanically and precisely stores vehicles. Thus, the automated steel parking structure operates without the need for human management. Therefore, the automated steel parking structure would not generate noise associated with tires squealing, engines accelerating, doors slamming, car alarms, and people talking like traditional garages as cars would be shut off at the garage entry and conveyed via electric mechanisms. The noise anticipated in the new automated steel parking structure would be generated by the pulleys, motors, and mechanical systems. These motors would be entirely enclosed within the new automated parking structure and a transparent wire fence decorated with live green landscaping such as clinging vines or ivy will screen the exterior. A representative noise measurement was taken of an automated steel parking structure that generated a noise level of 58.5 dBA Leq, which is 2.4 dBA below the ambient noise level recorded at street level on Gordon Street (i.e., 60.9 dBA Leq). Thus, the operation of the Modified Project's automated parking system would not generate a significant noise impact upon adjacent land uses.

Concurrent operations of the Modified Project's parking podium and the new automated steel parking structure would result in a combined noise level between 62.3 and 70.3 dBA Leq. Thus, similar to the CRA Approved Project, the activities within the parking podium and automated steel parking structure for the Modified Project would not increase ambient noise levels by 3 dBA or more as they would be similar to the current ambient noise levels generated in the vicinity of the Modified Project, which range from 60.9 dBA to 75.7 dBA Leq. Additionally, similar to the CRA Approved Project, the Modified Project would also incorporate Certified EIR Mitigation Measure MM IV.F-5.2, which would ensure the parking ramps would be constructed with concrete not metal to prevent tire squealing at turning areas to further reduce impacts. These mitigation measures would further reduce the Modified Project's operational noise impacts associated with locations off-site. Therefore, consistent with the CRA Approved Project, the parking podium and new automated steel parking structure noise would not increase ambient noise levels at the nearby sensitive receptors by 3 dBA or more. Thus, the operational noise impacts associated with the parking podium and new automated steel parking structure would be less than significant and within the impacts concluded in the

Certified EIR for the CRA Approved Project. Thus, the Modified Project would not substantially increase the CRA Approved Project's operational noise impacts associated with the parking podium and new automated steel parking structure.

Like the Modified Project, the operational noise impacts associated with the No Automated Steel Parking Structure Alternative would be less than significant and would not substantially increase the CRA Approved Project's operational noise impacts associated with the parking podium and new automated steel parking structure.

(3) Noise from People Utilizing the Modified Project

The Certified EIR for the CRA Approved Project did not analyze noise generated from people utilizing the CRA Approved Project's mixed-use commercial and residential land uses. Due to the mixed-use nature of the Modified Project, noise generated from people utilizing the Modified Project's uses, including the operation of the proposed ground floor commercial uses, the outdoor open spaces on the podium, and the public park have the potential to impact off-site sensitive receptors.

Noise levels from outdoor activities on the podium would be 69 dBA, which is lower than the ambient noise levels along Sunset Boulevard, therefore the noise generated from activities on the podium deck would not increase the ambient noise levels at the street level by 3 dBA or more. Noise impacts from individuals and small gatherings of people on the podium would therefore be less than significant.

In addition, the Modified Project would generate low levels of noise from public utilization of the proposed Gordon Street Park. Gordon Street Park is designed for passive recreational uses and would not accommodate playground equipment, or large contiguous open space areas that would allow for organized field games such as soccer or baseball. Based on the design and landscaping plan within the park area, activities within the park would be limited to walking dogs, walking, sitting on park benches, and enjoying picnics/barbeques. Conservatively, the maximum utilization of the park is estimated to include up to 60 individuals congregating and utilizing the park area in an informal manner at the same time. Noise generated by the public utilizing the Gordon Street Park would be below the 3 dBA threshold and would not be considered significant.

Based on this information, implementation of the Modified Project would not result in a substantial permanent increase in ambient noise levels above future existing ambient noise levels without the Modified Project. As such, the Modified Project's operational noise impacts associated with locations off-site would be less than significant, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to stationary noise.

Like the Modified Project, the No Automated Steel Parking Structure's operational noise impacts associated with locations off-site would be less than significant and would not

involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to stationary noise.

2. Project Design Features

No Project Design Features are proposed for Noise.

3. Mitigation Measures

Certified EIR Mitigation Measure Impact IV.F-3: All exterior windows within the Modified Project shall be constructed with double-pane glass and use exterior wall construction which provides a Sound Transmission Class of 50 or greater as defined in UBC No. 35-1, 1979 edition or any amendment thereto. The applicant, as an alternative, may retain an acoustical engineer to submit evidence, along with the application for a building permit, any alternative means of sound insulation sufficient to mitigate interior noise levels below a CNEL of 45 dBA in any habitable room.

Certified EIR Mitigation Measure MM IV.F-5.1: The air inlets of HVAC units installed at the project site shall be oriented to the east away from the residential neighborhood to the west of the site.

Certified EIR Mitigation Measure MM IV.F-5.2: Concrete, not metal, shall be used for construction of parking ramps. The interior ramps shall be textured to prevent tire squeal at turning areas.

4. Finding

Although the Modified Project and No Automated Steel Parking Structure Alternative would not result in significant impacts to Noise (Noise Compatibility Standards and Stationary Noise), mitigation measures have nonetheless been incorporated which further reduce these less than significant environmental effects, as identified in the Draft Supplemental EIR.

5. Rationale for Finding

As discussed above, the potential conflict arising from the Modified Project's inconsistency with the Noise/Land Use compatibility guidelines of the Noise Element of the General Plan would be considered a less than significant impact. As a result, operational noise levels associated with the Modified Project and No Automated Steel Parking Structure Alternative would not substantially increase impacts identified in the Certified EIR for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project and No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to noise levels for exterior spaces associated with the operation of the Modified Project or and No Automated Steel Parking Structure Alternative.

In addition, regarding stationary noise, the Certified EIR concluded the CRA Approved Project's stationary operational impacts would be less than significant. Similarly, the Modified Project's and No Automated Steel Parking Structure Alternative's stationary operational noise impacts would be less than significant related to noise from HVAC equipment, the parking structure, and from people utilizing the Modified Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project and No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to stationary noise.

However, the Modified Project and No Automated Steel Parking Structure Alternative would implement the above-described mitigation measure to further reduce the less than significant impacts.

6. Reference

For a complete discussion of Noise see Sections IV.F Noise and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

C. Land Use Planning (Consistency with Noise Element of the General Plan)

1. Description

The Certified EIR concluded the CRA Approved Project's operational noise would have a significant and unavoidable impact from a land use compatibility standpoint related to consistency with the Noise Element.

The Modified Project would contain exterior windows with double-pane glass and be designed and constructed to reduce interior noise levels for future Modified Project residents to acceptable noise levels in accordance with the Noise Element and CEQA regulations. In addition, the Modified Project would implement Regulatory Compliance Measure CM F-3, in Section IV.F Noise of the Draft Supplemental EIR, which ensures an acceptable interior noise environment under Noise Insulation Standards of Title 24 of the California Code Regulations and requires submittal of an acoustical report that demonstrates interior noise levels are no greater than 45 dBA CNEL prior to the issuance of building permits. Therefore, with Regulatory Compliance Measure CM F-3 and Certified EIR Mitigation Measure Impact IV.F-3, the Modified Project's operational noise impacts associated with locations for interior spaces would be less than significant and the Modified Project would be consistent with the City of Los Angeles' land use noise compatibility standards for interior ambient noise during operation of the Modified Project. Therefore, operational interior noise levels for locations on the project site associated with the Modified Project would be less than significant and would not substantially increase impacts identified in the Certified EIR for the CRA Approved Project.

For exterior ambient noise, the Certified EIR conclude that the CRA Approved Project would result in significant and unavoidable impacts to future residents of the CRA

Approved Project, as the exterior ambient noise levels were in the normally unacceptable and clearly unacceptable CNEL exposure range. Similar to the CRA Approved Project, the Modified Project would expose future residents to "normally unacceptable" noise levels for multi-family uses. Therefore, the Modified Project would conflict with the Noise/Land Use compatibility guidelines of the Noise Element of the General Plan, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. However, consistent with recent CEQA case law (*California Building Industry Association v Bay Area Air Quality Management District*, S213478, Opinion, p. 14), impacts arising from exposure of future occupants of a project to existing environmental conditions is not a significant impact upon the environment. Instead, impacts arising from exposure of future residents to existing environmental conditions should be evaluated in the context of whether the project would exacerbate existing environmental conditions that, in turn, would result in a significant impact upon the environment. The Modified Project would not exacerbate existing environmental conditions because future roadway noise levels with the Modified Project would not exceed the 3.0 dBA CNEL significance threshold and the Noise/Land Use compatibility classifications would remain the same with or without the development of the Modified Project.

Therefore the anticipated land use conflict arising from the Modified Project's inconsistency with the Noise/Land Use compatibility guidelines of the Noise Element of the General Plan would be considered a less than significant impact. Therefore, operational noise levels for locations on the project site associated with the Modified Project would be less than significant and would not substantially increase impacts identified in the Certified EIR for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the Noise Element of the General Plan.

Like the Modified Project, operational noise levels for locations on the project site associated with the No Automated Steel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the Noise Element of the General Plan.

2. Project Design Features

No Project Design Features are proposed for Land Use Planning (Consistency with Noise Element of the General Plan)

3. Mitigation Measure

Certified EIR Mitigation Measure Impact IV.F-3: All exterior windows within the Modified Project shall be constructed with double-pane glass and use exterior wall construction which provides a Sound Transmission Class of 50 or greater as defined in UBC No. 35-1, 1979 edition or any amendment thereto. The applicant, as an alternative,

may retain an acoustical engineer to submit evidence, along with the application for a building permit, any alternative means of sound insulation sufficient to mitigate interior noise levels below a CNEL of 45 dBA in any habitable room.

4. Finding

Although the Modified Project and No Automated Steel Parking Structure Alternative would not result in a significant impact to Land Use Planning (Consistency with Noise Element of the General Plan), mitigation measures have nonetheless been incorporated which further reduce these less than significant environmental effects, as identified in the Draft Supplemental EIR.

5. Rationale for Finding

As discussed above, the potential conflict arising from the Modified Project's inconsistency with the Noise/Land Use compatibility guidelines of the Noise Element of the General Plan would be considered a less than significant impact. As a result, operational noise levels associated with the Modified Project and No Automated Steel Parking Structure Alternative would not substantially increase impacts identified in the Certified EIR for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project and No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to land use noise compatibility standards.

However, the Modified Project and No Automated Steel Parking Structure Alternative would implement the above-described mitigation measure to further reduce the less than significant impacts.

6. Reference

For a complete discussion of Land Use Planning (Consistency with Noise Element of the General Plan) see Sections IV.H Land Use Planning and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

D. Public Services (Fire Protection, Operation)

1. Description

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts during operation of the CRA Approved Project in relation to increased demands upon Fire Department services.

(1) Response Distance and Emergency Access

The nearest fire station to the Modified Project, Fire Station 82, is approximately 0.5 mile from the project site. Due to the location of the Modified Project in an area adequately served by existing fire stations within a 1-mile radius of the project site,

response distance would be within Fire Department standards of the maximum 1.0 to 1.5 mile response distance for fire stations with an engine company and truck company. As compared to the CRA Approved Project, the Modified Project would result in a decrease in the on-site residential population, and, therefore, the Modified Project's increase in land use activity and associated fire protection service needs would be the same or less than the CRA Approved Project. Furthermore, the Modified Project's high-rise residential tower would also include automatic fire suppression sprinklers as required by the Fire Code. The presence of automatic fire sprinklers will reduce or slow the spread of fire in a high rise structure, further assisting fire fighters in the event of a fire.

Emergency vehicle access to the Modified project site would continue to be provided from local public roadways. Major roadways adjacent to the project site would continue to provide public and emergency access. The LAFD considers intersections with an LOS of E or F to inhibit emergency response. As discussed in Section IV.K.1, Traffic/Transportation, of the Draft Supplemental EIR, with implementation of Mitigation Measure MM K.1-1, the Gower Street and Sunset Boulevard intersection would operate at LOS D during the P.M. peak hour. Therefore, as with the CRA Approved Project, the Modified Project would not cause the major roadways that provide public and emergency access to operate at LOS E or F during the A.M. or P.M. peak hour and the Modified Project would not inhibit emergency vehicle access with incorporation of traffic mitigation measures. Furthermore, as provided by Regulatory Compliance Measures CM J.2-1 through CM J.2-3, the Modified Project Applicant would be required to ensure firefighting personnel and apparatus access, establish conditions the Modified Project must meet to the satisfaction of the City Fire Department, and submit a Fire Life Safety Resources Management Plan to the City Fire Department. Therefore, the Modified Project would not inhibit emergency vehicle access, and impacts related to emergency access would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to response distance and emergency access during operation of the Modified Project.

Like the Modified Project, impacts related to emergency access for the No Automated Steel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to response distance and emergency access during operation.

(2) Fire Flow

The Certified EIR concluded based upon fire flow and response criteria, existing fire protection service was considered adequate for the CRA Approved Project. Additionally, for the vacant 22-story, approximately 250 foot high mixed use building and closed approximately 18,962 square foot public park on the project site, a new fire hydrant was installed on Sunset Boulevard as required by the LAFD in order to meet the City's minimum distance from fire hydrants to residential units. Similar to the CRA Approved

Project, final fire flow requirements for the Modified Project would be verified during the review and approval process for the Modified Project before a certificate of occupancy is issued. However, it is expected that the fire flow requirements would be adequate for the Modified Project because it is expected that all required improvements to ensure adequate fire flow, including the installation of a new fire hydrant on Sunset Boulevard, were previously conducted. Furthermore, the uses included in the Modified Project are similar to the uses for the CRA Approved Project and reduce the number of dwelling units, reduce the square footage of commercial uses and reduce the size of the park. Thus, the Modified Project is smaller than the CRA Approved Project and, as a result, would require less fire protection services based upon fire flow. Therefore, because the fire protection service was considered adequate based upon the fire flow requirement for the larger CRA Approved Project from four fire hydrants and a new fire hydrant on Sunset Boulevard was subsequently installed, the existing fire protection service, based upon fire flow, would also be considered adequate for the Modified Project.

The Water Operations Division of the DWP would perform a fire flow study at the time of permit review in order to ascertain whether further water system or site-specific improvements would be necessary. Additional hydrants, water lines, and the water tanks would be installed per Fire Code requirements and would be based upon the specific land uses of the Modified Project. Furthermore, through Regulatory Compliance Measures CM J.2-1 through CM J.2-3, the Modified Project Applicant would be required to ensure adequate fire flows and infrastructure pursuant to the LAFD Fire Code, establish conditions the Modified Project must meet to the satisfaction of the City Fire Department and submit a Fire Life Safety Resources Management Plan to the City Fire Department. Therefore, with respect to fire flows, fire protection would be adequate and the Modified Project's impact upon fire protection services would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to fire protection during operation of the Modified Project.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's impact upon fire protection services would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to fire protection during operation.

2. Project Design Features

No Project Design Features are proposed for Public Services (Fire Protection, Operation).

3. Mitigation Measure

MM K.1-1: Gower Street & Sunset Boulevard. The Modified Project shall improve the Gower Street & Sunset Boulevard intersection to provide an operational northbound right turn lane by improving the northbound approach from a left turn lane and shared through/ right turn lane to a left turn lane, through lane and operational right turn lane.

Because this improvement requires the relocation of an existing passenger loading zone southerly on Gower Street south of Sunset Boulevard and removal of two to three metered parking spaces, the Modified Project shall set aside up to 3 spaces for public parking to replace these parking spaces on-site. Additionally, the Modified Project shall install additional system detector loops along the west side of Gower Street.

4. Finding

Although the Modified Project and No Automated Steel Parking Structure Alternative would not result in significant impact to Public Services (Fire Protection, Operation), mitigation measures have nonetheless been incorporated which further reduce these less than significant environmental effects, as identified in the Draft Supplemental EIR.

5. Rationale for Finding

As discussed above, the Certified EIR concluded the CRA Approved Project would result in less than significant impacts during operation of the CRA Approved Project in relation to increased demands upon Fire Department services. Similarly, the Modified Project and No Automated Steel Parking Structure Alternative would result in less than significant impacts during operation in relation to increased demands upon Fire Department services. As compared to the CRA Approved Project, the proposed Modified Project and No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to Fire Department services. However, the Modified Project and No Automated Steel Parking Structure Alternative would implement the above-described mitigation measure to further reduce the less than significant impacts.

6. Reference

For a complete discussion of Public Services (Fire Protection, Operation) see Sections IV.J Public Services and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

IX. Environmental Impacts analyzed in the Supplemental EIR and determined to be less than significant after Mitigation

A. Geology/Soils

1. Description

a. Seismic-Induced Ground Shaking

The Certified EIR stated the project site is located in a seismically active region and could be subjected to strong ground shaking in the event of an earthquake. The Certified EIR concluded the CRA Approved Project would result in less than significant impacts with mitigation related to exposing people or structures to the risk of loss, injury, or death involving seismic induced ground shaking.

Because the Modified Project is located on the same project site as the CRA Approved Project, similar to the CRA Approved Project analyzed in the Certified EIR, the project site is located in a seismically active region and could be subjected to strong ground shaking in the event of an earthquake. Therefore, development of the Modified Project would expose new residents, employees and visitors of the proposed dwelling units and commercial establishments to potentially significant adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. However, such hazards are inherent to the region and the effects of ground shaking can be mitigated to a less-than-significant level by incorporating proper design and construction methods in conformance with current building codes and engineering practices. Modern, well-constructed buildings are designed to resist ground shaking through the use of shear walls and reinforcements.

The Modified Project, including the additional construction of the new automated steel parking structure, would implement Certified EIR Code Required (Regulatory Compliance) Measure IV.C-2, which ensures consistency with all applicable provisions of the City of Los Angeles Building Code, as well as the seismic design criteria contained within the Uniform Building Code. In addition to Certified EIR Code-Required Measure IV.C-2, the Modified Project would also implement Certified EIR Mitigation Measure MM IV.C-2.1 and Certified EIR Mitigation Measure MM IV.C-2.2. Certified EIR Mitigation Measure MM IV.C-2.1 ensures the Modified Project would be designed and constructed in accordance with the recommendations provided in the CRA Approved Project's Geotechnical Report, the Modified Project's Geotechnical Report, and the Modified Project's Structural Narrative, or as they may be amended by request of the City. Certified EIR Mitigation Measure MM IV.C-2.2 requires the applicant to ensure geotechnical testing and observation be conducted on-site by a state certified geotechnical engineer during any excavation and earthwork activities to ensure that recommendations provided in the CRA Approved Project's Geotechnical Report and the Modified Project's Geotechnical Report are implemented where applicable.

The CRA Approved Project's Geotechnical Report found splays of the Hollywood Fault zone located approximately 2,500 feet north-northwest of the project site. The project site is not located within a designated Alquist-Priolo Earthquake Fault Zone or a fault rupture study zone. No known active faults trend through the project site. Since the Certified EIR for the CRA Approved Project, an Alquist-Priolo special study zone was established for the active Hollywood Fault. The closest distance of the Hollywood Fault special study zone to the project site is approximately 700 feet north of the project site's northern property line and the closest mapped active fault trace is approximately 1,200 feet north of the project site's northern property line. The Modified Project's Geotechnical Report concluded that the project site is not located within a special study zone, is not subject to fault rupture, and the issuance of the Seismic Hazard Zone Hollywood Quadrangle Official Map showing the Hollywood Fault being located 1,200 feet north of the project site does not impact the development of the Modified Project. Furthermore, the Hollywood Fault lacks surface fault features and therefore, while capable of producing an earthquake, poses a low hazard risk with respect to seismic-induced ground shaking. Additionally, although the project site is located within 0.24

mile (approximately 1,200 feet) of the active Hollywood Fault, and is close to many other faults on a larger regional level, the potential for seismic hazards is not higher than in other areas of the City of Los Angeles or elsewhere in the region. Such risks have been addressed in the project-specific seismic design and engineering plans for the CRA Approved Project, which the Modified Project would not change.

Therefore, consistent with the Certified EIR's conclusions for the CRA Approved Project, Modified Project impacts would be less than significant with mitigation. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or exacerbate existing environmental conditions that would cause a substantial increase in the severity of previously identified significant effects related to exposing people or structures to the risk of loss, injury, or death involving seismic induced ground shaking.

Like the Modified Project, the No Automated Steel Parking Structure impacts related to exposing people or structures to the risk of loss, injury, or death involving seismic induced ground shaking would be less than significant with mitigation and would not involve new significant environmental effects or exacerbate existing environmental conditions that would cause a substantial increase in the severity of previously identified significant effects related to exposing people or structures to the risk of loss, injury, or death involving seismic induced ground shaking.

b. Erosion and Loss of Topsoil

The Certified EIR determined that the CRA Approved Project would result in less-than-significant impacts with mitigation with respect to erosion and topsoil.

The Modified Project does not have the potential to result in erosion of soils during site preparation and construction activities, as the Modified Project's additional construction would only require minimal on-site construction associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. Nevertheless, similar to the CRA Approved Project, the Modified Project would implement Certified EIR Mitigation Measure MM IV.C-5, which ensures appropriate erosion control and drainage devices shall be incorporated, such as interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code. Therefore, consistent with the CRA Approved Project analyzed in the Certified EIR, construction impacts related to soil erosion would be less than significant.

Like the Modified Project, construction impacts related to soil erosion for the No Automated Steel Parking Structure would be less than significant.

c. Expansive Soils

The Certified EIR stated with adherence to the geotechnical engineering recommendations provided in the CRA Approved Project's Geotechnical Report and the mitigation measures identified in Section IV.C Geology and Soils of the Certified EIR for

the CRA Approved Project, impacts with respect to expansive soils would be less than significant. Therefore, the Certified EIR concluded the CRA Approved Project would result in less than significant impacts associated with expansive soils with incorporation of mitigation measures.

The Modified Project would include a new automated steel parking structure that is proposed to be located above the parking area on Level L3 (within the approximate height of Level L4 of the rest of the podium structure), which would include two floors of automated parking. With the geotechnical modification proposed for the Modified Project described in detail in Section IV.C, Geology and Soils, of the Draft Supplemental EIR, the applied pressure increases at all footings as a result of the automated steel parking structure would comply with the recommendations stated in the Modified Project's Geotechnical Report and will remain consistent with the recommended bearing pressure maximum of provided in the CRA Approved Project's Geotechnical Report and associated addenda.

In addition, the Modified Project would implement Certified EIR Code-Required (Regulatory Compliance) Measure IV.C-2, Certified EIR Mitigation Measure MM IV.C-2.1, and Certified EIR Mitigation Measure MM IV.C-2.2. Regulatory Compliance Measure Certified EIR Code-Required Measure IV.C-2 ensures the Modified Project would be designed and constructed in accordance with the requirements outlined in the 2011 City of Los Angeles Uniform Building Code, including all applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations and fills. Certified EIR Mitigation Measure MM IV.C-2.1 ensures the Modified Project would be designed and constructed in accordance with the recommendations provided in the CRA Approved Project's Geotechnical Report, the Modified Project's Geotechnical Report, and the Modified Project's Structural Narrative, or as they may be amended by request of the City. Certified EIR Mitigation Measure MM IV.C-2.2 requires the applicant to ensure geotechnical testing and observation be conducted onsite by a state certified geotechnical engineer during any excavation and earthwork activities to ensure that recommendations provided in the CRA Approved Project's Geotechnical Report and the Modified Project's Geotechnical Report are implemented where applicable. With adherence to the geotechnical engineering recommendations provided in the Modified Project's Geotechnical Report, Certified EIR Code-Required Measure IV.C-2, Certified EIR Mitigation Measure MM IV.C-2.1, and Certified EIR Mitigation Measure MM IV.C-2.2, the Modified Project's impacts with respect to expansive soils would be less than significant, consistent with the Certified EIR's conclusions for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or exacerbate existing environmental conditions that would cause a substantial increase in the severity of previously identified significant effects related to expansive soils.

Like the Modified Project, with adherence to the geotechnical engineering recommendations provided in the Modified Project's Geotechnical Report, Certified EIR Code-Required Measure IV.C-2, Certified EIR Mitigation Measure MM IV.C-2.1, and Certified EIR Mitigation Measure MM IV.C-2.2, the No Automated Steel Parking Structure Alternative's impacts with respect to expansive soils would be less than

significant and would not involve new significant environmental effects or exacerbate existing environmental conditions that would cause a substantial increase in the severity of previously identified significant effects related to expansive soils.

d. Groundwater

The Certified EIR stated, based on borings taken by GeoDesign, Inc. in November 2006, the highest groundwater level reported was at an elevation of 312.5 feet, approximately 49 feet bgs, which is below the lowest basement level of the CRA Approved Project. The Certified EIR concluded, with adherence to the geotechnical engineering recommendations provided in the CRA Approved Project's Geotechnical Report and mitigation measures identified in Section IV.C Geology and Soils of the Certified EIR, the CRA Approved Project would result in less than significant impacts with mitigation related to the groundwater table.

The Modified Project is located on the same project site as the CRA Approved Project. The Modified Project would result in the addition of an automated steel parking structure that is proposed to be located above the parking area on Level L3 (within the approximate height of Level L4 of the rest of the podium structure), which would include two floors of automated parking. As impacts to geology and soils are site-specific and the Modified Project and CRA Approved Project are located on the same project site, the Modified Project utilizes the same borings taken for the CRA Approved Project. As such, based on borings taken by GeoDesign, Inc. in November 2006, the highest groundwater level reported was at an elevation of 312.5 feet, approximately 49 feet bgs. Based on the data from these borings, the groundwater level at the project site is approximately nine to ten feet below the lowest basement level of the vacant 22-story, approximately 250-foot high mixed use building and closed approximately 18,962 square-foot public park on the project site and is not anticipated to rise significantly during the lifetime of the Modified Project. The structural modifications to the existing reinforced concrete structure associated with the automated steel parking structure, would not extend beyond the depth of existing footings. Thus, the structural modifications associated with the automated steel parking structure would not extend the footings into the groundwater table. In addition, the Modified Project would implement Certified EIR Mitigation Measure MM IV.C-2.2. Certified EIR Mitigation Measure MM IV.C-2.2 requires the applicant to ensure geotechnical testing and observation be conducted on-site by a state certified geotechnical engineer during any excavation and earthwork activities to ensure that recommendations provided in the CRA Approved Project's Geotechnical Report and the Modified Project's Geotechnical Report are implemented where applicable. With adherence to the geotechnical engineering recommendations provided in the Modified Project's Geotechnical Report and Certified EIR Mitigation Measure MM IV.C-2.2, the Modified Project's impacts with respect to groundwater would be less than significant, consistent with the Certified EIR's conclusions for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or exacerbate existing environmental conditions that would cause a substantial increase in the severity of previously identified significant effects related to the groundwater table.

Like the Modified Project, with adherence to the geotechnical engineering recommendations provided in the Modified Project's Geotechnical Report and Certified EIR Mitigation Measure MM IV.C-2.2, the No Automated Steel Parking Structure Alternative's impacts with respect to groundwater would be less than significant and would not involve new significant environmental effects or exacerbate existing environmental conditions that would cause a substantial increase in the severity of previously identified significant effects related to the groundwater table.

2. Project Design Features

No Project Design Features are proposed for Geology and Soils.

3. Mitigation Measures

Certified EIR Mitigation Measure MM IV.C-2.1: The Modified Project shall be designed and constructed in accordance with the recommendations provided in the CRA Approved Project's Geotechnical Report, the Modified Project's Geotechnical Report, and the Modified Project's Structural Narrative or as they may be amended by request of the City.

Certified EIR Mitigation Measure MM IV.C-2.2: The Modified Project Applicant shall ensure geotechnical testing and observation be conducted on-site by a state certified geotechnical engineer during any excavation and earthwork activities to ensure that recommendations provided in the CRA Approved Project's Geotechnical Report and the Modified Project's Geotechnical Report are implemented where applicable or as they may be amended by request of the City.

Certified EIR Mitigation Measure MM IV.C-5: Appropriate erosion control and drainage devices shall be incorporated, such as interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code. Outlets of culverts, conduits or channels shall be protected from erosion by discharge velocities by installing rock outlet protection. (Rock outlet protection is physical devise composed of rock, grouted riprap, or concrete rubble placed at the outlet of a pipe.) Sediment traps shall be installed below the pipeoutlet. Outlet protection shall be inspected, repaired, and maintained after each significant rain.

4. Finding

Changes or alternations and mitigation measures have been required in, or incorporated into, the Modified Project and the No Automated Steel Parking Structure Alternative which avoid or substantially lessen the potentially significant impacts associated with Geology and Soils, as identified in the Supplemental EIR, to less than significant levels.

5. Rationale for Finding

As discussed above, the Certified EIR concluded the CRA Approved Project would result in less than significant impacts with mitigation related to exposing people or

structures to the risk of loss, injury, or death involving seismic induced ground shaking, expansive soils, and ground water. The Modified Project and the No Automated Steel Parking Structure Alternative would implement Certified EIR Mitigation Measure MM IV.C-2.1, which ensures the Modified Project and the No Automated Steel Parking Structure Alternative would be designed and constructed in accordance with the recommendations provided in the CRA Approved Project's Geotechnical Report, the Modified Project's Geotechnical Report, and the Modified Project's Structural Narrative, or as they may be amended by request of the City. The Modified Project and the No Automated Steel Parking Structure Alternative would also implement Certified EIR Mitigation Measure MM IV.C-2.2, which requires the Applicant to ensure geotechnical testing and observation be conducted on-site by a state certified geotechnical engineer during any excavation and earthwork activities to ensure that recommendations provided in the CRA Approved Project's Geotechnical Report and the Modified Project's Geotechnical Report are implemented where applicable. Therefore, consistent with the Certified EIR's conclusions for the CRA Approved Project, Modified Project and the No Automated Steel Parking Structure Alternative impacts would be less than significant with mitigation.

In addition, similar to the CRA Approved Project, the Modified Project and the No Automated Steel Parking Structure Alternative would implement Certified EIR Mitigation Measure MM IV.C-5, which ensures appropriate erosion control and drainage devices shall be incorporated, such as interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code. Therefore, consistent with the CRA Approved Project analyzed in the Certified EIR, construction impacts related to soil erosion would be less than significant.

Accordingly, as compared to the CRA Approved Project, the proposed Modified Project and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or exacerbate existing environmental conditions that would cause a substantial increase in the severity of previously identified significant effects related to expansive soils.

6. Reference

For a complete discussion of Geology and Soils see Sections IV.C Geology and Soils and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

B. Noise (Cumulative Construction Noise/Vibration Impacts)

1. Description

a. Cumulative Construction Noise

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts related to cumulative construction noise.

Noise impacts are localized in nature and decrease substantially with distance. Accordingly, the cumulative construction noise impact analysis focused on the nearest related projects. The Modified Project and the nearest related project, Related Project 46, located at 5901 Sunset Boulevard, immediately east of the project site, could potentially result in cumulative construction noise impacts to Emerson College on Sunset Boulevard (Sensitive Receptor No. 13) and 1527 – 1533 ¾ Bronson Street (Sensitive Receptor No. 9), which are one- to two-story multi-family residential buildings.

If construction activities for the Modified Project and Related Project 46 happened concurrently, the outdoor noise levels at Emerson College would not increase ambient exterior noise levels by the 5 dBA or more at Emerson College even if construction of the Modified Project and Related Project 46 occur concurrently. Thus, the cumulative construction noise impact of the Modified Project and Related Project 46 to Emerson College would be less than significant.

Outdoor noise levels at 1527 – 1533 ¾ Bronson Street (Sensitive Receptor No. 9) could reach 89 dBA Leq during the additional construction activities of the Modified Project. 1527 – 1533 ¾ Bronson Street (Sensitive Receptor No. 9) is located adjacent to Related Project 46, approximately 10 feet to the north. At this distance, outdoor noise levels at 1527 – 1533 ¾ Bronson Street (Sensitive Receptor No. 9) could reach 97.3 dBA during construction of Related Project 46. If the additional construction activities for the Modified Project and the construction activities for the Related Project 46 happened concurrently, the outdoor noise levels at 1527 – 1533 ¾ Bronson Street could reach 97.9 dBA, which is an increase above ambient exterior noise levels of more than 5 dBA. However, the Modified Project's contribution to that cumulative construction noise level at 1527 – 1533 ¾ Bronson Street would only be 0.6 dBA. Because Related Project 46's construction noise is closer to 1527 – 1533 ¾ Bronson Street than the Modified Project's additional construction noise, Related Project 46's construction noise would be the dominant noise source generating an impact. As a result, the Modified Project's additional 0.6 dBA contribution to cumulative construction noise would not be perceptible to the human ear and therefore would not be cumulatively considerable. Nevertheless, the Modified Project would also implement Mitigation Measure MM F-1.4, which would ensure that if the Modified Project's additional construction activities and Related Project 46's construction activities happen concurrently, then the Modified Project's additional construction activities would not exceed the existing ambient noise levels by 5 dBA at the Modified Project's property line. With implementation of MM F-1.4 the Modified Project's additional contribution to noise at 1527 – 1533 ¾ Bronson Street would be reduced to 0.018 dBA. As such, with implementation of Mitigation Measure MM F-1.4, the cumulative construction outdoor noise levels at 1527 – 1533 ¾ Bronson Street (Sensitive Receptor No. 9) could reach 97.3 dBA, which is the same noise level that could be reached with the construction of Related Project 46 alone. Therefore, the Modified Project would not contribute to a cumulative construction noise impact for 1527 – 1533 ¾ Bronson Street (Sensitive Receptor No. 9). Thus, with implementation of Mitigation Measure MM F-1.4, the Modified Project's cumulative construction noise impacts would be less than significant.

Additionally, the Modified Project, based on the provisions set forth in LAMC 112.05, would implement Regulatory Compliance Measures CM F-1 and CM F-2, which ensure the Modified Project's compliance with LAMC Section 112.05 to prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible and LAMC Section 41.40, which limits construction to the hours of 7:00 A.M. to 9:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday. The Modified Project would also incorporate Mitigation Measures MM F-1.1, MM F-1.2, and Certified EIR Mitigation Measure MM F-1.1 through Certified EIR Mitigation Measure MM F1.5, which would reduce construction noise to the maximum extent feasible. With the implementation of these measures, the Modified Project's cumulative construction noise contribution at 1527 – 1533 ¾ Bronson Street (Sensitive Receptor No. 9) would be less than significant. Furthermore, Related Project 46 as well as other related projects, would be required to comply with the provisions of the LAMC and implement mitigation measures to reduce construction noise to the maximum extent feasible. As such, the Modified Project's cumulative construction noise impacts would be less than significant.

Like the Modified Project, with implementation of the above described measures cumulative construction noise impacts associated with the No Automated Steel Parking Structure Alternative would be less than significant.

b. Cumulative Groundborne Vibration

For cumulative construction-related truck trip groundborne vibration impacts, no sensitive receptors or other structures would be within 24 feet of the haul trucks on the haul truck route for the Modified Project or the related projects that would utilize the same haul route on Sunset Boulevard. Additionally, because vibration drops off rapidly with distance, there is rarely a cumulative increase in ground vibration from the presence of multiple trucks. Furthermore, Sunset Boulevard, as a commercial corridor, is already utilized by heavy duty trucks and is classified as an Avenue I in the City of Los Angeles Mobility Plan 2035. Based on this information, the Modified Project and the related projects' would not be expected to increase vibration levels associated with construction trucks along Sunset Boulevard.

For cumulative construction-related activity groundborne vibration impacts, the Modified Project and the nearest related project, Related Project 46, located at 5901 Sunset Boulevard, immediately east of the project site, could potentially result in cumulative groundborne vibration annoyance impacts from construction activities to 1527 – 1533 ¾ Bronson Street (Sensitive Receptor No. 9). The Modified Project's additional construction activities would result in groundborne vibration levels of 0.018 PPV (in./sec.) at Sensitive Receptor No. 9, which would be well below the distinctly perceptible thresholds for groundborne vibration of 0.25 PPV (in./sec.) for transient sources and 0.04 PPV (in./sec.) threshold for human annoyance from continuous/frequent intermittent sources and therefore would have a less than significant impact on Sensitive Receptor No. 9. The EIR for Related Project 46 concluded that the 5901 Sunset Boulevard Project's construction activities would result in a significant unavoidable impact with respect to groundborne human annoyance on

Sensitive Receptor 9. Groundborne vibration decreases substantially as the distance between the receptor and the source increases. Therefore, because Related Project 46's construction activities are closer to Sensitive Receptor No. 9 than the Modified Project's additional construction activities, the Modified Project's construction related vibration would not be the dominant vibration-generating source for impacts to Sensitive Receptor No 9. Nevertheless, to ensure that the Modified Project does not increase cumulative groundborne vibration impacts with respect to frequency or intensity at Sensitive Receptor No. 9, the Modified Project would implement Mitigation Measure MM F-1.5.

Specifically, Mitigation Measure MM F-1.5 would ensure that if the Modified Project's additional construction activities and Related Project 46's construction activities occur concurrently, then the Modified Project's additional construction activities would be temporarily halted if the groundborne vibration levels at the Modified Project's property line closest to Sensitive Receptor No. 9 reach 0.035 PPV. Implementation of this measure would ensure that groundborne vibration at the property line would not exceed 0.04 PPV (in./sec.), which is the threshold for groundborne vibration for continuous/frequent intermittent sources. Measurement of groundborne vibration levels at the Modified Project's property line would include the cumulative vibration generated from both the Modified Project's additional construction activities as well as groundborne vibration generated from Related Project 46 if construction of both projects is occurring at the same time. As a result, the measurement of groundborne vibration at the Modified Project's property line is conservative because it will ensure that the 0.04 PPV (in./sec.) threshold is not exceeded at Sensitive Receptor No. 9 since actual groundborne vibration would further attenuate below the threshold with the additional distance between the property line and Sensitive Receptor No. 9. Thus, with implementation of Mitigation Measure MM F-1.5 the Modified Project's additional construction would not contribute to additional groundborne vibration impacts at Sensitive Receptor No. 9. Therefore, with implementation of Mitigation Measure MM F-1.5, the Modified Project would not contribute to a cumulative construction-related groundborne vibration impact for Sensitive Receptor No. 9. Accordingly, cumulative groundborne vibration impacts would be less than significant.

Like the Modified Project, with implementation of the above described measures cumulative construction-related groundborne vibration impacts associated with the No Automated Steel Parking Structure Alternative would be less than significant.

2. Project Design Features

No Project Design Features are proposed for Noise/Vibration.

3. Mitigation Measures

MM F-1.4: The Modified Project's contractor shall retain the services of a qualified noise consultant to monitor noise at the Modified Project's property line when the Modified Project's additional construction activities and Related Project 46's construction activities occur concurrently. If the measured noise levels during concurrent

construction exceed the existing ambient noise levels by 4.9 dBA at the Modified Project's property line, the Modified Project's contractor shall evaluate and employ alternative construction methods to ensure that the Modified Project's additional construction activities shall not exceed the existing ambient noise levels by 5 dBA at the Modified Project's property line.

MM F-1.5: The Modified Project's contractor shall retain the services of a qualified vibration consultant to monitor vibration at the Modified Project's property line closest to Sensitive Receptor No. 9 (i.e., 1527 – 1533 ¾ Bronson Street) when the Modified Project's additional construction activities and Related Project 46's construction activities occur concurrently. If the measured vibration levels during concurrent construction exceed 0.035 PPV (in./sec.) at the Modified Project's property line closest to Sensitive Receptor No. 9, the Modified Project's contractor shall halt groundborne vibration-generating construction activities and evaluate and employ alternative construction methods to ensure that vibration at the Modified Project's property line closest to Sensitive Receptor No. 9 (i.e., 1527 – 1533 ¾ Bronson Street) does not exceed 0.04 PPV (in./sec.).

See also Mitigation Measures MM F-1.1, MM F-1.2, and Certified EIR Mitigation Measure MM F-1.1 through Certified EIR Mitigation Measure MM F 1.5, discussed further in Section X of these Findings, which would reduce construction noise to the maximum extent feasible.

4. Finding

Changes or alternations and mitigation measures have been required in, or incorporated into, the Modified Project and the No Automated Steel Parking Structure Alternative which avoid or substantially lessen the potentially significant impacts associated with Cumulative Construction Noise/Vibration Impacts, as identified in the Supplemental EIR, to less than significant levels.

5. Rationale for Finding

Regarding cumulative construction noise, if the Modified Project's or the No Automated Steel Parking Structure Alternative's additional construction activities and the construction activities for the Related Project 46, located at 5901 Sunset Boulevard, happened concurrently, the outdoor noise levels at 1527 – 1533 ¾ Bronson Street could reach 97.9 dBA, which is an increase above ambient exterior noise levels of more than 5 dBA. The Modified Project's contribution to the cumulative construction noise would be 0.6 dBA and would not be perceptible to the human ear and therefore would not be cumulatively considerable. Nevertheless, the Modified Project and the No Automated Steel Parking Structure Alternative would also implement Mitigation Measure MM F-1.4, which would ensure that if the Modified Project's or the No Automated Steel Parking Structure Alternative's additional construction activities and Related Project 46's construction activities happen concurrently, then the additional construction activities would not exceed the existing ambient noise levels by 5 dBA at the Modified Project's property line. Thus, with implementation of Mitigation Measure MM F-1.4, the Modified

Project's and the No Automated Steel Parking Structure Alternative's cumulative construction noise impacts would be less than significant.

Regarding cumulative construction-related activity groundborne vibration impacts, the Modified Project or the No Automated Steel Parking Structure Alternative and the nearest related project, Related Project 46, located at 5901 Sunset Boulevard, immediately east of the project site, could potentially result in cumulative groundborne vibration annoyance impacts from construction activities to 1527 – 1533 ¾ Bronson Street (Sensitive Receptor No. 9). While the Modified Project's and the No Automated Steel Parking Structure Alternative's construction related vibration would not be the dominant vibration-generating source for impacts to Sensitive Receptor No 9, to ensure that the Modified Project and the No Automated Steel Parking Structure Alternative do not increase cumulative groundborne vibration impacts with respect to frequency or intensity at Sensitive Receptor No. 9, the Modified Project and No Automated Steel Parking Structure Alternative would implement Mitigation Measure MM F-1.5. Mitigation Measure MM F-1.5 would ensure that if the Modified Project's or the No Automated Steel Parking Structure Alternative's additional construction activities and Related Project 46's construction activities occur concurrently, then the additional construction activities would be temporarily halted if the groundborne vibration levels at the Modified Project's property line closest to Sensitive Receptor No. 9 reach 0.035 PPV. Implementation of this measure would ensure that groundborne vibration at the property line would not exceed 0.04 PPV (in./sec.), which is the threshold for groundborne vibration for continuous/frequent intermittent sources. Thus, with implementation of Mitigation Measure MM F-1.5 the Modified Project's and the No Automated Steel Parking Structure Alternative's additional construction would not contribute to additional groundborne vibration impacts at Sensitive Receptor No. 9. Therefore, with implementation of Mitigation Measure MM F-1.5, the Modified Project and the No Automated Steel Parking Structure Alternative would not contribute to a cumulative construction-related groundborne vibration impact for Sensitive Receptor No. 9. Accordingly, cumulative groundborne vibration impacts would be less than significant.

6. Reference

For a complete discussion of Noise (Cumulative Construction Noise/Vibration) see Sections IV.F Noise and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

C. Land Use Planning Operational (City of Los Angeles Planning and Zoning Code Consistency)

1. Description

The Certified EIR concluded the CRA Approved Project, with approval of the requested discretionary actions and adoption of the required findings, would have less than significant impacts related to consistency with the proposed zoning designations with the incorporation of Certified EIR Mitigation Measure MM IV.H-7, which provides that the CRA Approved Project applicant shall procure all necessary entitlements and land

use approvals from the Planning Department, including but not limited to the various discretionary actions identified in the Certified EIR.

Implementation of the Modified Project would result in the modification of the CRA Approved Project. To permit the Modified Project the Applicant is proposing a General Plan Amendment, Vesting Zone Change and Height District Change so that the entire project site is subject to uniform land use designations and zoning requirements and a Vesting Tentative Tract Map to merge all of the lots on the project site into a single lot.

Specifically, the Modified Project is seeking a General Plan Amendment to the Hollywood Community Plan from High Medium Density Residential to Regional Center Commercial such that the land use designation for the entire project site is Regional Center Commercial. In addition the Project is seeking a Vesting Zone Change from the (T)(Q)C2 Zone and the (T)(Q)R4 Zone such that the entire project site would be in the C2 Zone. With the approval of the requested General Plan Amendment and Vesting Zone Change, the Modified Project would conform to the permitted uses of LAMC Section 12.14.

The Modified Project is proposing a Vesting Zone Change and Height District Change for the entire project site to a uniform zoning and height district of C2-2D. The proposed "D" Limitation for the Modified Project would limit the number of residential dwelling units allowed on the project site to 299 units. In addition, the proposed "D" Limitation would provide for the following limitations across the entire project site: a) the total allowable floor area for the entire site not to exceed approximately 324,693 square feet (4.5:1 FAR), in lieu of the 6:1 FAR otherwise permitted in Height District 2; and b) the mixed-use building height to approximately 250 feet, (total of 22 stories).

The proposed Modified Project will contain 299 residential apartment units, of which 5 percent of the total units (15 units) will be reserved for tenants at the "Very Low" income level, and therefore qualifies for a Density Bonus under the Municipal Code (see LAMC Section 12.22 A.25(c)). The proposed Modified Project is not utilizing the Municipal Code's Density Bonus provisions for additional residential units within the Modified Project. However, per LAMC Section 12.22 A.25(d)(1) – Affordable Housing Incentives, because the Modified Project qualifies for a Density Bonus, the Applicant will apply Parking Option 1 to the Modified Project's residential parking requirements. The Modified Project also qualifies for one on-menu incentive pursuant to LAMC Section 12.22 A.25(e)(1) and requests a 20 percent decrease in open space requirements to the Modified Project (see LAMC Section 12.22 A.25.(f)(6)). With the approval of this on-menu incentive, the LAMC open space requirement would be reduced to 35,060 square feet for the Modified Project, which the Modified Project would exceed as the Modified Project proposes to provide 35,234 square feet of open space.

With the approval of the requested Vesting Zone Change and Height District Change, the Modified Project would comply with the permitted density for the project site, which is consistent with the Certified EIR's conclusion that the CRA Approved Project would comply with the permitted density for the project site with the approval of the requested entitlements. In addition, the Modified Project's yard setbacks would be consistent with

the requirements of the proposed Zone Change, which is also consistent with the analysis in the Certified EIR.

The relevant land use changes between the CRA Approved Project and the Modified Project would not substantially increase the less-than-significant impact related to consistency with the LAMC. Therefore, compared to the analysis in the Certified EIR, the Modified Project also would be consistent with the LAMC with incorporation of Certified EIR Mitigation Measure MM IV.H7, which ensures the Modified Project Applicant shall obtain approval of the Modified Project's requested land use entitlements from the Planning Department, including but not limited to the various discretionary actions as listed in Section 3, Item B of Section IV.H. Land Use Planning in the Draft Supplemental EIR. As such, with approval of the requested entitlements, the Modified Project would be in conformance with the LAMC and land use impacts would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the existing density and floor area requirements in the LAMC.

Like the Modified Project, with approval of the requested entitlements, the No Automated Steel Parking Structure Alternative would be in conformance with the LAMC and land use impacts would be less than significant and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the existing density and floor area requirements in the LAMC.

2. Project Design Features

No Project Design Features are proposed for Land Use Planning Operational (City of Los Angeles Planning and Zoning Code Consistency).

3. Mitigation Measures

Certified EIR Mitigation Measure MM IV.H-7: The Applicant shall procure all necessary entitlements and land use approvals from the City of Los Angeles Department of City Planning, including but not limited to the various discretionary actions as listed above in Section 3, Item B of Section IV.H. Land Use Planning in the Draft Supplemental EIR.

4. Finding

Changes or alternations and mitigation measures have been required in, or incorporated into, the Modified Project and the No Automated Steel Parking Structure Alternative which avoid or substantially lessen the potentially significant impacts associated with Land Use Planning Operational (City of Los Angeles Planning and Zoning Code Consistency), as identified in the Supplemental EIR, to less than significant levels.

5. Rationale for Finding

The relevant land use changes between the CRA Approved Project and the Modified Project or the No Automated Steel Parking Structure Alternative would not substantially increase the less than significant impact related to consistency with the LAMC. Compared to the analysis in the Certified EIR, the Modified Project and the No Automated Steel Parking Structure Alternative also would be consistent with the LAMC with incorporation of Certified EIR Mitigation Measure MM IV.H7, which ensures the Modified Project Applicant shall obtain approval of the requested land use entitlements from the Planning Department. As such, with approval of the requested entitlements, the Modified Project and the No Automated Steel Parking Structure Alternative would be in conformance with the LAMC and land use impacts would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the LAMC.

6. Reference

For a complete discussion of Land Use Planning Operational (City of Los Angeles Planning and Zoning Code Consistency) see Sections IV.H Land Use Planning and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

D. Public Utilities (Solid Waste)

1. Description

a. Construction

The Certified EIR concluded the CRA Approved Project would result in less-than-significant impacts related to solid waste disposal resources during construction with mitigation measures incorporated. The CRA Approved Project was estimated to generate approximately 32.3 tons of waste per working day, which would be within the excess permitted daily intake capacity of area landfills and recycling centers. Therefore, the Certified EIR concluded impacts associated with demolition and construction debris would be less than significant.

For purposes of quantifying the estimated construction and demolition debris associated with construction of the Modified Project, the analysis quantifies the estimated construction and demolition debris associated with: 1) the construction activities that occurred as part of construction of the vacant 22-story, approximately 250-foot high mixed use building of approximately 319,562 square feet of floor area and closed approximately 18,962 square foot public park, which were completed in 2014; and 2) the additional construction activities necessary for the Modified Project associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. For comparative purposes, the Modified Project would generate an estimated total of 2,453 tons of demolition and construction debris as compared to the

CRA Approved Project generating an estimated total of 2,348 tons of demolition and construction debris. The Modified Project's total of 2,453 tons of construction and demolition debris, is not a substantial increase from the CRA Approved Project's projected construction and demolition debris (2,348 tons). Furthermore, the construction waste generated during the Modified Project's additional construction period associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations, which is expected to last approximately four months, is estimated to generate a total of 77 tons of demolition and construction debris. Assuming 22 working days per month, the Modified Project's additional construction period would generate approximately 0.88 tons of waste per working day, which is not a substantial increase from the tons of waste per working day generated by the CRA Approved Project. Therefore, the solid waste impacts as a result of construction of the Modified Project would not substantially increase the solid waste impacts identified in the Certified EIR for the CRA Approved Project during construction. Consistent with the CRA Approved Project, impacts associated with demolition and construction debris would be less than significant.

Additionally, the Sunshine and Chiquita Canyon Landfills would likely be the primary disposal and recycling sites used for demolition and construction debris and the construction solid waste generated by the Modified Project's additional construction would be well within the daily capacity currently available at the Sunshine Canyon Landfill and the Chiquita Canyon Landfill. Therefore, the Modified Project's solid waste impacts during construction would be less than significant.

Furthermore, similar to the CRA Approved Project, the California Green Building Standards Code prescribes mandatory measures for residential projects to recycle and/or salvage for reuse a minimum of 50 percent of the nonhazardous construction and demolition waste. Per the 2010 L.A. Green Code, the Modified Project would also implement a construction waste management plan to achieve the 2010 L.A. Green Code's requirement of 50 percent diversion from landfills. Therefore, the California Green Building Standards Code and the 2010 L.A. Green Code's mandatory measures would further reduce the Modified Project's construction and demolition debris. With compliance with the California Green Building Standards Code and the 2010 L.A. Green Code, the Modified Project's construction would generate less demolition and construction debris than the estimated 2,453 tons of construction and demolition debris. As such, the solid waste impacts as a result of the construction of the Modified Project would not substantially increase the solid waste impacts identified in the Certified EIR for the CRA Approved Project. Furthermore, implementation of Regulatory Compliance Measure CM I.4-1, would effectively achieve a 50 percent reduction in the Modified Project's solid waste disposal needs upon area landfills. Additionally, implementation of mitigation measure Certified EIR Mitigation Measure MM IV.H-4-1, which ensures the Applicant develops a construction and debris recycling program, would reduce impacts to solid waste to less than significant levels. Therefore, consistent with the analysis in the Certified EIR for the CRA Approved Project, the Modified Project's construction would comply with all applicable regulations related to solid waste and construction related solid waste impact upon regional landfill capacity would therefore be less than

significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to solid waste during construction.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's construction would comply with all applicable regulations related to solid waste and construction related solid waste impact upon regional landfill capacity would therefore be less than significant and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to solid waste during construction.

b. Operation

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts related to solid waste disposal resources with mitigation measures incorporated. The Certified EIR determined the CRA Approved Project daily contribution to the Sunshine Canyon landfill would represents well under one percent of the current excess remaining capacity. Because this increase is negligible in relation to the region as a whole, and solid waste disposal solutions are continuously being sought after on the regional level, the Certified EIR concluded the CRA Approved Project operational solid waste impacts would be considered less than significant.

Operation of the Modified Project would cause an on-going generation of solid waste throughout the lifespan of the Modified Project. For comparative purposes, the Modified Project's net increase in solid waste generation would be 3,599.3 net pounds (1.8 tons) of solid waste per day, or approximately 657 tons per year as compared to the CRA Approved Project's net increase of 3,891.3 net pounds (1.9 tons), or approximately 693.5 tons per year. The Modified Project's gross increase would be 4,078 gross pounds (2.04 tons) of solid waste per day, or approximately 745 tons per year as compared to the CRA Approved Project's gross increase of 4,370 gross pounds (2.2 tons), or approximately 803 tons per year. The Modified Project would generate less solid waste than the CRA Approved Project during operation.

The Modified Project's solid waste contribution to the Sunshine Canyon Landfill represents well under one percent of the current excess remaining capacity, which is consistent with the analysis in the Certified EIR for the CRA Approved Project and would not substantially increase the solid waste impacts identified in the Certified EIR for the CRA Approved Project. Furthermore, the additional solid waste demands generated by the Modified Project could be readily accommodated by the existing regional landfill operations without the need to expand operations or divert existing waste streams to alternative locations. Additionally, mitigation measure Certified EIR Mitigation Measure MM IV.H-4-2, which ensures the Applicant develops an operational project recycling plan, would reduce impacts upon solid waste disposal facilities to less than significant levels. Therefore, consistent with the analysis in the Certified EIR for the CRA Approved Project, the Modified Project would comply with all applicable regulations related to solid waste and the Modified Project's solid waste impact upon

regional landfill capacity would be considered less than significant. Moreover, the solid waste impacts associated with the Modified Project's modifications during operation are less than the CRA Approved Project's solid waste impacts during operation. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to solid waste during operation.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would comply with all applicable regulations related to solid waste and the No Automated Steel Parking Structure Alternative's solid waste impact upon regional landfill capacity would be considered less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to solid waste during operation.

2. Project Design Features

No Project Design Features are proposed for Public Utilities (Solid Waste).

3. Mitigation Measures

Certified EIR Mitigation Measure MM IV.H-4-1: The Applicant shall develop a construction and demolition debris recycling program to divert construction related solid waste and demolition debris from area landfills.

Certified EIR Mitigation Measure MM IV.H-4-2: The Applicant shall develop an operational project recycling plan that includes the design and allocation of recycling collection and storage space in the project. As a result of the City's space allocation ordinance, the Los Angeles Municipal Code (LAMC) includes provisions for recycling areas or rooms in all new development projects.

4. Finding

Changes or alternations and mitigation measures have been required in, or incorporated into, the Modified Project and the No Automated Steel Parking Structure Alternative which avoid or substantially lessen the potentially significant impacts associated with Public Utilities (Solid Waste), as identified in the Supplemental EIR, to less than significant levels.

5. Rationale for Finding

The Modified Project and the No Automated Steel Parking Structure Alternative's impacts with respect to solid waste would be less than significant with implementation of the Certified EIR Mitigation Measure MM IV.H-4-1 and Certified EIR Mitigation Measure MM IV.H-4-2, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project and the No Automated Steel Parking Structure Alternative

would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to solid waste.

6. Reference

For a complete discussion of Public Services (Police Services) see Sections IV.J Public Services and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

E. Public Services (Police Services)

1. Description

a. Police Services (Construction)

(1) Theft and Vandalism

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts to police services during construction related to theft and vandalism with incorporation of mitigation measures. The Certified EIR determined under the CRA Approved Project's construction of a mixed-use development, a significant impact to police services could occur. However, the CRA Approved Project would employ Mitigation Measures IV.J.1-1 and IV.J.1-2, which require erecting temporary fencing around the construction site to discourage trespassers and deploying security guards to monitor the construction site and deter any potential criminal activity to reduce the impact to police services. With implementation of these mitigation measures, the Certified EIR concluded that the CRA Approved Project would have a less than significant impact to police services during construction.

To allow for the development of the Modified Project minimal additional on-site construction is necessary associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. Additional construction may be necessary to comply with the building code requirements. Like the CRA Approved Project, the Modified Project would implement Certified EIR Mitigation Measures MM J.1-1.1 and MM J.1-1.2, which require erecting temporary fencing around the project site to secure the project site and discourage trespassers and employing security guards to secure the project site during the construction process. Implementation of these mitigation measures would ensure that construction of the Modified Project would not result in substantial adverse physical impacts that would impact acceptable service ratios or response times or other performance objectives for police protection services because the Modified Project's construction would include security and design features during construction that would reduce the Modified Project's demand for police services and therefore impacts related to police services during the construction period are less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to police services during construction of the Modified Project due to theft and vandalism.

Like the Modified Project, with implementation of the above described mitigation measures, impacts related to police services due to theft and vandalism during construction for the No Automated Steel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to police services during construction due to theft and vandalism.

(2) Construction-Related Traffic and Temporary Roadway or Sidewalk Closures

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts to police services during construction due to construction-related traffic and temporary roadway or sidewalk closures with incorporation of mitigation measures. As described in the Certified EIR, construction activities could require temporary lane closures on streets adjacent to the project site, which would have the potential to reduce emergency response times in the surrounding area. While the traffic lane closures were not expected for any extended periods for construction, in order to mitigate the potential temporary and short-term traffic impacts of any necessary lane and/or sidewalk closures, Certified EIR Mitigation Measure IV.J.1-2 required the development of a Construction Traffic Control/Management Plan to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the CRA Approved Project.

To allow for the development of the Modified Project minimal additional construction is necessary associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. Additional construction may be necessary to comply with the building code requirements. A traffic evaluation of the potential street traffic created by the Modified Project's additional construction activities was conducted in the Modified Project's Traffic Study, included as Appendix G to the Draft Supplemental EIR, and concluded that the additional construction associated with the Modified Project would not create traffic impacts in the vicinity of the project site.

The additional construction activities for the Modified Project could necessitate temporary lane closures on streets adjacent to the project site on a temporary and intermittent basis for utility relocations/hook-ups, delivery of materials, and other construction activities as may be required. Site deliveries and the staging of all equipment and materials would be organized in the most efficient manner possible on-site to avoid any impacts to the neighborhood and surrounding traffic. All construction equipment would be staged on-site or immediately adjacent to the project site throughout the duration of the Modified Project's additional construction activities. It is not expected that complete closures of any streets would be required during the additional construction activities. The Modified Project would also implement Mitigation Measure IV.J.1-1.1 and Certified EIR Mitigation Measure MM IV.J.1-2.1, which ensures, prior to construction, the development of a Construction Traffic Control/Management Plan for the Modified Project to be approved by LADOT. With implementation of this mitigation measure, the Modified Project's construction-related traffic and temporary roadway or sidewalk closures would not result in substantial adverse physical impacts

that would impact acceptable service ratios or response times or other performance objectives for police protection services because the Modified Project's construction would include design features to reduce the demand for police services and therefore impacts related to police services during the Modified Project's construction period would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to police services during additional construction of the Modified Project due to construction-related traffic.

Like the Modified Project, with implementation of the above described mitigation measures, impacts related to police services due to construction-related traffic during construction for the No Automated Steel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to police services during construction due construction-related traffic.

b. Police Services (Operational Impacts)

(1) Increase in Resident Population

The Certified EIR concluded that the CRA Approved Project's operational impacts to police services due to an increase in resident population would be less than significant with incorporation of mitigation measures. The Certified EIR explained that the CRA Approved Project would provide an increased 24-hour community presence, which often has the result of reducing crime rates. Nevertheless, to reduce the potential for increasing the demands upon police services, the CRA Approved Project included Mitigation Measures MM IV.J.1-3.1 and MM IV.J.1-3.2 providing for positioned functional and thematic lighting, nighttime security lighting, full-time onsite professional security, building security systems, and secure parking facilities, and an on-site security plan to reduce operational impacts to police services to a less-than-significant level.

Like the CRA Approved Project, the Modified Project would provide an increased 24-hour community presence, which often has the result of reducing crime rates. Further, as compared to the CRA Approved Project, the Modified Project would result in a decrease in the on-site residential population (from 722 new residents to 715 new residents), and therefore the Modified Project's increase in land use activity and associated police service needs would be the same or less than the CRA Approved Project. Nevertheless, to reduce the potential for increasing the demands upon police services in the area, the Modified Project, consistent with the CRA Approved Project, would include strategically positioned functional and thematic lighting to enhance public safety (see Regulatory Compliance Measure CM J.1-1, which includes submitting a diagram showing access routes and information to facilitate police response to the Los Angeles Police Department's Crime Prevention Section). Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security would be controlled to limit public access. The building and layout design would also include crime prevention features, such as nighttime security lighting, full-time onsite

professional security, building security systems, and secure parking facilities for the Modified Project. In addition, the continuous visible and non-visible presence of residents and employees at all times of the day would provide a sense of security during evening and early morning hours.

As part of the Modified Project, the Applicant would implement an on-site security plan prepared in consultation with the LAPD Crime Prevention Unit to minimize the potential for on-site crime and reduce demands upon additional LAPD services. With implementation of the security plan (Certified EIR Mitigation Measure MM IV.J.1-3.1 and MM IV.J.1-3.2), the Modified Project's impacts upon police services would be less than significant, consistent with the Certified EIR's analysis of the CRA Approved Project. Additionally, implementation of Regulatory Compliance Measure CM J.1-1, which requires the Applicant to submit a diagram of each portion of the property to the Los Angeles Police Department's Crime Prevention Section prior to the issuance of any Certificate of Occupancy, would further reduce the Modified Project's impacts upon police services. Moreover, because of the decrease in the on-site residential population the Modified Project's impacts upon police services are the same or less than the CRA Approved Project's impacts upon police services. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to police services during operation of the Modified Project due to the resident population.

Like the Modified Project, with implementation of the above described mitigation measures the No Automated Steel Parking Structure Alternative's impacts upon police services would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to police services during operation due to the resident population.

(2) Increase Demands Upon Police Services

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts related to increase demands upon police services with implementation of mitigation measures. As described in the Certified EIR for the CRA Approved Project, the public park could attract additional persons to the project area. The Certified EIR stated the CRA Approved Project's Applicant would be required to manage and maintain the park in accordance with all public health and safety regulations and that implementation of the CRA Approved Project's security plan will provide a continuous security presence to deter criminal activity, which would reduce impacts related to increase demands upon police services to a less than significant level.

Compared to the CRA Approved Project, the Modified Project would slightly decrease the size of the public park (from 21,177 square feet to 18,962 square feet). Despite the small difference in square footage, consistent with the CRA Approved Project, the Modified Project's public park could attract additional persons to the project area. As

with any public park or open space area, if not properly maintained and secured, such public places have the potential to attract criminal elements and blight. To reduce any such potential effects of the proposed park, the Applicant or Los Angeles Department of Recreation and Parks (RAP) (pending acquisition of a perpetual easement) will be required to manage and maintain the park in accordance with all public health and safety regulations. Furthermore, the Modified Project's security plan will provide a continuous security presence to deter criminal activity within and around the park (see Certified EIR Mitigation Measure MM IV.J.1-3.1 and MM IV.J.1-3.2). Therefore, through the implementation of regulatory compliance and mitigation measures, impacts on the demand for police services associated with the public park would be mitigated to a less than significant level, consistent with the Certified EIR's analysis of the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to police services during operation of the Modified Project due to the public park.

Like the Modified Project, through the implementation of the above described mitigation measures, impacts on the demand for police services associated with the public park for the No Automated Steel Parking Structure Alternative would be mitigated to a less than significant level and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to police services during operation due to the public park.

2. Project Design Features

No Project Design Features are proposed for Public Services (Police Services).

3. Mitigation Measures

MM IV.J.1-1.1: During construction, the Modified Project shall include the following measures:

1. A Construction Traffic Control/Management Plan shall be submitted to LADOT for review and approval.

2. The bulk of the work shall be conducted on site. If temporary lane closures are necessary, Street Services approval shall be obtained and closures shall be limited to non-peak commute hours from 9:00 AM to 3:00 PM.

3. Existing access for the site shall be maintained for construction access.

4. Deliveries of construction material shall be coordinated to non-peak travel periods, to the extent possible.

5. Construction workers shall be prohibited from parking on adjacent streets and construction workers shall be directed to park on-site.

Certified EIR Mitigation Measure MM IV.J.1-1.1: The Applicant shall erect temporary fencing suitable to prevent trespassers from entering the project site during construction activities to secure the project site and discourage trespassers.

Certified EIR Mitigation Measure MM IV.J.1-1.2: The Applicant shall employ security guards to monitor and secure the project site after hours during the construction process to secure the site and deter any potential criminal activity.

Certified EIR Mitigation Measure MM IV.J.1-2.1: In order to mitigate the potential temporary and short-term traffic impacts of any necessary lane and/or sidewalk closures during the construction period, the Project shall, prior to construction, develop a Construction Traffic Control/Management Plan to be approved by LADOT to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project. The Plan should include temporary roadway striping and signage for traffic flow as necessary, as well the identification and signage of alternative pedestrian routes in the immediate vicinity of the Project if necessary.

Certified EIR Mitigation Measure MM IV.J.1-3.1: The proposed security plan shall incorporate low-level and directional security lighting features to effectively illuminate project entryways, seating areas, lobbies, elevators, locker rooms, service areas, and parking areas with good illumination and minimum dead space to eliminate areas of concealment. Full cut-off fixtures shall be installed that minimize glare from the light source and provide light downward and inward to structures to maximize visibility.

Certified EIR Mitigation Measure MM IV.J.1-3.2: The Applicant shall develop and implement a Security Plan in consultation with the LAPD, outlining the security services and features to be provided in conjunction with the Modified Project. The plan shall be coordinated with the LAPD and a copy of said plan shall be filed with the LAPD West Bureau Commanding Officer. Said security plan may include some or all of the following components:

i. Provisions for on-site private security personnel for the commercial and residential areas. Through individual lease agreements for the proposed retail/commercial uses and property management services for the residential uses, private on-site security services shall be provided. Security officers shall be responsible for patrolling all common areas including the back service corridors and alleys, parking garages, and stairwells. All security officers shall patrol the grounds primarily by foot; however, bike patrol may be implemented in the parking garages and on the surrounding roadways.

ii. The parking garages shall be designed to cordon off residential and commercial serving parking areas to provide increased security for residents of the Modified Project. Both residential and commercial parking areas shall be fitted with emergency features such as

closed circuit television (CCTV) or emergency call boxes that will provide a direct connection with the on-site security force or the LAPD 911 emergency response system.

4. Finding

Changes or alternations and mitigation measures have been required in, or incorporated into, the Modified Project and the No Automated Steel Parking Structure Alternative which avoid or substantially lessen the potentially significant impacts associated with Public Services (Police Services), as identified in the Supplemental EIR, to less than significant levels.

5. Rationale for Finding

As discussed above, the Certified EIR concluded the CRA Approved Project would result in less than significant impacts to police services during construction and operations with incorporation of mitigation measures. For the Modified Project and the No Automated Steel Parking Structure Alternative with implementation of MM IV.J.1-1.1, Certified EIR Mitigation Measure MM IV.J.1-1.1, Certified EIR Mitigation Measure MM IV.J.1-1.2, Certified EIR Mitigation Measure MM IV.J.1-2.1, Certified EIR Mitigation Measure MM IV.J.1-3.1, and Certified EIR Mitigation Measure MM IV.J.1-3.2 impacts to police services during construction and operations would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to police services during construction or operation.

6. Reference

For a complete discussion of Public Services (Police Services) see Sections IV.J Public Services and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

F. Public Services (Schools, Construction)

1. Description

The Certified EIR concluded the CRA Approved Project's construction impacts to school services would be less than significant with mitigation. The CRA Approved Project proposed to implement precautionary mitigation measures during construction that were recommended by the LAUSD, specifically Certified EIR Mitigation Measures MM IV.J.3-1.1 and MM IV.J-3.1.2, which provide measures to ensure school bus access and school pedestrian/traffic safety access. The Modified Project would result in minimal additional on-site construction associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. Compared to the CRA Approved Project, the Modified Project's additional construction period would last approximately four months, which is not a substantial increase from the CRA Approved Project's construction timeline. As such, like the CRA Approved Project, the Modified

Project would also implement Certified EIR Mitigation Measures MM IV.J.3-1.1 and MM IV.J-3.1.2 to ensure school bus access and school pedestrian/traffic safety access during construction. Thus, the potential for the Modified Project to impact school facilities and services during construction will be similar under the Modified Project as compared to the impact conclusion in the Certified EIR, and would remain less than significant with the implementation of mitigation.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's impact to school facilities and services during construction will be less than significant with the implementation of mitigation and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to school facilities and services during construction.

2. Project Design Features

No Project Design Features are proposed for Public Services (Schools, Construction).

3. Mitigation Measures

Certified EIR Mitigation Measure MM IV.J.3-1.1: School Bus Access

- Prior to construction, contact the LAUSD Transportation Branch at (323) 342-1400 regarding potential impact to school bus routes.
- Maintain unrestricted access for school buses during construction.
- Comply with Provisions of the California Vehicle Code by requiring construction vehicles to stop when encountering school buses using red flashing lights.

Certified EIR Mitigation Measure MM IV.J-3.1.2: School Pedestrian/Traffic Safety Access

- Not endanger passenger safety or delay student drop-off or pickup due to changes in traffic patterns, lane adjustments, altered bus stops, or traffic lights.
- Maintain safe and convenient pedestrian routes to LAUSD schools (LAUSD will provide School Pedestrian Route Maps upon your request).
- Maintain ongoing communication with school administration at affected schools, providing sufficient notice to forewarn students and parents/guardians when existing pedestrian and vehicle routes to school may be impacted.

- Not haul past affected school sites, except when school is ***not*** in session. If that is infeasible, not haul during school arrival and dismissal times.

- Not staging or parking of construction-related vehicles, including workertransport vehicles, adjacent to school sites.

- Provide crossing guards when safety of students may be compromised by construction-related activities at impacted school crossings.

- Install barriers and/or fencing to secure construction equipment and site to prevent trespassing, vandalism, and attractive nuisances.

- Provide security patrols to minimize trespassing, vandalism, and short-cut attractions.

4. Finding

Changes or alternations and mitigation measures have been required in, or incorporated into, the Modified Project and the No Automated Steel Parking Structure Alternative which avoid or substantially lessen the potentially significant impacts associated with Public Services (Schools, Construction), as identified in the Supplemental EIR, to less than significant levels.

5. Rationale for Finding

The Certified EIR concluded the CRA Approved Project's construction impacts to school services would be less than significant with mitigation. The CRA Approved Project proposed to implement precautionary mitigation measures during construction that were recommended by the LAUSD, specifically Certified EIR Mitigation Measures MM IV.J.3-1.1 and MM IV.J-3.1.2. Like the CRA Approved Project, the Modified Project would also implement Certified EIR Mitigation Measures MM IV.J.3-1.1 and MM IV.J-3.1.2 to ensure school bus access and school pedestrian/traffic safety access during construction. Thus, the potential for the Modified Project and the No Automated Steel Parking Structure Alternative to impact school facilities and services during construction will be similar under the Modified Project and the No Automated Steel Parking Structure Alternative as compared to the impact conclusion in the Certified EIR, and would remain less than significant with the implementation of mitigation. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to schools during construction.

6. Reference

For a complete discussion of Public Services (Schools, Construction) see Sections IV.J Public Services and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

G. Traffic/Transportation

1. Description

(1) Construction

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts with mitigation related to temporary traffic and circulation patterns in the project vicinity during construction. The Certified EIR stated, to address traffic congestion on local roadways during peak traffic periods, the Planning Department has started implementing mitigation measures to restrict haul route trips to off peak hours. Such measures are automatically imposed as project conditions when applicants obtain haul route permits. Thus, the Certified EIR determined such measures would further reduce the CRA Approved Project's potential impact upon traffic conditions during the construction process to less than significant levels. The Certified EIR also stated, in order to further mitigate potentially significant construction related impacts, the CRA Approved Project would be required to develop a Construction Traffic Control/Management Plan to be approved by LADOT. Thus, the Certified EIR concluded traffic impacts during construction of the CRA Approved Project would be mitigated to less than significant levels.

The analysis of the Modified Project's potential impacts includes the same construction activities as the CRA Approved Project as well as additional construction associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. The Modified Project's additional construction activities would not overlap with the construction activities described for the CRA Approved Project and would only require minimal on-site construction associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. Construction of the new automated steel parking structure and interior building renovations would take approximately four months, which is not a substantial increase from the CRA Approved Project's construction timeline. It was estimated for the CRA Approved Project that an average of 200 construction workers would access the project site throughout the duration of the construction process, with a peak activity level of 250 workers. During the Modified Project's additional construction, off-site activity would typically involve construction workers arriving and departing the site, and the arrival and departure of construction haul trucks and trucks delivering construction materials to the site. Compared to the CRA Approved Project, it is estimated that approximately 83 construction worker and construction related vendor trips would access the project site on a daily basis throughout the Modified Project's additional construction process, which is not a substantial increase from the CRA Approved Project's number of construction workers.

Unlike the CRA Approved Project's Certified EIR, which did not include a construction activities traffic evaluation, a traffic evaluation of the potential street traffic created by the construction activities was conducted for the Modified Project's additional construction period. As shown in Table 16 in the Modified Project's Traffic Study, contained in Appendix G of the Draft Supplemental EIR, the Modified Project's additional construction would result in less than significant construction traffic impacts at all of the twenty intersections during both the A.M. and P.M. peak hours. Thus, consistent with the analysis in the Certified EIR for the CRA Approved Project, the Modified Project's impacts to traffic during construction would be less than significant. Additionally, the Modified Project would implement Regulatory Compliance Measure CM K.1-1, which requires adoption of construction measures (a Construction Traffic Control/Management Plan be submitted to LADOT for review and approval; the bulk of the construction work conducted on-site; if temporary lane closures needed, Street Services approval and be limited to non-peak commute hours; maintenance of existing site access for construction access; deliveries coordinated to non-peak travel periods to the extent possible; and construction workers prohibited from parking on adjacent streets and directed to park on-site). Implementation of Regulatory Compliance Measure CM K.1-1, which includes approval of a Construction Traffic Control/Management Plan and the maintenance of existing site access would ensure that emergency access to the site is maintained at all times and further reduce impacts related to traffic during construction.

Additionally, to address traffic congestion on local roadways during peak traffic periods, the Planning Department implements mitigation measures to restrict haul route trips to off peak hours. Therefore, Certified EIR Mitigation Measure MM IV.K.1-2, which would bind the Applicant to specific haul route conditions through a Covenant and Agreement would be automatically imposed if it is necessary for the Applicant to obtain a haul route permit for the Modified Project's additional construction activities and would further reduce the Modified Project's potential impact upon traffic conditions during the additional construction activities.

The Modified Project's additional construction activities associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations could necessitate temporary lane closures on streets adjacent to the site on a temporary and intermittent basis for utility relocation/hook-ups, delivery of materials and other construction related activities. Site deliveries and staging of all equipment and materials would be organized in the most efficient manner possible on-site to avoid impacts to the neighborhood and surrounding traffic. Because such potential lane closures would be temporary, they would not be expected to cause significant traffic impacts. Thus, the Modified Project's impacts related to traffic during the additional construction period would be less than significant. Furthermore, implementation of Regulatory Compliance Measure CM K.1-1, which requires adoption of construction measures and Certified EIR Mitigation Measure MM IV.K.1-2 would further reduce impacts related to traffic during the additional construction period.

Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to traffic during construction.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's impacts related to traffic during the additional construction period would be less than significant and implementation of Regulatory Compliance Measure CM K.1-1 and Certified EIR Mitigation Measure MM IV.K.1-2 would further reduce impacts related to traffic during the additional construction period. Accordingly, the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to traffic during construction.

(2) Operation

(a) Intersections

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts at all the studied intersections during the A.M. and P.M. peak hours for the future with the CRA Approved Project conditions. The Certified EIR concluded the addition of the CRA Approved Project's traffic to the future (2009) traffic volumes would not cause the level of service to change at any of the study intersections during the A.M. and P.M. peak hours. Therefore, the Certified EIR determined the CRA Approved Project's traffic impacts would be less than significant.

As detailed in Section IV.K.1 Traffic/Transportation of the Draft Supplemental EIR as well as Section III.A Topical Responses to Comments of the Final EIR, the Modified Project's impacts related to intersections during both the A.M. and P.M. peak hours to the 2015 or 2016 traffic conditions would be less than significant.

Regarding future conditions, since cumulative conditions have changed since the time of the Certified EIR, the Modified Project's traffic impacts were assessed under future (2017) and (2018) conditions. Specifically, in the Draft Supplemental EIR traffic generated by the Modified Project was added to the Future Without Modified Project traffic volumes in 2017 (ambient plus related project growth), to determine the Future With Modified Project traffic volumes at the study intersections. In the Final Supplemental EIR traffic generated by the Modified Project was added to the Future Without Modified Project traffic volumes in 2018 (ambient plus related project growth), to determine the Future With Modified Project traffic volumes at the study intersections.

The Future Plus Modified Project Traffic Conditions Analysis indicates that for the A.M. peak hour, the addition of Modified Project traffic could significantly impact one intersection in the A.M. peak hour during the future (2017 or 2018) conditions: Bronson Avenue and Sunset Boulevard. The Future Plus Modified Project Traffic Conditions Analysis indicates that for the P.M. peak hour, the addition of Modified Project traffic could significantly impact one intersection in the P.M. peak hour during the future (2017 or 2018) conditions: Gower Street and Sunset Boulevard. In addition, as part of the

Final Supplemental EIR an additional distribution analysis was conducted which determined that the intersection of Vine Street and Sunset Boulevard could be significantly impacted by Modified Project traffic during the P.M. Peak Hour.

Therefore, the Modified Project could significantly impact one of the twenty intersections during the A.M. peak hour and one of the twenty intersections during the P.M. peak hour. In addition, under the Final Supplemental EIR's additional distribution analysis the Modified Project could significantly impact an additional intersection during the P.M. peak hour. However, Mitigation Measures MM IV.K.1-1 and MM IV.K.1-2, which include physical intersection improvements and Mitigation Measure MM K.1-3, which includes implementation of a Transportation Demand Management Plan, would reduce the Modified Project's impacts to less than significant levels.

Mitigation Measure MM K.1-1 would provide, at the intersection of Gower Street and Sunset Boulevard, an operation northbound right turn lane by improving the northbound approach from a left turn lane and shared through/right turn lane to a left turn lane, through lane and operational right turn lane. Implementation of Mitigation Measure MM K.1-1 requires the relocation of an existing passenger loading zone southerly on Gower Street south of Sunset Boulevard and removal of two to three metered parking spaces. Therefore, as part of Mitigation Measure MM K.1-1, the Modified Project would set aside 3 parking spaces within the Modified Project's parking structure for public parking as well as install additional system detector loops along the west side of Gower Street. Mitigation Measure MM K.1-2 would provide, at the intersection of Bronson Avenue and Sunset Boulevard, an operational southbound right turn lane by improving the southbound approach from a left turn lane and shared through/right turn lane to a left turn lane, through lane and an operational right turn lane. Implementation of Mitigation Measure MM K.1-2 requires the removal of up to 4 parking spaces on the west side of Bronson Avenue north of Sunset Boulevard. Therefore, as part of Mitigation Measure MM K.1-2, the Modified Project would set aside 4 additional parking spaces within the Modified Project's parking garage for public parking as well as install additional system detector loops along the west side of Bronson Avenue. The Modified Project would provide the additional 7 public parking spaces on-site, which would be provided to the public for one hour free. The Applicant proposes to provide a sign outside of the Modified Project's parking structure on Gordon Street, as permitted by the LAMC, indicating the availability of these public parking spaces on-site. The public parking spaces in the Modified Project's parking structure would not create new vehicle trips as these parking spaces are being provided to replace existing parking spaces in the immediate vicinity of the project site.

Mitigation Measure MM K.1-3 would provide a Transportation Demand Management (TDM) Plan at the Modified Project that incorporates enhanced measures to achieve a reduction in the Modified Project's vehicle trips by 10 percent during the P.M. Peak Hour, which would be more than sufficient to ensure that the Vine Street and Sunset Boulevard intersection would be mitigated to a level such that the intersection would not be significantly impacted by Modified Project traffic.

Therefore, implementation of these mitigation measures would reduce the Modified Project's impacts during the A.M. and P.M. peak hour to a less than significant level. Therefore, consistent with the analysis in the Certified EIR for the CRA Approved Project, the Modified Project would result in less than significant impacts after mitigation related to analyzed intersections during both the A.M. and P.M. peak hours. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the intersections during both the A.M. and P.M. peak hours.

In addition, as an alternative related to parking, the Applicant may seek approval of an ordinance to reduce the clear space required at structural elements in the Modified Project's parking structure and to allow up to 66 percent of the Modified Project's parking stalls to be compact parking stalls to increase the available on-site parking supply to benefit the surrounding community in this area of Hollywood. Under this alternative, the Modified Project would provide approximately 508 parking spaces. This alternative would not encourage additional vehicle trips to the project site because trip generation for the Modified Project is based on the proposed mix of uses (residential, office, restaurant, retail, and coffee shop), and providing additional parking spaces for those uses would not modify the proposed mix of uses or demand for those uses. Therefore, the additional parking spaces would not modify the vehicle trip assumptions for the Modified Project. Further, of the 80 additional parking spaces, approximately 63 of them would be tandem parking spaces within the residential portion of the parking garage. These additional tandem parking spaces would provide additional on-site parking for certain residential units but would not encourage additional vehicle trips to the project site because, as explained above, trip generation assumptions are based on the number of residential units, which would remain the same. Further, these additional parking spaces would only be replacing parking reductions that are permitted for the Modified Project by providing affordable housing and bicycle parking as discussed in Section IV.H Land Use Planning and Section IV.K.2 Parking of the Draft Supplemental EIR. Therefore, the proposed alternative to provide additional parking spaces does not modify any of the analysis.

Like the Modified Project, implementation of the above described mitigation measures would reduce the No Automated Steel Parking Structure Alternative's impacts during the A.M. and P.M. peak hour to a less than significant level and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the intersections during both the A.M. and P.M. peak hours.

In addition, the No Automated Steel Parking Structure Alternative would provide approximately 508 parking spaces, which as discussed above would not encourage additional vehicle trips to the project site and would not modify any of the Supplemental EIR analysis regarding impacts to intersections during both the A.M. and P.M. peak hours.

(b) Roadway Segment

The CRA Approved Project's Neighborhood Traffic Analysis stated the CRA Approved Project's impacts related to roadway segment traffic volumes would be less than significant. The Modified Project's commercial component would increase the average daily traffic by less than 12 percent on Gordon Avenue south of Carlton Way, Carlton Way east of Gower Street, and Carlton Way west of Bronson Avenue segment. Therefore, the traffic impact of the Modified Project to these street segments would be below the 12 percent or more increase in average daily traffic thresholds. Therefore, the Modified Project's impacts related to roadway segment traffic volumes would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to traffic during operation.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's impacts related to roadway segment traffic volumes would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to traffic during operation.

(3) Congestion Management Program

The Certified EIR concluded the CRA Approved Project would have a less than significant impact upon the CMP network. As with the CRA Approved Project, for the Modified Project the nearest CMP intersection is Santa Monica Boulevard & Western Avenue, approximately one mile from the project site. It is anticipated that a conservative maximum of 10 percent of the Modified Project trips will go through the intersection during the peak periods which would equate to 26 trips during the Peak Hours (without taking credit for the prior uses that existed on the project site). This is below the CMP significance threshold of 50 vehicles or more added during the peak hours. The nearest CMP freeway monitoring segment is the Hollywood Freeway. The Modified Project's trip volumes are anticipated to be dispersed throughout the freeway system in the area. It is anticipated that, conservatively, approximately 10 to 15 percent of the Modified Project volumes will be using any one segment of the freeway. The maximum number of freeway trips on any one freeway would then be 37 vehicles during the peak hours (without taking credit for the prior uses that existed on the project site). Based on this information, no additional CMP intersection or freeway analysis is necessary. Nevertheless, an area freeway analysis was conducted and the Modified Project's addition to these volumes creates a minimal impact with up to a 0.2 percent increase during the 2015 peak periods and 0.3 percent increase during the future peak periods. Therefore, consistent with the analysis in the Certified EIR for the CRA Approved Project, the Modified Project would have a less than significant impact upon the CMP network. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the CMP network.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would have a less than significant impact upon the CMP network and would not involve new

significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the CMP network.

(4) Alternative Transportation

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts related to alternative transportation facilities.

The project site is located in a Transit Priority Area with high levels of public transportation service. For the Modified Project transit ridership would utilize approximately 0.4 percent of available transit capacity during the peak hours. Therefore, there is sufficient transit capacity for the Modified Project and the Modified Project's impacts to the transit system would be less than significant. In addition, while the Modified Project and other related projects will cumulatively add new ridership to the transit system, the project site and the greater Hollywood area in general are served by a considerable amount of transit service, including the Metro Red Line, several rapid and local bus routes and LADOT service. The related projects that are anticipated to be completed at or before the Modified Project and the Modified Project are conservatively estimated to generate transit trips that represent approximately 3.5 percent of the available transit capacity during the peak hours. Therefore, there is sufficient transit capacity for the related projects and the Modified Project and the cumulative transit impacts would be less than significant. In addition, neither the construction nor operation of the Modified Project would involve the relocation, replacement, or hinder the function of any of these public transportation facilities. Prior to the Modified Project's additional construction activities, the Modified Project would implement PDF IV.K.1-3, which ensures the Applicant contact Los Angeles County Metropolitan Transportation Authority (LACMTA) Bus Operations Control Special Events Coordinator regarding construction activities that may impact LACMTA bus lines at least 30 days in advance of initiating the Modified Project's additional construction activities. Operation of the Modified Project would establish a commercial and residential culture that affirms employees and residents decisions to use a commuting alternative. Further, the Modified Project would implement Mitigation Measure MM K.1-3, which ensures implementation of an employer and site based Transportation Demand Management (TDM) program that would encourage transit usage and other multi-modal commuter options. To this end, the Modified Project will provide several incentives for residents and employees to use alternate means of transportation.

In addition, the Modified Project would provide 401 bicycle parking spaces to accommodate the future residents and employees of the Modified Project, which would be in compliance with the LAMC. To incentivize carpooling, the Modified Project would include 3 designated spaces for rideshare vehicles. These components will further promote the use of alternative transportation. Therefore, consistent with the analysis in the Certified EIR for the CRA Approved Project, the Modified Project's impacts on alternative transportation facilities would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to alternative transportation facilities.

Like the Modified Project, the No Automated Steel Parking Structure's impacts on alternative transportation facilities would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to alternative transportation facilities.

(5) Bicycle, Pedestrian and Vehicle Safety

The Certified EIR did not discuss the CRA Approved Project's impacts with respect to bicycle safety. The Certified EIR did discuss pedestrian safety and circulation patterns and concluded the CRA Approved Project would result in less than significant impacts related to pedestrian safety and circulation patterns.

Vehicular access for the Modified Project would be from a single driveway off of Gordon Street north of Sunset Boulevard. The driveway will be located at the north end of the building site, south of the park site. The driveway would be designed with appropriate signage and warning lights/sounds to warn drivers to slow on approach and to warn pedestrians and bicyclists of approaching vehicles. In addition, the Modified Project provides for ground floor retail uses and entry plazas along Sunset Boulevard to provide an attractive, lively and safe pedestrian environment. Also, compared to the CRA Approved Project, the Modified Project will provide a total of 401 bicycle parking spaces, which will include at least 311 long term bicycle storage facilities that will be located in a safe, convenient, secure and well-maintained bicycle parking area. Short term bicycle parking spaces will be located outside the building on the Sunset Boulevard frontage as well as inside the ground level of the building and parking garage with direct access to the street. Thus, the Modified Project's design would not increase hazards to bicycle, pedestrian and vehicle safety.

Furthermore, the City of Los Angeles has adopted 2015-2035 Vision Zero Los Angeles in order to fulfill the City's commitment to eliminate all traffic deaths by 2025. As a result, LADOT has identified the City's High Injury Network (HIN) of city streets. Sunset Boulevard between Custer Avenue (west of the Harbor Freeway downtown) and Crescent Heights Boulevard is identified as part of the HIN. This stretch includes Sunset Boulevard along the southern boundary of the project site. Two of the signalized intersections along this stretch of roadway have Continental Crosswalks including Sunset Boulevard and Gordon Street (North, South, East, and West Legs) and Sunset Boulevard and Argyle Avenue (North, East, and West Legs), which serve to reduce traffic related injuries and maintain the performance and safety of public transit, bicycle or pedestrian facilities at these two intersections. In addition to the existing Continental Crosswalks, the Modified Project would implement PDF IV.K.1-2, which would improve the signalized intersections with Continental Crosswalks at Sunset Boulevard and Gower Street (North, South, East, and West Legs) and Sunset Boulevard and Bronson Avenue (North, South, East, and West Legs) to increase motorists' visibility of pedestrians to the east and west of the project site. Implementation of PDF IV.K.1-2 would be consistent with the City Vision Zero policies and approach to addressing improvements to the City's HIN. As such, with implementation of PDF IV.K.1-1 and PDF IV.K.1-2, the Modified Project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease

the performance or safety of such facilities. Therefore, consistent with the analysis in the Certified EIR for the CRA Approved Project, the potential impacts to bicycle, pedestrian and vehicle safety would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to bicycle, pedestrian, and vehicle safety.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative potential impacts to bicycle, pedestrian and vehicle safety would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to bicycle, pedestrian, and vehicle safety.

(6) Project Access

The Certified EIR did not analyze project access impacts in Section IV.K.1 Traffic/Transportation of the Certified EIR. However, the Certified EIR concluded in Section IV.J Public Services that the CRA Approved Project would not inhibit emergency vehicle access and impacts related to emergency access would be less than significant.

The Modified Project's additional construction activities associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations could necessitate temporary lane closures on streets adjacent to the site on a temporary and intermittent basis for utility relocation/hook-ups, delivery of materials and other construction related activities. Site deliveries and staging of all equipment and materials would be organized in the most efficient manner possible on-site to avoid impacts to emergency access. Additionally, as discussed above, a traffic evaluation of the potential street traffic created by the Modified Project's construction activities was conducted. Intersections nearest the primary project site access with an LOS of E or F are considered to inhibit project access. The primary project site access during the Modified Project's additional construction activities would be the single driveway off of Gordon Street north of Sunset Boulevard currently on the project site. When added to future traffic volumes, the Modified Project's additional construction activities would not cause the nearest intersection, Intersection #13 (A and B), Gordon Street and Sunset Boulevard, to operate at LOS E or LOS F during the A.M. or P.M. peak hours. As such, impacts related to project access during construction of the Modified Project's additional construction activities would be less than significant. Furthermore, the Modified Project would implement Regulatory Compliance Measure CM K.1-1, which includes approval of a Construction Traffic Control/Management Plan and the maintenance of existing site access. As such, implementation of this regulatory compliance measure would ensure that project access to the site is maintained at all times and further reduce impacts related to project access during construction.

During operation, primary project access for the Modified Project would be from a single driveway off of Gordon Street north of Sunset Boulevard. As provided in Appendix C Supplemental Traffic Analysis, to the Final Supplemental EIR the Modified Project's

parking garage has ample capacity for vehicles that would queue as part of the Modified Project. Based on that analysis, no queues would extend beyond the Modified Project's parking structure to affect traffic on Gordon Street and therefore no queuing impacts would occur.

Additionally, the Modified Project's operation would not cause the nearest intersections to operate at LOS E or LOS F during the A.M. or P.M. peak hours. Furthermore, the Modified Project would implement Regulatory Compliance Measures CM J.2-1 through CM J.2-3, which would require the Modified Project Applicant to ensure firefighting personnel and apparatus access, establish conditions the Modified Project must meet to the satisfaction of the City Fire Department, and submit a Fire Life Safety Resources Management plan to the City Fire Department. Implementation of Regulatory Compliance Measures CM J.2-1 through CM J.2-3 would ensure adequate emergency service access during operation and further reduce impacts related to project access. Therefore, Modified Project impacts related to project access would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to project access.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative impacts related to project access would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to project access.

2. Project Design Features

PDF K.1-2: The Modified Project shall improve the intersections of Gower Street and Sunset Boulevard (North, South, East and West Legs) and Bronson Street and Sunset Boulevard (North, South, East and West Legs) with Continental Crosswalks.

PDF K.1-3: The Applicant shall contact Los Angeles County Metropolitan Transportation Authority (LACMTA) Bus Operations Control Special Events Coordinator at 213-922-4632 regarding construction activities that may impact LACMTA bus lines at least 30 days in advance of initiating the Modified Project's additional construction activities. For closures that last more than six months, LACMTA's Stops and Zones Department will also need to be notified at 213-922-5188, 30 days in advance of initiating the Modified Project's additional construction activities. Other municipal bus operators may also be impacted and should be included in construction outreach efforts.

3. Mitigation Measures

MM K.1-1: Gower Street & Sunset Boulevard. The Modified Project shall improve the Gower Street & Sunset Boulevard intersection to provide an operational northbound right turn lane by improving the northbound approach from a left turn lane and shared through/ right turn lane to a left turn lane, through lane and operational right turn lane. Because this improvement requires the relocation of an existing passenger loading

zone southerly on Gower Street south of Sunset Boulevard and removal of two to three metered parking spaces, the Modified Project shall set aside up to 3 spaces for public parking to replace these parking spaces on-site. Additionally, the Modified Project shall install additional system detector loops along the west side of Gower Street.

MM K.1-2: Bronson Avenue & Sunset Boulevard. The Modified Project shall improve the Bronson Avenue and Sunset Boulevard intersection to provide an operational southbound right turn lane by improving the southbound approach from a left turn lane and shared through/ right turn lane to a left turn lane, through lane and an operational right turn lane. Because this improvement requires the removal of up to 4 parking spaces on the west side of Bronson Avenue north of Sunset Boulevard, the Modified Project shall set aside 4 spaces for public parking to replace these parking spaces on-site. Additionally, the Modified Project shall install additional system detector loops along the west side of Bronson Avenue.

MM K.1-3: The Modified Project shall implement a Transportation Demand Management (TDM) Plan, consistent with the recommendations of LADOT, that would achieve a least a 10 percent reduction in the Modified Project's P.M. Peak Hour trips. While multiple methods of compliance may be available for certain measures, the final TDM Plan shall be reviewed and approved by LADOT prior to the certificate of occupancy for the Modified Project to ensure that the TDM Plan will provide at minimum a 10 percent reduction in the Modified Project's P.M. Peak Hour trips. Potential measures that could achieve a 10 percent reduction in the Modified Project's P.M. Peak Hour trips include the following elements:

1. Establish an on-site Transportation Management Office (TMO) as part of the management office to assist residents and employees in finding alternate travel modes and strategies.

2. Provide a visible on-site kiosk with options for ridesharing, bus routes, bike routes in a prominent area(s) in view for residents, employees and patrons of the commercial components;

3. Provide car sharing service for residents and employees;

4. Encourage alternative work arrangements for residents and employees;

5. Improve the existing bus stop on the north side of Sunset Boulevard, east of Gordon Street;

6. Provide transit pass reductions of at least 25 percent for residents and employees

7. Provide carpool and vanpool matching and preferential parking for carpools/vanpools that register with the TMO;

8. Provide secure bicycle facilities and bicycle sharing service for residents and employees;

9. Provide transit and ridesharing incentives such as points or coupons for merchandise

10. Provide guaranteed rides home for employees that use alternative modes of transportation or rideshare in the event of an emergency;

11. Provide unbundled parking for residents; and

12. Encourage office tenants to establish workplace parking for employees (i.e. charging employees of office tenants for some or all of their parking costs) or to establish an employee parking cash-out program.

Certified EIR Mitigation Measure MM IV.K.1-2: If it is necessary for the Applicant to obtain a haul route permit for the Modified Project's additional construction activities, prior to the issuance of a grading permit, the Applicant shall record and execute a Covenant and Agreement (Planning Department General Form CP-6770), binding the Applicant to the following haul route conditions:

i. All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors to the extent feasible.

ii. Hours of operation shall be from 9:00 A.M. to 4:00 P.M.

iii. Days of the week shall be Monday through Saturday. No hauling activities are permitted on Sundays or Holidays.

iv. Trucks shall be restricted to 18-wheel trucks or smaller.

v. The Traffic Bureau of the Los Angeles Police Department shall be notified prior to the start of hauling (213.485.3106).

vi. Streets shall be cleaned of spilled materials at the termination of each work day.

vii. The final approved haul routes and all the conditions of approval shall be available on the job site at all times.

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

ix. Hauling and grading equipment shall be kept in good operating condition and muffled as required by law.

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

xi. All trucks are to be watered only when necessary at the job site to prevent excessive blowing dirt.

xii. All trucks are to be cleaned of loose earth at the job site to prevent spilling. Any material spilled on the public street shall be removed by the contractor.

xiii. The applicant shall be in conformance with the State of California, Department of Transportation policy regarding movements of reducible loads.

xiv. All regulations set forth in the State of California Department of Motor Vehicles pertaining to the hauling of earth shall be complied with.

xv. "Truck Crossing" warning signs shall be placed 300 feet in advance of the exit in each direction.

xvi. One flag person(s) shall be required at the job site to assist the trucks in and out of the Project area. Flag person(s) and warning signs shall be in compliance with Part II of the 1985 Edition of "Work Area Traffic Control Handbook."

xvii. The City of Los Angeles, Department of Transportation, telephone 213.485.2298, shall be notified 72 hours prior to beginning operations in order to have temporary "No Parking" signs posted along the route.

xviii. Any desire to change the prescribed routes must be approved by the concerned governmental agencies by contacting the Street Use Inspection Division at (213) 485-3711 before the change takes place.

xix. The permittee shall notify the Street Use Inspection Division, at (213) 485-3711, at least 72 hours prior to the beginning of hauling operations and shall also notify the Division immediately upon completion of hauling operations.

xx. A surety bond by Contractor shall be posted in an amount satisfactory to the City Engineer for maintenance of haul route streets. The forms for the bond will be issued by the Valley District Engineering Office, 6262 Van Nuys Boulevard, Suite 251, Van

Nuys, CA 91401. Further information regarding the bond may be obtained by calling 818.374.5090; or the West Los Angeles District Engineering Office, 1828 Sawtelle Boulevard, 3rd Floor, Los Angeles, CA 90025. Further information regarding the bond may be obtained by calling 310.575.8388; or by the Central District Engineering Office, 201 N. Figueroa Street, Room 770, Los Angeles, CA 90012. Further information regarding the bond may be obtained by calling 213.977.6039; or by the Harbor District Engineering Office, 638 S. Beacon Street, 4th Floor, San Pedro, CA 90731. Further information regarding the bond may be obtained by calling 310.732.4677.

4. Finding

Changes or alternations and mitigation measures have been required in, or incorporated into, the Modified Project which avoid or substantially lessen the potentially significant impacts associated with Traffic/Transportation, as identified in the Supplemental EIR, to less than significant levels.

5. Rationale for Finding

As discussed above, regarding construction, the Certified EIR concluded the CRA Approved Project would result in less than significant impacts with mitigation. Consistent with the analysis in the Certified EIR, the Modified Project's and the No Automated Steel Parking Structure Alternative's impacts to traffic during construction would be less than significant. Further, implementation of Certified EIR Mitigation Measure MM IV.K.1-2, which would bind the Applicant to specific haul route conditions, would be automatically imposed if it is necessary for the Applicant to obtain a haul route permit for the additional construction activities and would further reduce the Modified Project's and the No Automated Steel Parking Structure Alternative's potential impact upon traffic conditions during the additional construction activities.

Regarding operations, the Certified EIR concluded the CRA Approved Project would result in less than significant impacts at all the studied intersections during the A.M. and P.M. peak hours for the future with the CRA Approved Project conditions. Prior to mitigation, the Modified Project and the No Automated Steel Parking Structure Alternative could significantly impact one of the twenty intersections during the A.M. peak hour and one of the twenty intersections during the P.M. peak hour. In addition, under the Final Supplemental EIR's additional distribution analysis the Modified Project and the No Automated Steel Parking Structure Alternative could significantly impact an additional intersection during the P.M. peak hour. However, Mitigation Measures MM IV.K.1-1 and MM IV.K.1-2, which include physical intersection improvements and Mitigation Measure MM K.1-3, which includes implementation of a Transportation Demand Management Plan would reduce the Modified Project's and the No Automated Steel Parking Structure Alternative's impact to less than significant.

Accordingly, as compared to the CRA Approved Project, the proposed Modified Project and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to traffic.

6. Reference

For a complete discussion of Traffic/Transportation see Sections IV.K.1 Traffic/Transportation and VI. Alternatives to the Modified Project of the Draft Supplemental EIR and Section III.A Topical Responses to Comments of the Final Supplemental EIR.

X. Environmental Impacts analyzed in the Supplemental EIR and determined to be significant and UNAVOIDABLE

The following impact areas were concluded by the Draft Supplemental EIR to be significant and unavoidable with the implementation of the mitigation measures described in the Final Supplemental EIR. CEQA Section 21081 and Section 15093(b) of the CEQA Guidelines provide that when the decision of a public agency allows the occurrence of unavoidable significant impacts, the agency must state in writing the reasons to support its action based on the EIR and/or other information in the record. Specifically, pursuant to CEQA Guidelines Section 15093(b), the decision maker must adopt a Statement of Overriding Considerations at the time of approval of a project if it finds that significant unavoidable adverse environmental effects will occur. As the proposed project will result in significant unavoidable impacts, a Statement of Overriding Considerations that addresses these impacts is presented in Section XIV, Statement of Overriding Considerations, of these Findings.

A. Noise and Vibration (Construction)

1. Description

a. Construction Truck Trip Noise

While the Certified EIR for the CRA Approved Project did not discuss noise levels associated with construction-related truck trips, the Draft Supplemental EIR provides an analysis of the noise levels associated with the CRA Approved Project's construction-related truck trips to provide a comparison to the noise levels associated with the additional construction-related truck trips for the Modified Project. Based on the traffic volumes in the CRA Approved Project's Traffic Study in Appendix F of the Certified EIR, the construction-related truck trips for the CRA Approved Project would not double the volume of traffic on Sunset Boulevard and, therefore, would not have the potential to increase noise along Sunset Boulevard above 3 dBA (CNEL). Therefore, the impacts related to noise generated by the construction-related truck trips from the CRA Approved Project would be less than significant.

The analysis of the Modified Project's potential impacts includes the same construction activities as the CRA Approved Project as well as additional construction associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. The Modified Project's additional construction would utilize the same haul route identified in the Certified EIR along Sunset Boulevard. The addition of the construction-related truck trips for the Modified Project's additional construction would not substantially increase the existing volume of traffic along Sunset Boulevard. The Modified Project's construction worker and construction-related truck trips would not double the existing volume of traffic on Sunset Boulevard and, therefore, would not have the potential to generate a 3 dBA or higher increase in noise levels along Sunset Boulevard. Therefore, it is anticipated the noise generated by the Modified Project's additional construction-related truck trips would not substantially increase noise levels in the Project area and construction-related truck noise impacts from the Modified Project's additional construction-related truck trips would be less than significant.

Based on the temporary nature and relatively short duration of the additional construction work involved in the Modified Project's additional construction activities, and the fact that the Modified Project's additional construction activities would not overlap with the construction activities analyzed for the CRA Approved Project in the Certified EIR in a manner that would increase construction-related truck trips on a given day, the Modified Project's additional construction would not substantially increase the noise generated by the construction-related truck trips of the CRA Approved Project. Therefore, the Modified Project's construction-related truck trips would not expose persons to or generation of noise levels in excess of established standards or result in a substantial temporary increase in ambient noise levels in the project vicinity and noise impacts generated by construction-related truck trips would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to noise generated during construction.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative noise impacts generated by construction-related truck trips would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to noise generated during construction

b. Construction Activity Noise

The Certified EIR stated construction activities would primarily affect the existing adjacent residences located to the north, west and east of the project site. When compared with the average ambient noise levels recorded in the Certified EIR at the sensitive receptors along Gordon Street, construction activities associated with the CRA Approved Project would exceed ambient exterior noise levels by more than 10 dBA for more than one day and more than 5 dBA for more than 10 days in a three month period. While mufflers on the construction equipment would reduce noise levels by an average of 3 dBA, the Certified EIR determined the resulting noise levels from construction of the

CRA Approved Project would still exceed thresholds of significance for construction noise.

The analysis of the Modified Project's potential impacts includes the same construction activities as the CRA Approved Project as well as additional construction associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. Specifically, the ground clearing, excavation, grading, foundations, structural and finishing phases of the CRA Approved Project have already occurred as analyzed in the CRA Approved Project's Certified EIR. The Modified Project's additional construction will require the use of heavy equipment for the retrofitting of existing foundations and construction of the new automated steel parking structure.

During construction of the automated steel parking structure, there would be a mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of the activity. Such activities would be similar to but less intensive than the activities involved with the structural and finishing phases of the CRA Approved Project. In addition, construction activities associated with the Modified Project's additional construction activities associated with foundation upgrades and interior building renovations would occur interior to the parking structure and building and would be attenuated by the walls of the existing structure. Noise from interior activities would be attenuated by a factor of 20-40 dBA and thus would generate lower noise levels than construction associated with the CRA Approved Project. The construction of the Modified Project's automated steel parking structure would occur on the exterior of the third level of the parking podium on the north side of the existing structure and would generate similar exterior noise levels as predicted for the CRA Approved Project.

The Modified Project's construction noise associated with the additional construction activities would exceed 5 dBA Leq at all but two of the 13 sensitive receptors. However, the exterior noise levels for construction activities would be the same as identified in the Certified EIR for the CRA Approved Project (i.e., up to 84 dBA CNEL or 89 dBA Leq) for sensitive land uses within 50 feet of the construction site. Therefore, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to construction noise.

Based on criteria set forth in the L.A. CEQA Thresholds Guide, construction activities lasting more than one day that would increase ambient exterior noise levels by 10 dBA or more at a noise sensitive use would result in a significant impact. In addition, the L.A. CEQA Thresholds Guide states that construction activities lasting more than 10 days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would result in a significant impact. Therefore, construction activities could impact nearby sensitive receptors as construction noise could exceed existing ambient exterior noise levels by more than 10 dBA for more than one day and more than 5 dBA for more than 10 days in a three month period. Due to

distance, the resulting noise levels would at the residential structures exceed the thresholds of significance for construction noise.

LAMC Section 41.40 regulates noise from demolition and construction activities. Exterior demolition and construction activities that generate noise are limited to the hours of 7:00 A.M. to 9:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday. Demolition and construction are prohibited on Sundays and all federal holidays. The construction activities associated with the Modified Project would comply with these LAMC requirements. Pursuant to the City Noise Ordinance (LAMC Section 112.05), construction noise levels are exempt from the 75 dBA noise threshold if all technically feasible noise attenuation measures are implemented. Although the estimated construction-related noise levels associated with the Modified Project could exceed the numerical noise thresholds, implementation of the mitigation measures would reduce the noise levels associated with construction of the Modified Project to the maximum extent that is technically feasible. The Modified Project would implement Regulatory Compliance Measures CM F-1 and CM F-2, which ensure the Modified Project's compliance with LAMC Section 112.05 to prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible and LAMC Section 41.40, which limits the hours of allowable construction activities. Additionally, the Modified Project would incorporate Mitigation Measures MM F-1.1, MM F-1.2, MM F-1.6, and Certified EIR Mitigation Measure MM F-1.1 through Certified EIR Mitigation Measure MM F-1.5, which would reduce construction noise to the maximum extent feasible. The Modified Project's additional construction activities would also incorporate Mitigation Measure MM F-1.3, which requires the Modified Project's additional construction activities to utilize on-site electrical sources or solar generators in lieu of diesel or gasoline generators where feasible.

Despite implementation of the Regulatory Compliance Measures and Mitigation Measures, which would reduce construction noise to the maximum extent feasible, temporary construction-related noise impacts from the Modified Project would be considered significant and unavoidable after mitigation, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. The Modified Project's additional construction activities would not overlap with the construction activities analyzed for the CRA Approved Project in the Certified EIR in a manner that would increase construction noise on a given day. The construction noise levels associated with the Modified Project's additional construction activities would be within the CRA Approved Project's construction noise levels and, therefore, would not substantially increase the CRA Approved Project's construction noise levels.

Additionally, the Certified EIR for the CRA Approved Project anticipated a 24-month construction timeline. Compared to the CRA Approved Project, the Modified Project's additional construction period would last approximately four months, which is not a substantial increase from the CRA Approved Project's construction timeline. Based on the temporary nature and relatively short duration of the additional construction work involved in the Modified Project, and the fact that the Modified Project's construction activities would not overlap with the construction activities analyzed for the CRA Approved Project in the Certified EIR in a manner that would increase construction

noise on a given day, the noise impacts as a result of construction of the Modified Project would not substantially increase the noise impacts for construction of the CRA Approved Project. Therefore, while the Modified Project's construction-related noise would generate noise levels in excess of established standards and therefore would result in a significant and unavoidable impact, the Modified Project's construction-related noise would be within the impacts of the CRA Approved Project analyzed and disclosed in the Certified EIR and would not substantially increase the CRA Approved Project's impacts related to construction noise. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to construction noise.

For the No Automated Steel Parking Structure Alternative, additional on-site construction would be necessary associated with interior building renovations and may also be necessary to comply with building code requirements. The additional construction is anticipated to be generally limited to interior building locations. While some construction activities may occur on the exterior of the building in connection with interior building renovations, the exterior construction activities would be reduced as no substantial changes to the above-ground parking podium are proposed. While noise from the limited exterior construction activities are conservatively concluded to have a significant and unavoidable impact on a temporary and intermittent basis consistent with the analysis of construction activities for the CRA Approved and Modified Project due to the proximity of nearby sensitive receptors, as compared to the Modified Project's additional construction activities, the No Automated Steel Parking Structure Alternative's additional construction activities would slightly reduce the intensity of the significant noise impact. Nevertheless, construction related noise would continue to result in a significant and unavoidable impact. As compared to the CRA Approved Project, the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to construction noise.

c. Construction Truck Trip Groundborne Vibration

The Certified EIR for the CRA Approved Project did not discuss groundborne vibration levels associated with construction-related truck trips. Construction of the Modified Project includes the same construction activities as the CRA Approved Project as well as additional construction associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. The Modified Project's additional construction would utilize the same haul route identified in the Certified EIR along Sunset Boulevard. The addition of the construction-related truck trips during the Modified Project's additional construction would not substantially increase the heavy duty truck trips that exist along Sunset Boulevard. Therefore, the Modified Project construction-related truck trips would not expose persons to or generate excessive groundborne vibration and impacts related to vibration as a result of the Modified Project's additional construction would be less than significant.

The Certified EIR for the CRA Approved Project anticipated a 24-month construction timeline. Compared to the CRA Approved Project, the Modified Project's additional construction period would last approximately four months, which is not a substantial increase from the CRA Approved Project's construction timeline. Further, the additional construction activities for the Modified Project would not overlap with the construction activities analyzed for the CRA Approved Project in the Certified EIR in a manner that would increase groundborne vibration from construction-related truck trips on a given day. Thus, based on the temporary nature and relatively short duration of the additional construction work involved, it is anticipated that the vibration generated by the construction-related truck trips as a result of the Modified Project's additional construction would not substantially increase the groundborne vibration generated by the construction period of the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to vibration generated during construction.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's construction-related truck groundborne vibration impact would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to vibration generated during construction.

d. Construction Activity Groundborne Vibration

As set forth in the Certified EIR, vibration levels associated with construction of the CRA Approved Project could exceed the threshold for residences and buildings where people normally sleep and the Certified EIR concluded that the CRA Approved Project's impact to groundborne vibration would be significant and unavoidable on a temporary basis during construction.

The analysis of the Modified Project's potential impacts includes the same construction activities as the CRA Approved Project as well as additional construction associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. The construction groundborne vibration activities for the CRA Approved Project were located throughout the project site and, therefore, the groundborne vibration levels were calculated based on the distances from the project site boundary to the nearest sensitive receptors. For the additional construction that would occur under the Modified Project, the construction groundborne vibration activities would occur as a result of the structural foundation retrofit on the west side of Level 1 of the parking structure to accommodate the new automated steel parking structure. Therefore, the distances utilized for groundborne vibration levels were calculated based on the distances from the construction groundborne vibration activities on the west side of the parking structure to the nearest sensitive receptors.

For the Modified Project's additional construction activities vibration generating equipment would include a jackhammer and loader/backhoe, which would be utilized for the installation and retrofitting for the new automated steel parking structure that

includes foundation and structural modifications. Based on this construction equipment, the Modified Project's additional construction period groundborne vibration levels at the two nearest sensitive receptors would be below the threshold of significance. Therefore, for the Modified Project's additional construction, construction-related groundborne vibration would not expose persons to or generate excessive groundborne vibration at the nearest sensitive receptors, and impacts would be less than significant and would not substantially increase the CRA Approved Project's impacts related to construction groundborne vibration. However, because the changes involved in the Modified Project would not reduce or avoid the previously identified significant impact associated with the CRA Approved Project's construction activities, groundborne vibration impacts would remain significant and unavoidable (but temporary) as concluded in the Certified EIR for the CRA Approved Project.

Nevertheless, because the Modified Project's additional construction activities would not overlap with the construction activities of the CRA Approved Project analyzed in the Certified EIR, the Modified Project's additional construction activities would by itself result in less than significant impacts associated with construction groundborne vibration. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to human annoyance from construction groundborne vibration.

Implementation of Regulatory Compliance Measures CM F-1 and CM F-2, which ensure compliance with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574 and any subsequent ordinances, as well as restrict construction and demolition to the hours of 7:00 AM to 9:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday, would reduce groundborne vibration impacts to the maximum extent feasible. Additionally, implementation of Mitigation Measures MM F-1.1 and MM F-1.2, which require demolition and construction activities to be scheduled to avoid operating several pieces of equipment simultaneously and the Modified Project's contractor to use power construction equipment with state-of-the-art noise shielding and muffling devices, would further reduce groundborne vibration impacts. Furthermore, Certified EIR Mitigation Measure MM F-1.1 through Certified EIR Mitigation Measure MM F-1.5, which ensure all construction equipment engines shall be properly tuned and muffled; construction activities be conducted as far as possible from the nearest sensitive receptors and natural and/or manmade barriers be used to screen such activities from these land uses to the maximum extent possible; the use of construction equipment with the greatest generation potential to be minimized to the maximum extent feasible; a temporary noise barrier be erected between the source and sensitive receptor if construction activities exceed 75 dBA at the property line of the adjacent property and if construction equipment is left stationary and continuous; and an informational sign be posted at the entrance to each construction site, would also reduce groundborne vibration impacts to the maximum extent feasible.

Further, the Certified EIR for the CRA Approved Project anticipated a 24-month construction timeline. Compared to the CRA Approved Project, the Modified Project's additional construction period would last approximately four months, which is not a

substantial increase from the CRA Approved Project's construction timeline. In addition, the Modified Project's additional construction activities would not overlap with the construction activities analyzed for the CRA Approved Project in the Certified EIR in a manner that would increase groundborne vibration from construction on a given day. Thus, based on the temporary nature and relatively short duration of the additional construction work involved, it is anticipated that the groundborne vibration impacts as a result of the Modified Project's additional construction would not substantially increase the groundborne vibration impacts for construction of the CRA Approved Project. Therefore, the Modified Project's construction-related groundborne vibration impacts would be within the scope of impacts analyzed in the Certified EIR for the CRA Approved Project and would not substantially increase the CRA Approved Project's impacts related to construction groundborne vibration. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to construction groundborne vibration.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's additional construction activities would by itself result in less than significant impacts associated with construction groundborne vibration and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to human annoyance from construction groundborne vibration.

2. Project Design Features

No Project Design Features are proposed for Noise (Construction).

3. Mitigation Measures

MM F-1.1: Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

MM F-1.2: The Modified Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

MM F-1.3: The construction contractor for the Modified Project's additional construction activities shall use on-site electrical sources or solar generators to power equipment rather than diesel or gasoline generators where feasible.

MM F-1.6: Prior to the issuance of building permits for the development of the Modified Project, the Applicant shall provide proof satisfactory to the City Department of Public Works or Department of Building and Safety, as applicable, that all related construction contractors have been required in writing to comply with the City Noise Ordinance, and prior to the development of the Modified Project, the Applicant shall design a Construction Noise Mitigation Plan to minimize the construction-related noise impacts to off-site noise-sensitive receptors. The intent of the Construction Noise Management

Plan is to provide the contractor with measures to reduce noise impacts by at least 10 dBA through implementation of the following:

- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously.
- The Modified Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
- The construction contractor for the Modified Project's additional construction activities shall use on-site electrical sources or solar generators to power equipment rather than diesel or gasoline generators where feasible.
- All construction equipment engines shall be properly tuned and muffled according to manufacturers' specifications.
- Noise construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers or temporary sound barrier) shall be used to screen such activities from these land uses to the maximum extent possible and the unnecessary idling of such construction activities shall be prohibited.
- To the maximum extent feasible, the use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized.
- If noise levels from construction activity are found to exceed 75 dBA at the property line of an adjacent property and construction equipment is left stationary and continuously operating for more than one day, a temporary noise barrier, shall be erected between the noise source and receptor.
- An information sign shall be posted at each entrance to the construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any reasonable complaints shall be rectified within 24 hours of their receipt.

Certified EIR Mitigation Measure MM F-1.1: All construction equipment engines shall be properly tuned and muffled according to manufacturers' specifications.

Certified EIR Mitigation Measure MM F-1.2: Noise construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen such activities from these land uses to the maximum extent possible.

Certified EIR Mitigation Measure MM F-1.3: To the maximum extent feasible, the use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized.

Certified EIR Mitigation Measure MM F-1.4: If noise levels from construction activity are found to exceed 75 dBA at the property line of and adjacent property and construction equipment is left stationary and continuously operating for more than one day, a temporary noise barrier shall be erected between the noise source and receptor.

Certified EIR Mitigation Measure MM F-1.5: An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any reasonable complaints shall be rectified within 24 hours of their receipt.

4. Finding

Mitigation measures have been incorporated into the Modified Project which substantially lessen the potentially significant impacts related to construction noise and vibration, as identified in the Supplemental EIR. In addition, changes or alterations have been required in, or incorporated into, the Modified Project which avoid or substantially lessen the significant environmental effect of the Modified Project upon construction noise and vibration including the adoption of the No Automated Steel Parking Structure Alternative in lieu of the Modified Project which would slightly reduce the intensity of the significant noise impact. However, although such measures and changes would reduce the impact, the No Automated Steel Parking Structure Alternative may result in temporary noise and vibration impacts to sensitive uses during construction above the relevant thresholds, and therefore, the No Automated Steel Parking Structure Alternative's construction noise and vibration impacts during construction would be significant and unavoidable, consistent with the conclusion for the Modified Project. Specific economic, legal, social, technological, or other considerations, including considerations identified in Section XIV of the Findings (Statement of Overriding Considerations), make infeasible additional Mitigation Measures or project alternatives identified in the Final Supplemental EIR.

5. Rationale for Finding

As discussed above, the Certified EIR determined the resulting noise levels from construction of the CRA Approved Project would exceed thresholds of significance for construction noise. Similar to the CRA Approved Project, construction activities for the

Modified Project and No Automated Steel Parking Structure Alternative could impact nearby sensitive receptors as construction noise could exceed existing ambient exterior noise levels by more than 10 dBA for more than one day and more than 5 dBA for more than 10 days in a three month period. Implementation of the mitigation measures would reduce the noise levels associated with construction of the Modified Project and No Automated Steel Parking Structure Alternative to the maximum extent that is technically feasible. The Modified Project and No Automated Steel Parking Structure Alternative would incorporate Mitigation Measures MM F-1.1, MM F-1.2, MM F-1.6, and Certified EIR Mitigation Measure MM F-1.1 through Certified EIR Mitigation Measure MM F-1.5, which would reduce construction noise to the maximum extent feasible. The Modified Project's and No Automated Steel Parking Structure Alternative's additional construction activities would also incorporate Mitigation Measure MM F-1.3, which requires the Modified Project's additional construction activities to utilize on-site electrical sources or solar generators in lieu of diesel or gasoline generators where feasible. Despite implementation of the Regulatory Compliance Measures and Mitigation Measures, which would reduce construction noise to the maximum extent feasible, temporary construction-related noise impacts from the Modified Project and the No Automated Steel Parking Structure Alternative would be considered significant and unavoidable after mitigation, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to construction noise. However, as compared to the Modified Project, the No Automated Steel Parking Structure Alternative would slightly reduce the intensity of the significant noise impact.

Regarding vibration, the Certified EIR concluded that the CRA Approved Project's impact to groundborne vibration would be significant and unavoidable on a temporary basis during construction. For the Modified Project's and the No Automated Steel Parking Structure Alternative's additional construction, construction-related groundborne vibration would not expose persons to or generate excessive groundborne vibration at the nearest sensitive receptors, and impacts would be less than significant and would not substantially increase the CRA Approved Project's impacts related to construction groundborne vibration. However, because the changes involved in the Modified Project and the No Automated Steel Parking Structure Alternative would not reduce or avoid the previously identified significant impact associated with the CRA Approved Project's construction activities, groundborne vibration impacts would remain significant and unavoidable (but temporary) as concluded in the Certified EIR for the CRA Approved Project. Despite implementation of the Regulatory Compliance Measures and Mitigation Measures, which would reduce construction vibration to the maximum extent feasible, temporary construction-related vibration impacts from the Modified Project and the No Automated Steel Parking Structure Alternative would be considered significant and unavoidable after mitigation, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project and the No Automated Steel Parking Structure Alternative

would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to construction noise.

6. Reference

For a complete discussion of Noise /Vibration (Construction) see Sections IV.F Noise and VI. Alternatives to the Modified Project of the Draft Supplemental EIR and Section II Additions and Corrections to the Draft Supplemental EIR of the Final Supplemental EIR.

B. Land Use

1. Description

The Certified EIR concluded that with implementation of construction-related mitigation measures prescribed in Sections IV.B Air Quality, IV.F Noise, and IV.K.1 Traffic/Transportation in the Certified EIR for the CRA Approved Project, construction related land use impacts would generally be reduced to acceptable levels. The Certified EIR determined implementation of recommended mitigation measures pertaining to air quality, traffic, and noise would further reduce construction impacts upon adjacent land uses. The Certified EIR concluded less than significant land use impacts would occur during construction of the CRA Approved Project associated with construction-related air quality impacts and construction-related traffic impacts after mitigation. Nevertheless, the Certified EIR determined, with implementation of mitigation measures, significant and unavoidable land use impacts would occur during construction of the CRA Approved Project associated with construction-related noise impacts.

Construction of the Modified Project could cause temporary and intermittent impacts to adjacent land uses due to temporary increases in air emissions (including fugitive dust), noise, and traffic congestion. These potential effects and recommended Mitigation Measures are discussed in detail in Sections IV.B, Air Quality; IV.F, Noise; and IV.K Traffic/Transportation, of the Draft Supplemental EIR.

Regarding construction related-traffic, the Certified EIR stated traffic impacts during construction would be less than significant with implementation of mitigation measures. Construction-related traffic impacts associated with the Modified Project's and the No Automated Steel Parking Structure Alternative's additional construction activities would be less than significant, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. The construction-related traffic impacts associated with the Modified Project's and the No Automated Steel Parking Structure Alternative's additional construction activities would be within the scope of impacts for the CRA Approved Project and would not substantially increase the CRA Approved Project's impacts related to construction traffic. Therefore, consistent with the CRA Approved Project, less than significant land use impacts would occur during construction of the Modified Project or the No Automated Steel Parking Structure Alternative associated with construction-related traffic impacts.

Regarding construction related air quality, the construction-related air quality impacts from the Modified Project's and the No Automated Steel Parking Structure Alternative's additional construction activities would be considered less than significant, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. Accordingly, the air quality impacts resulting from construction emissions associated with the Modified Project and the No Automated Steel Parking Structure Alternative would be less than significant and within the scope of impacts analyzed for the CRA Approved Project. As compared to the CRA Approved Project, the proposed Modified Project and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to construction-related air quality impacts.

Regarding construction related noise, temporary construction-related noise impacts from the Modified Project and the No Automated Steel Parking Structure Alternative would be considered significant and unavoidable after mitigation, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. However, as compared to the Modified Project, the No Automated Steel Parking Structure Alternative would slightly reduce the intensity of the significant noise impact. The Modified Project's and the No Automated Steel Parking Structure Alternative's additional construction activities would not overlap with the construction activities analyzed for the CRA Approved Project in the Certified EIR in a manner that would increase construction noise on a given day. For the Modified Project's and the No Automated Steel Parking Structure Alternative's additional construction activities the construction noise levels associated with the additional construction would be within the CRA Approved Project's construction noise levels and, therefore, would not substantially increase the CRA Approved Project's construction noise levels. Thus, based on the temporary nature and relatively short duration of the construction work involved, it is anticipated that the noise impacts as a result of the additional construction would not substantially increase the noise impacts from construction of the CRA Approved Project. As a result, the Modified Project's and the No Automated Steel Parking Structure Alternative's construction-related noise impact, while significant and unavoidable, would be within the scope of impacts for the CRA Approved Project and would not substantially increase the CRA Approved Project's impacts related to construction noise. Therefore, consistent with the CRA Approved Project, with implementation of mitigation measures, significant and unavoidable land use impacts would occur during construction of the Modified Project and the No Automated Steel Parking Structure Alternative associated with construction-related noise impacts.

2. Project Design Features

No Project Design Features are proposed for Land Use Planning (Construction).

3. Mitigation Measures

See Certified EIR Mitigation Measure IV.B-1, MM F-1.1, MM F-1.2, MM F-1.3, MM F-1.4, MM F-1.5, MM F-1.6, Certified EIR Mitigation Measure MM F-1.1, Certified EIR Mitigation Measure MM F-1.2, Certified EIR Mitigation Measure MM F-1.3, Certified EIR

Mitigation Measure MM F-1.4, Certified EIR Mitigation Measure MM F-1.5, Certified EIR Mitigation Measure MM IV.K.1-2, and Certified EIR Mitigation Measure MM IV.K.2-1.

4. Finding

Mitigation measures have been incorporated into the Modified Project which substantially lessen the potentially significant impacts related to land use construction noise and vibration impacts, as identified in the Supplemental EIR. In addition, changes or alterations have been required in, or incorporated into, the Modified Project which avoid or substantially lessen the significant environmental effect of the Modified Project upon construction noise and vibration including the adoption of the No Automated Steel Parking Structure Alternative in lieu of the Modified Project which would slightly reduce the intensity of the significant noise impact. However, although such measures and changes would reduce the impact, the No Automated Steel Parking Structure Alternative may result in temporary noise and vibration impacts to sensitive uses during construction above the relevant thresholds, and therefore, the No Automated Steel Parking Structure Alternative's construction land use impacts related to noise and vibration would be significant and unavoidable, consistent with the conclusion for the Modified Project.. Specific economic, legal, social, technological, or other considerations, including considerations identified in Section XIV of the Findings (Statement of Overriding Considerations), make infeasible additional Mitigation Measures or project alternatives identified in the Final Supplemental EIR.

5. Rationale for Finding

As discussed above, land use impacts associated with the additional construction of the Modified Project and the No Automated Steel Parking Structure Alternative would be less than significant related to construction-related air quality and temporary construction traffic impacts, which is consistent with the CRA Approved Project. Additionally, consistent with the CRA Approved Project, even following the implementation of mitigation measures, significant and unavoidable land use impacts would occur during construction of the Modified Project and the No Automated Steel Parking Structure Alternative associated with construction-related noise impacts. As compared to the Modified Project, the No Automated Steel Parking Structure Alternative would slightly reduce the intensity of the construction-related noise impacts. Construction of the Modified Project and the No Automated Steel Parking Structure Alternative would not substantially increase land use impacts identified in the Certified EIR for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to temporary disruption of adjacent land uses with increased air quality, noise impacts and temporary construction traffic impacts during construction.

6. Reference

For a complete discussion of Land Use Planning (Construction) see Sections IV.H Land Use Planning and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

XI. Alternatives to the Project

As a Draft Supplemental EIR to a previously Certified EIR, the Draft Supplemental EIR's alternative analysis provided an overview of the project background, the original project objectives, the revised project objectives and design features of the Modified Project, and a summary of the prior alternatives that were analyzed in the Certified EIR. In addition, based on changed circumstances that have occurred since the Certified EIR was certified, the No Project Alternative was updated for the Modified Project to reflect the fact that the project site has changed since the Certified EIR was certified and now contains a vacant 22-story, approximately 250-foot high mixed-use building of approximately 319,562 square feet of floor area, and a closed approximately 18,962 square-foot public park. In addition, in order to provide additional information for decisionmakers, the Draft Supplemental EIR analysis also evaluated a No Automated Steel Parking Structure Alternative. Under this alternative, parking spaces would be provided within the three levels of subterranean parking and three levels of above-grade parking that are currently developed on the project site and no additional construction would be required to provide parking. The alternatives evaluated in the Certified EIR and Draft Supplemental EIR are summarized below.

A. Summary of Findings

Following the assessment of the alternatives, it is recommended that the No Automated Steel Parking Structure Alternative be adopted in lieu of the Modified Project. As described below, the No Automated Steel Parking Structure Alternative would remove the automated steel parking structure and require the adoption of a parking ordinance. The No Automated Steel Parking Structure Alternative would not impede the attainment of any of the Modified Project objectives and would slightly reduce the intensity of the significant noise impact, however impacts associated with construction noise and vibration would remain significant and unavoidable. Further, based upon the following analysis, the City finds, pursuant to CEQA Guidelines Section 15096(g)(2), that no feasible alternative or mitigation measure within its powers will substantially lessen any significant effect of the No Automated Steel Parking Structure Alternative project, reduce the significant, unavoidable impacts of the No Automated Steel Parking Structure Alternative project to a level that is less than significant, or avoid any significant impact that the No Automated Steel Parking Structure Alternative project will have on the environment

B. Project Objectives

An important consideration in the analysis of alternatives is the degree to which such alternatives would achieve the objectives of the proposed project.

As described in the Certified EIR and restated in the Draft Supplemental EIR, the primary goal of the CRA Approved Project was to fill the demand for high-rise residential

living and provide neighborhood-serving retail uses in the Hollywood area of the City of Los Angeles. Specific objectives of the CRA Approved Project included:

- To contribute to the revitalization of the Hollywood Redevelopment Project area by providing an example of "smart growth" infill development consisting of mixed-use retail, office, and residential development which is consistent with the surrounding architectural elements of Sunset Boulevard corridor;

- To retain and incorporate the architectural character of the Sunset Boulevard street frontage by retaining and incorporating various structural and architectural features of the existing restaurant building that currently occupies the project site;

- To provide on-site parking in a manner that accommodates the project occupant's needs [without] providing more parking than needed in an effort to promote the use of regional transportation modes given the close proximity of two MTA Metro Red Line Stations (Hollywood & Vine and Hollywood & Western) and multiple bus lines consistent with the Land Use Transportation Policy of the Circulation Element of the General Plan;

- To provide opportunities for viable retail and creative office space in a manner that is complimentary to the existing character of the adjoining residential neighborhood;

- To promote a safe pedestrian-oriented environment by providing extensive streetscape amenities and active retail storefronts along Sunset Boulevard;

- To provide a park in a manner that will provide a safe, attractive and well maintained open space environment;

- To provide a viable project that promotes the City's economic well-being by significantly increasing property and sales tax revenues;

- To accommodate a portion of the City's workforce housing demands in a manner that contributes to a safe, and livable neighborhood;

- To enhance the visual appearance and appeal of the neighborhood by providing perimeter and interior landscaping;

- To eliminate and prevent the spread of blight and deterioration by providing housing ownership opportunities, retail and restaurant uses, and open space within a City-designated Redevelopment Area;

- To orient housing and retail toward the street to make for a safer neighborhood ("eyes on the street");

- To support traffic reduction transportation policies by providing high-density multi-family housing and jobs in proximity to mass transit;
- To encourage the use of alternative modes of transit including bus, subway, walking, and bicycles by enhancing pedestrian connections, limiting large scale automobile access, and providing flex car opportunities and bicycle storage facilities on site;
- To create an environmentally responsible building that will act as a model for energy efficient building in Los Angeles; and
- To provide a high-performance and environmentally efficient mixed-use project with the intent to achieve a Gold rating through the Leadership in Energy and Environmental Design (LEED)® certification process.

As stated in Section II, Project Description of the Draft Supplemental EIR, similar to the CRA Approved Project's primary goal, the underlying purpose of the proposed Modified Project is to meet the demand for mid- to high-rise residential living and provide neighborhood-serving retail uses and additional office space in the Hollywood area of the City of Los Angeles. To further this underlying purpose the following basic project objectives of the Modified Project are:

1. To contribute to the revitalization of the Hollywood Community Plan area by providing an example of "smart-growth" infill development consisting of a mixed-use residential building with office and neighborhood serving retail land uses which is consistent with the surrounding Sunset Boulevard corridor;
2. To provide housing in order to contribute to housing needs based on the current and projected housing demand in the City of Los Angeles;
3. To promote affordable housing by including 5 percent affordable housing units at the "Very Low" income level;
4. To provide a publicly accessible park in a manner that will provide a safe, attractive and well maintained open space environment; and
5. To provide a viable project that promotes the City's economic well-being by significantly increasing property and sales tax revenues.

The following Modified Project additional objectives have also been identified.

1. To provide on-site parking in a manner that is consistent with City requirements;
2. To provide opportunities for retail and office space in a manner that is complimentary to the existing character of the adjoining residential neighborhood;

3. To promote a safe pedestrian-oriented environment by providing extensive streetscape amenities and active retail storefronts along Sunset Boulevard;

4. To create a development with a high-quality urban design;

5. To enhance the visual appearance and appeal of the neighborhood by providing perimeter and interior landscaping;

6. To eliminate and prevent the spread of blight and deterioration by providing housing, retail and restaurant uses, and open space within a City-designated Redevelopment Area;

7. To orient housing and retail toward the street to make for a safer neighborhood ("eyes on the street");

8. To support traffic reduction transportation policies by providing high-density multi-family housing and jobs in a designated Transit Priority Area in close proximity to mass transit;

9. To promote a balanced community by providing a mix of land uses including commercial, residential, office and public open space; and

10. To encourage the use of alternative modes of transit including bus, subway, walking, and bicycles by enhancing pedestrian connections and providing bicycle storage facilities on site.

C. CRA Approved Project Alternatives Analysis

1. Alternative 1: No Project Alternative

a. Description of the Alternative

Under the No Project Alternative in the Certified EIR, it was assumed that the restaurant at 5939 Sunset Boulevard and associated surface parking areas in operation at the time of the Certified EIR would remain in operation for the foreseeable future. The three residential properties at 1538-1540 Gordon Street were partially vacant and, due to the condition of the buildings, were proposed to be demolished by the CRA Approved Project's applicant. Due to the relatively high costs associated with renovating and re-occupying the existing structures, the Certified EIR determined it was reasonable to assume that under the No Project Alternative the residential properties would be demolished and rebuilt as multi-family housing with three seven-unit, 3-story (45-foot high) multi-family condominium buildings for a total of 21 units, consistent with the zoning and land use regulations. The Certified EIR stated each condominium building would include a below grade parking level with 17 parking spaces.

b. Impact Summary of Alternative

The Certified EIR determined the No Project Alternative would create several reduced environmental impacts as compared to the CRA Approved Project. The CRA Approved Project was anticipated to result in significant unavoidable impacts in the following issue areas: Aesthetics (shade/shadow), Noise and Vibration (Construction), Cumulative Operational Roadway Noise, and Land Use/Noise (Operational Land Use Compatibility Standards). The Certified EIR found the No Project Alternative would reduce the CRA Approved Project's significant unavoidable impacts for Aesthetics (shade/shadow). Impacts associated with construction noise and vibration and operational land use compatibility standards would remain significant and unavoidable under this alternative.

c. Finding

While the No Project Alternative would reduce the CRA Approved Project's significant unavoidable impacts for Aesthetics (shade/shadow). Impacts associated with construction noise and vibration and operational land use compatibility standards would remain significant and unavoidable under this alternative. In addition, the No Project Alternative failed to meet most of the CRA Project Objectives. For instance, the No Project Alternative would not contribute to the revitalization of the Hollywood Redevelopment Project area because it would not allow a mixed-use infill development on the site. The No Project Alternative would also fail to accomplish several important CRA Approved Project objectives, including: to provide a park that would serve the public; to promote a mixed-use project compatible with the General Plan, Hollywood Community Plan, and Hollywood Redevelopment Plan; to increase property tax and sales tax revenues for the City; and to provide high-density housing in close proximity to mass transit. In addition, the No Project Alternative would also fail to meet the primary goal of the CRA Approved Project, which is to meet the demand for mid- to high-rise residential living in the Hollywood area of the City of Los Angeles.

Therefore, pursuant to CEQA Section 21081(a)(3), specific economic, legal, social, technological, or other considerations, including considerations identified in Section XIV of these Findings (Statement of Overriding Considerations), make infeasible the No Project Alternative described in the Certified EIR and the Draft Supplemental EIR.

d. Rationale for Finding

The No Project Alternative would reduce the CRA Approved Project's significant unavoidable impacts for Aesthetics (shade/shadow). Impacts associated with construction noise and vibration and operational land use compatibility standards would remain significant and unavoidable under this alternative. However, the No Project Alternative would fail to meet most of the CRA Project Objectives. The No Project Alternative would not contribute to the revitalization of the Hollywood Redevelopment Project area because it would not allow a mixed-use infill development on the site. The No Project Alternative would also fail to accomplish several important CRA Approved Project objectives, including: to provide a park that would serve the public; to promote a mixed-use project compatible with the General Plan, Hollywood Community Plan, and Hollywood Redevelopment Plan; to increase property tax and sales tax revenues for the City; and to provide high-density housing in close proximity to mass transit. In addition,

the No Project Alternative would also fail to meet the primary goal of the CRA Approved Project, which is to meet the demand for mid- to high-rise residential living in the Hollywood area of the City of Los Angeles.

Accordingly, the No Project Alternative fails to meet the CRA Approved Project objectives. Therefore, the No Project Alternative is infeasible and less desirable than the CRA Approved Project and is rejected for the reasons stated above.

e. Reference

For a complete discussion of impacts associated with the No Project Alternative, please see Section VI, Alternatives to the Proposed Project, of the Certified EIR and Section VI, Alternatives to the Modified Project, of the Draft Supplemental EIR.

2. Alternative 2: By-Right Development Under The Current General Plan And Zoning Designations

a. Description of the Alternative

This alternative was selected as a possible scenario for future development of the project site to be consistent with the applicable General Plan land use and zoning designations at the time of the Certified EIR. The objective of this alternative was to define a reduced density project that was as close as possible to a "By-Right Development" that could be developed without any specific variances, deviations or special discretionary approvals from the CRA or Planning. The Certified EIR noted that this alternative presented a theoretical development scenario from a planning and land use perspective with the primary goal of reducing or eliminating the CRA Approved Project's significant and unavoidable impacts. This alternative, did not take into consideration the financial feasibility of construction and development.

The By-Right Development Alternative would include a 166,929 square-foot mixed-use development with 148 dwelling units, 13,500 square feet of commercial retail space (including 5,000 square feet of retail space and 8,500 square feet of restaurant uses). Similar to the CRA Approved Project, the Certified EIR assumed that parking would be provided in three subterranean parking levels beneath the entire project site. A total of 397 parking spaces would be required. This alternative would not provide a park for public use or any office space, which was requested by the CRA in order to retain some of the declining office space inventory in the area.

With respect to scale and massing of the proposed alternative development, the project site would be developed with a three-story (45-foot high) condominium complex fronting Gordon Street and an approximate seven-story building with a six-story residential tower on top of ground floor retail and restaurant uses fronting on Sunset Boulevard. Overall, in comparison to the CRA Approved Project, the By-Right Development Alterative would be a smaller structure

b. Impact Summary of Alternative

The Certified EIR concluded the By-Right Development Alternative would reduce the severity of some of the CRA Approved Project's environmental impacts. The CRA Approved Project was anticipated to result in significant unavoidable impacts in the following issue areas: Aesthetics (Shade/Shadow), Noise and Vibration (Construction), Cumulative Operational Roadway Noise, and Land Use/Noise (Operational Land Use Compatibility Standards). The By-Right Development Alternative would reduce the CRA Approved Project's significant unavoidable impacts for Aesthetics (Shade/Shadow). Impacts associated with construction noise and vibration and operational land use compatibility standards would remain significant and unavoidable under this alternative.

c. Finding

While the By-Right Development Alternative would reduce the CRA Approved Project's significant unavoidable impacts for Aesthetics (Shade/Shadow). Impacts associated with construction noise and vibration and operational land use compatibility standards would remain significant and unavoidable under this alternative. In addition, the By-Right Development Alternative would fail to meet several of the CRA Approved Project's objectives. For instance, the office space component of the CRA Approved Project would be eliminated in the By-Right Development Alternative, which doesn't fulfill the objective of the CRA Approved Project to provide opportunities for viable creative office space in the Hollywood area. In addition, while this alternative would provide high-density multi-family housing in close proximity to mass transit, it would not provide as much density as the CRA Approved Project and would thus fall short of the project site's potential to maximize traffic reduction transportation policies.

Therefore, pursuant to CEQA Section 21081(a)(3), specific economic, legal, social, technological, or other considerations, including considerations identified in Section XIV of these Findings (Statement of Overriding Considerations), make infeasible the By-Right Development Alternative described in the Certified EIR and the Draft Supplemental EIR.

d. Rationale for Finding

The By-Right Development Alternative would reduce the CRA Approved Project's significant unavoidable impacts for Aesthetics (Shade/Shadow). Impacts associated with construction noise and vibration and operational land use compatibility standards would remain significant and unavoidable under this alternative. However, the No Project Alternative would fail to meet most of the CRA Project Objectives.

For instance, the office space component of the CRA Approved Project would be eliminated in the By-Right Development Alternative, which doesn't fulfill the objective of the CRA Approved Project to provide opportunities for viable creative office space in the Hollywood area. In addition, while this alternative would provide high-density, multi-family housing in close proximity to mass transit, it would not provide as much density as the CRA Approved Project and would thus fall short of the project site's potential to maximize traffic reduction transportation policies.

Accordingly, the By-Right Development Alternative fails to meet the CRA Approved Project objectives. Therefore, the By-Right Development Alternative is infeasible and less desirable than the CRA Approved Project and is rejected for the reasons stated above.

e. Reference

For a complete discussion of impacts associated with the No Project Alternative, please see Section VI, Alternatives to the Proposed Project, of the Certified EIR and Section VI, Alternatives to the Modified Project, of the Draft Supplemental EIR.

3. Alternative 3: Anticipated Development Under The Proposed Hollywood Community Plan Amendment ("General Plan Amendment Alternative")

a. Description of the Alternative

At the time of the Certified EIR, the Planning Department was in the process of updating the Hollywood Community Plan. This alternative built upon the land use and zoning designations identified for the project site as shown in the Draft Hollywood CPU Appendix to Matrix, dated February 16, 2006. The Certified EIR noted, that these land use and zoning designations were not final but were presented as a theoretical project alternative for informational purposes only.

Based on the Draft Hollywood CPU Appendix to Matrix, the General Plan designation applicable to the project site would be amended to allow for a development of 216,288 square feet of developed floor area with up to 180 dwelling units, 13,500 square feet of retail and restaurant area, and 45,354 square feet of commercial office. Similar to the CRA Approved Project, parking for this alternative would be provided in three subterranean parking levels beneath the entire project site. A total of 549 parking spaces would be needed to meet all of the parking requirements for the project site. The Proposed General Plan Amendment Alternative would not require any financial subsidies or assistance from the CRA and would not involve any specific zoning variances or adjustments. However, this alternative would not provide any of the public benefits of the CRA Approved Project. For instance, this alternative would not provide the park for public use.

With respect to scale and massing of the proposed alternative, the project site would be developed with a three-story (45-foot high) condominium complex fronting Gordon Street and an approximate 12-story building with a seven-story residential tower on top of a five-level podium structure with ground floor retail and restaurant uses fronting Sunset Boulevard. As the Proposed General Plan Amendment Alternative would be consistent with the underling zoning regulations were the land use and zoning designations to be updated consistent with the Draft Hollywood CPU Appendix to Matrix, it would be compatible with the existing mid-rise residential buildings along Gordon Street. However, the buffer and open space areas created by the proposed public park feature created under the CRA Approved Project would not be provided.

b. Impact Summary of Alternative

The Certified EIR determined the Proposed General Plan Amendment Alternative would reduce the severity of some of the CRA Approved Project's environmental impacts. The CRA Approved Project was anticipated to result in significant unavoidable impacts in the following issue areas: Aesthetics (Shade/Shadow), Noise and Vibration (Construction), Cumulative Operational Roadway Noise, and Land Use/Noise (Operational Land Use Compatibility Standards). Impacts associated with the General Plan Amendment Alternative would be reduced for Aesthetics (Shade/Shadow) but not to the extent that it would avoid a significant unavoidable impact on adjacent land uses. Impacts associated with construction noise and vibration and operational land use compatibility standards would remain significant and unavoidable under this alternative.

c. Finding

While the Proposed General Plan Amendment Alternative would reduce the Aesthetics (Shade/Shadow) impact it would not be reduced to the extent that it would avoid a significant unavoidable impact on adjacent land uses. Impacts associated with construction noise and vibration and operational land use compatibility standards would remain significant and unavoidable under this alternative. In addition, the Proposed General Plan Amendment Alternative would fail to meet several of the CRA Approved Project's objectives. Because the General Plan Amendment Alternative would not seek any development assistance or incentives from the CRA, the property would be developed in strict conformance with the General Plan and Zoning regulations. Although the Proposed General Plan Amendment Alternative would meet the objective of creating a mixed-use retail/residential development, it would not provide the public park. While this alternative would provide high-density multi-family housing in close proximity to mass transit, it would not provide as much density as the CRA Approved Project and would thus fall short of the project site's potential to maximize traffic reduction transportation policies.

Therefore, pursuant to CEQA Section 21081(a)(3), specific economic, legal, social, technological, or other considerations, including considerations identified in Section XIV of these Findings (Statement of Overriding Considerations), make infeasible the Proposed General Plan Amendment Alternative described in the Certified EIR and Draft Supplemental EIR.

d. Rationale for Finding

The Proposed General Plan Amendment Alternative would reduce the Aesthetics (Shade/Shadow) impact, however it would not be reduced to the extent that it would avoid a significant unavoidable impact on adjacent land uses. Impacts associated with construction noise and vibration and operational land use compatibility standards would remain significant and unavoidable under this alternative. However, the Proposed General Plan Amendment Alternative would fail to meet several of the CRA Project Objectives. Because the General Plan Amendment Alternative would not seek any development assistance or incentives from the CRA, the property would be developed

in strict conformance with the General Plan and Zoning regulations. Although the Proposed General Plan Amendment Alternative would meet the objective of creating a mixed-use retail/residential development, it would not provide the public park. While this alternative would provide high-density multi-family housing in close proximity to mass transit, it would not provide as much density as the CRA Approved Project and would thus fall short of the project site's potential to maximize traffic reduction transportation policies

Accordingly, the Proposed General Plan Amendment Alternative fails to meet the CRA Approved Project objectives. Therefore, the Proposed General Plan Amendment Alternative is infeasible and less desirable than the CRA Approved Project and is rejected for the reasons stated above.

e. Reference

For a complete discussion of impacts associated with the Proposed General Plan Amendment Alternative, please see Section VI, Alternatives to the Proposed Project, of the Certified EIR and Section VI, Alternatives to the Modified Project, of the Draft Supplemental EIR.

4. Alternative 4: North/South Tower Alignment Alternative

a. Description of the Alternative

During the planning and design process for the CRA Approved Project, several architectural and site plan configurations were considered in an effort to maximize the energy efficiency of the CRA Approved Project. One of the alternative designs considered but rejected was developing the podium and residential tower along a north-south axis instead of the east-west alignment that was proposed as part of the CRA Approved Project. The north-south tower alignment was considered for its ability to potentially reduce the scale and massing of the structure along the Sunset Boulevard frontage, to reduce the CRA Approved Project's shadow impacts on neighboring properties, and to open up the view corridor to and from the Hollywood Hills. After running preliminary calculations on this model, it was found that the north-south alignment would result in a less energy efficient building and would increase the future operating costs of the building. Nevertheless, this configuration remains a feasible project alternative to evaluate. In addition, this alternative analyzed the CRA Approved Project assuming the OSF Building façade would be completely demolished. Under this scenario, the architectural façade of the proposed structure would reflect a modern architectural design.

b. Impact Summary of Alternative

The Certified EIR concluded the North-South Alignment Alternative would generally result in the same environmental impacts as the CRA Approved Project for all environmental issue areas except for shade and shadow. The CRA Approved Project was anticipated to result in significant unavoidable impacts in the following issue areas:

Aesthetics (shade/shadow), Noise and Vibration (Construction), Cumulative Operational Roadway Noise, and Land Use/Noise (Operational Land Use Compatibility Standards). The North-South Alignment Alternative would not reduce the CRA Approved Project's significant unavoidable impacts for any of these issues. Impacts associated with Aesthetics (shade/shadow) would be reduced but not to the extent that it would avoid a significant unavoidable impact on adjacent land uses. Impacts associated with construction noise and vibration and operational land use compatibility standards would remain under this alternative. In addition, impacts to energy efficiency and electricity and natural gas demands were anticipated to increase under this alternative; however, not to the extent that any new significant unavoidable impacts would occur.

c. Finding

The North-South Alignment Alternative would reduce the Aesthetics (shade/shadow) impact, however it would not be reduced to the extent that it would avoid a significant unavoidable impact on adjacent land uses. Impacts associated with construction noise and vibration and operational land use compatibility standards would remain significant and unavoidable under this alternative. The North-South Alignment Alternative would meet many of the CRA Approved Project objectives, however it would fail to provide a high-performance and energy-efficient building.

Therefore, pursuant to CEQA Section 21081(a)(3), specific economic, legal, social, technological, or other considerations, including considerations identified in Section XIV of these Findings (Statement of Overriding Considerations), make infeasible the North-South Alignment Alternative described in the Certified EIR and the Draft Supplemental EIR.

d. Rationale for Finding

The North-South Alignment Alternative would reduce the Aesthetics (Shade/Shadow) impact, however it would not be reduced to the extent that it would avoid a significant unavoidable impact on adjacent land uses. Impacts associated with construction noise and vibration and operational land use compatibility standards would remain significant and unavoidable under this alternative. However, while the North-South Alignment Alternative would meet many of the CRA Approved Project objectives it would fail to provide a high-performance and energy-efficient building.

Accordingly, the North-South Alignment Alternative fails to meet the CRA Approved Project objectives. Therefore, the No Project Alternative is infeasible and less desirable than the CRA Approved Project and is rejected for the reasons stated above.

e. Reference

For a complete discussion of impacts associated with the North-South Alignment Alternative, please see Section VI, Alternatives to the Proposed Project, of the Certified EIR and Section VI, Alternatives to the Modified Project, of the Draft Supplemental EIR.

5. CRA Approved Project Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. In addition, Section 15126.6 of the CEQA Guidelines states that: "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives."

In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. The Certified EIR determined the Environmentally Superior Alternative would be the No Project Alterative. The No Project Alternative would eliminate nearly all of the CRA Approved Project's potentially adverse effects upon the environment as it would maintain the status-quo.

In accordance with the CEQA Guidelines requirement to identify an environmentally superior Alternative other than the No Project Alternative, the By-Right Development Alternative was selected as the Environmentally Superior Alternative in the Certified EIR. Specifically, the By-Right Development Alternative was selected as the environmentally superior alternative because of its ability to avoid the CRA Approved Project's significant and unavoidable shade and shadow impacts upon neighboring properties. In addition, this alternative would result in a less intensive development and would consume less energy and water resources and would generate less wastewater and fewer demands for public utilities and services. However, the Certified EIR determined that the CRA Approved Project is preferable to the By-Right Development Alternative because the By-Right Development Alternative would fail to provide high density housing in proximity to mass transit opportunities in an area with a high level of employment opportunities. While on a project-by-project basis, the environmental impacts under this alternative appear beneficial from a regional perspective, this alternative would result in the displacement of the CRA Approved Project's proposed housing density to other areas within the City and would not entirely eliminate such impacts.

Accordingly, in adopting the statement of overriding considerations for the CRA Approved Project the CRA found that there are no feasible alternatives or feasible mitigation measures that would substantially lessen or avoid any significant environmental effect of the CRA Approved Project. (See CEQA Guidelines Section 15096(g)(2).) The City of Los Angeles made the same finding following its consideration of the CRA Approved Project.

D. Modified Project Alternatives Analysis

The Certified EIR determined the CRA Approved Project would result in significant unavoidable impacts in the following issue areas: Aesthetics (Shade/Shadow), Noise and Vibration (Construction), Cumulative Operational Roadway Noise, and Land Use/Noise (Operational Land Use Compatibility Standards). In adopting the statement of overriding considerations, the CRA found that there are no feasible alternatives or feasible mitigation measures that would substantially lessen or avoid any significant

environmental effect of the CRA Approved Project. (See CEQA Guidelines Section 15096(g)(2).) The City of Los Angeles made the same finding following its consideration of the CRA Approved Project.

As discussed in Section I, Introduction/Executive Summary, of the Draft Supplemental EIR, the purpose of the Supplemental EIR is to inform decision-makers and the general public of the potential environmental impacts resulting from the proposed development of the Modified Project and to determine whether implementation of the Modified Project would result in any new significant environmental impacts that were not identified in the Certified EIR for the CRA Approved Project, or whether the previously identified significant impacts would be substantially more severe under the Modified Project.

As analyzed in the Supplemental EIR, the Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects of the CRA Approved Project. In addition, some of the significant impacts that were previously identified in the Certified EIR for the CRA Approved Project are no longer considered significant impacts of the Modified Project. Specifically, for the Aesthetics (Shade/Shadow) significant impact, the Certified EIR concluded the CRA Approved Project would result in significant and unavoidable shade and shadow impacts upon nearby residential properties during the winter months. However, because the Modified Project is a mixed-use residential project located on an infill site within a Transit Priority Area as defined by CEQA, the Modified Project's aesthetic impacts are not considered significant impacts on the environment pursuant to SB 743. Therefore, the Modified Project would result in less-than-significant shade and shadow impacts upon nearby residential properties during the winter months. With regard to Land Use/Noise (Operational Land Use Compatibility Standards), the Certified EIR concluded the CRA Approved Project's operational noise impacts would be significant and unavoidable, as the CRA Approved Project would expose future residents of the project to exterior ambient noise levels that are in the "normally unacceptable" and "clearly unacceptable" CNEL exposure range. Consistent with recent CEQA case law, impacts arising from exposure of future occupants of a project to existing environmental conditions is not a significant impact upon the environment. Instead, impacts arising from exposure of future residents to existing environmental conditions should be evaluated in the context of whether the project would exacerbate existing environmental conditions that, in turn, would result in a significant impact upon the environment. The Modified Project would not exacerbate existing environmental conditions because future roadway noise levels with the Modified Project would not exceed the significance threshold and the Noise/Land Use compatibility classifications would remain the same with or without the development of the Modified Project. As such, the Modified Project's operational noise impacts associated with exposure of future residents to ambient noise levels that are in the "normally unacceptable" CNEL exposure range would be less than significant. Additionally, the Modified Project's future year with project traffic volumes on local street segments would result in less than significant cumulative operational roadway noise impacts. Thus, the CRA Approved Project's significant and unavoidable cumulative operational roadway noise impact would be reduced to less than significant levels under the Modified Project. While the

Noise and Vibration (Construction) significant impact identified in the Certified EIR would remain for the Modified Project, as discussed in Section IV.F, Noise and IV.H, Land Use and Planning, of the Draft Supplemental EIR, the Modified Project would not involve a substantial increase in the severity of the previously identified significant impacts to noise or vibration during construction.

Pursuant to CEQA Guidelines Section 15126.6, subd. (b) "[b]ecause an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project." Pursuant to CEQA Guidelines Section 15163 the "supplement to the EIR need contain only the information necessary to make the previous EIR adequate for the project as revised." As the Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects of the CRA Approved Project, the alternatives analysis prepared for the CRA Approved Project in the Certified EIR needed only to be updated to contain information necessary to make the previous EIR adequate for the project as revised. For the Modified Project's alternatives analysis, the only new information that affects the conclusions in the alternatives analysis from the Certified EIR is that since certification of the Certified EIR the project site has change and is now developed with a vacant 22-story, approximately 250-foot high mixed use building of approximately 319,562 square feet of floor area, and a closed approximately 18,962 square-foot public park. The building and public park are closed in compliance with an Order to Vacate issued by the Los Angeles Department of Building and Safety on March 19, 2015. Accordingly, the Draft Supplemental EIR updated the No Project Alternative for the Modified Project to account for these changed project site conditions.

In addition, while not required under CEQA because the Modified Project would not result in new significant effects or substantially more severe significant effects, to provide additional information for decisionmakers the analysis also includes a discussion of a No Automated Steel Parking Structure Alternative. Under this alternative, instead of providing parking in the new automated steel parking structure, approval of a City ordinance would be required that would provide for the reduction of clear space at structural elements in the Modified Project's parking structure and to allow up to 66 percent of the parking stalls to be compact parking stalls. Under the No Automated Steel Parking Structure Alternative, approximately 508 parking spaces would be provided within the three levels of subterranean parking and three levels of above-grade parking that are currently developed on the project site and no additional construction would be required to provide parking within the project to meet Code requirements.

1. No Project Alternative

a. Description of the Alternative

The project site has substantially changed since the Certified EIR for the CRA Approved Project. The project site is currently improved with a vacant 22-story, approximately 250-foot high mixed use building of approximately 319,562 square feet of floor area, and a closed approximately 18,962 square-foot public park. The building and public park are closed in compliance with an Order to Vacate issued by the Los Angeles Department of Building and Safety on March 19, 2015. The building is comprised of an 18-floor residential tower above a four-level above-grade podium structure with three levels of subterranean parking and three levels of above-grade parking.

Compared to the Modified Project, the No Project Alternative would ensure the vacant 22-story, approximately 250-foot high mixed use building of approximately 319,562 square feet of floor area, and a closed approximately 18,962 square-foot public park that currently occupies the project site remain vacant and closed until those uses are demolished. While it is somewhat speculative to assume what would occur if no further discretionary action is taken by the lead agency, it is reasonable to assume the vacant development on the project site would ultimately be required by the City to be demolished under the No Project Alternative as a matter of public safety. If the project site were instead to remain vacant it could fall into disrepair and would lead to urban blight.

b. Impact Summary of Alternative

The construction activities associated with the demolition of the vacant development would result in air quality and GHG emissions, would generate new noise and vibration impacts, and would increase haul trucks and construction worker vehicle trips on a short-term and temporary basis. The short-term construction impacts of the No Project Alternative were compared to the short-term construction impacts of the Modified Project's additional construction activities. As discussed in Section VI, Alternatives to the Modified Project in the Draft Supplemental EIR, compared to the impacts associated with the additional construction activities under the proposed Modified Project for localized construction emissions, the No Project Alternative would result in higher peak daily construction emissions for all criteria pollutants. With respect to greenhouse gas emissions, the short-term construction impacts associated with the No Project Alternative would generate additional GHG emissions. As such, the short-term construction impacts associated with the No Project Alternative would not be environmentally superior to the additional construction activities necessary for the Modified Project with respect to construction air quality and GHG emissions

In addition, due to the activities involved with demolition of the existing development, the No Project Alternative would still not avoid the CRA Approved Project and Modified Project's significant unavoidable impacts to noise and vibration during construction because demolition of the existing development would generate noise and vibration impacts on surrounding uses.

The Aesthetics (Shade/Shadow), Land Use/Noise (Operational Land Use Compatibility Standards), and Cumulative Operational Roadway Noise impacts identified in the Certified EIR for the CRA Approved Project are no longer considered significant impacts

for the Modified Project. Therefore, there are no significant impacts in these categories for an alternative to the Modified Project to reduce. While any further development on the project site would be speculative to address, any future development on the project site would likely also have significant unavoidable impacts to noise and vibration during construction due to the proximity of nearby residential land uses. Therefore, the No Project Alternative would not be effective in reducing or avoiding the Modified Project's significant and unavoidable impact to construction related noise and vibration. With respect to operations, impacts associated with the ongoing operation of further development on the project site would be speculative to address. As analyzed in the Draft Supplemental EIR, there are no significant operational impacts associated with the proposed Modified Project.

c. Finding

The No Project Alternative would not be effective in reducing or avoiding the Modified Project's significant and unavoidable impact to construction related noise and vibration. In addition, the No Project Alternative would fail to accomplish all of the Modified Project's objectives. The No Project Alternative would fail to provide a publicly accessible park; would not contribute to the revitalization of the Hollywood Community Plan area; would not include affordable housing; would not generate increased property and sales tax revenues for the City; and would fail to provide high-density multi-family housing and jobs in a designated Transit Priority Area. Similar to the No Project Alternative analysis in the Certified EIR for the CRA Approved Project, the underlying purpose of the Modified Project, which is to meet the demand for mid- to high-rise residential living and provide neighborhood-serving retail uses and additional office space in the Hollywood area of the City of Los Angeles, would not be met under the No Project Alternative.

Therefore, pursuant to CEQA Section 21081(a)(3), specific economic, legal, social, technological, or other considerations, including considerations identified in Section XIV of these Findings (Statement of Overriding Considerations), make infeasible the No Project Alternative described in the Draft Supplemental EIR.

d. Rationale for Finding

The No Project Alternative would not be effective in reducing or avoiding the Modified Project's significant and unavoidable impact to construction related noise and vibration. In addition, the No Project Alternative would fail to accomplish all of the Modified Project's objectives. The No Project Alternative would fail to provide a publicly accessible park; would not contribute to the revitalization of the Hollywood Community Plan area; would not include affordable housing; would not generate increased property and sales tax revenues for the City; and would fail to provide high-density multi-family housing and jobs in a designated Transit Priority Area. Similar to the No Project Alternative analysis in the CRA Approved Project, the underlying purpose of the Modified Project, which is to meet the demand for mid- to high-rise residential living and provide neighborhood-serving retail uses and additional office space in the Hollywood area of the City of Los Angeles, would not be met under the No Project Alternative.

Accordingly, the No Project Alternative fails to meet the Modified Project objectives. Therefore, the No Project Alternative is infeasible and less desirable than the Modified and is rejected for the reasons stated above.

e. Reference

For a complete discussion of impacts associated with the No Project Alternative, please see Section VI, Alternatives to the Modified Project, of the Draft Supplemental EIR.

2. No Automated Steel Parking Structure Alternative

a. Description of the Alternative

The project site is currently improved with a vacant 22-story, approximately 250-foot high mixed use building of approximately 319,562 square feet of floor area, and a closed approximately 18,962 square-foot public park. The building and public park are closed in compliance with an Order to Vacate issued by the Los Angeles Department of Building and Safety on March 19, 2015. The building is comprised of an 18-floor residential tower above a four-level above-grade podium structure with three levels of subterranean parking and three levels of above-grade parking.

Compared to the Modified Project, the No Automated Steel Parking Structure Alternative would not include the automated steel parking structure that is proposed to be constructed above the parking area on Level L3 (within the approximate height of Level L4 of the rest of the podium structure), which would include two floors of automated parking. Instead, under the No Automated Steel Parking Structure Alternative, the City would adopt an ordinance that would provide for the reduction of clear space at structural elements in the parking structure and to allow up to 66 percent of the parking stalls to be compact parking stalls. Under the No Automated Steel Parking Structure Alternative, approximately 508 parking spaces would be provided within the three levels of subterranean parking and three levels of above-grade parking that are currently developed on the project site and no new construction would be required to provide parking that meets or exceeds Code required minimums. As discussed in Section IV.K.1 Traffic/Transportation of the Draft Supplemental EIR, providing 508 parking spaces, which would exceed the Code required minimum of 428 parking spaces, would not encourage additional vehicle trips to the project site.

To allow for the development of the Modified Project additional on-site construction is necessary associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. Additional construction may also be necessary to comply with the building code requirements. Construction of the new automated steel parking structure and interior building renovations would take approximately three to four months. To allow for the development of the No Automated Steel Parking Structure Alternative, additional on-site construction would still be necessary associated with interior building renovations and may also be necessary to comply with the building code requirements, however no additional on-site construction would be necessary for the installation of and retrofitting for the new automated steel

parking structure. Additional construction for the No Automated Steel Parking Structure Alternative would be anticipated to take approximately three to four months consistent with the Modified Project; however, the additional construction is anticipated to be generally limited to interior building locations. While some construction activities may occur on the exterior of the building in connection with interior building renovations, the exterior construction activities would be reduced as no substantial changes to the above-ground parking podium are proposed.

b. Impact Summary of Alternative

As compared to the Modified Project's additional construction activities, the No Automated Steel Parking Structure Alternative's additional construction activities would slightly reduce the intensity of the significant noise impact. Like the Modified Project's additional construction activities, the additional construction for the No Automated Steel Parking Structure Alternative would not have a significant vibration impact. However, as concluded in Section IV.F Noise and Section IV.H, Land Use and Planning, the vibration from the construction of the entirely of the Modified Project would remain significant and unavoidable. There is no change to this conclusion with the No Automated Steel Parking Structure Alternative. However, because the No Automated Steel Parking Structure Alternative would slightly reduce the intensity of the significant noise impact, it is considered environmentally superior to the Modified Project.

As discussed above, the Aesthetics (Shade/Shadow), Land Use/Noise (Operational Land Use Compatibility Standards), and Cumulative Operational Roadway Noise impacts identified in the Certified EIR for the CRA Approved Project are no longer considered significant impacts for the Modified Project. Therefore, there are no significant impacts in these categories for an alternative to the Modified Project to reduce.

c. Finding

While the significant noise and vibration impact would remain under the No Automated Steel Parking Structure Alternative, the alternative would slightly reduce the intensity of the significant noise impact and is therefore considered environmentally superior to the Modified Project. With respect to meeting the Modified Project objectives, the No Automated Steel Parking Structure Alternative would meet all of the Modified Project objectives to the same extent as the Modified Project. The removal of the automated steel parking structure and adoption of a parking ordinance would not impede the attainment of any of the Modified Project objectives

Therefore, the City finds that this alternative is feasible and meets the Modified Project's objectives to the same extent as the Modified Project.

d. Rationale for Finding

The No Automated Steel Parking Structure Alternative would slightly reduce the intensity of the significant noise impact, however impacts associated with construction

noise and vibration would remain significant and unavoidable under this alternative. In addition, the No Automated Steel Parking Structure Alternative would meet all of the Modified Project objectives to the same extent as the Modified Project. The removal of the automated steel parking structure and adoption of a parking ordinance would not impede the attainment of any of the Modified Project objectives.

Therefore, the City finds that this alternative is feasible and meets the Modified Project's objectives to the same extent as the Modified Project.

e. Reference

For a complete discussion of impacts associated with No Automated Steel Parking Structure Alternative, please see Section VI, Alternatives to the Modified Project, of the Draft Supplemental EIR.

3. Modified Project Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. In addition, Section 15126.6 of the CEQA Guidelines states that: "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives."

In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. While the Environmentally Superior Alternative was addressed in the Certified EIR pursuant to Section 15126.6 of the CEQA Guidelines, to provide additional information for decision makers, an Environmentally Superior Alternative was also evaluated for the two specific alternatives to the Modified Project addressed in the Draft Supplemental EIR. The environmentally superior alternative is the No Automated Steel Parking Structure Alternative because the No Automated Steel Parking Structure Alternative would slightly reduce the intensity of the significant and unavoidable noise impact as compared to the Modified Project because the No Automated Steel Parking Structure Alternative would include less exterior construction activities than the Modified Project. Therefore, the No Automated Steel Parking Structure alternative is the Environmentally Superior Alternative.

XII. Findings regarding General Impact Categories

A. Growth-Inducing Impacts

Section 15126.2(d) of the CEQA Guidelines requires a discussion of the ways in which a project could induce growth. This includes ways in which a project will foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Section 15126.2(d) of the CEQA Guidelines states:

> Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly

> or indirectly, in the surrounding environment. Included in this are projects which will remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

The Certified EIR stated the CRA Approved Project was intended to increase housing and employment opportunities in the Hollywood Area and contribute to the revitalization of the area, which would meet the objectives of the Hollywood Redevelopment Area. The Certified EIR determined the demolition of existing uses and development of the CRA Approved Project would require upgrades to the existing infrastructure which could encourage other developments in the area, thereby contributing to growth. The Certified EIR also stated the CRA Approved Project would provide 311 multi-family residences and approximately 722 new residents to the project area, but that the CRA Approved Project was consistent with the projected population and housing forecasts for the Hollywood Community Plan Area and would not exceed the maximum allowable dwelling units permitted within the Redevelopment Plan Area. The Certified EIR concluded the CRA Approved Project may induce substantial growth with respect to infrastructure through immediate and gradual upgrades to community facilities. However, the high-density, transit-oriented growth induced by the CRA Approved Project was determined to be consistent with the objectives of both the Hollywood Community Plan and the Hollywood Redevelopment Project Area.

Consistent with the CRA Approved Project, the Modified Project is intended to increase housing and employment opportunities in the Hollywood area and to contribute to the revitalization of the area through private investment and the development of commercial and residential uses. The Certified EIR stated the CRA Approved Project would be consistent with the population and housing forecasts. As discussed in Section IV.G, Population, Housing and Employment of the Draft Supplemental EIR, the growth associated with the Modified Project is within the planned population, housing, and employment growth forecasts of SCAG's 2016-2040 RTP/SCS. Further, compared to the CRA Approved Project, the Modified Project would involve the development of fewer residential apartment units and would increase the population by fewer new residents (from 311 dwelling units and 722 new residents for the CRA Approved Project to 299 dwelling units and 693 new residents for the Modified Project). Additionally, as compared to the CRA Approved Project some additional short-term employment opportunities would be generated by construction activity resulting from the installation and retrofitting for the new automated steel parking structure and interior building renovations for the Modified Project. The CRA Approved Project was expected to generate up to 200 – 250 daily construction workers, while the Modified Project's

minimal additional construction activities would generate less than 100 additional short-term construction jobs (approximately 83 construction-related jobs). With regard to permanent jobs, the Modified Project would be expected to generate approximately 128 net new employees and approximately 163 gross new employees at the project site, which would be 18 fewer employees than estimated in the Certified EIR. Such economic growth inducing impacts of the Modified Project would meet the objectives of the Hollywood Redevelopment Project Area. Therefore, direct growth from the Modified Project would be within the Certified EIR's growth forecasts for the CRA Approved Project, and the Modified Project's growth would not substantially increase the growth impacts identified in the Certified EIR for the CRA Approved Project.

Like the Modified Project, economic growth inducing impacts of the No Automated Steel Parking Structure Alternative would meet the objectives of the Hollywood Redevelopment Project Area and direct growth from the No Automated Steel Parking Structure Alternative would not substantially increase the growth impacts identified in the Certified EIR for the CRA Approved Project.

Regarding indirect growth during construction, the Certified EIR determined in Section IV.G, Population and Housing, that the employment opportunities provided by the construction of the CRA Approved Project would not likely result in household relocation by construction workers to the vicinity of the project site. Thus, the Certified EIR concluded the generation of temporary construction jobs would not cause a permanent increase in local population. For the Modified Project, as discussed in Section IV.G, Population, Housing and Employment of the Draft Supplemental EIR, the employment opportunities provided by the construction of the Modified Project are not likely to result in any household relocation by construction workers to the vicinity of the project site. Based on the temporary nature and relatively short duration of the additional construction work involved, it is anticipated that the construction work force would be filled by the local resident population and skilled labor positions that already exist within the greater Los Angeles region. Similar to the CRA Approved Project, it is anticipated that most construction workers would come from the existing construction industry workforce within Los Angeles County, and with contractors that already reside in the surrounding community or would commute from their existing place of residence within the region. This is due to the fact that the work requirements of many construction projects are highly specialized, temporary, and overlapping so that construction workers remain at a job site only for the time frame in which their specific skills are needed to complete a particular phase of the construction process. Therefore, indirect population growth and employment growth impacts associated with construction of the Modified Project would be less than significant, which is consistent with the conclusions of the analysis in the Certified EIR for the CRA Approved Project.

Like the Modified Project, indirect population growth and employment growth impacts associated with construction of the No Automated Steel Parking Structure Alternative would be less than significant, which is consistent with the conclusions of the analysis in the Certified EIR for the CRA Approved Project.

As described in Section IV.G, Population and Housing of the Certified EIR for the CRA Approved Project, new jobs in the retail and restaurant industries would not generate indirect population growth within the region because existing residents within the proximity of these types of employment opportunities typically fill these jobs. As such, the Certified EIR determined that the CRA Approved Project's proposed uses would not generate substantial indirect population growth or demand for new housing. As discussed in Section IV.G, Population, Housing and Employment of the Draft Supplemental EIR, the Modified Project's 128 net new employees and 163 gross new employees would be within the planned employment growth forecasts. The Modified Project's net and gross increase in employment would be 18 fewer employees than estimated in the Certified EIR. The Certified EIR also concluded the CRA Approved Project's new employees would be within the planned employment growth forecasts. Thus, the Modified Project's employment growth impacts during operation would be within the impacts concluded in the Certified EIR for the CRA Approved Project. Additionally, similar to the CRA Approved Project, new jobs in the retail and restaurant industries do not typically generate indirect population growth within the region as such jobs are generally filled by residents that already reside within proximity to those jobs. As such, the Modified Project would also not generate substantial indirect population growth or demand for new housing, which is consistent with the analysis in the Certified EIR for the CRA Approved Project.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's employment growth impacts during operation would be within the impacts concluded in the Certified EIR for the CRA Approved Project and would also not generate substantial indirect population growth or demand for new housing, which is consistent with the analysis in the Certified EIR for the CRA Approved Project.

Consistent with the CRA Approved Project, the Modified Project would develop a mixed-use multi-family residential/commercial/office project within a densely developed urban environment. However, as the Modified Project would develop less dwelling units and less commercial square footage than the CRA Approved Project, the Modified Project would result in less housing and employment opportunities than the CRA Approved Project. Thus, the Modified Project would result in less overall growth than the CRA Approved Project. As discussed above, the Certified EIR concluded that while the CRA Approved Project may induce substantial growth with respect to infrastructure through the immediate and gradual upgrades to community facilities, the high-density, transit-oriented growth induced by the CRA Approved Project would be consistent with the objectives of both the Hollywood Community Plan and the Hollywood Redevelopment Project Area. The Modified Project would result in less overall growth than the CRA Approved Project and also be consistent with the objectives of both the Hollywood Community Plan and the Hollywood Redevelopment Project by placing high density housing and commercial land uses in a Transit Priority Area. Therefore, the Modified Project would not spur additional direct or indirect growth in Hollywood other than what is already anticipated in adopted plans, and potential impacts would be less than significant. This is consistent with the analysis in the Certified EIR for the CRA Approved Project and therefore the Modified Project would not involve new significant

environmental effects or substantially increase the severity of previously identified significant effects related to growth.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not spur additional direct or indirect growth in Hollywood other than what is already anticipated in adopted plans, and potential impacts would be less than significant. This is consistent with the analysis in the Certified EIR for the CRA Approved Project and therefore the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or substantially increase the severity of previously identified significant effects related to growth.

B. Significant Irreversible Environmental Changes

Section 15126.2(c) of the CEQA Guidelines requires that an EIR should include the consideration and discussion of significant irreversible environmental changes, which would be caused by implementation of the proposed project. Section 15126.2(c) of the CEQA Guidelines provides:

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

The Certified EIR for the CRA Approved Project did not analyze consumption of nonrenewable resources in accordance with Section 15126.2(c) of the CEQA Guidelines. However, the CRA Approved Project analyzed in the Certified EIR would have consumed limited, slowly renewable and nonrenewable resources for (1) building materials, (2) fuel and operational materials/resources, and (3) the transportation of goods and people to and from the project site. Similar to the CRA Approved Project, the Modified Project would consume limited, slowly renewable and nonrenewable resources. The limited, slowly renewable and nonrenewable resources the CRA Approved Project and Modified Project would consume would be in the form of raw land, lumber, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper, and lead), petrochemical construction materials (e.g., plastics), water, and non-renewable fuel (i.e., gas and diesel fuel to power equipment and vehicles during construction and operation).

With respect to land resources, the project site for the CRA Approved and Modified Project occupies an infill lot that was previously developed with prior residential and commercial uses. The project site is located in an urban developed area and is adequately supported by existing infrastructure including roads and public utilities. As such, the CRA Approved Project and Modified Project would not consume raw land or

result in the conversion of raw land in a manner that would commit future generations to develop raw land or occupy previously inaccessible areas.

With respect to the utilization and consumption of lumber, aggregate materials, metals and petrochemical construction materials (e.g., plastics) for construction, the CRA Approved Project and Modified Project's consumption of such materials would be satisfied with the existing supply of commercial products already committed to the marketplace. In addition, for the CRA Approved Project consistent with Mitigation Measures provided in the Certified EIR, the CRA Approved Project would divert and recycle construction and demolition debris. The Modified Project would implement a construction and demolition debris recycling program for the purposes of assisting the City in achieving its 50 percent diversion goal pursuant to AB 939 and the Modified Project's additional construction activities would comply with Section 99.05.408.1 of L.A. Green Building Code, effective 2014, which requires that construction waste be reduced by at least 50 percent. Thus, for both the CRA Approved Project and the Modified Project consumption of nonrenewable building materials such as hardwood lumber, aggregate materials, metals, and plastics would be reduced.

Water, which is a slowly renewable resource, would also be consumed during construction and operation of both the CRA Approved Project and Modified Project. As discussed in Section IV.I Public Utilities of the Draft Supplemental EIR, the CRA Approved Project and Modified Project would have less than significant impacts on water supply.

With respect to the consumption and utilization of fossil fuels, the operation of construction equipment and vehicles during both construction and operation would result in the irreversible consumption of nonrenewable resources. However, as discussed in Section V.E General Impact Categories, Energy Resources of the Draft Supplemental EIR, the CRA Approved Project and the Modified Project's consumption of fuel would not be considered excessive or substantial with respect to regional fuel supplies. Furthermore, as mixed use projects in an urban setting that are in close proximity to alternative modes of transportation, both the CRA Approved Project and the Modified Project would promote an efficient use of fuel for the operational fuel demands associated with the use of vehicles.

Thus, though the CRA Approved Project and Modified Project would consume limited, slowly renewable and nonrenewable resources, the consumption would be on a relatively small scale and consistent with regional and local urban design and development goals for the area. As a result, the use of nonrenewable resources in this manner would not result in significant irreversible changes to the environment under both the CRA Approved Project and the Modified Project. Accordingly, as compared to the CRA Approved Project, the Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consumption of resources in accordance with Section 15126.2(c) of the CEQA Guidelines.

Like the Modified Project, the use of nonrenewable resources for the No Automated Steel Parking Structure Alternative would not result in significant irreversible changes to the environment and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consumption of resources in accordance with Section 15126.2(c) of the CEQA Guidelines.

C. Energy Conservation

Section 21100(b) of the CEQA Guidelines requires that an EIR include a detailed statement setting forth mitigation measures proposed to minimize a project's significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy. Appendix F of the CEQA Guidelines states that, in order to ensure that energy implications are considered in project decisions, the potential energy implications of a project shall be considered in an EIR, to the extent relevant and applicable to the project.

The Certified EIR for the CRA Approved Project did not analyze energy conservation in accordance with Appendix F. However, to provide a comparison to the Modified Project a discussion of the energy conservation of the CRA Approved Project was provided in the Draft Supplemental EIR. As mixed use development projects, both the CRA Approved Project and the Modified Project would use energy during short-term construction activities as well as long-term operational use over the life of the projects in the form of electricity, natural gas, and petroleum. Each fuel type is discussed separately below.

1. Electricity Use

Electricity demands for construction of the CRA Approved Project would be negligible and would be associated with limited lighting and electronic equipment. The electricity used would be on temporary basis supplied by LADWP and would be substantially less than that required for the CRA Approved Project's operations.

Operation of the CRA Approved Project would require electricity for multiple purposes including, but not limited to heating, ventilation, and air conditioning (HVAC), refrigeration, lighting, electronics, and commercial machinery. As discussed in Section IV.I, Public Utilities, of the Draft Supplemental EIR, the annual energy demands of the CRA Approved Project include approximately 3,420,493 kWh of electricity per year. As discussed in Section IV.I Public Utilities of the Draft Supplemental EIR, the Certified EIR for the CRA Approved Project would have complied with the 2005 Title 24 Building Energy Efficiency Standards and proposed additional energy conservation features related to electricity, including installation of energy efficient lighting, implementing a 20 percent water conservation strategy for indoor and outdoor water use, incorporating a solid waste reduction recycling program, and incorporating photovoltaic panels to meet a portion of the CRA Approved Project's energy demands. Further, as noted in the Certified EIR, one of the stated project objectives of the CRA Approved Project was to provide a high-performance and environmentally efficient mixed-use project with the

intent to achieve a Gold rating through the Leadership in Energy and Environmental Design (LEED)® certification process. In addition, as discussed in the Certified EIR, the CRA Approved Project would not have an adverse impact on the electrical system and therefore would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity.

Thus, with compliance with 2005 Title 24 Building Energy Efficiency Standards and implementation of the energy efficiency design features, the CRA Approved Project would not result in the wasteful, inefficient, or unnecessary consumption of energy; would not conflict with existing energy standards and regulations; and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Therefore, the CRA Approved Project's impacts related to energy efficiency for electricity would be less than significant.

Similar to the CRA Approved Project, electricity demands for construction of the Modified Project would be negligible and would be associated with limited lighting and electronic equipment. The electricity used would be on temporary basis supplied by LADWP and would be substantially less than that required for the Modified Project during operations.

In addition, similar to the CRA Approved Project, operation of the Modified Project would require electricity for multiple purposes including, but not limited to heating, ventilation, and air conditioning (HVAC), refrigeration, lighting, electronics, and commercial machinery. As discussed in Section IV.I, Public Utilities of the Draft Supplemental EIR, the annual energy demands of the Modified Project would include approximately 2,933,723 kWh of electricity per year. This is lower than the estimated annual energy demands for the CRA Approved Project of approximately 3,420,493 kWh electricity per year.

As discussed in Section IV, Public Utilities of the Draft Supplemental EIR, the Modified Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Code of Regulations (CCR). Title 24 standards are updated every three years and each set of successive standards improve energy efficiency from the previous set of standards. The Modified Project would implement the 2008 Title 24 Building Energy Efficiency Standards for all existing construction to remain on the project site, and any additional construction activities necessary for the Modified Project would comply with the 2013 Building Energy Efficiency Standards – Revised November 25, 2013. Additionally, the Modified Project would implement the 2010 CALGreen Code for all existing construction to remain on the project site, and any additional construction activities necessary for the Modified Project would comply with the 2013 version of the CALGreen Code (Effective January 1, 2014). The Modified Project's energy efficient features related to electricity would include energy efficient lighting, implementing a 20 percent water conservation strategy for indoor and outdoor water use, Energy Star rated appliances within the dwelling units, energy efficient boilers, heaters and air conditioning systems, and incorporating a solid waste reduction recycling program. The Modified Project also would be designed with the intent to achieve the same 2008 LEED Gold rating that was also a goal for the CRA Approved Project.

Since certification of the Certified EIR, a number of laws, regulations and policies have been enacted to promote renewable energy, which will increase the percentage of the Modified Project's electricity that comes from renewable sources. Thus, the sources that provide energy to the Modified Project will continue to be increasing supplied by renewable energy sources during the operational life of the Modified Project.

As discussed in Section IV.I, Public Utilities, of the Draft Supplemental EIR, the Modified Project's electricity demands are consistent with existing energy standards and regulations and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Thus, with compliance with Title 24 Building Energy Efficiency Standards, the CALGreen Code, implementation of the Modified Project's energy efficiency design features, and increasing supply of renewable energy sources, the Modified Project would not result in the wasteful, inefficient, or unnecessary consumption of energy; would not conflict with existing energy standards and regulations; and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Accordingly, as compared to the CRA Approved Project, the Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy conservation for electricity.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not result in the wasteful, inefficient, or unnecessary consumption of energy; would not conflict with existing energy standards and regulations; and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Accordingly, as compared to the CRA Approved Project, the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy conservation for electricity.

2. Natural Gas

Natural gas is not anticipated to be required for construction of the CRA Approved Project. Any minor amounts of natural gas that may be consumed would be temporary and would be substantially less than that required for the CRA Approved Project's operations.

Operation of the CRA Approved Project would require natural gas for various purposes including, but not limited to heating and cooling, service water heating, and kitchen appliances. As discussed in Section IV.I, Public Utilities, of the Draft Supplemental EIR, the annual natural gas demands of the CRA Approved Project include approximately 15,436,416 cubic feet of natural gas per year. The CRA Approved Project would have been required to comply with energy conservation standards pursuant to the 2005 Title 24 Building Energy Efficiency Standards. The CRA Approved Project also proposed additional energy conservation features, including installation of energy efficient lighting, implementing a 20 percent water conservation strategy for indoor and outdoor water use, incorporating a solid waste reduction recycling program, and incorporating photovoltaic panels to meet a portion of the CRA Approved Project's energy demands.

In addition, as noted in the Certified EIR, one of the stated project objectives of the CRA Approved Project was to provide a high-performance and environmentally efficient mixed-use project with the intent to achieve a Gold rating through the Leadership in Energy and Environmental Design (LEED)® certification process.

In addition, as discussed in Section IV.I, Public Utilities, of the Certified EIR, the natural gas demands of the CRA Approved Project would be accommodated in accordance with all standards and regulations for the conveyance of natural gas and would be within the available regional supplies. Thus, with compliance with 2005 Title 24 Building Energy Efficiency Standards and implementation of the energy efficiency design features, the CRA Approved Project would not result in the wasteful, inefficient, or unnecessary consumption of energy; would not conflict with existing energy standards and regulations; and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Therefore, the CRA Approved Project's impacts related to energy efficiency for natural gas would be less than significant.

Similar to the CRA Approved Project, natural gas is not anticipated to be required for construction of the Modified Project. Any minor amounts of natural gas that may be consumed would be temporary and would be substantially less than that required for the Modified Project's operations.

Similar to the CRA Approved Project, operation of the Modified Project would require natural gas for various purposes including, but not limited to heating and cooling, service water heating, and kitchen appliances. As discussed in Section IV.I, Public Utilities of the Draft Supplemental EIR, the annual energy demand of the Modified Project would include 14,611,368 cubic feet of natural gas per year. This is lower than the estimated annual natural gas demands for the CRA Approved Project of approximately 15,436,416 cubic feet of natural gas per year.

Similar to the CRA Approved Project, the Modified Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Code of Regulations. The Modified Project would implement the 2008 Title 24 Building Energy Efficiency Standards for all existing construction to remain on the project site, and any additional construction activities necessary for the Modified Project would comply with the 2013 Building Energy Efficiency Standards – Revised November 25, 2013. Additionally, the Modified Project would implement the 2010 CALGreen Code for all existing construction to remain on the project site, and any additional construction activities necessary for the Modified Project would comply with the 2013 version of the CALGreen Code (Effective January 1, 2014). The Modified Project also would be designed with the intent to achieve the same 2008 LEED Gold rating that was also a goal for the CRA Approved Project. As it pertains to natural gas consumption, the Modified Project's energy efficient features include implementing a 20 percent water conservation strategy for indoor and outdoor water use, providing Energy Star rated appliances within the dwelling units, and installing energy efficient boilers and heaters. The reduction in water use and the incorporation of energy efficient appliances, boilers,

and heaters would further serve to reduce the Modified Project's demand for natural gas resources.

As discussed in Section IV.I, Public Utilities, of the Draft Supplemental EIR, the natural gas demands of the Modified Project would be accommodated in accordance with all standards and regulations for the conveyance of natural gas and would be within the regional supplies. Thus, with compliance with Title 24 Building Energy Efficiency Standards, the CALGreen Code, and implementation of the Modified Project's energy efficiency design features, the Modified Project would not result in the wasteful, inefficient, or unnecessary consumption of energy; would not conflict with existing energy standards and regulations; and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Accordingly, as compared to the CRA Approved Project, the Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy conservation for natural gas.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not result in the wasteful, inefficient, or unnecessary consumption of energy; would not conflict with existing energy standards and regulations; and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Accordingly, as compared to the CRA Approved Project, the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy conservation for natural gas.

3. Petroleum Based Fuel (Diesel and Gasoline)

a. Construction

While the Certified EIR for the CRA Approved Project did not analyze energy efficiency or the consumption of petroleum based fuels in accordance with Appendix F of the CEQA Guidelines, Section IV.I, Public Utilities, of the Certified EIR estimated that the CRA Approved Project would consume approximately 269,491 gallons of fuel during construction, including 213,197 gallons of diesel fuel associated with hauling and on-site heavy equipment and 56,294 gallons of gasoline associated with construction worker vehicles commuting to and from the construction site. The Certified EIR determined that, due to the relatively short duration of the construction process, and the fact that the extent of fuel consumption is inherent to construction projects of the size and nature of the CRA Approved Project, fuel consumption impacts would not be considered excessive or substantial with respect to regional fuel supplies.

Based on carbon dioxide emission factors for transportation fuels published by the U.S. Energy Information Administration, the amount of diesel and petroleum-based gasoline (E10) consumed can be estimated based on CO_2 emissions. The CRA Approved Project's estimated CO_2e emissions are presented in Section IV.D, Greenhouse Gas

Emissions of the Draft Supplemental EIR, it is estimated that the construction of the CRA Approved Project would consume approximately 202,012 gallons of fuel, including approximately 61,805 gallons of diesel fuel and 140,206 gallons of gasoline. While construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and would cease upon the completion of construction. Further, the petroleum consumed related to construction of the CRA Approved Project would be typical of construction projects of similar types and sizes and would not necessitate new petroleum resources beyond what are typically consumed in California. In addition, construction of the CRA Approved Project would equate to approximately 0.00054 percent of the total amount of petroleum that would be used statewide during the course of the CRA Approved Project construction.

Furthermore, the CRA Approved Project's construction activities would be subject to existing laws and regulations in place to reduce the consumption of energy resources, such as those presented in Section IV.B Air Quality of the Draft Supplemental EIR. The CRA Approved Project's compliance with these regulations would reduce the number of trips and fuel required to transport construction debris and in turn reduce the wasteful, inefficient, and unnecessary consumption of energy. Further, due to the fact that the CRA Approved Project would be built on an urban infill site in a Transit Priority Area, construction worker trip and haul truck trip distances are anticipated to be reduced as compared to sites that are not located in urban centers. In this regard, petroleum consumption due to construction worker trips and hauling and vendor trips would be expected to be reduced as compared to construction activities on sites that are not located within infill development areas.

Therefore, the estimated annual fuel demands for the CRA Approved Project would be consistent with the energy conservation goals identified in Appendix F of the CEQA Guidelines and would not result in the wasteful, inefficient, or unnecessary consumption of energy; would not conflict with existing energy standards and regulations; and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Therefore, the CRA Approved Project's impacts related to energy efficiency for petroleum during construction would be less than significant.

Using the same fuel consumption factors, and the CO_2 emissions estimates for the Modified Project's construction activities provided in Section IV.D, Greenhouse Gas Emissions of the Draft Supplemental EIR, construction of the Modified Project would consume approximately 186,492 gallons of fuel including approximately 62,645 gallons of diesel fuel and 123,847 gallons of gasoline. A total of approximately 202,012 gallons of fuel would be consumed by the construction of the CRA Approved Project and approximately 186,492 gallons of fuel would be consumed during construction of the Modified Project. As a result, the fuel that would be consumed during the Modified Project's construction would be 15,520 gallons less than the fuel that would be consumed during the construction of the CRA Approved Project. The overall reduction between the Modified Project and the CRA Approved Project is primarily attributed to a prior delayed construction timeline and the resulting improved fuel efficiency factors in construction equipment that occurred during that period of delay.

While construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and would cease upon the completion of construction. Further, the petroleum consumed related to construction of the Modified Project would be typical of construction projects of similar types and sizes and would not necessitate new petroleum resources beyond what are typically consumed in California. In addition, construction of the Modified Project would equate to approximately 0.00042 percent of the total amount of petroleum that would be used statewide during the course of the Modified Project construction.

Furthermore, the Modified Project's construction activities would be subject to existing laws and regulations in place to reduce the consumption of energy resources, such as those presented in Section IV.B Air Quality of the Draft Supplemental EIR. The Modified Project's compliance with these regulations would reduce the number of trips and fuel required to transport construction debris and in turn reduce the wasteful, inefficient, and unnecessary consumption of energy. Further, similar to the CRA Approved Project, the Modified Project would be built on an urban infill site in a Transit Priority Area, and construction worker trip and haul truck trip distances would be reduced as compared to sites that are not located in urban centers. In this regard, petroleum consumption due to construction worker trips and hauling and vendor trips would be expected to be reduced as compared to construction activities on sites that are not located within infill development areas.

As such, the Modified Project's construction would not substantially increase the petroleum use as compared to the CRA Approved Project. Therefore, the estimated annual fuel demands for the Modified Project would be consistent with the energy conservation goals identified in Appendix F of the CEQA Guidelines and would not result in the wasteful, inefficient, or unnecessary consumption of energy; would not conflict with existing energy standards and regulations; and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Therefore, the Modified Project's impacts related to energy efficiency for petroleum during construction would be less than significant. Accordingly, as compared to the CRA Approved Project, the Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy conservation for petroleum during construction.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not result in the wasteful, inefficient, or unnecessary consumption of energy; would not conflict with existing energy standards and regulations; and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Therefore, the No Automated Steel Parking Structure Alternative's impacts related to energy efficiency for petroleum during construction would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy conservation for petroleum during construction.

b. Operation

During operation, the majority of fuel consumption resulting from the CRA Approved Project would involve the use of motor vehicles traveling to and from the project site. As explained in detail in Section V.E. Energy Conservation of the Draft Supplemental EIR, the CRA Approved Project's demand for petroleum-based fuels would be approximately 350,627 gallons per year. In comparison to regional supplies, the CRA Approved Project's operations would equate to approximately 0.00188 percent of the total amount of petroleum that would be used statewide annual during operations of the CRA Approved Project.

With respect to reducing the demands upon fossil fuels generated from vehicle trips, as discussed in detail in Section V.E. Energy Conservation of the Draft Supplemental EIR, the CRA Approved Project proposed to integrate the sustainable design features including: proximity to mass transit; in-fill smart growth, and providing a mix of land uses that would result in an overall reduction in vehicle trips and vehicle miles traveled.

In summary, although the CRA Approved Project would see an increase in petroleum use during operation, vehicles would use less petroleum due to advances in fuel economy over time. Additionally, the CRA Approved would include a variety of features that are expected to reduce the number of vehicles traveling to and from the site during operation. As such, while the CRA Approved Project would generate more vehicle trips when compared to 2006 conditions, it would increase density in an urban infill project located within a major population center that is in close proximity to public transportation systems. When compared with new development projects sited on previously undeveloped land and away from population centers, infill projects are generally expected to involve fewer vehicles miles traveled during operation. Given these considerations, the petroleum consumption associated with operation of the CRA Approved Project would be consistent with the energy conservation goals identified in Appendix F of the CEQA Guidelines and would not result in the wasteful, inefficient, or unnecessary consumption of energy; would not conflict with existing energy standards and regulations; and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Therefore, the CRA Approved Project's impacts related to energy efficiency for petroleum during operations would be less than significant.

Similar to the CRA Approved Project, the majority of fuel consumption resulting from the operation of the Modified Project would involve the use of motor vehicles traveling to and from the project site. As explained in detail in Section V.E. Energy Conservation of the Draft Supplemental EIR, the Modified Project's demand for petroleum-based fuels would be approximately 317,497 gallons per year. In comparison to regional supplies, the Modified Project's operations would equate to approximately 0.0017 percent of the total amount of petroleum that would be used statewide annual during operations of the Modified Project.

Similar to the CRA Approved Project, the Modified Project would implement sustainable design features to reduce petroleum demands, which are discussed in detail in Section V.E. Energy Conservation of the Draft Supplemental EIR.

In summary, similar to the CRA Approved Project, the Modified Project would see an increase in petroleum use during operation. However, over the operational life of the Modified Project vehicles would use less petroleum due to advances in fuel economy over time. Additionally, the Modified Project would include a variety of features that are expected to reduce the number of vehicles traveling to and from the site during operation. As such, while the Modified Project would generate slightly more vehicle trips when compared to the CRA Approved Project it includes numerous additional measures that were not a part of the CRA Approved Project to promote the use of non-vehicular transportation to the site in a transit rich corridor with a pedestrian-friendly frontage. These include a required TDM program, substantial bicycle parking and additional electric vehicle ready parking spaces in the Modified Project's garage. Furthermore, when viewed on a regional scale, the Modified Project is an urban infill project located within a major population center that serves an existing demand for market rate and affordable housing products. When compared with new development projects sited on previously undeveloped land and away from population centers, infill projects are generally expected to involve fewer vehicles miles traveled during operation. Given these considerations, the petroleum consumption associated with the Modified Project would not be considered inefficient or wasteful, and impacts would be less than significant.

Therefore, the estimated annual fuel demands for Modified Project would be consistent with the energy conservation goals identified in Appendix F of the CEQA Guidelines and would not result in the wasteful, inefficient, or unnecessary consumption of energy; would not conflict with existing energy standards and regulations; and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Therefore, the Modified Project's impacts related to energy efficiency for petroleum during operations would be less than significant. Accordingly, as compared to the CRA Approved Project, the Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy conservation for petroleum during operations.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not result in the wasteful, inefficient, or unnecessary consumption of energy; would not conflict with existing energy standards and regulations; and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Therefore, the No Automated Steel Parking Structure Alternative's impacts related to energy efficiency for petroleum during operations would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy conservation for petroleum during operations.

XIII. Other CEQA Considerations

1. The City, acting through the Planning Department, is the "Lead Agency" for the project evaluated in the Supplemental EIR. The City finds that the Supplemental EIR was prepared in compliance with CEQA and the CEQA Guidelines. The City

finds that it has independently reviewed and analyzed the Supplemental EIR for the proposed project, that the Draft Supplemental EIR which was circulated for public review reflected its independent judgment and that the Final Supplemental EIR reflects the independent judgment of the City.

2. The Supplemental EIR evaluated or imposed mitigation measures for the following potential proposed project and cumulative environmental impacts: Aesthetics (Views, Light and Glare, and Shade/Shadow); Air Quality; Geology and Soils; Greenhouse Gas Emissions; Cultural Resources; Noise; Population, Housing, and Employment; Land Use Planning; Public Utilities (Water, Wastewater, Energy, Solid Waste); Public Services (Police Services, Fire Protection, Recreation and Parks, Schools); Traffic/Transportation; Parking; and Hazardous Materials/Risk of Upset. Additionally, the Supplemental EIR considered, in separate sections, Growth Inducing Impacts, Significant Irreversible Environmental Changes, and Energy Conservation. The significant environmental impacts of the proposed project and the alternatives were identified in the Supplemental EIR.

3. The City finds that the Supplemental EIR provides objective information to assist the decision-makers and the public at large in their consideration of the environmental consequences of the proposed project. The public review period provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding the Draft Supplemental EIR. The Final Supplemental EIR was prepared after the review period and responds to comments made during the public review period.

4. The Planning Department evaluated comments on environmental issues received from persons who reviewed the Draft Supplemental EIR. In accordance with CEQA, the Planning Department prepared written responses describing the disposition of significant environmental issues raised. The Final Supplemental EIR provides adequate, good faith and reasoned responses to the comments. The Planning Department reviewed the comments received and responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts to the Draft Supplemental EIR. The Lead Agency has based its actions on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental impacts identified and analyzed in the Supplemental EIR.

5. The Final Supplemental EIR documents changes to the Draft Supplemental EIR and accordingly provides additional information that was not included in the Draft Supplemental EIR. Having reviewed the information contained in the Draft Supplemental EIR, the Final Supplemental EIR, and the administrative record, as well as the requirements of CEQA and the CEQA Guidelines regarding recirculation of Draft EIRs, the City finds that there is no new significant impact, substantial increase in the severity of a previously disclosed impact, significant information in the record of proceedings or other criteria under CEQA that will

require recirculation of the Draft Supplemental EIR, or that will require preparation of another supplemental or subsequent EIR. Specifically, the City finds that:

- The Responses to Comments contained in the Final Supplemental EIR fully considered and responded to comments claiming that the proposed project will have significant impacts or more severe impacts not disclosed in the Draft Supplemental EIR and include substantial evidence that none of these comments provided substantial evidence that the proposed project will result in changed circumstances, significant new information, considerably different mitigation measures, or new or more severe significant impacts than were discussed in the Draft Supplemental EIR.

- The City has thoroughly reviewed the public comments received regarding the proposed project and the Final Supplemental EIR as they relate to the proposed project to determine whether under the requirements of CEQA, any of the public comments provide substantial evidence that will require recirculation of the Supplemental EIR prior to its adoption, and has determined that recirculation of the Supplemental EIR is not required.

- None of the information submitted after publication of the Final Supplemental EIR, including testimony at the public hearings on the proposed project, constitutes significant new information or otherwise requires preparation of another supplemental or subsequent EIR. The City does not find this information and testimony to be credible evidence of a significant impact, a substantial increase in the severity of an impact disclosed in the Final Supplemental EIR, or a feasible mitigation measure or alterative not included in the Final Supplemental EIR.

6. The project design features and mitigation measures identified for the proposed project were included in the Draft Supplemental EIR and Final Supplemental EIR. The final project design features and mitigation measures for the proposed project are described in the Mitigation Monitoring Program ("MMP"). Each of the project design features and mitigation measures identified in the MMP is incorporated into the proposed project. The City finds that the impacts of the project have been mitigated to the extent feasible by the project design features and mitigation measures identified in the MMP.

7. The responses to the comments on the Draft Supplemental EIR, which are contained in the Final Supplemental EIR, clarify and amplify the analysis in the Draft Supplemental EIR.

8. CEQA requires the Lead Agency approving a project to adopt a MMP for the changes to the project, which it has adopted or made a condition of project approval in order to ensure compliance with the mitigation measures during project implementation. The mitigation measures included in the Supplemental EIR as certified by the City and included in the MMP as adopted by the City

serves that function. The MMP includes all of the mitigation measures and project design features adopted by the City in connection with the approval of the project and has been designed to ensure compliance with such measures during implementation of the project. In accordance with CEQA, the MMP provides the means to ensure that the mitigation measures are fully enforceable. In accordance with the requirements of CEQA §21081.6, the City hereby adopts the MMP.

9. In accordance with the requirements of CEQA §21081.6, the City hereby adopts each of the mitigation measures expressly set forth herein as conditions of approval for the project.

10. The custodian of the documents or other material which constitute the record of proceedings upon which the City decision is based is the Planning Department.

11. The City finds and declares that substantial evidence for each and every finding made herein is contained in the Certified EIR and Supplemental EIR, which are incorporated herein by this reference, or is in the record of proceedings in the matter. The City finds and declares based on such evidence that the proposed project analyzed in the Supplemental EIR would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects of the CRA Approved Project analyzed in the Certified EIR.

12. The City is certifying an EIR for, and is approving and adopting findings for, the entirety of the actions described in these Findings and in the Supplemental EIR as comprising the proposed project. It is contemplated that there may be a variety of actions undertaken by other State and local agencies (who might be referred to as "responsible agencies" under CEQA). Because the City is the Lead Agency for the project, the EIR is intended to be the basis for compliance with CEQA for each of the possible discretionary actions by other State and local agencies to carry out the project.

13. The Supplemental EIR is a Project EIR for purposes of environmental analysis of the proposed project. A Project EIR examines the environmental effects of a specific project. The Supplemental EIR serves as the primary environmental compliance document for entitlement decisions regarding the proposed project by the City of Los Angeles and the other regulatory jurisdictions.

XIV. Statement of Overriding Considerations

As explained in Section II, Project Description of the Draft Supplemental EIR, on October 18, 2007, the CRA adopted Resolution No. 7094 that certified that the Final EIR (Certified EIR) was completed in compliance with CEQA and the CEQA Guidelines, that the information contained in the Final EIR and the Erratum to the Final EIR had been reviewed and considered by the Commissioners of the CRA prior to considering the proposed project, and that the Final EIR and the Erratum to the Final EIR reflected

the independent judgment and analysis of the CRA. On December 14, 2007, the CRA subsequently adopted Resolution No. 7095 approving CEQA findings for the approval of the project, a statement of overriding considerations, and a mitigation monitoring and reporting program.

In September 2008, the City of Los Angeles approved the land use entitlements for the Sunset and Gordon Mixed-Use Project and as part of the approvals, the Los Angeles City Council considered the information contained in the Certified EIR and adopted findings and adopted the following Statement of Overriding Considerations in accordance with CEQA Section 21081:

> "The proposed Sunset and Gordon Mixed-Use Project will result in significant unavoidable impacts, for which alternatives and mitigation measures to reduce the impacts to insignificant levels are not available or feasible for the reasons described in the Final EIR and CEQA findings, in the following environmental impact or issue area(s): shade and shadow, construction related noise and vibration, and ambient noise exposure above land use/noise compatibility standards for multi-family residential uses. Despite these significant impacts which have not been mitigated to below a level of significance, the Planning Commission has balanced the benefits of the Project against the unavoidable significant environmental effects as described in the CEQA Documents and makes the following Statement of Overriding Consideration that the Project will result in the following substantial community benefits, including economic, legal, social, technological, or other benefits, that outweigh and render acceptable the significant effects on the environment that cannot be mitigated to a level less than significant. Specifically such benefits include but are not limited to the following:
>
> - Promotes housing choices by providing workforce housing options
> - Preserves and increases employment with the creation of new commercial and creative office targeted at the entertainment community
> - Promotes a balanced community by providing a mix of land uses including commercial residential, and open space
> - Provides a public park of approximately 21,500 square-feet
> - Promotes rehabilitation and restoration by preserving key elements of the Peerless Auto Showroom/Old Spaghetti Factory, a vintage 1924 building
> - Improves the quality of the environment by constructing to a Leadership on Environment and Energy Design ("LEED") Gold Standard
> - Provides temporary construction-related employment opportunities using all union labor with a local area hiring program in place."

As discussed in Section I, Introduction/Executive Summary, of the Draft Supplemental EIR, the purpose of the Supplemental EIR is to inform decision-makers and the general public of the potential environmental impacts resulting from the proposed development of the Modified Project and to determine whether implementation of the Modified Project would result in any new significant environmental impacts that were not identified in the Certified EIR for the CRA Approved Project, or whether the previously identified significant impacts would be substantially more severe under the Modified Project.

As discussed in Section XI of the Findings (Alternatives to the Project), following the assessment of the alternatives, it is recommended that the No Automated Steel Parking Structure Alternative be adopted in lieu of the Modified Project. The No Automated Steel Parking Structure Alternative would not impede the attainment of any of the Modified Project objectives and would slightly reduce the intensity of the significant noise impact, however impacts associated with construction noise and vibration would remain significant and unavoidable. The No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects of the CRA Approved Project. In addition, some of the significant impacts that were previously identified in the Certified EIR for the CRA Approved Project are no longer considered significant impacts of the No Automated Steel Parking Structure Alternative.

- For the Aesthetics (Shade/Shadow) significant impact, the Certified EIR concluded the CRA Approved Project would result in significant and unavoidable shade and shadow impacts upon nearby residential properties during the winter months. However, because the No Automated Steel Parking Structure Alternative is a mixed-use residential project located on an infill site within a Transit Priority Area as defined by CEQA, the aesthetic impacts are not considered significant impacts on the environment pursuant to SB 743. Therefore, the No Automated Steel Parking Structure Alternative would result in less than significant shade and shadow impacts upon nearby residential properties during the winter months.

- For the Land Use/Noise (Operational Land Use Compatibility Standards), the Certified EIR concluded the CRA Approved Project's operational noise impacts would be significant and unavoidable, as the CRA Approved Project would expose future residents of the project to exterior ambient noise levels that are in the "normally unacceptable" and "clearly unacceptable" CNEL exposure range. Consistent with recent CEQA case law, impacts arising from exposure of future occupants of a project to existing environmental conditions is not a significant impact upon the environment. Instead, impacts arising from exposure of future residents to existing environmental conditions should be evaluated in the context of whether the project would exacerbate existing environmental conditions that, in turn, would result in a significant impact upon the environment. The No Automated Steel Parking Structure Alternative would not exacerbate

existing environmental conditions because future roadway noise levels with the No Automated Steel Parking Structure Alternative would not exceed the significance threshold and the Noise/Land Use compatibility classifications would remain the same with or without the development of the No Automated Steel Parking Structure Alternative. As such, the operational noise impacts associated with exposure of future residents to ambient noise levels that are in the "normally unacceptable" CNEL exposure range would be less than significant.

- For the CRA Approved Project's significant and unavoidable cumulative operational roadway noise impact, the No Automated Steel Parking Structure Alternative's future year with project traffic volumes on local street segments would result in less than significant cumulative operational roadway noise impacts. Thus, the CRA Approved Project's significant and unavoidable cumulative operational roadway noise impact would be reduced to less than significant levels under the No Automated Steel Parking Structure Alternative.

While the Noise and Vibration (Construction) significant impact identified in the Certified EIR would remain for the No Automated Steel Parking Structure Alternative, the No Automated Steel Parking Structure Alternative would not involve a substantial increase in the severity of the previously identified significant impacts to noise or vibration during construction. Nevertheless, because the Final Supplemental EIR has identified unavoidable significant impacts that will result from implementation of the No Automated Steel Parking Structure Alternative. CEQA Section 21081 and Section 15093(b) of the CEQA Guidelines provide that when the decision of the public agency allows the occurrence of significant impacts that are identified in the EIR but are not at least substantially mitigated, the agency must state in writing the reasons to support its action based on the completed EIR and/or other information in the record. CEQA Guidelines require, pursuant to CEQA Guidelines Section 15093(b), that the decision-maker adopt a Statement of Overriding Considerations at the time of approval of a project if it finds that significant adverse environmental effects have been identified in the EIR which cannot be substantially mitigated to an insignificant level or be eliminated. These findings and the Statement of Overriding Considerations are based on substantial evidence in the record, including but not limited to the Supplemental EIR, including the reference library to the EIR, and documents and materials that constitute the record of proceedings.

The following impacts are not mitigated to a less than significant level for the No Automated Steel Parking Structure Alternative, as identified in the Supplemental EIR: Noise and Vibration (Construction) as discussed in Section IV.F, Noise and IV.H, Land Use and Planning.

Accordingly, the City adopts the following Statement of Overriding Considerations. The City recognizes that significant and unavoidable impacts will result from implementation of the No Automated Steel Parking Structure Alternative. Having (i) adopted all feasible mitigation measures, (ii) rejected alternatives to the proposed No Automated Steel

Parking Structure Alternative, as discussed above, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the No Automated Steel Parking Structure Alternative against the No Automated Steel Parking Structure Alternative's significant and unavoidable impacts, the City hereby finds that the benefits outweigh and override the significant unavoidable impacts for the reasons stated below.

- The project would provide 299 residential apartment units to meet the demand for mid- to high-rise residential living based on the current and projected housing demand in the City of Los Angeles and the region supporting Mayor Garcetti's Housing Initiative to build 100,000 housing units by 2021.

- The project promotes affordable housing by including 5 percent of the total number of housing units, 15 residential apartment units, at the "Very Low" income level.

- The project promotes a balanced community and contributes to the revitalization of the Hollywood Community Plan by providing an example of "smart-growth" infill development consisting of a mix of land uses which are consistent with the surrounding Sunset Boulevard including 299 residential apartment units, neighborhood-serving uses including approximately 3,700 square feet of ground floor restaurant space and approximately 3,970 square feet of ground floor community serving retail space, approximately 38,440 square feet of office space, and approximately 18,962 square-feet of park uses.

- The project preserves and increase employment with the creation of approximately 38,440 square feet of new commercial and creative office space targeted at the entertainment community in the Hollywood area of the City of Los Angeles.

- The project improves the quality of the environment by being designed with the intent to achieve the 2008 Leadership on Environment and Energy Design ("LEED") Gold Standard.

- The project provides temporary construction-related employment opportunities using all union labor with approximately 100 short-term construction jobs associated with the additional construction activities.

- The project provides a publicly accessible approximately 18,962 square-foot park in a manner that will provide a safe, attractive and well maintained open space environment.

- The project supports traffic reduction transportation policies by providing high-density multi-family housing and jobs and developing a robust Transportation Demand Management program which among other features would include transit pass discounts for residents and employees, car sharing services, carpooling incentives, and unbundled parking in a designated Transit Priority Area.

- The project encourages the use of alternative modes of transit including bus, Metro Red Line Rail, walking, and bicycles by enhancing pedestrian connections by improving the signalized intersections at Sunset Boulevard and Gower Street and Sunset Boulevard and Bronson Avenue with Continental Crosswalks and improving the bus stop on the north side of Sunset Boulevard, east of Gordon Street.

FINDINGS OF FACT (SUBDIVISION MAP ACT)

In connection with the approval of Vesting Tentative Tract No. 74172, the Advisory Agency of the City of Los Angeles, pursuant to Sections 66473.1, 66474.60, .61 and .63 of the State of California Government Code (the Subdivision Map Act), makes the prescribed findings as follows:

(a) THE PROPOSED MAP IS CONSISTENT WITH APPLICABLE GENERAL AND SPECIFIC PLANS.

The project is located within the Hollywood Community Plan, one of 35 Community Plans that comprise the Land Use Element of the General Plan. The Hollywood Community Plan designates the subject property for Regional Center Commercial and High Medium Residential land uses with the corresponding zones of C2, C4, P, PB, RAS3, and RAS4, and R4, respectively. Lots 6 and 12-16 are located in the Hollywood Signage Supplemental Use District (SUD).

The site is currently improved with a vacant 22-story, approximately 250-foot high mixed-use building containing approximately 319,562 square feet of floor area, and an approximately 18,962-square-foot public park. The building is comprised of an 18-floor residential tower above a four-level, above-grade podium structure including three (3) levels of subterranean parking and three (3) levels of above-grade parking. The existing building and public park are currently closed due to an Order to Vacate issued by the Los Angeles Department of Building and Safety on March 19, 2015.

The applicant is seeking approval of Vesting Tentative Tract Map No. VTT-74172 to permit the merger of nine (9) lots consisting of 1.66 net acres (72,154 net square feet) to create one (1) master lot and one (1) airspace lot (above and below grade) for the building, and for the limited dedication and merger of Gordon Street below-grade at a width of four feet and depth of 48.33 feet.

The applicant is also seeking a concurrent General Plan Amendment to amend the 1988 Hollywood Community Plan to re-designate the portion of the project site located at 1528-1540 N. Gordon Street (Lots 17, 18, and 19 of Bagnoli Tract No. 2), from High Medium Residential to Regional Center Commercial; a Vesting Zone and Height District Change from (T)(Q)C2-2D and (T)(Q)R4-1VL to C2-2D subject to conditions that would permit a total allowable floor area for the entire project site of approximately 324,693 square feet, 299 dwelling units, and

building height of approximately 250 feet (22 stories); a Conditional Use Permit to allow the sale and dispensing of a full-line of alcoholic beverages for on-site consumption within the proposed ground floor restaurant; an Affordable Housing On-Menu Incentive to allow a 20 percent decrease in the total required amount of usable open space for a project setting aside affordable housing units for Very Low Income Households in conjunction with Parking Option 1; and a Site Plan Review for a project which creates, or results in an increase of, 50 or more dwelling units under related Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR. With the approval of Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR, the proposed map will be consistent with the Hollywood Community Plan. As conditioned herein, in the event that Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR is not approved, the subdivider must submit a tract map modification.

The Subdivision Map Act requires the Advisory Agency to find the proposed map be consistent with the General Plan. The proposed tract map is consistent with the General Plan Framework, Hollywood Community Plan, Housing Element, and Mobility Plan 2035 as follows:

Framework Element

GOAL 3C: Multi-family neighborhoods that enhance the quality of life for the City's existing and future residents.

GOAL 3F: Mixed-use centers that provide jobs, entertainment, culture, and serve the region.

Objective 3.7: Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and serves and the residents' quality of life can be maintained or improved.

Objective 3.10: Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.

Policy 3.10.5: support the development of small parks incorporating pedestrian-oriented plazas, benches, other streetscape amenities and ,where appropriate, landscaped play areas.

The proposed map is consistent with the Framework Element by creating a master lot and an airspace lot to support the mixed-use development containing 299 dwelling units and approximately 46,110 square feet of commercial space comprised of office, restaurant, and retail areas, thereby providing housing and jobs in the area. Per Bureau of Engineering letter dated June 1, 2018, the

proposed tract is currently connected to an existing sewer in the street adjoining the subdivision, and the tract will connect to the public sewer system and will not result in violation of the California Water Code. Per Bureau of Sanitation letter dated June 4, 2018, there are no potential problems to the sewer and storm drain line serving the proposed tract. Per the Department of Water and Power letter dated February 24, 2017, the proposed tract can be supplied with water from the municipal system, and all required water mains have been installed. Additionally, the existing streets are improved with sidewalks, curb, and gutter to serve the tract. As such, the proposed subdivision allows for growth in an area where there is sufficient public infrastructure.

Surrounding properties are developed with multi-family residential, retail, commercial and parking uses. The proposed tract map and mixed-use development provide various uses, including residential, commercial, retail, and restaurant, and are compatible with adjacent land uses. In addition, the proposed master lot is developed with an approximately 18,962-square-foot public park with landscaped areas and benches, which will be maintained on-site to serve existing and future residents, thereby supporting the development of small parks incorporating benches and other streetscape amenities that enhance existing and future residents' lifestyles.

Hollywood Community Plan

Objective 1: To further the development of Hollywood as a major center of population, employment, retail services, and entertainment.

Objective 2: To make provision for the housing required to satisfy the varying needs and desires of all economic segments of the Community, maximizing the opportunity for individual choice.

As previously mentioned, the proposed tract and mixed-use development supports the development of Hollywood as a major center of population, employment, and retail services by providing various uses, including residential, commercial, retail and restaurant and accommodating population growth through the creation of 299 dwelling units. Additionally, the proposed project will provide market-rate units as well as affordable housing units for Very Low Income households, consisting of 50 studio, 156 one-bedroom and 93 two-bedroom units, thereby providing a range of housing opportunities by type and cost and satisfying the varying needs and desires of residents in the City.

Mobility Plan 2035

Policy 3.3: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.

Policy 3.4: Provide all residents, workers and visitors with affordable, efficient, convenient, and attractive transit services.

Policy 3.8: Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.

The proposed tract is located in a transit rich corridor and close proximity to employment, retail, restaurants, and entertainment, which will promote the use of transit and pedestrian trips in lieu of vehicular trips. The Metro Red Line Hollywood/Vine Station is located approximately one-half mile away from the project site. The Metro Red Line is a 17-mile subway that runs from Union Station in downtown Los Angeles to Highland Avenue and on to North Hollywood in the San Fernando Valley and connects to the Orange Line bus, which travels to Warner Center and Chatsworth at the North Hollywood Station. The Metro Red Line also connects to the Blue Line rail and the Expo Line rail at the 7th/Metro Center Station and the Gold Line rail and Purple Line rail at Union Station. These Metro Lines further connect to other points throughout the City and the greater Los Angeles area. Additionally, the Los Angeles Metropolitan Authority (MTA) routes a number of bus lines with stops conveniently located near the project site, including Bus Line 2 that connects Union Station to the Pacific Palisades and Bus Lines 180/181 and 217 that connects Hollywood to Pasadena and Westchester area.

Additionally, the proposed project will provide a total of 401 bicycle parking spaces, which encourages a different mode of transportation other than vehicles. All long-term bicycle parking spaces will be secured and comply with the City's Bicycle Parking Ordinance. Short-term bicycle parking spaces will be located outside the building on the Sunset Boulevard frontage as well as inside the ground level of the building and parking garage with direct access to the street.

Hollywood Signage and Supplemental Use District (SUD)

The proposed tract does not involve any signs subject to the SUD.

Therefore, in conjunction with the pending General Plan Amendment, Vesting Zone Change, and Height District change, the proposed Vesting Tentative Tract Map would be consistent with the use, density, and area requirements of the requested zone and would therefore be consistent with the Hollywood SUD.

(b) THE DESIGN OR IMPROVEMENT OF THE PROPOSED SUBDIVISION IS CONSISTENT WITH APPLICABLE GENERAL AND SPECIFIC PLANS.

For purposes of a subdivision, design and improvement is defined by Section 66418 of the Subdivision Map Act and LAMC Section 17.02. Design refers to the configuration and layout of the proposed lots in addition to the proposed site plan layout. Pursuant to Section 66427(a) of the Subdivision Map Act, the location of

the buildings is not considered as part of the approval or disapproval of the map by the Advisory Agency. Easements and/or access and "improvements" refers to the infrastructure facilities serving the sub division. LAMC Section 17.05 enumerates the design standards for a tract map and requires that each map be designed in conformance with the Street Design Standards and in conformance with the General Plan.

As indicated in Finding (a), LAMC Section 17.05 C requires that the Tract Map be designed in conformance with the zoning regulations of the project site. The site is currently zoned (T)(Q)C2-2D and (T)(Q)R4-1VL. The applicant is seeking a General Plan Amendment to amend the 1988 Hollywood Community Plan to re-designate the portion of the project site located at 1528-1540 N. Gordon Street (Lots 17, 18, and 19 of Bagnoli Tract No. 2), from High Medium Residential to Regional Center Commercial; a Vesting Zone and Height District Change from (T)(Q)C2-2D and (T)(Q)R4-1VL to C2-2D subject to conditions that would permit a total allowable floor area for the entire project site of approximately 324,693 square feet, 299 dwelling units, and building height of approximately 250 feet (22 stories); a Conditional Use Permit to allow the sale and dispensing of a full-line of alcoholic beverages for on-site consumption within the proposed ground floor restaurant; an Affordable Housing On-Menu Incentive to allow a 20 percent decrease in the total required amount of usable open space for a project setting aside affordable housing units for Very Low Income Households in conjunction with Parking Option 1; and a Site Plan Review for a project which creates, or results in an increase of, 50 or more dwelling units under related Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR. With the approval of Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR, the proposed map will be consistent with the Hollywood Community Plan. As conditioned herein, in the event that Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR is not approved, the subdivider must submit a tract map modification.

The applicant requests a Vesting Tentative Tract Map to permit the merger of nine (9) contiguous lots consisting of 1.66 net acres (72,154 net square feet) to create one (1) master lot (no upper and lower limits) and one (1) airspace lot (above and below grade) for the building, and for the limited dedication and merger of Gordon Street below-grade at a width of four feet and depth of 48.33 feet, approximately 0.3 feet below the finished grade of the public sidewalk. The revised tract map was distributed to and reviewed by the various city agencies of the Subdivision Committee that have the authority to make dedication, and/or improvement recommendations. The Bureau of Engineering (BOE) reviewed the tract map for compliance with the Street Design Standards. BOE determined that the City Engineer cannot enforce an existing policy that does not allow encroachments within 10 feet below the finished sidewalk grade for this subdivision, since the existing structure below grade is to remain. In addition, any required street dedication along Gordon Street including a property line cut corner at the intersection of Sunset Boulevard and Gordon Street cannot be obtained at this time, since the existing structure is to remain. However, BOE

recommends that the existing parking structure below the public sidewalk along Gordon Street be permitted to be merged with the remainder of the tract map with conditions requiring that consents to the area being merged and waivers of any damages that may accrue as a result of such mergers be obtained from all property owners who might have certain rights in the area being merged and that satisfactory arrangements be made with all public utility agencies maintaining existing facilities within the area being merged. Additionally, the applicant is required to record an agreement satisfactory to the City Engineer stating that they will grant the necessary private easements for ingress and egress purposes to serve proposed airspace lots to use upon the sale of the respective lots and they will maintain the private easements free and clear of obstructions and in safe conditions for use at all times. As conditioned, the design and improvements of the proposed subdivision are consistent with the applicable General Plan.

(c) THE SITE IS PHYSICALLY SUITABLE FOR THE TYPE OF DEVELOPMENT.

The project site is physically suitable for the proposed type of development. Specifically, the project site is generally level and, according to the memo from the Grading Division of the Department of Building and Safety, is outside of a City of Los Angeles Hillside Area; is exempt or located outside of a State of California liquefaction, earthquake induced landslide, or fault-rupture hazard zone; and does not require any grading or construction of an engineered retaining structure to remove potential geologic hazards. The tract has been approved contingent upon the satisfaction of the Department of Building and Safety, Grading Division prior to the recordation of the map and issuance of any permits. Prior to the issuance of any permits, the project would be required to be reviewed and approved by the Department of Building and Safety and the Fire Department. Therefore, the project site is physically suitable for the proposed type of development.

(d) THE SITE IS PHYSICALLY SUITABLE FOR THE PROPOSED DENSITY OF DEVELOPMENT.

The site is currently improved with a vacant 22-story, approximately 250-foot high mixed-use building containing approximately 319,562 square feet of floor area, and an approximately 18,962-square-foot public park. The building is comprised of an 18-floor residential tower above a four-level, above-grade podium structure including three (3) levels of subterranean parking and three (3) levels of above-grade parking. The existing building and public park are currently closed due to an Order to Vacate issued by the Los Angeles Department of Building and Safety on March 19, 2015. However, the applicant is requesting a Vesting Tentative Tract Map to merge a portion of the public right-of-way below grade on Gordon Street and existing lots, and resubdivide to create a master lot and an airspace lot. The applicant is also seeking other entitlements under Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR. The Vesting Tentative Tract Map and other entitlements will allow the applicant to continue maintaining a 22-story structure

consisting of an 18-floor residential tower containing 299 dwelling units and approximately 324,693 square feet of floor area and the 18,962-square-foot public park. As proposed, and in conjunction with the approval of Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR, the proposed density and height is consistent with the zone and land use designation. The Grading Division of the Department of Building and Safety determined that because of the site's location a Geology/Soils Report were not required for the proposed subdivision. The Bureau of Engineering determined that the tract is connected to an existing sewer in the street adjoining the subdivision. Additionally, prior to the issuance of a demolition, grading or building permit, the project would be required to comply with conditions herein and applicable requirements of the LAMC. As conditioned, the proposed Tract Map is physically suitable for the proposed density of the development.

(e) THE DESIGN OF THE SUBDIVISION OR THE PROPOSED IMPROVEMENTS ARE NOT LIKELY TO CAUSE SUBSTANTIAL ENVIRONMENTAL DAMAGE OR SUBSTANTIALLY AND AVOIDABLY INJURE FISH OR WILDLIFE OR THEIR HABITAT.

The site is currently improved with a vacant 22-story, approximately 250-foot high mixed-use building containing approximately 319,562 square feet of floor area, and an approximately 18,962-square-foot public park. The building is comprised of an 18-floor residential tower above a four-level, above-grade podium structure including three (3) levels of subterranean parking and three (3) levels of above-grade parking. The existing buildings will continue to be maintained on site. There is no habitat conservation plan or natural community conservation plans presently which govern any portion of the project site. There are no protected trees on the project site. The EIR concludes the project site does not contain or support any known species identified as candidate, sensitive, or special status by local or regional plans, policies or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. Impacts upon biological resources will therefore be less than significant and no mitigation measures are required. Therefore, the design of the subdivision would not cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.

(f) THE DESIGN OF THE SUBDIVISION OR TYPE OF IMPROVEMENTS IS NOT LIKELY TO CAUSE SERIOUS PUBLIC HEALTH PROBLEMS.

There appears to be no potential public health problems caused by the design or improvement of the proposed subdivision. The development is required to be connected to the City's sanitary sewer system, where the sewage will be directed to the LA Hyperion Treatment Plant, which has been upgraded to meet Statewide ocean discharge standards. The Bureau of Engineering has reported that the proposed subdivision does not violate the existing California Water Code, because the subdivision will be connected to the public sewer system and will

have only a minor incremental impact on the quality of the effluent from the Hyperion Treatment Plant. In addition, the EIR fully analyzed the impacts of the project on the existing public utility and sewer systems, facilities and services.

(g) THE DESIGN OF THE SUBDIVISION OR THE TYPE OF IMPROVEMENTS WILL NOT CONFLICT WITH EASEMENTS, ACQUIRED BY THE PUBLIC AT LARGE, FOR ACCESS THROUGH OR USE OF PROPERTY WITHIN THE PROPOSED SUBDIVISION.

As required by LAMC Section 12.03, the project site has a minimum of 20 feet of frontages along Sunset Boulevard and Gordon Street, which are public streets. The project site consists of nine (9) lots identified as Lots FR 6 (Arb 1) of Paul and Angel Reyes Subdivision of the East 5 Acres of the South East ¼ of the North West ½ of Section 11 Township 1 South Range 14 West SBM Tract; and Lot 12-19 of Bagnoli Tract No. 2 and by Assessor Parcel Map No. 5545-009-031. 5545-009-035, 5545-009-005, 5545-009-006, and 5545-009-007.

There is an easement granted to the City of Los Angeles for public utilities, recorded November 5, 1976 as Instrument No. 3321, located along Gordon Street on Lots 12 and 15. The existing development that will be maintained is constructed around the public utilities easement, and the design of the subdivision and improvements will continue to maintain the easement free and clear of obstructions and in safe conditions for use at all times.

Therefore, the design of the subdivision and the proposed improvements would not conflict with easements acquired by the public at large for access through or use of the property within the proposed subdivision.

(h) THE DESIGN OF THE PROPOSED SUBDIVISION SHALL PROVIDE, TO THE EXTENT FEASIBLE, FOR FUTURE PASSIVE OR NATURAL HEATING OR COOLING OPPORTUNITIES IN THE SUBDIVISION. (REF. SECTION 66473.1)

In assessing the feasibility of passive or natural heating or cooling opportunities in the proposed subdivision design, the applicant has prepared and submitted materials which consider the local climate, contours, configuration of the parcel(s) to be subdivided and other design and improvement requirements.

Providing for passive or natural heating or cooling opportunities will not result in reducing allowable densities or the percentage of a lot which may be occupied by a building or structure under applicable planning and zoning in effect at the time the tentative map was filed.

The lot layout of the subdivision has taken into consideration the maximizing of the north/south orientation.

The topography of the site has been considered in the maximization of passive or natural heating and cooling opportunities.

In addition, prior to obtaining a building permit, the subdivider shall consider building construction techniques, such as overhanging eaves, location of windows, insulation, exhaust fans; planting of trees for shade purposes and the height of the buildings on the site in relation to adjacent development.

These findings shall apply to both the tentative and final maps for Vesting Tentative Tract Map No. 74172.

VINCENT P. BERTONI, AICP
Advisory Agency

KEVIN S. GOLDEN
Deputy Advisory Agency

CHRISTINA TOY LEE
Senior City Planner

VPB:CTL:KSG:MN:NC

Note: If you wish to file an appeal, it must be filed within 10 calendar days from the decision date as noted in this letter. For an appeal to be valid to the City Planning Commission, it must be accepted as complete by the City Planning Department and appeal fees paid, prior to expiration of the above 10-day time limit. Such appeal must be submitted on Master Appeal Form No. CP-7769 at the Department's Public Offices, located at:

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Downtown Office
Figueroa Plaza
201 North Figueroa Street, 4th Floor
Los Angeles, CA 90012
(213) 482-7077

Valley Office
6262 Van Nuys Boulevard, Suite 251
Van Nuys, CA 91401
(818) 374-5050

West Los Angeles Office
1828 Sawtelle Boulevard, 2nd Floor
Los Angeles, CA 90025
(310) 231-2598

Forms are also available on-line at http://planning.lacity.org

The time in which a party may seek judicial review of this determination is governed by California Code of Civil Procedure Section 1094.6. Under that provision, a petitioner may seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, only if the petition

for writ of mandate pursuant to that section is filed no later than the 90th day following the date on which the City's decision becomes final.