Environmental Review Section

City Hall • 200 N. Spring Street, Room 721 • Los Angeles, CA 90012

INITIAL STUDY/PROPOSED MITIGATED NEGATIVE DECLARATION
HOLLYWOOD COMMUNITY PLAN AREA

1541 Wilcox Hotel

Case No. ENV-2014-3707-EAF

Council District No. 13

THIS DOCUMENT COMPRISES THE INITIAL STUDY/PROPOSED MITIGATED NEGATIVE DECLARATION ANALYSIS AS REQUIRED UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

Project Address: 1541 Wilcox Avenue

Project Description: The project would involve the demolition of the existing structures on the project site and the construction of a hotel with four levels of subterranean parking for a total of 144 parking spaces. Project components include a ten-story plus penthouse structure containing approximately 200 hotel rooms with a ground floor comprised of a lobby reception, a 1,862 square-foot hotel lobby bar, a 4,595 square-foot restaurant, a 2,315 square-foot kitchen and a 1,085 square-foot outdoor eating area; a second floor comprised of guest rooms, 3,020 square feet of meeting rooms and terraces accessible to hotel guests only; a 3,924 square-foot pool deck on the roof of the 10th floor; and a 1,430 square-foot penthouse restaurant. The applicant requests the following discretionary approvals: (1) a Vesting Height District Change from C4-2D to remove the existing D Limitation and impose a new D Limitation to permit an FAR not to exceed 5.5 to 1; (2) a Master Conditional Use Permit for the on-site sale and consumption of a full line of alcoholic beverages; (3) an Adjustment to permit zero-foot side yards on the second story in lieu of the 14-foot side yard required in the C4 Zone; (4) Site Plan Review; (5) approval and execution of an Owner Participation Agreement with CRA/LA, a Designated Local Authority to authorize a Floor Area Ratio exceeding 4.5 to 1; and (6) a Haul Route Approval.

APPLICANT:
1541 Wilcox Hotel LLC

PREPARED BY:
FirstCarbon Solutions

July 2015

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CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT

PROPOSED MITIGATED NEGATIVE DECLARATION

LEAD CITY AGENCY: City of Los Angeles		COUNCIL DISTRICT:
PROJECT TITLE: 1541 Wilcox Avenue Hotel	**ENVIRONMENTAL CASE:** ENV-2014-3707-MND	**CASE NO.** CPC-2014-3706-ZC-HD-ZAA-SPR

PROJECT LOCATION: 1521-1541 Wilcox Avenue, Los Angeles, CA 90028

Project Description: The project would involve the demolition of the existing structures on the project site and the construction of a hotel with four levels of subterranean parking for a total of 144 parking spaces. Project components include a ten-story plus penthouse structure containing approximately 200 hotel rooms with a ground floor comprised of a lobby reception, a 1,862 square-foot hotel lobby bar, a 4,595 square-foot restaurant, a 2,315 square-foot kitchen and a 1,085 square-foot outdoor eating area; a second floor comprised of guest rooms, 3,020 square feet of meeting rooms and terraces accessible to hotel guests only; a 3,924 square-foot pool deck on the roof of the 10th floor; and a 1,430 square-foot penthouse restaurant. The applicant requests the following discretionary approvals: (1) a Vesting Height District Change from C4-2D to remove the existing D Limitation and impose a new D Limitation to permit an FAR not to exceed 5.5 to 1; (2) a Master Conditional Use Permit for the on-site sale and consumption of a full line of alcoholic beverages; (3) an Adjustment to permit zero-foot side yards on the second story in lieu of the 14-foot side yard required in the C4 Zone; (4) Site Plan Review; (5) approval and execution of an Owner Participation Agreement with CRA/LA, a Designated Local Authority to authorize a Floor Area Ratio exceeding 4.5 to 1; and (6) a Haul Route Approval.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY
1541 Wilcox Hotel, LLC
1605 N. Cahuenga Boulevard
Los Angeles, CA 90028

FINDING: The Department of City Planning of the City of Los Angeles has proposed that a mitigated negative declaration be adopted for this project. The mitigation measures outlined on the attached pages will reduce any potentially significant adverse effects to a level of insignificance.

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED

Any written comment received during the public review period are attached together with the response of the Lead City Agency. The project decision-maker may adopt the mitigated negative declaration, amend it, or require preparation of an EIR. Any changes made should be supported by substantial evidence in the record and appropriate findings made.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.

NAME OF PERSON PREPARING FORM	TITLE	TELEPHONE NUMBER
Oliver Netburn	City Planning Associate	(213) 978-1382
ADDRESS	**SIGNATURE (Official)**	**DATE**
200 North Spring Street, 7th Floor Los Angeles, CA 90012		August 17, 2015

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TABLE OF CONTENTS

APPENDICES

(Under Separate Cover)

APPENDIX A: PROJECT PLANS

APPENDIX B: SHADE-SHADOW REPORT

APPENDIX C: AIR QUALITY AND GREENHOUSE GAS MODELING

APPENDIX D: CULTURAL RESOURCES TECHNICAL REPORT

APPENDIX E: GEOLOGY AND SOILS REPORTS

APPENDIX F: PHASE I ESA REPORT

APPENDIX G NOISE MONITORING SHEETS

APPENDIX H TRAFFIC IMPACT ANALYSIS

FIGURES

TABLES

1. INTRODUCTION

The subject of this Initial Study/ Mitigated Negative Declaration (IS/MND) is the 1541 Wilcox Hotel Project (project). The project would include the construction of a ten-story plus penthouse structure with a Floor Area Ratio of 5.5 to 1; 200 hotel rooms; a ground floor comprised of a lobby reception, a 1,862 square-foot lobby bar, a 4,959 square-foot restaurant and a 2,315 square-foot kitchen and a 1,085 square foot outdoor eating area; a second floor comprised of guest rooms, 3,020 square feet of meeting rooms and terraces accessible to hotel guests only; a 3,924 square-foot pool deck on the roof of the 10th floor; a 1,430 square-foot penthouse restaurant; and four levels of subterranean parking with 144 parking spaces. The project site is located at 1541 Wilcox Avenue in the Hollywood Community within the City of Los Angeles. The project applicant is 1541 Wilcox Hotel, LLC located at 1605 Cahuenga Blvd., in Los Angeles, CA 90028. A description of the project is contained in Section II, Project Description. The City of Los Angeles, Department of City Planning, is the Lead Agency under the California Environmental Quality Act (CEQA).

DISCRETIONARY ACTIONS

The project would require approval of discretionary actions by the City of Los Angeles and CRA/LA, a Designated Local Authority, which may include the following:

- Pursuant to LAMC Section 12.32, a Vesting Height District Change from C4-2D to remove the D Limitation and impose a new D Limitation to permit an FAR not to exceed 5.5 to 1;
- Pursuant to LAMC Section 12.24-W,1, a Master Conditional Use Permit for the on-site sale and consumption of a full line of alcoholic beverages in the following locations: (a) the ground floor restaurant and lobby bar from 8 a.m. to 2 a.m. daily; (b) the roof restaurant and pool deck from 8 a.m. to 2 a.m. daily; (c) controlled-access liquor cabinets to be located within the guest rooms at all times; and (d) guest rooms by way of room service at all times;
- Pursuant to LAMC Section 12.28, an Adjustment to permit zero-foot side yards on the second story in lieu of the 14-foot side yard required in the C4 Zone;
- Pursuant to LAMC Section 16.05, Site Plan Review for a development creating more than 50 guest rooms;
- Pursuant to Hollywood Redevelopment Plan Section 506.2.3, approval and execution of an Owner Participation Agreement with CRA/LA, a Designated Local Authority to authorize a Floor Area Ratio exceeding 4.5 to 1;
- Haul Route Approval.

A previous version of this IS/MND was published between March 5th and March 25th, 2015. The previous iteration studied a larger project and did not analyze the land use consistency implications of the requested Owner Participation Agreement. Moreover, the previous IS/MND was not published for the full 30 days required when a state agency such as CRA-LA, a Designated Local Authority is a responsible agency.

PROJECT INFORMATION

Project Title:	1541 Wilcox Hotel
Project Location:	1541 Wilcox Avenue
Lead Agency:	City of Los Angeles Department of City Planning 200 N. Spring Street, Room 721 Los Angeles, CA 90012
City Contact Person:	Oliver Netburn, City Planning Associate Expedited Processing Section

ORGANIZATION OF THE INITIAL STUDY

This Initial Study (IS) is organized into six sections as follows:

Introduction: This section provides introductory information such as the Project title, the Project applicant, and the lead agency for the Project.

Project Description: This section provides a detailed description of the environmental setting and the Project, including project characteristics and environmental review requirements.

Initial Study Checklist: This section contains the completed Initial Study Checklist.

Environmental Impact Analysis: Each environmental issue identified in the Initial Study Checklist contains an assessment and discussion of impacts associated with each subject area. When the evaluation identifies potentially significant effects, as identified in the Checklist, mitigation measures are provided to reduce such impacts to a less than significant level.

List of Preparers: This section provides a list of City personnel, other governmental agencies, and consultant team members that participated in the preparation of this IS.

Appendices: Includes various documents and information used in the preparation of this IS.

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2. PROJECT DESCRIPTION

ENVIRONMENTAL SETTING

Project Location

The 0.47-acre project site is located at 1541 Wilcox Avenue in the Hollywood Community within the City of Los Angeles and is generally bounded by Wilcox Avenue to the east, commercial uses to the north, multi-family residential uses to the south, and a parking lot and duplex to the west (see Figures 2-1 and 2-2).

Regional access to the project site is provided via the Hollywood Freeway (US-101). Major north-south streets serving the project site and surrounding area include N. Cahuenga Boulevard and N. Highland Avenue. Major east-west streets serving the project site and surrounding area include Hollywood Boulevard and Sunset Boulevard.

The project site is served by the Hollywood/Highland Station (approximately 0.5 mile northwest of the project site) and the Hollywood/Vine Station (approximately 0.5 mile northeast of the project site) of the Metro Rail Red Line. The Metro Rail Red Line extends from Union Station/Gateway Transit Center through downtown Los Angeles to North Hollywood and along Wilshire Boulevard to Western Avenue. The Metro Red Line also provides access to other regional transit lines, including the Metro Rail Blue, Expo and Gold Lines, Metrolink commuter rail, and regional and local bus lines.

Description of the Project Site and Existing Land Uses

The project site is approximately 0.47 acre, or approximately 20,682 square feet (sq ft), and it comprises one parcel located immediately south of commercial uses, west of Wilcox Avenue, immediately north of multi-family residential uses, and east of a parking lot. The existing project site is currently developed with a 14,208-square-foot warehouse and an associated paved surface parking lot. Views of the existing project site are shown in Appendix A.

Description of Surrounding Land Uses

The project site is located in a developed urban area. General land uses in the vicinity of the project site include various commercial, multi-family residential, retail, institutional, and medical facilities. The following paragraphs describe the specific land uses in the project site's vicinity.

Directly east of the project site, across Wilcox Avenue, is a car service center. South of this commercial use on the corner of Wilcox Avenue and Sunset Boulevard is a studio instrument rental business. A hotel lies directly north of the car service center and it is adjacent to a parking lot of a walk-in clinic located on the corner of Selma Avenue and Wilcox Avenue.

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Source: Census 2000 Data, The CaSIL, FCS GIS 2014.

FirstCarbon SOLUTIONS

5 2.5 0 5 Miles

Figure 2-1
Regional Location Map

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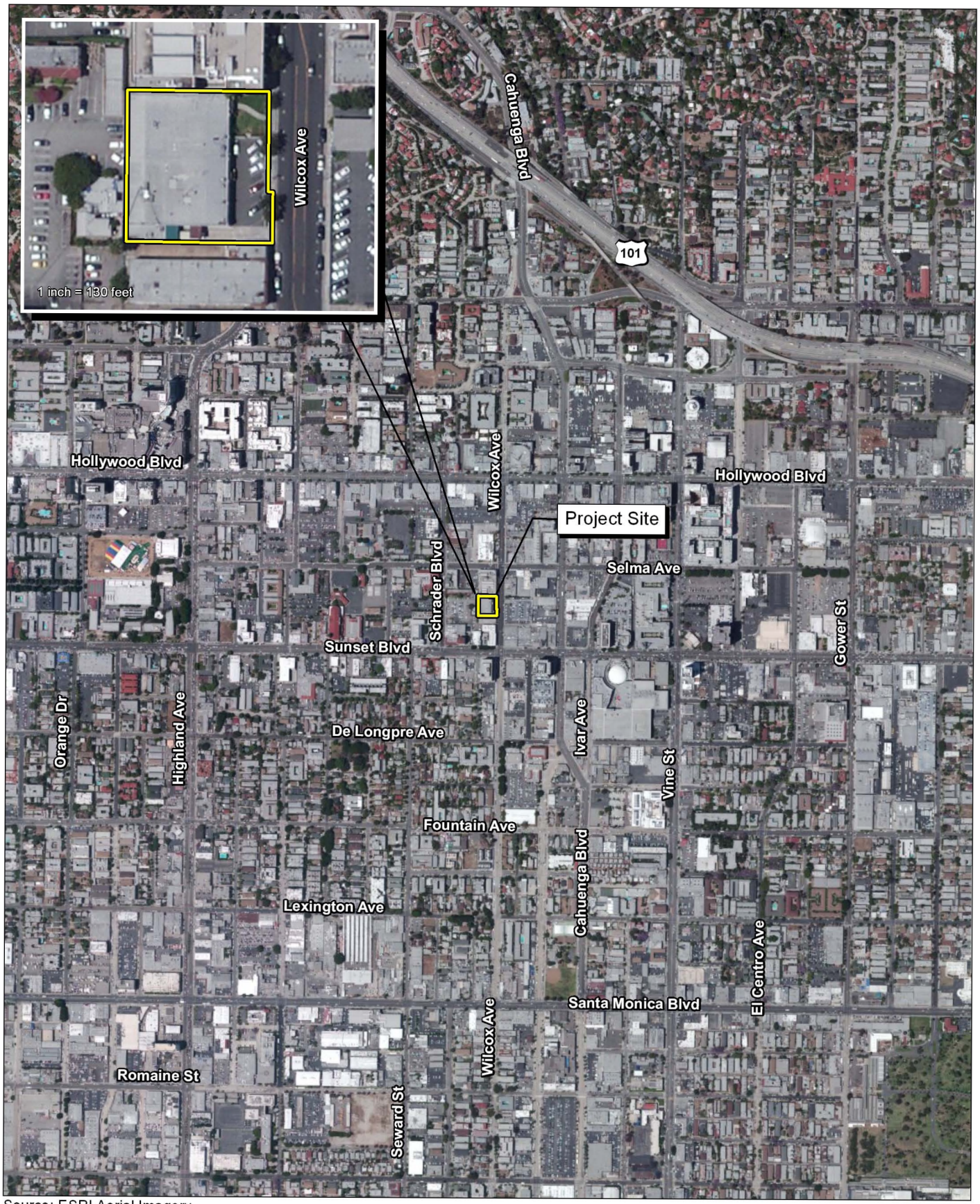

Source: ESRI Aerial Imagery.

FirstCarbon® SOLUTIONS

1,000 500 0 1,000 Feet

Figure 2-2
Local Vicinity Map
Aerial Base

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Directly north of the project site, on Wilcox Avenue, is an office building, which is adjacent to a vacant structure currently undergoing renovation on the southwest corner of Selma Avenue and Wilcox Avenue.

Land uses northwest of the project site include parking and additional multi-family residential apartment complexes. Further north, across Selma Avenue is a post office and additional parking lots.

Directly west of the project site, fronting Schrader Boulevard is a parking lot and a one-story duplex. South of the parking lot and southwest of the project site on the corner of Schrader Boulevard and Sunset Boulevard is residential development. West of the parking lot is another parking lot with commercial development to the south, including a Money Mart, JN Media, SAE Institute, Ponchik Factory, and the Department of Water and Power. North of the parking lot are more residential uses and the Hollywood Wilshire YMCA.

The area directly south and adjacent to the project site is developed with a two-story multi-family residential structure. Further south fronting Wilcox Avenue are vacant commercial uses, a liquor store, and a copy business. South of the project site fronting Sunset Boulevard are more commercial uses, including a dry cleaner, a bar, and a nine-story office building. South, across Sunset Boulevard is a twelve-story office building adjacent to a commercial building and a hotel.

Land Use and Zoning Designation

The Hollywood Community Plan Area (Community Plan Area) is located in the eastern portion of the City of Los Angeles. When the Community Plan was adopted, the project site was designated by the Community Plan as "Commercial Regional Center." The project site's underlying zoning is C4-2D (C4: Commercial, C2 uses with limitation, 2: Height District 2, D: Development Limitation). The development limitation allows a maximum by right floor area ratio (FAR) of 2:1 with additional FAR available pursuant to approval by the City Planning Commission and the Community Redevelopment Agency (CRA). The project falls under the jurisdiction of Council District CD-13.

Redevelopment Agency Approval

The Property is located within the boundaries of the Hollywood Redevelopment Project Area. Until the City accepts a transfer of all land use related redevelopment plans and functions, authority to implement the Amended Hollywood Redevelopment Plan is vested in CRA/LA, a Designated Local Authority (successor agency to the former Community Redevelopment Agency of the City of Los Angeles). As a public agency other than the City of Los Angeles with discretionary approval power over the project, CRA/LA is a responsible agency under CEQA.

DESCRIPTION OF THE PROJECT

The project includes the demolition of a 14,208-square-foot warehouse and the construction of a 10-story plus penthouse hotel with a maximum height of 114.5 feet to the top of the roof deck. Other portions of the structure project above the roof deck, including the penthouse restaurant and fitness center which reach 124.5 feet in height and the elevator shaft which reaches 130.5 feet in height (see Figures 2-3 through 2-9). The penthouse restaurant and fitness center will feature operable glass walls. The new hotel would feature:

- 200 hotel guest rooms
- a ground floor lobby, lobby bar and restaurant
- meeting rooms accessible to hotel guests only
- a fitness center accessible to hotel guests only
- a penthouse restaurant accessible to the public
- a roof deck pool adjacent to the penthouse restaurant accessible to the public
- four levels of underground parking with 144 parking spaces

Table 2-1 summarizes the key hotel features distributed throughout the hotel. Figures 2-3 through 2-9 give a detailed illustration of the floor plans for each level. A landscape plan, a floor plan of the subterranean parking garage, and elevations are provided in Appendix A.

Table 2-1
Key Hotel Features by Floor

Features
1st Floor Hotel entrance Restaurant (4,595 sq ft), kitchen (2,315 sq ft) and outdoor eating area (1,085 square-feet) Lobby and reception area (733 sq ft) Lobby bar (1,862 sq ft) Courtyard (934 sq ft)
2nd Floor Private terraces (accessible to guests only) Meeting rooms (3,020 sq ft) Guest rooms
3rd through 10th Floor Guest rooms
Roof Deck Penthouse Restaurant (1,430 sq ft) Pool deck (3,924 sq ft) Fitness/Spa (840 sq ft)

The vehicle and pedestrian entrances to the hotel lobby and restaurant would be from Wilcox Avenue. The hotel will operate 24 hours per day. Hours of operation for the ground floor restaurant, the lobby bar, the penthouse restaurant and the pool deck are 8 a.m. to 2 a.m.

Live entertainment is proposed only within the indoor ground-floor restaurant and lobby. No dancing is proposed in any portion of the project. The second story terrace will be accessible to hotel guests only. No outdoor music, even ambient background music, is proposed for the second-story terrace. No live entertainment is proposed for the roof deck or penthouse restaurant. Only ambient background music will be used on the roof deck and penthouse restaurant. Ambient background music on the roof deck shall cease at 10 p.m. Sunday through Wednesday and 11 p.m. Thursday through Saturday.

Table 2-2 provides a breakdown of the floor area for each building level.

Table 2-2
Interior Floor Area

Floor	Floor Area (sq ft)
One	14,539
Two	10,033
Three, Six, Nine	10,932 each (total 32,796)
Four, Five, Seven, Eight	10,835 each (total 43,340)
Ten	8,881
Roof	4,162
Total Square Footage	113,751
Source: Rockwell Group. May 2015.	

Allowable Floor Area is determined by the Buildable Area of the Lot multiplied by the allowable FAR. The allowable FAR is 2:1, as the project falls under the D Limitation and would allow a maximum floor area of 41,364 square feet. The existing D Limitation allows for applicants, upon request, to be granted an FAR no greater than 6:1 with approval from the City Planning Commission and the Community Redevelopment Agency. The Applicant requests a Vesting Height District Change to allow an FAR of up to 5.5:1.

Modified Dedications and Sidewalk Easement

The Hollywood Community Plan designates Wilcox Avenue a designated Secondary Highway requiring a 45-foot half right-of-way, comprised of a 35-foot half road bed and a 10-foot sidewalk. Along the property's 150 feet of frontage, the southern 50 linear feet is dedicated to a 30-foot half right-of-way,

and the remaining 100 feet is dedicated to a 35-foot half right-of-way. Based on the current Secondary Highway designation, the property must dedicate an additional 10 to 15 feet along its frontage.

Landscaping and Exterior Features

The project's frontage includes several large Chinese Elm (ulmus parvifolia) trees to be planted in 36-inch boxes and a newly paved sidewalk. A landscape plan is provided in Appendix A. In addition, landscaping would be provided at the lobby entrance the first level; on the second level terrace; and on the rooftop pool deck.

The exterior of the building will include building materials such as composite wood paneling, black porcelain, white stucco, and vision glass (clear paneling). North, south, east, and west elevations are provided in Appendix A, as well as visual simulations of the building. As shown in the elevations, the project has a maximum building height of 114.5 feet to the roof deck, 124.5 feet to the top of the penthouse restaurant and fitness center, and 130.5 feet at the top of the elevator shaft.

Lighting

The project site would be illuminated with indoor and outdoor lighting. Security lighting would be provided along the perimeter of the structure, in stairwells, along walkways, and in courtyards. Lighting would also be provided to illuminate the hotel signage and rooftop garden area. All lighting would either be shielded and focused on the project site or located completely indoors.

Parking and Vehicular Access

Approximately 144 parking spaces would be provided in the proposed four below grade parking levels. Floor plans for the four levels of subterranean parking are located in Appendix A. Parking would be provided in compliance with the requirements of the City of Los Angeles Municipal Code (LAMC). Based on the LAMC, the hotel is required to provide one space per hotel guest room for the first 30 rooms, one space for every two guest rooms for the next 30 rooms, and one space for every 3 rooms for the remaining guest rooms. The commercial restaurants and bar are required to provide 1 space per 500 square feet. With 200 hotel guest rooms and 10,202 square feet of commercial land uses, the total number of required parking spaces is 111 guest parking spaces (the ground floor eating area does not count as Floor Area for parking purposes). The project will meet this requirement.

Vehicular ingress and egress to the guest parking would be provided from Wilcox Avenue into the lower level parking garage on the south side of the project site. Pedestrian access to the hotel would be provided from the street level via the main entrance on Wilcox Avenue, and from parking levels via two dedicated elevators, and central and northeast corner stairwells. Valet service for the project will occur on Wilcox Avenue. The portion of Wilcox Avenue fronting the property is currently a designated loading zone, so no on-street parking will be displaced. The proposed valet arrangement will allow valet attendants to move vehicles from Wilcox Avenue to the project's subterranean parking by turning right into the driveway without entering travel lanes on Wilcox Avenue. A total of 30 bike parking spaces (15 on the

first parking level and 15 at grade) are also provided on the project site for use by hotel guests, restaurant and bar patrons and employees. Access to the various bike parking locations would occur from the sidewalk and driveway on Wilcox Avenue.

Other Features

The building features three standard and one service elevator that provides access to all floors building floors. The building also features two staircases on the western portion of the structure.

Housekeeping storage is provided on all floors; pool support/storage is provided on the roof deck. Mechanical equipment areas are located within the parking garage and on the upper roof. Solar panels are proposed on the upper roof.

Construction

Construction activities associated with the project would be undertaken in three phases: demolition and substructure work, construction of the structure, and interior work and finishing, as shown in Table 2-3. The demolition and substructure work phase includes the demolition of all existing structures and pavement located on the project site, excavation and grading of the project site, and preparation of the building foundation. Excavation will be required for the foundation, utilities, and the subterranean parking. Excavation will conservatively result in the export of approximately 41,140 cubic yards of soil all related to excavation for the below grade parking levels, permitting excavation of the entire site to a depth of 53 feet below grade.[1] The elevation of the project's lowest finished floor is 45 feet below grade, with a 3-foot mat-slab foundation requiring excavation to 48 feet below grade. The building construction phase includes the construction of the proposed building, architectural coating, and connecting the building to the utilities. The interior work and finishing phase includes installation of carpet, fixtures, etc. Construction of the project would be completed in November 2017.

Table 2-3
Construction Schedule

Construction Task	Schedule
Demolition and substructure work	4 months (July 2016-February 2017)
Building Construction	7 months (October 2016-September 2017)
Interior work and finishing	4 months (March 2017-November 2017)
Source: FirstCarbon Solutions. May 2015.	

[1] *The area of the project site is 20,682 square feet (2,298 square yards). Excavation to a depth of 17.9 yards (53 feet and 8 inches) yields an excavated volume of 41,140 cubic yards (2,298 square yards* times 17.9 yards equals 41,140 cubic yards). Thus, the MND studies a volume equivalent to excavating the entire project site to a depth of 53 feet and 8 inches.

Northbound haul trips would use Sunset Boulevard, Wilcox Avenue and Hollywood Boulevard. Southbound haul trips would use Wilcox Avenue, Sunset Boulevard and Van Ness Avenue. See Figure 2-10 for the proposed haul routes. A haul route approval is required.

PROJECT OBJECTIVES

- Redevelop and revitalize an underutilized site and provide commercial facilities to support the Hollywood Community Plan Area and the needs of the surrounding neighborhood;
- Create a high-quality, integrated development with multiple uses that will meet the community's need and serve future generations;
- Create new hotel rooms in an area of the City poorly served by hotel infrastructure;
- Activate the subject site with pedestrian friendly uses;
- Provide a branded lodging option for leisure and business travelers, tourists and visiting friends/relatives of local residents who must currently look outside of Hollywood for quality hotel stock;
- Leverage the millions of public investment dollars on local transit facilities and infrastructure, including the Hollywood/Highland and Hollywood/Vine Metro stations which are both located approximately 0.5 miles from the subject site.
- Capitalize on smart growth opportunities by intensifying a currently under-utilized site with a mix of uses and a 5.5 to 1 FAR on a site designated as Regional Center Commercial by the Community Plan;
- Improve the aesthetic quality and sustainability of the subject site by removing older, outdated structures and developing a modern, efficient building that utilizes the latest City and State Green Building Codes;
- Create an architecturally-inspired development that is economically sustainable, compatible with surrounding land uses, and consistent with the policies and objectives of the Hollywood Community and Redevelopment Plans;
- Promote multiple modes of transportation, including biking, through the development of guest bike parking for visitors and employees.

Site Design Objectives

- Provide a well-designed development that is complementary to surrounding land uses;
- Enhance project aesthetics by providing variation in design elements, including building planes, heights and massing within an urbanized area.

Economic Objectives

- Maximize the value of the currently underutilized site through replacement of surface parking lot and other existing structures with new commercial uses;
- Accommodate the area's future economic expansion and anticipated population growth by providing commercial uses within a community that has the necessary infrastructure, including mass transit, to support such development and growth;
- Strengthen the economic vitality of the region by attracting new workers through construction and operation of the project and generating employment opportunities for the local area.
- Strengthen the local Hollywood economy by providing transient lodging options that will allow tourists to stay in Hollywood longer, thus patronizing local business.

DISCRETIONARY ACTIONS

The project would require approval of discretionary actions by the City of Los Angeles and CRA/LA, which may include the following:

- Pursuant to LAMC Section 12.32, a Vesting Height District Change from C4-2D to remove the existing D Limitation and impose a new D Limitation to permit an FAR not to exceed 5.5 to 1;
- Pursuant to LAMC Section 12.24-W,1, a Master Conditional Use Permit for the on-site sale and consumption of a full line of alcoholic beverages in the following locations: (a) the ground floor restaurant and lobby bar from 8 a.m. to 2 a.m. daily; (b) the roof restaurant and pool deck from 8 a.m. to 2 a.m. daily; (c) controlled-access liquor cabinets to be located within the guest rooms at all times; and (d) guest rooms by way of room service at all times;
- Pursuant to LAMC Section 12.28, an Adjustment to permit zero-foot side yards on the second story in lieu of the 14-foot side yard required in the C4 Zone;
- Pursuant to LAMC Section 16.05, Site Plan Review for a development creating more than 50 guest rooms;
- Pursuant to Hollywood Redevelopment Plan Section 506.2.3, approval and execution of an Owner Participation Agreement with CRA/LA, a Designated Local Authority to authorize a Floor Area Ratio exceeding 4.5 to 1; and
- Haul Route Approval.

This Initial Study/Mitigated Negative Declaration serves as the environmental document under CEQA for all discretionary actions associated with the project. This Initial Study/Mitigated Negative Declaration is intended to be the primary reference document in the formulation and implementation of a mitigation monitoring program for the project. This Initial Study/Mitigated Negative Declaration is also intended to cover all state, regional, and/or local government discretionary approvals that may be required in conjunction with the project, whether or not they are explicitly listed. Federal, state and regional agencies

that may have jurisdiction over specific activities associated with the project include but are not necessarily limited to:

- CRA/LA, a Designated Local Authority
- South Coast Air Quality Management District
- Regional Water Quality Control Board, Los Angeles Region

A previous version of this IS/MND was published between March 5th and March 25th, 2015. The previous iteration studied a larger project and did not analyze the land use consistency implications of the requested Owner Participation Agreement. Moreover, the previous IS/MND was not published for the full 30 days required when a state agency such as CRA-LA, a Designated Local Authority is a responsible agency.

WILCOX AVENUE HOTEL
1541 WILCOX AVE.
LOS ANGELES, CA

1ST FLOOR PLAN

SCALE: 1/16" = 1'-0"

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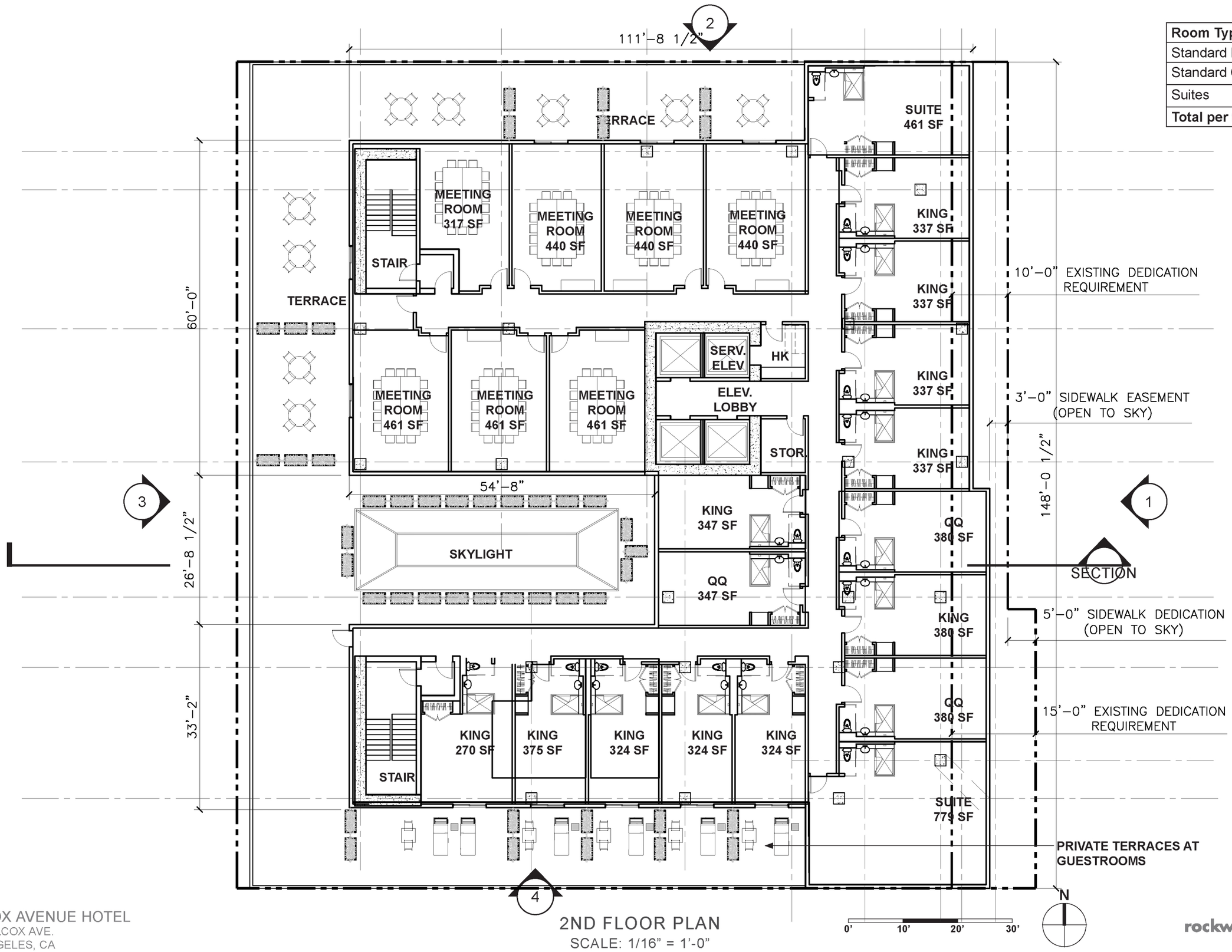
Room Type	Quantity
Standard King	11
Standard Queen	3
Suites	2
Total per floor	**16**



2ND FLOOR PLAN

SCALE: 1/16” = 1’-0”

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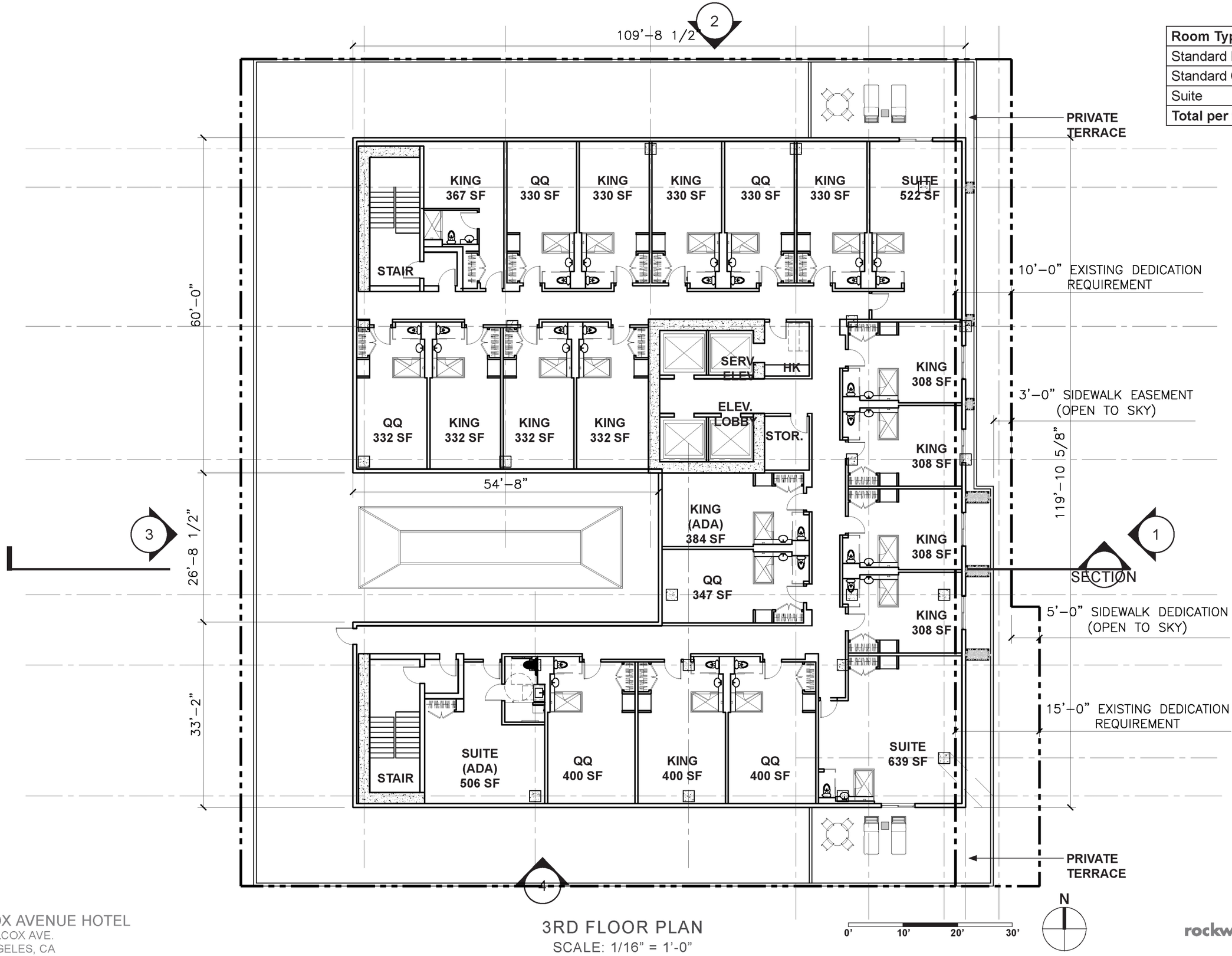
Room Type	Quantity
Standard King	13
Standard Queen	6
Suite	3
Total per floor	**22**



3RD FLOOR PLAN
SCALE: 1/16" = 1'-0"

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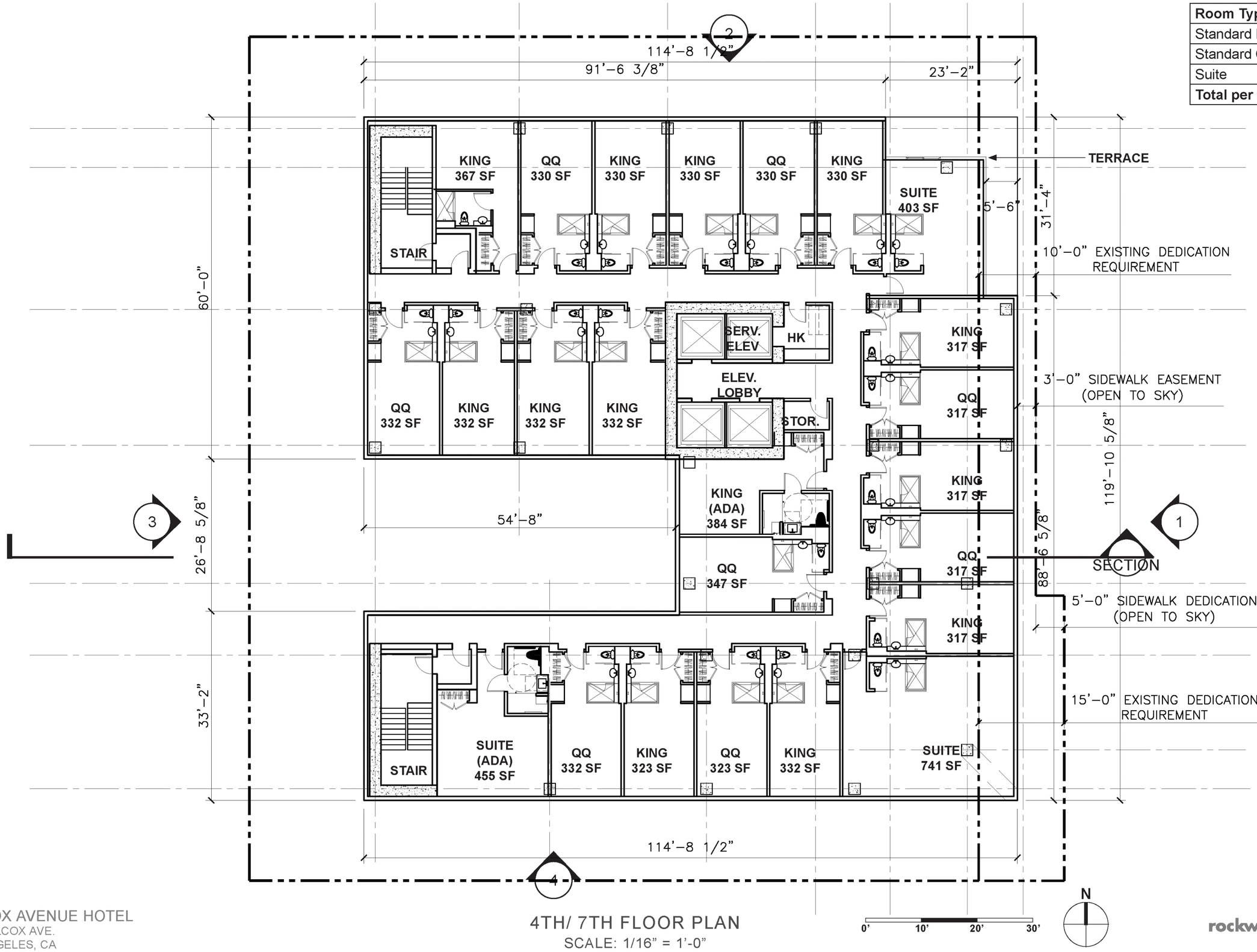
Room Type	Quantity
Standard King	13
Standard Queen	8
Suite	3
Total per floor	**24**



4TH/ 7TH FLOOR PLAN
SCALE: 1/16” = 1’-0”

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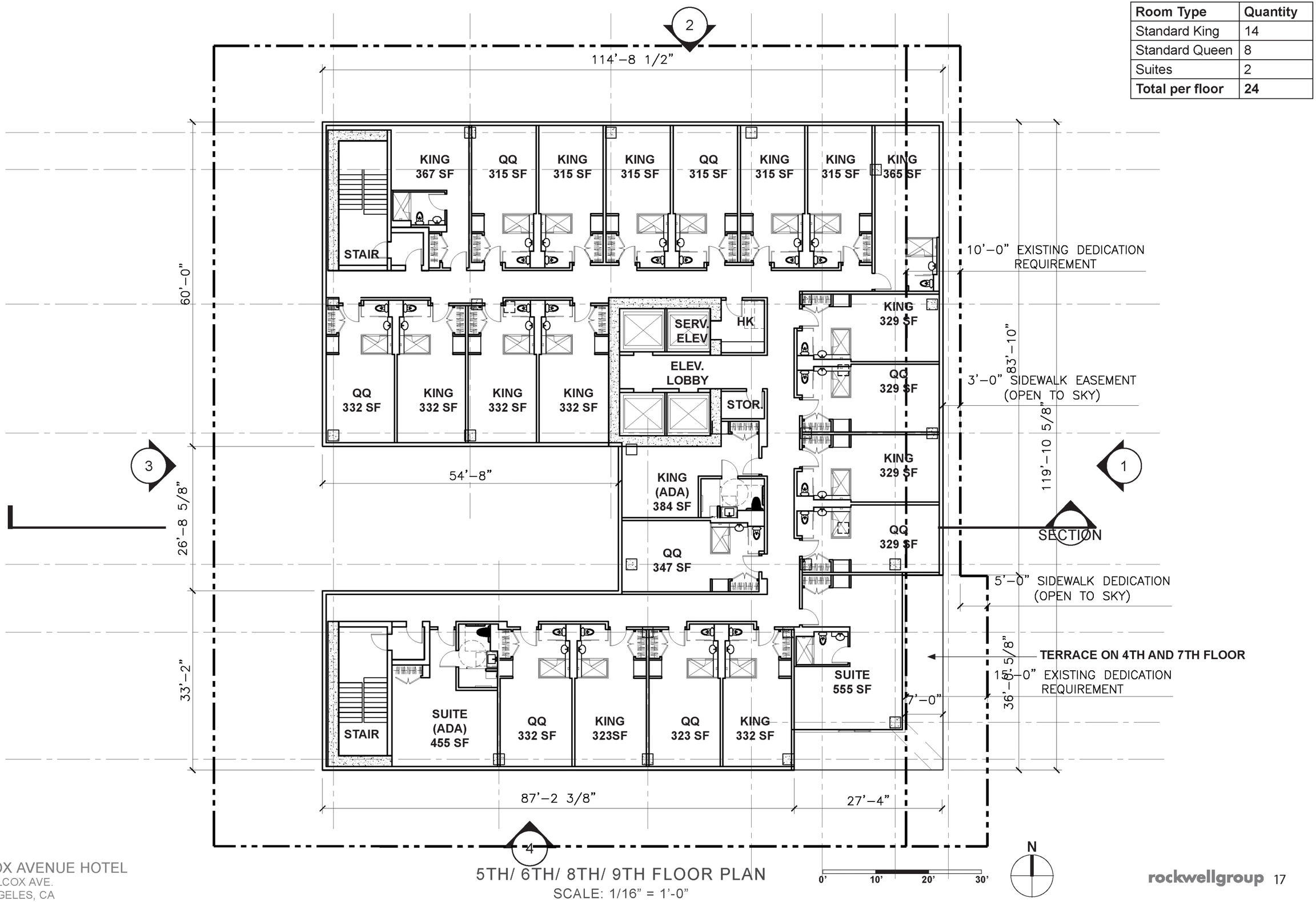
Room Type	Quantity
Standard King	14
Standard Queen	8
Suites	2
Total per floor	**24**



WILCOX AVENUE HOTEL
1541 WILCOX AVE.
LOS ANGELES, CA

5TH/ 6TH/ 8TH/ 9TH FLOOR PLAN
SCALE: 1/16” = 1’-0”

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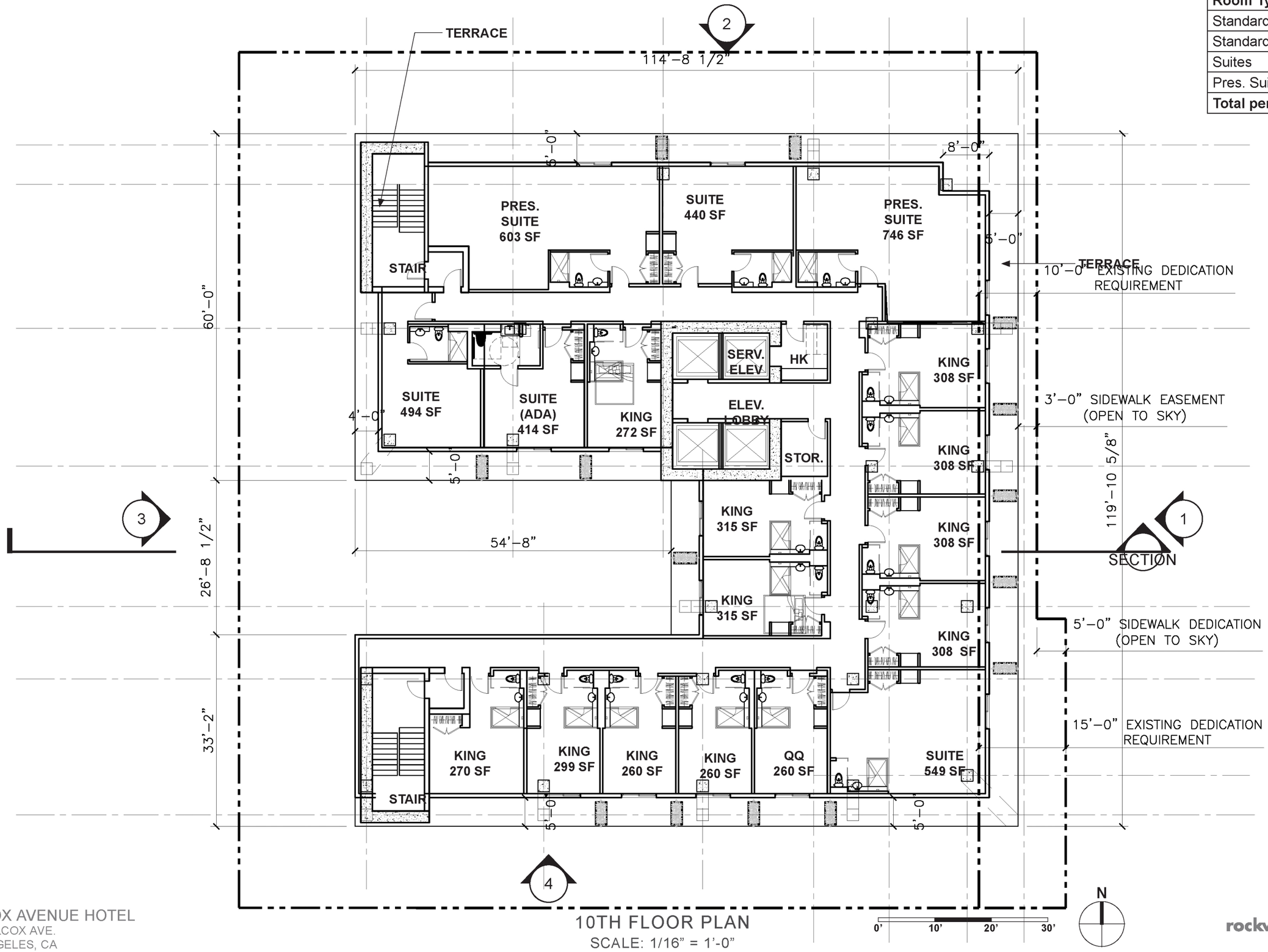
Room Type	Quantity
Standard King	11
Standard Queen	1
Suites	4
Pres. Suites	2
Total per floor	**18**



10TH FLOOR PLAN

SCALE: 1/16" = 1'-0"

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WILCOX AVENUE HOTEL
1541 WILCOX AVE.
LOS ANGELES, CA

ROOF PLAN

SCALE: 1/16" = 1'-0"

0' 10' 20' 30'

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Source: ESRI Aerial Imagery.

FirstCarbon® SOLUTIONS

1,000 500 0 1,000 Feet

Figure 2-10
Haul Route

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2.1 SUMMARY OF RECOMMENDED MITIGATION MEASURES

The following mitigation is recommended based on the analysis contained herein.

Cultural Resources

5-1. In the event that buried cultural resources are discovered during project development, construction activities shall stop within 50 feet of the find and a qualified archaeologist shall be consulted to determine whether the resource requires further study:

a. The archaeologist shall make recommendations to the Lead Agency on the measures that shall be implemented to protect the discovered resources, including but not limited to, excavation of and evaluation of the finds in accordance with Section15064.5 of the CEQA Guidelines. Potentially significant cultural resources consist of, but are not limited to, stone, bone, fossils, wood, or shell artifacts or features, including hearths, structural remains, or historic dumpsites. Any previously undiscovered resources found during construction within the project area should be recorded on appropriate Department of Parks and Recreation (DPR) forms, and evaluated for significance in terms of CEQA criteria.

b. If the discovered resource is determined to be a unique historic resource as defined under Section 15064.5 of the CEQA Guidelines, additional measures shall be identified by the archaeologist and recommended to the Lead Agency. Appropriate measures for significant resources could include avoidance or capping; incorporation of the location of the find as undisturbed green or open space; and/or data recovery excavations of the find.

c. No further ground-disturbing activities shall occur in the vicinity of the find until the Lead Agency approves the measures to protect these resources. Any archaeological artifacts recovered as a result of mitigation shall be donated to a qualified scientific institution approved by the Lead Agency, where they would be afforded long-term preservation to allow future scientific study.

5-2. In the event that paleontological resources are encountered during the course of grading and/or excavation, all development shall temporarily cease in these areas until a qualified paleontologist is brought onto the project site to properly assess the resources and make recommendations for their disposition. Excavation or disturbance may continue in other areas of the project site that are not reasonably suspected to overlie adjacent paleontological resources.

5-3. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

a. Stop immediately and contact the County Coroner:

1104 N. Mission Road
Los Angeles, CA 90033
323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

b. The coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Commission.

c. The Native American Heritage Commission will immediately notify the person it believes to be the most likely descendent of the deceased Native American.

d. The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.

e. If the descendent does not make recommendations within 48 hours the owner shall reinter the remains in an area of the property secure from further disturbance, or;

f. If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the Native American Heritage Commission.

Geology and Soils

6-1. The Project shall be supported on foundations embedded into alluvium.

6-2. The soils chemistry results shall be considered in the design of the Project, subject to the approval of the Department of Building and Safety.

6-3. The property owner shall maintain the site as outlined in the Preliminary Geotechnical Engineering Investigation document, Drainage and Maintenance section prepared by GeoConcepts and dated May 16, 2014.

6-4. Excavation and grading activities shall be scheduled during dry weather periods as feasible. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the project site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.

6-5. Implementation of appropriate erosion control and drainage devices to the satisfaction of the Building and Safety Department shall be incorporated such as: sand bags and inlet and outlet structures, as specified by Section 91.7013 of the Building Code, and planting

fast-growing annual and perennial grasses in areas where construction is not immediately planned.

6-6. Stockpiles and excavated soil shall be covered with secured tarps or plastic sheeting.

6-7. All excavation and shoring systems shall meet, at a minimum, the requirements given in the State of California Occupational Safety and Health Standards.

6-8. When rain is forecast, all fill shall be properly compacted prior to stopping work for the day. Once compacted, these fills shall have the surface sloped and use temporary drainage devices to transfer excess water to the street. Drainage shall not be allowed to pond anywhere on the site.

Hazards and Hazardous Materials

8-1. An Operations and Maintenance (O&M) Program would be implemented in order to safely manage the suspect asbestos containing materials (ACMs). The identified suspect ACMs would need to be sampled to confirm the presence or absence of asbestos prior to any demolition activities to prevent potential exposure to workers and/or building occupants. Prior to the issuance of the demolition permit, the applicant must provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant that no ACMs are present in the buildings. If ACMs are found to be present, a qualified asbestos abatement consultant shall abate the buildings in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other State and Federal rules and regulations.

8-2. A Lead Based Paint (LBP) survey must be conducted onsite. Any contractor who would disturb lead containing surfaces must be notified of the hazard and their requirement to comply with the applicable city, state, and federal regulations. Any additional LBP identified shall be abated by a qualified abatement consultant in accordance with all applicable city, State, and Federal regulations.

8-3. Prior to the issuance of the demolition permit, the applicant must provide a letter to the Department of Building and Safety from a qualified polychlorinated biphenyls (PCB) abatement consultant that no PCBs are present onsite. If PCBs are found to be present, a qualified abatement consultant shall abate the site in compliance with the applicable city, State, and Federal rules and regulations.

Noise

12-1. The project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

12-2. Construction and demolition shall be restricted to the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday. Construction and demolition shall not occur on Sundays or any federal holiday.

12-3. Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

12-4. Where feasible, the project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

12-5. Noise and groundborne vibration 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- and vibration-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.

12-6. The project developer shall install a temporary noise control barrier in the southern property line of the construction site abutting residential uses. The noise control barrier shall be engineered to reduce construction-related noise levels at the adjacent multi-family residential structures with a goal of a reduction of 10 dBA. The barrier shall be a similar height to the multi-family residential building to the south of the project site. The supporting structure shall be engineered and erected according to applicable codes. The temporary barrier shall remain in place until all windows have been installed in the south façade of the new hotel building and paving activities in the hotel project site are complete.

12-7. The project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

12-8. The rooftop deck shall be enclosed on all sides with a six-foot tall plexiglass perimeter wall and include landscaping (i.e., shrubbery and trees) to minimize noise levels at off-site locations to the maximum extent feasible. Based on a review of the FHWA Noise Barrier Design Handbook, the rooftop deck plexiglass perimeter wall shown in the project plans would achieve approximately 5 to 10 dBA of noise attenuation.

12-9. Upon operation of the outdoor spaces on the second and eleventh levels, the project applicant shall provide the adjacent uses to the north, south, and west, a building manager contact and phone number to report any loud, unnecessary, and unusual noise, which disturbs the peace or quiet for the adjacent uses.

12-10. All new construction work shall be performed so as not to adversely affect the structural integrity of the immediately adjacent buildings to the south, north and west of the project site (i.e., Sensitive Receptor Nos. 1, 2, 3 and 4). Preconstruction surveys shall be performed to document conditions of the adjacent structures. A structural monitoring program shall be implemented and recorded during construction.

12-11. The performance standards of the structure monitoring plan shall include the following:

a) Documentation shall consist of video and/or photographic documentation of accessible and visible areas on the exterior and select interior facades of the buildings. A registered civil engineer or certified engineering geologist shall develop recommendations for the adjacent structure-monitoring program that will include, but not be limited to, vibration monitoring, elevation and lateral monitoring points, crack monitors and other instrumentation deemed necessary to protect the structures from construction-related damage.

b) The monitoring program shall survey for vertical and horizontal movement, as well as vibration thresholds. If the thresholds are met or exceeded, or noticeable structural damage becomes evident to the project contractor, work shall stop in the area of the affected building until measures have been taken to stabilize the affected building to prevent construction-related damage to the structure.

c) The structure-monitoring program shall be submitted to the Department of Building and Safety and received into the case file for the associated discretionary action permitting the project prior to initiating any construction activities.

12-12. Concrete, not metal, shall be used for construction of parking ramps.

12-13. The interior ramps shall be textured to prevent tire squeal at turning areas.

Public Services

14-1. 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 project shall provide fire hydrants to meet LAFD fire flow requirements. The number, sizes and locations of hydrants will be determined in conjunction with the Fire Department, either prior to recordation of the final map or approval of the building permit. The project shall provide an on-site water storage tank. The location and sizing of the tank will be determined in conjunction with the Fire Department. The plot plan shall include the following minimum design features: all structures must be within 300 feet of an approved fire hydrant, entrances to any guest room shall not be more than 150 feet in distance in horizontal travel from the entry/exit or vertical stair, and the stairway shall be within 150 feet from the edge of the roadway of an improved street or approved fire lane. Design of the project site shall provide adequate access for the Fire Department equipment and personnel to the structure. In addition, the project applicant shall install an automatic sprinkler system in accordance with Fire Code Section 57.118.11 and in conformance with LAFD Standard No. 59.

14-2. The plans shall incorporate the design guidelines relative to security, semi-public and privates spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space design with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

14-3. Prior to construction of the project, the applicant shall install barriers and/or fencing around the project site to secure construction equipment, to prevent trespassing, vandalism, and attractive nuisances and shall review potential impacts to bus routes with the Los Angeles Unified School District (LAUSD) Transportation Branch.

14-4. During construction, the applicant shall provide crossing guards at impacted school crossings so as not to compromise the safety of students during construction related activities, shall not park construction and/or worker transport vehicles adjacent to school sites, shall not haul past affected school sites when school is in session or during school arrival and dismissal times, shall maintain communication with school administration to provide sufficient notice when existing pedestrian and vehicle routes

to the school site may be impacted, shall maintain unrestricted access for school buses, and shall comply with provisions of the California Vehicle Code by requiring construction vehicles to stop when encountering school buses using red flashing lights.

14-5. The applicant shall maintain safe and convenient pedestrian routes to LAUSD schools and not endanger passenger safety or delay student-drop off or pickup due to traffic patterns, lane-adjustments, altered bus stops, or traffic lights by installing appropriate traffic controls (signs and signals) to ensure vehicular and pedestrian safety.

14-6. The applicant shall pay school fees as required by applicable law.

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CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK
ROOM 615, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY and CHECKLIST

(CEQA Guidelines Section 15063)

LEAD CITY AGENCY	**COUNCIL DISTRICT**	**DATE**
City of Los Angeles Planning Department	*13*	*June 1, 2015*

RESPONSIBLE AGENCIES

N/A

PROJECT TITLE/NO.	**CASE NO.**
1541 Wilcox Avenue	*ENV-2014-0524-EAF*

PREVIOUS ACTIONS CASE NO.	☐ **DOES have significant changes from previous actions.** ☐ **DOES NOT have significant changes from previous actions.**

PROJECT DESCRIPTION:

See Section II (Project Description).

ENVIRONMENTAL SETTING:

See Section II (Project Description) and Section IV (Environmental Impact Analysis.)

PROJECT LOCATION

See Section II (Project Description).

PLANNING DISTRICT	**STATUS:** ☐ **PRELIMINARY** ☐ **PROPOSED** ☒ **ADOPTED**
Hollywood Community	

EXISTING ZONING	**MAX. DENSITY ZONING**	☐ **DOES CONFORM TO PLAN**
C4-2D	*2:1*	
PLANNED LAND USE & ZONE	**MAX. DENSITY PLAN**	☒ **DOES NOT CONFORM TO PLAN**
Commercial Regional Center	*2:1*	
SURROUNDING LAND USES	**PROJECT DENSITY**	☐ **NO DISTRICT PLAN**
Residential, Commercial	*FAR:* 5.5:1	

☞ **DETERMINATION (To be completed by Lead Agency)**

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

	City Planning Associate
SIGNATURE	**TITLE**

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to

"Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).

5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:

   a Earlier Analysis Used. Identify and state where they are available for review.
   b Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated

7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.

9) The explanation of each issue should identify:
   a The significance criteria or threshold, if any, used to evaluate each question; and
   b The mitigation measure identified, if any, to reduce the impact to less than significance.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Green House Gas Emissions	☐ Population/Housing
☐ Agricultural Resources	☒ Hazards & Hazardous Materials	☒ Public Services
☐ Air Quality	☐ Hydrology/Water Quality	☐ Recreation
☐ Biological Resources	☐ Land Use/Planning	☐ Transportation/Traffic
☒ Cultural Resources	☐ Mineral Resources	☐ Utilities/Service Systems
☒ Geology/Soils	☒ Noise	☐ Mandatory Findings of Significance

INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)

☞ **BACKGROUND**

PROPONENT NAME	**PHONE NUMBER**
Richard Heyman 1541 Wilcox Hotel, LLC	*(323) 466-1400*
PROPONENT ADDRESS *1605 Cahuenga Boulevard* *Los Angeles, California 90028*	
AGENCY REQUIRING CHECKLIST	***DATE SUBMITTED***
City of Los Angeles, Department of City Planning	*June 2015*
PROPOSAL NAME (If Applicable)	

☞ **ENVIRONMENTAL IMPACTS** (Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
I.	**AESTHETICS.**				
a.	Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a d state scenic highway?	☐	☐	☒	☐
c.	Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
II.	**AGRICULTURAL AND FOREST RESOURCES.**				
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b.	Conflict the existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resource Code section 12220(g)), timberland (as defined by Public Resource Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g))?	☐	☐	☐	☒
d.	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use??	☐	☐	☐	☒
III.	**AIR QUALITY.**				
a.	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b.	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c.	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air	☐	☐	☒	☐

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?				
d.	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e.	Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐
IV.	**BIOLOGICAL RESOURCES.**				
a.	Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c.	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e.	Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	☐	☐	☒	☐
f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒
V.	**CULTURAL RESOURCES:**				
a.	Cause a substantial adverse change in significance of a historical resource as defined in §15064.5?	☐	☐	☒	☐
b.	Cause a substantial adverse change in significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c.	Directly or indirectly destroy a unique paleontological	☐	☒	☐	☐

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	resource or site or unique geologic feature?				
d.	Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐
VI.	**GEOLOGY AND SOILS.**				
a.	i. Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving: i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
	ii. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving :Strong seismic ground shaking?	☐	☐	☒	☐
	iii. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving : Seismic-related ground failure, including liquefaction?	☐	☒	☐	☐
	iv. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving : Landslides?	☐	☐	☒	☐
b.	Result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐
c.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☒	☐	☐
d.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
VII.	**GREEN HOUSE GAS EMISSIONS.**				
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐
VIII.	**HAZARDS AND HAZARDOUS MATERIALS**				
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials	☐	☐	☒	☐
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?	☐	☐	☐	☒
g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h.	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒
IX.	**HYDROLOGY AND WATER QUALITY.**				
a.	Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b.	Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby	☐	☐	☒	☐

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?				
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?	☐	☐	☒	☐
e.	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f.	Otherwise substantially degrade water quality?	☐	☐	☒	☐
g.	Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h.	Place within a 100-year flood plain structures which would impede or redirect flood flows?	☐	☐	☐	☒
i.	Expose 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?	☐	☐	☒	☐
j.	Inundation by seiche, tsunami, or mudflow?	☐	☐	☒	☐
X.	**LAND USE AND PLANNING**.				
a.	Physically divide an established community?	☐	☐	☒	☐
b.	Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c.	Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XI.	**MINERAL RESOURCES**.				
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b.	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒
XII.	**NOISE.**				
a.	Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b.	Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
c.	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
d.	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f.	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
XIII.	**POPULATION AND HOUSING**.				
a.	Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b.	Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c.	Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
XIV.	**PUBLIC SERVICES.**				

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Fire protection?	❑	☒	❑	❑
b.	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Police protection?	❑	☒	❑	❑
c.	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Schools?	❑	☒	❑	❑
d.	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Parks?	❑	❑	☒	❑
e.	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Other governmental services (including roads)?	❑	❑	☒	❑
XV.	**RECREATION.**				
a.	Would the project 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?	❑	❑	☒	❑
b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	❑	❑	☒	❑

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI.	**TRANSPORTATION/CIRCULATION**.				
a.	Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	❑	❑	☒	❑
b.	Conflict with and applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	❑	❑	☒	❑
c.	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	❑	❑	❑	☒
d.	Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	❑	❑	❑	☒
e.	Result in inadequate emergency access?	❑	❑	☒	❑
f.	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	❑	❑	☒	❑
XVII.	**UTILITIES AND SERVICE SYSTEMS.**				
a.	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	❑	❑	☒	❑
b.	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	❑	❑	☒	❑
c.	Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	❑	❑	☒	❑
d.	Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?	❑	❑	☒	❑

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
e.	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	❑	❑	☒	❑
f.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	❑	❑	☒	❑
g.	Comply with federal, state, and local statutes and regulations related to solid waste?	❑	❑	☒	❑

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.

a.	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	❑	❑	☒	❑
b.	Does the project have impacts which are individually limited, but cumulatively considerable?("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	❑	❑	☒	❑
c.	Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	❑	❑	❑	☒

☞ **DISCUSSION OF THE ENVIRONMENTAL EVALUATION (Attach additional sheets if necessary)**

PREPARED BY	TITLE	TELEPHONE #	DATE
Christine Jacobs-Donoghue	Senior Environmental Planner	714-508-4100	June 1, 2015

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4. ENVIRONMENTAL IMPACT ANALYSIS

1. AESTHETICS

Public Resources Code Section 21099(d), effective January 1, 2014, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." The proposed project is an employment center project as defined in Section 21099(a)(1) because it is located on property zoned for commercial uses with a floor area ratio of no less than 0.75. It is located within a transit priority area, as defined in Section 21099(a)(7), because the project is within one-half mile (approximately 1,600 feet) of the Hollywood/Vine Metro Red Line rail portal. Therefore, aesthetic impacts of the proposed project are less than significant.

a) Would the project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. A significant impact would occur if a project were to introduce incompatible scenic elements within a field of view containing a scenic vista or substantially block views of a scenic vista. The project site is located in the Hollywood Community of the City of Los Angeles and is currently developed with a warehouse and associated paved surface parking lot. The project would be developed with a new structure with approximately ten stories and a penthouse, solar panels, and a building height of 114.5 feet to the roof deck for the majority of the structure, 124.5 feet to the penthouse roof and 130.5 feet to the top of the elevator shaft.

The project site is located in a developed urban area. General land uses near the project site include various commercial, multi-family residential, retail, institutional, and medical facilities.

Directly east of the project site, across Wilcox Avenue, is a car service center. South of this commercial use on the corner of Wilcox Avenue and Sunset Boulevard is a studio instrument rental business. A hotel lies directly north of the car service center and it is adjacent to a parking lot of a walk-in clinic located on the corner of Selma Avenue and Wilcox Avenue.

An office building is located directly north of the project site on Wilcox Avenue, which is adjacent to a vacant structure currently under renovation on the southwest corner of Selma Avenue and Wilcox Avenue. Land uses northwest of the project site include parking and additional multi-family residential apartment complexes. Further north, across Selma Avenue, is a post office and additional parking lots.

Directly west of the project site, fronting Schrader Boulevard is a parking lot and one-story duplex. South of the parking lot, southwest of the project site on the corner of Schrader Boulevard and Sunset Boulevard, is residential development. West of the parking lot is another parking lot

with commercial development to the south including Money Mart, JN Media, SAE Institute, Ponchik Factory, and the Department of Water and Power. North of the parking lot are additional multi-family residential uses and the Hollywood Wilshire YMCA.

The area directly south and adjacent to the project site is developed with a two-story multi-family residential structure. Further south fronting Wilcox Avenue are vacant commercial uses, a liquor store, and a copy business. South of the project along Sunset Boulevard are more commercial uses including a dry cleaner, a bar, and a nine-story office building. South, across Sunset Boulevard is a twelve-story office building adjacent to a commercial building and a hotel.

The project site is located at an elevation of approximately 365 feet above mean sea level. Scenic vistas in the area are limited due to the urbanized nature of the surrounding area. There are no tall topographic features on the project site from which scenic vistas may be viewed, or which make up part of the scenic landscape of the surrounding community. Limited views of the Hollywood Hills are available from the existing project site, including the Hollywood sign, located approximately 2.50 miles northeast of the project site. However, views from the project site of these resources are partially obstructed by intervening buildings and mature trees. Because the existing views are not expansive and the City of Los Angeles does not identify Wilcox Avenue as a scenic highway possessing views of any significant scenic resources[1], the development of the project would not block a substantial and recognized view of the Hollywood Hills. Furthermore, these views are not considered unique or valued views, as they are available from many locations in the area surrounding the project site.

Additionally, the project would not block views from taller structures beyond the project area, as these views are currently blocked by the existing structures surrounding the project site. The only unobstructed views near the project site are along Wilcox Avenue further south of the project. With the development of the project, these street views will not change. Development of the project would not introduce incompatible scenic elements, nor would it substantially block or have an adverse effect on a scenic vista. Therefore, impacts with respect to scenic vistas would be less than significant, and no further analysis of this issue is required.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Less Than Significant Impact. A significant impact would occur only where scenic resources would be damaged or removed by a project. The project site is located in the Hollywood Community and is currently developed with a warehouse and associated paved surface parking lot. The project includes development of a hotel and restaurants. Under the California Department of Transportation, Officially Designated State Scenic Highways and Officially Designated County

[1] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps, Open Space & Desirable Open Space in the City of Los Angeles, September 1, 1996.*

Scenic Highways there are no scenic highways in the project vicinity.[2] Additionally, there are no significant natural features (such as rock outcroppings, bodies of water, substantial stands of native vegetation, etc.) or major open spaces on the project site.

The Cultural Resources Assessment[3] evaluated the building on the project site and found that the building did not meet any of the criteria that would classify it as a historical resource for the purposes of CEQA. This is discussed further in Section 5, Cultural Resources. In addition, three historic buildings in the project vicinity were also evaluated: 1540 Schrader Boulevard, the Hollywood Athletic Club at 6525 W. Sunset Boulevard, and the Hollywood Citizen News at 1545 Wilcox Avenue (adjacent to the project site); see 5.a) on cultural resources for further information. The nearby historic buildings would not be damaged or removed as a result of the project. In addition, although the project will present a stylistic contrast to the nearby historical buildings, the new building would be sited with a three foot setback that is comparable to the Citizen News building. The design of the podium would present a visually consistent street wall with the Citizen News building. The height of the building will also not affect the nearby historic buildings because their historical significance is not dependent on height or visual dominance[4]. Thus, the project would not have an adverse effect on historic buildings.

Based on these considerations, impacts with respect to scenic resources would be less than significant.

c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact. A significant impact may occur if a project were to introduce incompatible visual elements on the project site or visual elements that would be incompatible with the character of the area surrounding the project site. The project site is currently developed with a warehouse and its associated paved surface parking lot. The existing structure onsite is one story in height. The surrounding area is developed with buildings and surface parking lots; the nearby structures include various heights including one- to five- story structures, a nine story structure at Sunset Boulevard and Wilcox Avenue, and a structure greater than 10 stories at Sunset Boulevard and Cahuenga Avenue. These structures contribute to a diverse visual character of varied height, massing, and density.

The project will develop a ten-story plus penthouse hotel with approximately 200 guest rooms. At street level, the frontage of the project will be lined with new Chinese Elm (ulmus parvifolia) trees in 36" boxes. The entrance, made of stone and wood panels, will be surrounded by glass

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2 *California Department of Transportation, Officially Designated State Scenic Highways and Officially Designated County Scenic Highways. Website: www.dot.ca.gov/hq/LandArch/scenic/schwy.htm. March 24, 2014.*

3 *1541 Wilcox Avenue Cultural Resources Technical Report. ICF International. May 2014.*

4 *1541 Wilcox Avenue Cultural Resources Technical Report. ICF International. May 2014.*

and white stucco. The buildings entrance and bicycle parking will be directly adjacent to the entrance to the subterranean parking, which is located on the south end of the building with access from Wilcox Avenue. The façade of the building would include black porcelain, composite wood paneling, and glass. The roof of the building also includes an indoor penthouse restaurant and a pool deck. The second floor terrace and roof deck will be landscaped with trees and other landscaping treatments. However, roof deck development will be set back and will be behind a glass wall. Elevations and visual simulations of the project can be found in Appendix A.

Viewsheds refer to the visual qualities of a geographic area that are defined by the horizon, topography, and other natural features that give an area its visual boundary and context, or by development that has become a prominent visual component of the area. Public views are those that can be seen from vantage points that are publicly accessible, such as streets, freeways, parks, and vista points. These views are generally available to a greater number of persons than are private views. Private views are those that can be seen from vantage points located on private property. Private views are not considered to be impacted when interrupted by land uses on adjacent blocks, specifically if a project complies with the zoning regulations applicable to the project site. The existing viewsheds along Wilcox Avenue, Selma Avenue, and Sunset Boulevard are defined primarily by views of retail, commercial, residential, and public facilities developments.

Views of the project site from the adjacent uses would change in character as a result of the increased building height and amount of development included in the project. Current views of the project site from the surrounding uses would be replaced with views of the new, approximately ten-story plus penthouse structure with a building height of 114.5 feet to the roof deck, 124.5 feet to the top of the penthouse level and 130.5 feet to the top of the elevator shaft when measured from adjacent grade. Project development would change the current appearance of the project site, increase the amount of development on the project site, and increase the visibility of the project site. Project development would be visible from the surrounding roadways as well as from various commercial, retail, and residential land uses located along nearby streets. In addition, the project would be partially visible from the nearby Selma Park. Views of the project site would likely be available from more offsite locations than at present because of the increased height and mass associated with the project. However, the project would add visual continuity, as it would be designed to be compatible and complementary with surrounding uses. Overall, the project would improve the visual character and quality of the site and surrounding area by replacing a warehouse and parking lot with little visual character, with a modern hotel in a visually pleasing contemporary architectural design. The design of the building includes a variety of materials and lines to break up the massing of the structure. Materials are generally in an earth tone palette and include stone, black porcelain, wood panels, glass, and stucco.

As described above, the project site is located in a developed urban area with various commercial, multi-family residential, retail, government, and medical buildings at various heights. Additionally, the project would not block views from taller structures beyond the project area, as

these views are currently blocked by existing structures surrounding the project site. The only unobstructed views near the project site are further south on Wilcox Avenue. With the development of the project, these street views will not change.

Shade/Shadow

The height of the project, however, may affect surrounding land uses by producing shade and shadow on adjacent uses. A Shade and Shadow Analysis[5] was conducted to determine the impact the project would have on surrounding land uses (see Appendix B).

The issue of shade and shadow pertains to the blockage of direct sunlight by project buildings, which may significantly affect adjacent properties. Shading is an important environmental issue because the users or occupants of certain land uses, such as outdoor areas of residential uses, recreational/parks, churches, schools, outdoor restaurants, and pedestrian areas have some reasonable expectations for direct sunlight and warmth from the sun. These land uses are termed "shadow-sensitive".

Shadow lengths are dependent on the height and size of the building from which they are cast and the angle of the sun. The angle of the sun varies with respect to the rotation of the earth (i.e. time of day) and elliptical orbit (i.e. change in seasons). The longest shadows are cast during the winter months and the shortest shadows are cast during the summer months.

Winter and Summer Solstice, and Equinox

"Solstice" is defined as either of the two points on the ecliptic (i.e., the path of the earth around the sun) that lie midway between the equinoxes (separated from them by an angular distance of 90°). At the solstices, the sun's apparent position on the celestial sphere reaches its greatest distance above or below the celestial equator, about 23-1/2° of the arc. At winter solstice, about December 22, the sun is overhead at noon at the Tropic of Capricorn; this marks the beginning of winter in the Northern Hemisphere. At the time of summer solstice, about June 22, the sun is directly overhead at noon at the Tropic of Cancer. In the Northern Hemisphere, the longest day and shortest night of the year occur on this date, marking the beginning of summer. Measuring shadow lengths for the winter and summer solstices represents the extremes of the shadow patterns that occur throughout the year. Shadows cast on the summer solstice are the shortest shadows during the year, becoming progressively longer until winter solstice when the shadows are the longest they are all year. Shadow-impacted areas are shown for winter solstice and summer solstice, cast from 9:00AM to 3:00PM (winter) and 9:00AM to 5:00 PM (summer) (See Appendix B).

"Equinox" is defined as either of two points of intersection of the sun's apparent annual path and the plane of the earth's equator, that is, a point of intersection of the ecliptic and the celestial

[5] *Shade and Shadow Analysis, Scott A. Johnson Consulting , May 2015.*

equator. At the equinoxes day and night are the same duration as the sun's transit falls on the equator. Shadows cast on the equinoxes are intermediary between the solstices. Shadow-impacted areas are shown for the equinox from 9:00 a.m. to 3:00 p.m. (Spring) and 9:00 a.m. to 5:00 p.m. (Fall) (See Appendix B).

Thresholds of Significance

According to the City of Los Angeles CEQA Thresholds Guide, a project impact would normally be considered significant if shadow-sensitive uses, known as a sensitive receptor, would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April); or for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October).

The City of Los Angeles CEQA Thresholds Guide defines a sensitive receptor as:

> "Facilities and operations that are sensitive to the effects of shading generally include, but are not limited to, routinely useable outdoor spaces associated with residential, recreational or institutional land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors."

Therefore, the threshold outlined above has been used.

Building heights were based on the design drawings provided by the architect. The dimensions, setbacks, and placement of existing buildings were estimated based on a site reconnaissance, ground photographs and aerial photographs of the project vicinity. Shadows for each season are illustrated in figures in Appendix B.

Spring Shadows

The project would cast shadows to the northwest and northeast during the Spring Equinox. During the transit of the sun, from 9:00 a.m. to 3:00 p.m., shadows from the project site would fall upon adjacent commercial and multi-family uses to the northwest and north.

As shown in Appendix B, no sensitive uses would be shaded for more than more than 3 hours between the hours of 9:00 a.m. and 3:00 p.m. Consequently, spring shadow impacts from the project would be less than significant.

Summer Shadows

The project would cast shadows to the southwest, south and east during the Summer Solstice. During the transit of the sun from 9:00 a.m. to 5:00 p.m., shadows from the project site would fall upon commercial uses immediately adjacent to the project site.

No sensitive uses would be shaded for more than 4 hours between the hours of 9:00 a.m. to 5:00 p.m. Consequently, summer shadow impacts from the project would be less than significant.

Fall Shadows

The project would cast shadows to the northwest and northeast during the Autumnal Equinox. During the transit of the sun from 9:00 a.m. to 5:00 p.m., shadows from the project site would fall upon adjacent commercial, multi-family residential and hotel uses to the northwest, north and east.

No sensitive uses would be shaded for more than 4 hours between the hours of 9:00 a.m. to 5:00 p.m. Consequently, fall shadow impacts from the project would be less than significant.

Winter Shadows

The project sites would cast far-reaching shadows to the northwest and northeast during the Winter Solstice. During the transit of the sun, from 9:00 a.m. to 3:00 p.m., shadows from the project site would fall upon adjacent commercial, hotel and multi-family residential uses to the northwest, north, and east.

No sensitive uses would be shaded for more than 3 hours between the hours of 9:00 a.m. and 3:00 p.m. Consequently, winter shadow impacts from the project would be less than significant.

While the project would result in an increased sense of height and massing on the project site, it would be an appropriate addition to the project area. Overall, the project would represent a visual improvement over the current views of the project site, and is not expected to degrade the existing visual character or quality of the project site and its surroundings. In addition, project implementation would result in less than significant impacts related to shade and shadow based on City standards. Therefore, impacts with respect to visual character and quality would be less than significant. Nevertheless, City requirements would be implemented. The following Standard Conditions provided by the City address landscaping, maintenance and potential nuisance issues in order to maintain the project's attractive visual character and consistency with City requirements during project construction and operation:

Standard Conditions

SC 1-1 All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped and maintained in accordance with a landscape plan and an automatic irrigation plan, prepared by a licensed Landscape Architect.

SC 1-2 Every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from debris, rubbish, garbage, trash, overgrown vegetation, or other similar material, pursuant to Municipal Code Section 91.8104. In addition, the exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley, pursuant to Municipal Code Section 91.8104.15

SC 1-3 The applicant shall affix or paint a plainly visible sign, on publically accessible portions of the construction barriers, with the following language: "POST NO

BILLS". Such language shall appear at intervals of no less than 25 feet along the length of the publically accessible portions of the barrier. The applicant shall be responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any authorized signs within 48 hours of occurrence.

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. A significant impact may occur if a project were to introduce new sources of light or glare on or from the project site which would be incompatible with the area surrounding the project site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways.

Light

Lighting on the project site currently consists of architectural and security lighting from the existing structures. The project site is also illuminated by spillover lighting from the surrounding commercial and residential uses as well as streetlights along the adjacent roadways. Light from vehicle headlights from cars traveling on Wilcox Avenue and other adjacent roadways may contribute to the overall ambient lighting levels in the project area.

The project would illuminate the new structure with indoor lighting, architectural lighting, signage, and security lighting. However, all security lighting would be shielded and focused on the project site and directed away from the neighboring land uses. The rooftop, which includes an indoor restaurant and an outdoor pool deck, will be lighted as well. Lighting will be focused on these rooftop uses and be shielded so that light would not spill to neighboring land uses.

Signage would also be incorporated on the project site, and the proposed signage would be comprised of project identity signs and address signs. Project signage would incorporate specific design features intended to mitigate visual impacts, such as light and glare and hazards to passing motorists.

As the project site and the surrounding area are currently illuminated at night, the project would not contribute to a substantial amount of light that would adversely affect the day or nighttime views in the project vicinity and would not adversely impact neighboring uses. In addition, project lighting would be controlled by Standard Conditions to ensure shielding and prevent light spillage onto adjacent uses. Therefore, impacts resulting from project lighting would be less than significant.

Glare

Urban glare is largely a daytime phenomenon, occurring when sunlight is reflected off of the surfaces of buildings or objects. Excessive glare not only restricts visibility but also increases

the ambient heat reflectivity in a given area. Currently, glare from the project site comes from sunlight reflected off vehicle windshields in the surface parking lot.

The project would eliminate the existing source of glare by providing parking within an enclosed parking structure, which would be shielded from public view. The project would be built with a variety of earth tone materials including black porcelain, composite wood paneling, stone, stucco, and glass. The building will also have different forms and lines that will break up the massing, including any reflective surfaces such as glass so that there would be little to no glare.

The project will include solar panels, which will be located on the roof of the building. The solar panels would not create a new source of substantial glare that would adversely affect day or nighttime views in the area, because the solar panels would be black in color and absorptive rather than reflective. By design, the solar panels would absorb sunlight to maximize electrical output and would use anti-reflective glass. Additionally, the frames and other mounting components on which the solar panels would be attached are constructed of galvanized aluminum, which has a low reflective property. The project would not include shiny surfaces or metal, or any other reflective materials in the building façades. The potential for glare generation is not high given the project's building materials and design. Therefore, impacts related to glare would be less than significant. Nevertheless, City requirements would be implemented. The following standard conditions address lighting design, glare, and compatible signage:

Standard Conditions

SC-1-4 Outdoor lighting shall be designed and installed with shielding, such that the light sources cannot be seen from adjacent residential properties or the public right-of-way.

SC 1-5 The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.

SC 1-6 On-site signs shall be limited to the maximum allowable under the Municipal Code. Multiple temporary signs in store windows and along building walls are not permitted.

2. AGRICULTURE AND FOREST RESOURCES

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. A significant impact may occur if a project were to result in the conversion of State-designated agricultural land from agricultural use to another non-agricultural use. The project is

within the Hollywood Community of the City of Los Angeles. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland" in California.

According to the State Department of Conservation's most recent information found in the California Important Farmland Finder, the project site is designated as Urban and Built-Up Land and is not included in the Important Farmland category.[6] The project site is located in the in the Hollywood Community Plan, which designates the project site as a Commercial Regional Center, which is characterized as a highly urbanized area by the Community Plan. The area is also zoned as C4-2D, which permits commercial uses. The project site is neither used nor zoned for agricultural purposes. The project site is located in an urbanized area of the Hollywood Community and the project site is currently developed with a warehouse and associated paved surface parking lot. Since the project site is not currently developed with agricultural uses, development of the project would not convert any Prime or Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. Buildout of the project would have no impact on the conversion of Important Farmland in California to non-agricultural uses.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act Contract from agricultural use to another non-agricultural use. The project site is located in the in the Hollywood Community Plan, which designates the project site as a Commercial Regional Center, which is characterized as a highly urbanized area by the Community Plan. The area is also zoned as C4-2D, which permits commercial uses. As such, the project site is not zoned for agricultural uses nor are there any existing agricultural uses onsite.

The California Land Conservation Act of 1965, commonly referred to as the Williamson Act, enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments that are much lower than normal because they are based upon farming and open space uses as opposed to full market value.[7] The project site does not contain any state designated agricultural lands or open spaces. Therefore, the project site is not subject to a Williamson Act contract.

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[6] *California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, County PDF Maps. Website: www.dot.ca.gov/hq/LandArch/scenic/schwy.htm February 20, 2014.*

[7] *California Department of Conservation, Division of Land Resource Protection, Williamson Act Program. Website: ftp://ftp.consrv.ca.gov/pub/dlrp/wa/. February 20, 2014.*

As the project would not result in the conversion of land zoned for agricultural use or the conversion of land under a Williamson Act contract from agricultural use to another non-agricultural use, there would be no impact to property zoned for agricultural use as a result of the buildout of the project.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resource Code section 12220(g)) timberland (as defined by Public Resource Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g))?

No Impact. A significant impact may occur if a project were to conflict with existing zoning for forestland. California Public Resources Code (PRC) section 12220(g) defines forest land as " … land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits"; additionally, timberland is defined by PRC section 4526 as land " … which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products." The project site consists of previously disturbed lands and non-native landscaping. Therefore, no forestland or timberland activity could be supported on the project site or near the project site. These conditions preclude the possibility of changes to forestland or timberland zoning resulting from the project. No impacts to forestland would occur.

d) Would the project result in the loss of forestland or conversion of forestland to non-forest use?

No Impact. A significant impact may occur if a project were to result in the loss of forestland. As stated above, no forestland or timberland exists on the project site or near the project site. Therefore, no impact would occur.

e) Would the project involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. A significant impact may occur if a project results in the conversion of farmland to another non-agricultural use or forestland to non-forest land. Neither the project site nor surrounding parcels are utilized for agricultural activities. Additionally, as discussed above in Question 2(a), the project site is not classified as any type of farmland by the State of California's Farmland Mapping and Monitoring Program. No farmland or forestland exists within the project site. Moreover, the project does not include components that would result in changes to surrounding land uses. Implementation of the project would not result in conversion of farmland or forestland, and there are no project elements that would otherwise affect agricultural or forest lands. Therefore, no impact would occur.

3. AIR QUALITY

The following air quality discussion is based on project-specific air quality modelling and analysis consistent with the Project Description provided in Section 2. All supporting documents are located in Appendix C.

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. A significant air quality impact may occur if a project is not consistent with the applicable Air Quality Management Plan (AQMP), or would, in some way, represent a substantial hindrance to employing the policies or obtaining the goals of that plan. In the case of projects proposed within the City of Los Angeles or elsewhere in the South Coast Air Basin (Air Basin), the applicable AQMP is prepared by the South Coast Air Quality Management District (SCAQMD). The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Air Basin. To that end, the SCAQMD, a regional agency, works directly with the Southern California Association of Governments (SCAG), county transportation commissions, and local governments, and cooperates actively with state and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures though educational programs or fines, when necessary.

The SCAQMD is directly responsible for reducing emissions from stationary (area and point sources) and attaining state and federal ambient air quality standards. It has responded to this requirement by preparing a series of AQMPs. The most recent of these was adopted by the Governing Board of the SCAQMD on December 7, 2012. The purpose of this AQMP, referred to as the 2012 AQMP, is to set forth a comprehensive and integrated program that will lead the Air Basin into compliance with the federal 24-hour $PM_{2.5}$ air quality standard, and to provide an update of the Air Basin's projections in meeting the federal 8-hour ozone standards. The California Air Resources Board (ARB) approved the AQMP as an amendment to the State Implementation Plan on January 25, 2013 and directed the Executive Director to submit the AQMP to the United States Environmental Protection Agency (EPA) for inclusion in the State Implementation Plan (SIP). Specifically, the AQMP will serve as the official SIP submittal for the federal 2006 24-hour $PM_{2.5}$ standard and was submitted February 13, 2013 to the EPA. The SIP is currently pending approval. In addition, the AQMP updates specific elements of the previously approved 8-hour ozone SIP: (1) an updated emissions inventory and (2) new control measures and commitments for emissions reductions to help fulfill the Section 182(e)(5) portion of the 8-hour ozone SIP.

The 2012 AQMP includes Air Basin-wide $PM_{2.5}$ measures that will be implemented by the 2014 attainment date, episodic control measures to achieve air quality improvements (would only apply during high $PM_{2.5}$ days), Section 182(e)(5) implementation measures (to maintain progress

towards meeting the 2023 8-hour ozone national standard), and transportation control measures. Most of the control measures focus on incentives, outreach, and education.

Projects that are consistent with the projections of employment and population forecasts identified in the Growth Management Chapter of SCAG's Regional Comprehensive Plan and Guide (RCPG) are considered consistent with the AQMP growth projections, since the Growth Management Chapter forms the basis of the land use and transportation control portions of the AQMP.

As indicated in the response to Question 13, Population and Housing, the project's anticipated increases in employment are within the SCAG projections for the City of Los Angeles and are therefore also consistent with the 2012 AQMP.

According to the SCAQMD, the project is consistent with the AQMP if the project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.[8] As shown in Question 3(b) and 3(c), the project would not exceed the SCAQMD's regional thresholds for construction-generated ROG, NO_x, CO, SO_x PM_{10}, and $PM_{2.5}$. In addition, with the implementation of Standard Condition 3-1 below, fugitive dust emissions from construction will be controlled, consistent with SCAQMD Rule 403. Operational ROG, NO_x, CO, SO_x PM_{10}, and $PM_{2.5}$ emissions will not exceed SCAQMD's regional thresholds. Furthermore, estimated project construction and operational emissions would not exceed SCAQMD's localized significance threshold (LST) criteria.

In summary, the project would not exceed SCAQMD's localized thresholds and regional thresholds. Therefore, the project impacts would be less than significant. Nevertheless, the following Standard Conditions and regulatory requirements would be implemented:

Standard Condition

SC 3-1 The following Standard Conditions will be implemented during construction activities:

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

- The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.

[8] *South Coast Air Quality Management District 1993, page 12-3.*

- All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
- All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
- All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
- Trucks with no current hauling activity shall not idle but be turned off.

b) Would the Project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact. The project may have a significant impact if project-related emissions would exceed federal, state, or regional standards or thresholds, or if project-related emissions would substantially contribute to an existing or projected air quality violation. As mentioned previously, the project is located within the SCAQMD's jurisdiction. To address potential impacts from construction and operational activities, the SCAQMD currently recommends that impacts from projects with mass daily emissions that exceed any of the thresholds outlined in Table 4-1 be considered significant.

Table 4-1
SCAQMD's Regional Emission Thresholds of Significance

Pollutant	Construction	Operation
	pounds/day	pounds/day
Carbon monoxide (CO)	550	550
Sulfur oxides (SO_x)	150	150
Respirable particulate matter (PM_{10})	150	150
Fine particulate matter ($PM_{2.5}$)	55	55
Nitrogen oxides (NO_x)	100	55
Reactive organic gases (ROG)	75	55

Source: SCAQMD; CEQA Air Quality Handbook, 1993; SCAQMD Significance Thresholds found at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2 March 2011.]

Construction

Potential emissions from project construction were estimated using the CalEEMod computer model, as recommended by the SCAQMD. Three basic types of activities are expected to occur and generate construction-related emissions at the project site as a result of implementation of the project. The first activity would involve the demolition and removal of the structures presently located at the project site. The existing approximately 14,208 square foot warehouse structure will be demolished and exported to a landfill. In addition, 0.13 acre of existing paving would also be demolished and exported to a landfill. Secondly, the project site would be shored, excavated, and graded to accommodate the subterranean parking and foundations for the proposed building structures. An estimated 41,140 cubic yards of excavated soil would be exported. Haul trucks are assumed to have a 16 cubic yard capacity for a total of 5,143 soil-hauling trips. If smaller trucks are used for hauling, the number of trips will be increased commensurately. Finally, the proposed structures would be constructed. Overall, construction activities at the project site would occur over an approximate seventeen-month period, with construction ending in the fourth quarter of 2017.

The construction equipment list assumed for the purposes of the air quality analysis is shown in Table 4-2. The activity for construction equipment is based on the horsepower and load factors of the equipment. The horsepower is the power of an engine. The load factor is the average power of a given piece of equipment while in operation compared with its maximum rated horsepower. A load factor of 1.0 indicates that a piece of equipment continually operates at its maximum operating capacity. The duration for construction is shown in Table 4-3.

Table 4-2
Construction Equipment Assumptions

Activity	Equipment	Number	Hours per day	Horse-Power	Load Factor
Demolition (Building and Paving)	Concrete/Industrial Saws	2	8	81	0.73
	Rubber Tired Dozers	2	8	255	0.4
	Tractors/Loaders/Backhoes	6	8	97	0.37
Grading	Excavators	2	8	162	0.38
	Graders	1	6	174	0.41
	Rubber Tired Dozers	1	6	255	0.40
	Tractors/Loaders/Backhoes	1	7	97	0.37
Building Construction	Cranes	1	6	226	0.29
	Forklifts	1	6	89	0.20
	Generator Sets	1	8	84	0.74
	Tractors/Loaders/Backhoes	1	6	97	0.37
	Welders	3	8	46	0.45

Table 4-2
Construction Equipment Assumptions

Activity	Equipment	Number	Hours per day	Horse-Power	Load Factor
Architectural Coatings	Air Compressors	1	6	78	0.48
Source: CalEEMod 2013.2.2 and ARB Offroad Table D-7.					

Table 4-3
Construction Duration

Phase	Duration (working days)	
	CalEEMod Default	Project
Demolition – Building	10	10
Demolition – Paving	10	10
Grading	2	60
Building Construction	100	250
Architectural Coatings	5	65
Source: Project construction schedule provided by developer Schedule was based on number of working days, not overall schedule.		

Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and prevailing weather conditions. Nonetheless, Table 4-4 Estimated Peak Daily Construction Emissions identifies daily emissions that are estimated to occur on peak construction days based on the modeling assumptions and parameters provided above. These calculations assume that appropriate dust control measures would be implemented as required by SCAQMD Rule 403—Fugitive Dust, included as Standard Condition 3-1 above. CalEEMod considers all dust control measures to be "mitigation"; therefore, the incorporation of the regulatory requirement displays as "mitigated" output, but is not considered mitigation under the California Environmental Quality Act (CEQA).

Table 4-4
Estimated Peak Daily Construction Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Demolition Phase – Building						

Table 4-4
Estimated Peak Daily Construction Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Onsite Fugitive Dust	0.00	0.00	0.00	0.00	0.55	0.08
Onsite Off-Road Equipment	2.91	28.26	21.50	0.02	1.74	1.63
Subtotal Onsite Emissions	*2.91*	*28.26*	*21.50*	*0.02*	*2.29*	*1.72*
Offsite Hauling Trips	0.12	1.89	1.50	0.00	0.14	0.06
Offsite Vendor Trips	0.00	0.00	0.00	0.00	0.00	0.00
Offsite Worker Trips	0.06	0.08	0.85	0.00	0.15	0.04
Subtotal Offsite Emissions	*0.18*	*1.97*	*2.35*	*0.01*	*0.29*	*0.10*
Total Building Demolition Emissions	***3.09***	***30.22***	***23.84***	***0.03***	***2.58***	***1.81***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Demolition Phase – Paving						
Onsite Fugitive Dust	0.00	0.00	0.00	0.00	0.09	0.01
Onsite Off-Road Equipment	2.91	28.26	21.50	0.02	1.74	1.63
Subtotal Onsite Emissions	*2.91*	*28.26*	*21.50*	*0.02*	*1.83*	*1.65*
Offsite Hauling Trips	0.02	0.32	0.25	0.00	0.02	0.01
Offsite Vendor Trips	0.00	0.00	0.00	0.00	0.00	0.00
Offsite Worker Trips	0.06	0.08	0.85	0.00	0.15	0.04
Subtotal Offsite Emissions	*0.08*	*0.40*	*1.10*	*0.00*	*0.17*	*0.05*
Total Paving Demolition Emissions	*2.99*	*28.66*	*22.60*	*0.03*	*2.00*	*1.70*
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Site Grading Phase						
Onsite Fugitive Dust	0.00	0.00	0.00	0.00	1.95	0.99
Onsite Off-Road Equipment	2.77	29.90	20.53	0.02	1.58	1.45
Subtotal Onsite Emissions	*2.77*	*29.90*	*20.53*	*0.02*	*3.52*	*2.44*
Offsite Hauling Trips	1.60	24.87	19.76	0.06	1.85	0.74
Offsite Vendor Trips	0.00	0.00	0.00	0.00	0.00	0.00
Offsite Worker Trips	0.06	0.08	0.85	0.00	0.15	0.04
Subtotal Offsite Emissions	*1.66*	*24.95*	*20.61*	*0.07*	*2.00*	*0.78*

Table 4-4
Estimated Peak Daily Construction Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Total Grading Emissions	*4.43*	*54.85*	*41.14*	*0.09*	*5.52*	*3.22*
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Building Construction Phase (2016)						
Onsite Off-Road Equipment	3.29	20.55	14.71	0.02	1.37	1.32
Subtotal Onsite Emissions	*3.29*	*20.55*	*14.71*	*0.02*	*1.37*	*1.32*
Offsite Hauling Trips	0.00	0.00	0.00	0.00	0.00	0.00
Offsite Vendor Trips	0.19	1.79	2.48	0.00	0.15	0.06
Offsite Worker Trips	0.24	0.32	3.39	0.01	0.59	0.16
Subtotal Offsite Emissions	*0.43*	*2.12*	*5.86*	*0.01*	*0.74*	*0.22*
Total Building Construction 2016Emissions	*3.72*	*22.66*	*20.57*	*0.03*	*2.10*	*1.54*
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Building Construction Phase (2017)						
Onsite Off-Road Equipment	2.95	19.11	14.31	0.02	1.23	1.18
Subtotal Onsite Emissions	*2.95*	*19.11*	*14.31*	*0.02*	*1.23*	*1.18*
Offsite Hauling Trips	0.00	0.00	0.00	0.00	0.00	0.00
Offsite Vendor Trips	0.17	1.63	2.35	0.00	0.15	0.06
Offsite Worker Trips	0.22	0.29	3.06	0.01	0.59	0.16
Subtotal Offsite Emissions	*0.39*	*1.93*	*5.40*	*0.01*	*0.74*	*0.22*
Total Building Construction 2017Emissions	*3.34*	*21.04*	*19.72*	*0.03*	*1.96*	*1.40*
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Architectural Coating Phase						
Arch Coating	44.24	0.00	0.00	0.00	0.00	0.00
Onsite Off-Road Equipment	0.33	2.19	1.87	0.00	0.17	0.17
Subtotal Onsite Emissions	*44.58*	*2.19*	*1.87*	*0.00*	*0.17*	*0.17*
Offsite Hauling Trips	0.00	0.00	0.00	0.00	0.00	0.00

Table 4-4
Estimated Peak Daily Construction Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Offsite Vendor Trips	0.00	0.00	0.00	0.00	0.00	0.00
Offsite Worker Trips	0.04	0.06	0.59	0.00	0.11	0.03
Subtotal Offsite Emissions	*0.04*	*0.06*	*0.59*	*0.00*	*0.11*	*0.03*
Total Architectural Coating Emissions	**44.62**	**2.24**	**2.46**	**0.00**	**0.29**	**0.20**
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Demolition - Building + Grading*	7.51	85.08	64.98	0.12	8.10	5.03
Building Construction 2017 + Architectural Coating*	47.96	23.28	22.17	0.04	2.25	1.60
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No

Note: Emissions are based on Winter results for a conservative estimate.
**Both Demolition – Building and Grading Phases and Building Construction 2017 and Architectural Coating Phases occur concurrently. They have been added together in order to illustrate highest possible daily estimated to occur during construction.*
Source: CalEEMod Calculation sheets are provided in Appendix C.

As shown in Table 4-4, construction-related daily emissions would not exceed the regional emissions thresholds recommended by SCAQMD for ROG, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$ during any construction phase.

Operational

Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities related to the project upon completion of construction. Stationary area source emissions would be generated by the consumption of natural gas for space and water heating devices, and the operation of landscape maintenance equipment. Mobile emissions would be generated by the motor vehicles traveling to and from the project site.

The analysis of daily operational emissions from the project has been prepared utilizing the CalEEMod computer model recommended by the SCAQMD. CalEEMod is a land-use based model that generates air emissions based on the type and density of the proposed land uses, and is influenced by other factors such as trip generation rates, proximity to mass transit, and the extent of pedestrian friendly amenities. The mobile emissions analysis was conservatively based upon trip generation estimates provided in the Traffic Impact Analysis prepared by Overland

Traffic Consultants, February 2014, which generated the trip generation for a more intensive project with higher square footage and 225 guest rooms. The operational analysis did not take credit for emissions that presently occur from the existing land uses, which results in an even more conservative assumption. The results of these calculations and associated SCAQMD thresholds are presented in Table 4-5.

As shown in Table 4-5, the operational emissions associated with the 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 (non-smog season). Therefore, impacts associated with regional operational emissions from the project would be less than significant.

Table 4-5
Estimated Future (2017) Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	**NO_x**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Summertime (Smog Season) Emissions						
Area	3.25	0.00	0.02	0.00	0.00	0.00
Energy	0.07	0.62	0.52	0.00	0.05	0.05
Mobile (Vehicle) Sources	10.91	26.52	110.54	0.26	17.28	4.87
Total Project Emissions	***14.23***	***27.15***	***111.08***	***0.26***	***17.33***	***4.92***
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Wintertime (Non-Smog Season) Emissions						
Area	3.25	0.00	0.02	0.00	0.00	0.00
Energy	0.07	0.62	0.52	0.00	0.05	0.05
Mobile (Vehicle) Sources	11.53	27.89	113.19	0.25	17.28	4.87
Total Project Emissions	***14.85***	***28.52***	***113.74***	***0.25***	***17.33***	***4.92***
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No

Source: CalEEMod Calculation sheets are provided in Appendix C.

c) Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative threshold for ozone precursors)?

Less Than Significant Impact. A significant impact may occur if the project would add a considerable cumulative contribution to a federal or state non-attainment pollutant. If an area is in nonattainment for a criteria pollutant, then the background concentration of that pollutant has historically exceeded the ambient air quality standard. It follows that if the project exceeds the regional threshold for that nonattainment pollutant, then it would result in a cumulatively considerable net increase of that pollutant and result in a significant cumulative impact. The Air Basin is in nonattainment for PM_{10}, $PM_{2.5}$, nitrogen dioxide, and ozone. Therefore, if the project exceeds the regional thresholds for PM_{10}, or $PM_{2.5}$, then it contributes to a cumulatively considerable impact for those pollutants. If the project exceeds the regional threshold for NO_X or ROG, then it follows that the project would contribute to a cumulatively considerable impact for ozone, as NO_x and ROG are precursors to ozone. NO_x emissions include nitrogen oxide (NO) and NO_2; therefore, using NO_x emissions for NO_2 emissions is a conservative assumption. If the project exceeds the NO_x threshold, it could contribute cumulatively to nitrogen dioxide concentrations.

With respect to determining the significance of the project contribution, the SCAQMD recommends that the project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Furthermore, SCAQMD states that if an individual development project generates less-than-significant construction or operational emissions impacts, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment.

As discussed in the response to Question 3(b) above, the project would not exceed the SCAQMD's regional thresholds for construction-generated ROG, NO_x, CO, SO_x PM_{10}, and $PM_{2.5}$. Operational ROG, NO_x, CO, SO_x PM_{10}, and $PM_{2.5}$ emissions would not exceed SCAQMD's regional thresholds. Therefore, the project would not generate a cumulatively considerable increase in emissions for the pollutants for which the Air Basin is in nonattainment, and impacts would be less than significant.

d) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Sensitive receptors are populations that are more susceptible to the effects of air pollution than the population at large. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, childcare centers, and athletic facilities. The project area is urbanized with

such land uses as residential, commercial, restaurant, hospital and parking uses located within the immediate area.

Asbestos

Asbestos is a fibrous mineral which is both naturally occurring in ultramafic rock (a rock type commonly found in California), and used as a processed component of building materials. Because asbestos has been proven to cause a number of disabling and fatal diseases, such as asbestosis and lung cancer, it is strictly regulated either based on its natural widespread occurrence, or in its use as a building material. Exposure to asbestos could occur if the project would disturb an area with naturally occurring asbestos, or demolish existing structures. Each impact area is addressed separately below.

Naturally Occurring Asbestos (NOA)

The California Department of Conservation, Division of Mines and Geology (DMG) has a published guide for generally identifying areas that are likely to contain NOA[9]. The DMG map indicates NOA is not known to occur within the project area. Therefore, disturbance of NOA during project construction is not a concern for the project.

Asbestos Containing Materials (ACM)

In the initial Asbestos National Emission Standards for Hazardous Air Pollutants rule promulgated in 1973, a distinction was made between building materials that would readily release asbestos fibers when damaged or disturbed (friable) and those materials that were unlikely to result in significant fiber release (non-friable). The United States Environmental Protection Agency (EPA) has since determined that severely damaged, otherwise non-friable materials can release significant amounts of asbestos fibers. Asbestos has been banned from many building materials under the Toxic Substances Control Act, the Clean Air Act, and the Consumer Product Safety Act. However, most uses of asbestos for building material are not banned. Therefore, the potential source of asbestos exposure for the project is the demolition activity of the existing structures.

SCAQMD's Rule 1403 specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, and includes the removal and associated disturbance of asbestos-containing materials (ACM). The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and land filling requirements for asbestos-

[9] *California Geological Survey, Department of Conservation. 2011. Reported Historic Asbestos Mines, Historic Asbestos Prospects, and Other Natural Occurrences of Asbestos in California. Website: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ms/59/MS59_Plate.pdf. March 5, 2014.*

containing waste materials (ACWM). The Rule further states that the SCAQMD shall be notified of the intent to conduct any demolition or renovation activity[10].

Compliance with SCAQMD, federal, and state regulations reduces the potential of asbestos-containing material exposure to a less than significant impact.

Construction: Fugitive Dust

Dust emissions from grading, trenching, or land clearing can create nuisances and localized health impacts related to fugitive dust. As shown in Impact 3(b) above, the project would not exceed the regional threshold of significance for construction-generated fugitive PM_{10}. In addition, the project's onsite PM_{10} emissions fall below the SCAQMD's LST threshold, as shown in Impact 3(d) below. Therefore, the project would not expose receptors to substantial fugitive dust concentrations from construction activities.

Construction: Diesel Particulate Matter

The project would generate diesel exhaust, a source of diesel particulate matter, during project construction. Diesel particulates are typically 2.5 microns ($PM_{2.5}$). Onsite emissions of diesel particulate matter occur during construction from the operation of heavy-duty construction equipment and from vendor trucks that operate on project sites.

Project activities that would generate diesel particulate matter emissions are short-term in nature. Determination of risk from diesel particulate matter is considered over a 70-year exposure time. Guidance published by the CAPCOA, Health Risk Assessments for Proposed Land Use projects, does not include guidance for health risks from construction projects addressed in CEQA; risks near construction projects are expected to be included later when the toxic emissions from construction activities are better understood[11]. Additionally, the nearest sensitive receptors (residences) would be located approximately 49 feet from the project site. Therefore, considering the dispersion of the emissions and the short time frame, exposure to diesel particulate matter is anticipated to be less than significant.

Localized Significance Analysis

On-site emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ during construction and operation of the project have the potential to affect nearby sensitive receptors. Furthermore, traffic congested roadways and intersections have the potential to generate elevated concentrations of CO that might also

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[10] *South Coast Air Quality Management District (SCAQMD). 2008. AQMD Rule 1403. Website: http://www.aqmd.gov/home/programs/business/business-detail?title= super-compliant-coatings. March 5, 2014.*

[11] *California Air Pollution Control Officers Association (CAPCOA). 2009. Health Risk Assessment for Proposed Land Use Projects. Website: http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA_HRA_LU_Guidelines_8-6-09.pdf March 5, 2014.*

affect nearby sensitive receptors. Pollutant concentrations that exceed the thresholds outlined in Table 4-6 would have a significant impact on sensitive receptors.

Table 4-6
Localized Pollutant Concentration Significance Thresholds

Pollutant – Averaging Time	Threshold
CO – 1 Hour	20.0 ppm
CO – 8 Hour	9.0 ppm
NO_2 – 1 Hour	0.18 ppm
NO_2 – Annual	0.03 ppm
PM_{10} – 24 Hour	*10.4 µg/m³ (construction)* *2.5 µg/m³ (operation)*
PM_{10} – Annual	1.0 *µg/m³*
$PM_{2.5}$ – 24 Hour	*10.4 µg/m³ (construction)* *2.5 µg/m³ (operation)*
Thresholds for particulates (PM_{10} and $PM_{2.5}$) do not include background concentrations. *Source*: SCAQMD, Final Localized Significance Threshold Methodology, 2008. Website: *http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2*	

The SCAQMD has developed localized significance threshold (LST) look-up tables for project sites between one and five acres in size to simplify the evaluation of localized onsite construction and operational emissions at small sites.[12] LSTs are provided for each of SCAQMD's Source Receptor Areas (SRAs) at various distances from the source of emissions. These LSTs are used to address the potential localized NO_2, CO, PM_{10}, and $PM_{2.5}$ impacts from onsite construction and operational emissions.

Construction

The daily construction emissions generated by the project are analyzed against SCAQMD's (LSTs) to determine whether the emissions would cause or contribute to adverse localized air quality impacts. The SCAQMD's LSTs are only applicable to the following criteria pollutants: NO_2, CO, PM_{10}, and $PM_{2.5}$. The LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standards, and are developed based on the ambient concentrations of that pollutant for each Source Receptor Area (SRA). SCAQMD has divided the basin into 36 Source Receptor Areas, which are designated to provide a general representation of the local

[12] *South Coast Air Quality Management District (SCAQMD). 2008. June 2003, revised July 2008. Final Localized Significance Threshold Methodology. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn= 2.*

meteorological, terrain, and air quality conditions within the particular geographical area. The project is located within SRA 1.

The nearest offsite sensitive receptors are residential units located directly adjacent to the project site. The shortest look-up distance in the SCAQMD's look-up table is 25 meters. The distance to the nearest receptor is less than 25 meters from the project boundary; however, the SCAQMD LST guidance document recommends using 25 meters when receptors are closer than 25 meters. Therefore, the use of the 25-meter look-up distance is appropriate under this circumstance (SCAQMD 2008). In addition, the project site is 0.5 acres. Therefore, the analysis compares the project's construction emissions to the LST lookup table for SRA 1, for receptors at 25 meters.

According to SCAQMD's guidance, the maximum number of acres disturbed on the peak day is calculated using the equipment list for project construction and following the assumed acres disturbed per 8-hour day as provided in the CalEEMod manual. The CalEEMod manual identifies various equipment and the acreage disturbed in an 8-hour day:

- Crawler tractors, graders, and rubber tired dozers: 0.5 acre per 8-hour day
- Scrapers: 1 acre per 8-hour day

Therefore, the peak-day acreage for the project would be 1 acre during Grading, as the maximum daily-disturbed acreage would be as follows:

- Grading: 1 Grader and 1 Rubber Tired Dozer at 0.5 acre/day each = 1 acre

Based on the estimated grading equipment for the project, the values found in SCAQMD's mass rate LST look up tables for one-acre were used to provide the threshold amount.

Table 4-7 identifies the daily emissions that are estimated to occur during construction of the project. As shown in Table 4-7, onsite emissions generated by the project during the different phases of construction would not exceed the established SCAQMD localized thresholds for NO_2, CO, PM_{10} and $PM_{2.5}$. Therefore, the localized air quality impacts resulting from construction emissions associated with the project would be less than significant.

Table 4-7
Localized Estimated Daily Construction Emissions

Construction Phase	Total On-site Emissions (Pounds per Day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Demolition – Building				
Onsite fugitive dust	—	—	0.55	0.08

Table 4-7
Localized Estimated Daily Construction Emissions

Construction Phase	Total On-site Emissions (Pounds per Day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Onsite off-road equipment	28.26	21.50	1.74	1.63
Total Onsite Building Demolition Emissions	*28.26*	*21.50*	*2.29*	*1.72*
SCAQMD Localized Thresholds	74	680	5	3
Significant Impact?	No	No	No	No
Demolition – Paving				
Onsite fugitive dust	—	—	0.09	0.01
Onsite off-road equipment	28.26	21.50	1.74	1.63
Total Onsite Paving Demolition Emissions	*28.26*	*21.50*	*1.83*	*1.65*
SCAQMD Localized Thresholds	74	680	5	3
Significant Impact?	No	No	No	No
Grading				
Onsite fugitive dust	—	—	1.95	0.99
Onsite off-road equipment	29.90	20.53	1.58	1.45
Total Onsite Grading Emissions	*29.90*	*20.53*	*3.52*	*2.44*
SCAQMD Localized Thresholds	74	680	5	3
Significant Impact?	No	No	No	No
Building (2016)				
Onsite off-road equipment	20.55	14.71	1.37	1.32
SCAQMD Localized Thresholds	74	680	5	3
Significant Impact?	No	No	No	No
Building (2017)				

Table 4-7
Localized Estimated Daily Construction Emissions

Construction Phase	Total On-site Emissions (Pounds per Day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Onsite off-road equipment	19.11	14.31	1.23	1.18
SCAQMD Localized Thresholds	74	680	5	3
Significant Impact?	No	No	No	No
Architectural Coating				
Onsite off-road equipment	2.19	1.87	0.17	0.17
SCAQMD Localized Thresholds	74	680	5	3
Significant Impact?	No	No	No	No

Localized thresholds for construction emissions at a receptor distance of 25 meters, as established by the SCAQMD for a one-acre site in SRA 1.
Source: CalEEMod Calculation sheets are provided in Appendix C..

Operation

To determine whether operational emissions generated by the project would result in localized air quality impacts, the operational emissions of the project are analyzed against the SCAQMD's LSTs for a receptor location of 25 meters, the shortest look-up distance available, from the project. The SCAQMD LST guidance document recommends using 25 meters when receptors are closer than 25 meters[13]. In addition, the project site is approximately 0.5 acres in size. Therefore, the analysis compares the project's construction emissions to the LST lookup table for SRA 1, for receptors at 25 meters. As discussed previously, the LST methodology is applicable to projects where emission sources occupy a fixed location. Consequently, this analysis only evaluates the emissions generated by the onsite stationary sources (e.g., water and space heaters, landscaping equipment, etc.) associated with the project. Table 4-8 analyzes the daily operational emissions generated by the onsite stationary and mobile sources associated with the project against the SCAQMD's localized operational emission thresholds interpolated for the project's 0.5-acre site with a receptor distance of 25 meters in accordance with SCAQMD LST guidance.

[13] *South Coast Air Quality Management District (SCAQMD). 2008. June 2003, revised July 2008. Final Localized Significance Threshold Methodology. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn= 2*

As shown in Table 4-8, the onsite operational emissions generated by the project would not exceed the established SCAQMD localized thresholds for NO_2, CO, PM_{10} and $PM_{2.5}$. Thus, the localized air quality impacts resulting from operational emissions associated with the project would be less than significant.

Table 4-8
Localized Estimated Daily Operational Emissions

Operational Phase	Total On-site Emissions (Pounds per Day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Summertime & Wintertime Emissions				
Area	0.00	0.02	0.00	0.00
Energy	0.62	0.52	0.05	0.05
Total Emissions	*0.62*	*0.54*	*0.05*	*0.05*
SCAQMD Localized Thresholds [b]	74	680	2	1
Significant Impact?	No	No	No	No

[a] *The localized thresholds for operational emissions at a receptor distance of 25 meters for a 1-acre site in SRA 1.*
Source: CalEEMod Calculation sheets are provided in Appendix C.

Localized CO Impacts from Mobile Sources

Carbon monoxide (CO) "hot spot" thresholds ensure that emissions of CO associated with traffic impacts from the project in combination with CO emissions from existing and forecasted regional traffic do not exceed state or federal standards for CO at any traffic intersection impacted by the project. Project concentrations may be considered significant if a CO hot spot intersection analysis determines that project generated CO concentrations cause a localized violation of the state CO 1-hour standard of 20 ppm, state CO 8-hour standard of 9 ppm, federal CO 1-hour standard of 35 ppm, or federal CO 8-hour standard of 9 ppm.

As previously stated, the project proposes a hotel with 200 guest rooms, 3,020 square feet of meeting space, 10,020 square feet of commercial floor area and a 3,924 square feet of pool deck. The traffic analysis prepared by Overland Traffic Consultants Traffic Study in February 2014, and approved by LADOT on May 9, 2014, analyzed a larger project consisting of 225 guest rooms, a 11,797 square foot lobby restaurant/bar, 9,504 square feet of banquet space[14], and 4,443 square feet of rooftop restaurant/bar. The February 2014 analysis states that the project would

[14] *The traffic analysis studied banquet space that would have been open to the public in addition to hotel guests. The project's meeting rooms will be open to hotel guests only. Accordingly, the traffic study is a conservative estimate of project impacts.*

generate 3,410 gross daily trips. The traffic study is based on a larger project and, consequently, the analysis and trip generation used in the analysis is more conservative. An update letter dated April 23rd, 2015 added two new related projects to the analysis. Neither future LOS nor project impacts changed with consideration of the new related projects. Under conservative trip generation assumptions, the traffic study determined that the added traffic volume generated by the project would not significantly impact the traffic flow at any of the study intersections.

This analysis follows guidelines recommended by the CO Protocol (University of California, Davis 1997) and the SCAQMD. According to the CO Protocol, intersections with Level of Service (LOS) E or F may require detailed analysis. In addition, intersections that operate under LOS D conditions in areas that experience meteorological conditions favorable to CO accumulation may require a detailed analysis. The SCAQMD recommends that a local CO hot spot analysis be conducted if the intersection meets one of the following criteria: 1) the intersection is at LOS D or worse and where the project increases the volume to capacity ratio by 2 percent, or 2) the project decreases LOS at an intersection from C to D.

There are no intersections that will result in a reduction of LOS from C to D (or worse). There are two intersections that will operate at LOS D or worse under future with project conditions: 1) the intersection of Cahuenga Boulevard and Hollywood Boulevard will operate at LOS E during AM Peak Hour and LOS D during PM Peak Hour; and 2) the intersection of Highland Avenue and Sunset Boulevard will operate at LOS E during both AM and PM Peak Hour. However, the increase in volume to capacity ratio from future without project, to future with project, will not exceed a 1.5% change for any of these intersections[15].

Therefore, the project does not require a CO hotspot analysis since the project's traffic generation does not meet the criteria for such an analysis, and would not significantly worsen the LOS at nearby intersections. Impacts are less than significant.

Toxic Air Contaminants

The project consists of the development of commercial uses, and would not include any land uses that would involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants. The project is not a land use considered a 'sensitive receptor' by SCAQMD. In addition, the nearest sensitive receptors (residences) would be located adjacent to the project site. The ARB Air Quality and Land Use Handbook contains recommendations that will "help keep California's children and other vulnerable populations out of harm's way with respect to nearby

[15] *Traffic Impact Analysis for Sunset+ Wilcox Hotel, Overland Traffic Consultants, Inc. February 2014.*

sources of air pollution"[16], including recommendations for distances between sensitive receptors and certain land uses. These recommendations are assessed as follows.

Heavily traveled roads. ARB recommends avoiding new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day. Epidemiological studies indicate that the distance from the roadway and truck traffic densities were key factors in the correlation of health effects, particularly in children. The project is in close proximity to Wilcox Avenue and Sunset Boulevard, which are an urban road and a major highway, respectively. The project is approximately 15 meters from Wilcox Ave, which is estimated to currently have 10,400 vehicles per day[17]. The project is approximately 74 meters from Sunset Boulevard, which is estimated to currently have 47,640 vehicles per day[16]. The vehicle traffic on both Wilcox Avenue and Sunset Boulevard are below the 100,000 vehciles per day siting guidance provided by ARB. In addition, the project would not include construction of, or an increase to an existing, heavily traveled road as defined by ARB's Land Use Handbook. Therefore, the project would not expose sensitive receptors to significant health risks from heavily traveled roads.

Distribution centers. ARB also recommends avoiding siting new sensitive land uses within 1,000 feet of a distribution center. The project would not include construction of a distribution center. Therefore, the project would not expose sensitive receptors to significant health risks from distribution centers.

Fueling stations. ARB recommends avoiding new sensitive land uses within 300 feet of a large fueling station (a facility with a throughput of 3.6 million gallons per year or greater). A 50-foot separation is recommended for typical gas dispensing facilities. The project would not include construction of a fueling station. Therefore, the project would not expose sensitive receptors to significant health risks from fueling stations.

Dry cleaning operations. ARB recommends avoiding siting new sensitive land uses within 300 feet of any dry cleaning operation that uses perchloroethylene. For operations with two or more machines, ARB recommends a buffer of 500 feet. The project is located approximately 230 feet from the existing dry cleaning operation on Sunset Boulevard. A review of ARB's Community Health Air Pollution Information System (CHAPIS) shows that the facility does not utilize perchloroethylene, and thus, is not a consideration for health risks[18]. The project would not

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[16] *California Air Resources Board (ARB). 2005. California Environmental Protection Agency. Air Quality and Land Use Handbook: A Community Health Perspective. April 2005. Website: www.arb.ca.gov/ch/landuse.htm. March 5, 2014.*

[17] *California Environmental Health Tracking Program. 2011. Traffic Linkage Service Demonstration. Website: http://www.ehib.org/traffic_tool.jsp. March 5, 2014.*

[18] *Air Resources Board (ARB). 2014. Community Health Air Pollution Information System (CHAPIS). Website: http://www.arb.ca.gov/ch/chapis1/chapis1.htm., accessed December 29, 2014.*

include construction of a dry cleaning operation. Therefore, the project would not expose sensitive receptors to significant health risks from dry cleaning operations.

Therefore, this impact is less than significant.

Conclusion

The project would not expose receptors to substantial quantities or significant concentrations of asbestos from renovation or soils disturbance, construction-generated fugitive dust, or construction-generated DPM. SCAQMD's LST would not be exceeded, and the project would not expose receptors to CO hotspots or Toxic Air Contaminants. Therefore, the project would result in a less than significant impact.

e) Would the project create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. The SCAQMD recommends that odor impacts be addressed in a qualitative manner. Such an analysis shall determine whether the project would result in excessive nuisance odors, as defined under the California Code of Regulations and Section 41700 of the California Health and Safety Code, and thus would constitute a public nuisance related to air quality.

Land uses typically considered associated with odors include wastewater treatment facilities, waste-disposal facilities, or agricultural operations. The project does not contain land uses typically associated with emitting objectionable odors. Additionally, these types of land uses are not located in the project's vicinity.

Diesel exhaust and VOCs would temporarily be emitted during construction of the project (such as from application of paints and coatings), which are objectionable to some; however, these emissions would disperse rapidly from the project site and therefore should not reach an objectionable level at the nearest sensitive receptors. Impacts are less than significant.

4. BIOLOGICAL RESOURCES

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact. A significant impact would occur if a project were to remove or modify habitat for any species identified or designated as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game (CDFG) or the U.S. Fish and Wildlife Service (USFWS). The project site is located in an urbanized area of the Hollywood Community, and is currently developed with a warehouse and associated paved surface parking lot. Landscaping onsite is limited to ornamental trees, shrubs,

and grass, and does not include any native vegetation. No candidate, sensitive, or special-status species identified in local plans, policies, or regulations, or by the CDFG or the USFWS would be expected to occur on the project site. Therefore, no impact on sensitive or special-status species would occur.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact. A significant impact would occur if riparian habitat or any other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFG or USFWS were to be adversely modified without adequate mitigation. The project site is located in an urbanized area of the Hollywood Community, and is currently developed with a warehouse and associated paved surface parking lot. No riparian or other sensitive habitat areas are located on or adjacent to the project site.[19] Therefore, no impacts to sensitive habitats would occur.

c) Would the Project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. A significant impact would occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed by the project without adequate mitigation. The project site is located in an urbanized area of the Hollywood Community, and is currently developed with a warehouse and associated paved surface parking lot. No federally protected wetlands (marsh, vernal pool, coastal, etc.) occur on or in the vicinity of the project site.[20] Therefore, the project would not result in the direct removal, filling, or hydrological interruption of a federally protected wetland as defined by Section 404 of the Clean Water Act. No impact to federally protected wetlands would occur.

d) Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

No Impact. A significant impact would occur if the project would interfere with, or remove access to a migratory wildlife corridor, or impede the use of wildlife nursery sites. The project site is located in an urbanized area of the Hollywood Community, and is currently developed with a warehouse and associated paved surface parking lot. There is no native habitat on the

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[19] *City of Los Angeles, Department of City Planning, City of Los Angeles Citywide General Plan Framework Final Environmental Impact Report, 2.18 Biological Resources, Figure BR-1B, Biological Resources Areas (Metro Geographical Area), January 19, 1995. Website: http://cityplanning.lacity.org. February 20, 2014.*

[20] *U.S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands Mapper. Website: http://www.fws.gov/wetlands/Data/Mapper.html.. February 20, 2014.*

project site and, due to the existing urban development, the project site does not function as a corridor for the movement of native or migratory animals. Therefore, no impacts to migratory wildlife corridors or native wildlife nursery sites would occur.

e) Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact. A project-related significant effect could occur if the project would cause an impact that is inconsistent with local regulations pertaining to biological resources. The project site is located in an urbanized area of the Hollywood Community, and is currently developed with a warehouse and associated paved surface parking lot. Three non-native street trees are located adjacent to the project site on Wilcox Avenue. Approximately one non-native tree is located on the project site. Local ordinances protecting biological resources are limited to the City of Los Angeles Native Tree Preservation Ordinance. No protected biological resources or tree species, such as oak trees, currently exist on the project site. Therefore, impacts on tree removal would be less than significant.

f) Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. A significant impact would occur if the project were inconsistent with any mapping or policies in any of the above types of conservation plans. The project site is located in an urbanized area of the Hollywood Community, and is currently developed with a warehouse and associated paved surface parking lot. No locally designated natural communities are known to occur on or adjacent to the project site. Additionally, the project site is not part of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impact with respect to Habitat or Natural Community Conservation Plans would occur.

5. CULTURAL RESOURCES

The following analysis is supported by the 1541 Wilcox Avenue Cultural Resources Technical Report, prepared by ICF International (ICF) and dated May 2014.[21] This report is included as Appendix D to this Draft Initial Study/Mitigated Negative Declaration (IS/MND).

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Less Than Significant Impact. Section 15064.5 of the CEQA Guidelines defines a historical resource as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; 2) a resource listed in

[21] *1541 Wilcox Avenue Cultural Resources Technical Report. ICF International. May 2014.*

a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A project-related significant adverse effect would occur if a project were to adversely affect a historical resource meeting one of the above definitions.

Survey Results

Literature Review/Records Search

The cultural resources records search conducted at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton identified a total of 31 cultural resources within the one-mile and quarter-mile radii of the project area. These resources included three historic archaeological sites and 28 built environment resources. In addition, six City of Los Angeles HCMs were identified. One property, the U. S. Post Office-Hollywood Station at 1615 Wilcox Avenue, is listed in the National Register of Historic Places. A total of eight cultural resource studies have been conducted within the quarter-mile radius of the project site. Only one of these studies included the project site in its analysis. The majority of these studies were conducted between 25 and 30 years ago. There were no prehistoric archaeological sites identified within the one-mile radius of the project site.

Resources Less than 50 Years Old

ICF identified four buildings that were constructed within the past 50 years. The NRHP and CRHR generally hold that in order to be eligible or listed, buildings or structures must be at least 50 years of age. The NRHP and CRHR criteria allow for exceptions to this age threshold for resources possessing exceptional significance. In all cases, ICF found no evidence to suggest that any of these buildings or structures is exceptionally important. Therefore, they are not considered eligible for listing in the NRHP or CRHR, are not historical resources for the purposes of CEQA, and were not evaluated further.

Previously Evaluated Resources

The buildings listed in Table 4-9 were previously evaluated in the context of the 2010 historic resources survey for the Hollywood Redevelopment Project Area conducted on behalf of the former Community Redevelopment Agency of the City of Los Angeles (2010 CRA Survey) and determined not eligible for listing in the NRHP or CRHR, or designation as HCMs. These resources, therefore, are not considered historical resources for the purposes of CEQA. Because the resources listed in Table 4-9 are not historical resources under CEQA, potential impacts were not analyzed.

Table 4-9
Properties Evaluated as Not Historical Resources

Address	Year Built
6515 W. Sunset Boulevard	1961
6507 W. Sunset Boulevard	1922
6501 W. Sunset Boulevard	1924
6465 (6461) W. Sunset Boulevard	1923
1521 Wilcox Avenue	1923 & 1937
1550 Wilcox Avenue	1925
Source: ICF 2014.	

The existing building located on the project site at 1541 Wilcox Avenue was evaluated in 2010 as not eligible for the NRHP, CRHR, or as a HCM and, therefore, is not considered a historical resource for the purposes of CEQA. As such, it would normally have been included in this table. However, because the potential impacts of the project involve the demolition of the existing building, and because the evaluation presented in the 2010 CRA Survey indicated that the building "may warrant special consideration in local planning efforts," ICF performed a full re-evaluation of the building, and the results are summarized below.

Evaluation of 1541 Wilcox Avenue (Project Site)

The existing resource on the project site consists of a one-story light industrial building with an irregular plan and concrete masonry unit construction. Consisting of over 14,000 square feet, the building rises to a height of over 25 feet and features a flat roof with a parapet. It was designed as a printing plant, although no architect is identified on the building permit. The building's engineer was Joseph F. Rhodes and the builder contracted was Ray S. Andrews. A long driveway extends along the south elevation from the sidewalk to a loading bay at the rear (west) end of the building. The building is set back approximately 15 feet from the sidewalk and features well-tended grass. The primary elevation is asymmetrically composed and six bays wide. Each bay is different with one containing a pair of glass doors, others containing windows, and still another containing steps leading to a small porch and single door. Although the primary façade offers a decorative concrete block screen and weeping mortar treatment, these notable features contrast with the building's otherwise simple presentation. The exterior integrity is excellent and no significant alterations are visible.

Located 1.5 blocks south of Hollywood Boulevard, the one-story building located at 1541 Wilcox Avenue was constructed in 1948 to serve as the printing plant for the Hollywood Citizen News, headquartered in a 1930 building located immediately to the north. However, no research uncovered to date indicates that the construction or operation of the 1948 printing facility played either a pivotal or an essential role in the history of HCN. Nor does research indicate that any significant events associated with either Los Angeles's or Hollywood's historical development occurred in the building.

After a quarter century as a printing plant, the building was converted to a recording studio in 1976 by new owner Group Four Recording. It is important to note that 1976 is only 38 years ago and, therefore, does not conform to the standard 50-year threshold for NRHP and CRHR eligibility. As such, any important events occurring in the building dating to the recording studio era would need to meet the criteria for exceptional significance. Nothing revealed by research suggests, however, that the building possesses exceptional significance associated with this context. No research uncovered to date has revealed a significant connection between the building during either its printing plant or recording studio phases or any important person. Accordingly, the building on the project site is not significant under any of these criteria.

Although the primary façade offers a decorative concrete block screen and weeping mortar treatment that elevates it from a completely utilitarian presentation, these features are neither sufficiently notable nor sufficiently innovative to meet the criteria for architectural significance at the NRHP, CRHR, or HCM levels. Nor does the architectural design and architect's body of work suggest the work of a master. Integrity as viewed from the public right-of-way is good, but alteration permits indicate that additional rooms were built, doors and windows were closed up, and interior partitions have been altered. Alteration permits post-dating the building's conversion to a recording studio indicate that doors and windows were closed up and interior

partitions altered, suggesting a diminishment of physical integrity associated with the building's tenure as a printing press.

Based on these considerations, the existing building on the project site is not a historical resource for the purposes of CEQA. Therefore, no impacts resulting from the project are expected, and impacts to the existing building at 1541 Wilcox Avenue are not considered further.

Consideration as a Potential Historic District

The collection of buildings and structures identified in the study area were evaluated as a potential historic district. Although consisting of fewer than 20 buildings, their construction dates span a large range from 1923-2008. In addition, many property types and land uses are included within the study area, including multi-family residential, commercial, retail, mixed-use, recreational, and light industrial. Several architectural styles are also present, including Spanish Colonial Revival, Mid-Century Modern, Contemporary, Utilitarian, and Art Deco. With such a wide variation in dates of construction, architectural styles, and property types, no coherent theme is present to unify and define a historic district. Moreover, several of the existing buildings exhibit poor integrity such that they would be unlikely to contribute to a district, even if one were present. Therefore, the project would not impact a historic district.

Project Impacts to Historic Resources

The buildings listed in Table 4-10 are located within the study area and were all evaluated by the 2010 CRA Survey as historical resources for the purposes of CEQA. Potential impacts to these resources are discussed below.

Table 4-10
Properties Evaluated as Historic Resources in 2010 CRA Survey

Address	Year Built
1540 Schrader Boulevard	1927
1545 Wilcox Avenue (Hollywood Citizen News)	1930
6525 W. Sunset Boulevard (Hollywood Athletic Club)	1923
Source: ICF 2014.	

6525 West Sunset Boulevard (Hollywood Athletic Club)

6525 West Sunset Boulevard is located at the northeast corner of Schrader and Sunset Boulevards. It was constructed in 1923 based upon a Meyer & Heller design and was reputed to be the tallest building in Hollywood at the time of construction. The building is stucco-clad and has a rectangular building plan, which consists of a two-story section featuring the gymnasium and other amenities and a seven-story tower originally containing hotel rooms. The Hollywood Athletic Club is separated from the project site by a surface parking lot.

1545 Wilcox Avenue (Hollywood Citizen News)

1545 Wilcox Avenue was construction was constructed in 1930 and located immediately to the north of the project site. The Hollywood Citizen News (HCN) building was constructed during the period when Hollywood was emerging as an alternative business center and rival to downtown as a center of retail and other business concerns. It was designed by Francis D. Rutherford. The building has a rectangular building plan and is two stories in height. When it was originally constructed, the project site was designed to serve as the printing plant for HCN.

1540 Schrader Boulevard

1540 Schrader Boulevard was built in 1927 and consists of a two-story rectangular plan Spanish Colonial Revival multi-family residential building. It is located northwest of the project site. It features original wood frame windows and doors. The primary elevation faces Schrader with a secondary façade facing south and opening onto the surface parking lot immediately west of the project site.

Potential Construction Impacts

Construction activities would include demolition of the existing building on the project site, the staging of materials and equipment onsite, excavation work for the new underground parking, and the erection of a new structure. Physical features of the identified CEQA historical resources within the study area would be unaffected by these construction activities, resulting in no direct impact to these resources. Although these construction activities would temporarily alter the setting of the historical resources in the study area, they would not directly or permanently affect the character-defining features of the historical resources in the study area and do not pose an impact to their significance. Any construction impacts would be minor and temporary, and therefore less than significant.

Potential Operational Impacts

All three of the evaluated or potential historical resources were constructed before the existing 1948 printing plant building, located on the project site and proposed for demolition. Therefore, although the construction of the project would alter the current setting of the historical resources in the study

area, their setting had already been altered by the existing 1948 building. Nevertheless, the proposed building is significantly taller and larger than the existing building, so the extent of the setting change must be considered.

With regard to the Hollywood Athletic Club, its primary elevation faces Sunset Boulevard and this view would be unaffected due to the relatively large size of its footprint, its height, its distance and separation from the project site. With respect to 1540 Schrader Boulevard, the primary elevation faces Schrader Boulevard. Views of the building from the public right-of-way will be unaffected by the project. Currently, the rear of 1540 Schrader Boulevard is adjacent to the existing one-story printing plant building. The building is designed as a U-shaped shaft sitting upon a one-story base that is square in plan. When the new building is constructed, 1540 Schrader Boulevard's setting will remain similar insofar as its rear elevation will be sited adjacent to a one-story massing. The massing of the U-shaped shaft is sited along east and south elevations, away from 1540 Schrader Boulevard, posing the least visual impact possible. Therefore, neither the Hollywood Athletic Club nor 1540 Schrader Boulevard would experience an impact to their historical significance as a result of the project.

With regard to Hollywood Citizen News, although the existing building on the project site was designed to serve as the printing plant for Hollywood Citizen News, the two buildings are structurally unconnected and stylistically dissimilar. The proposed new building will also be structurally independent and present a stylistic contrast to Hollywood Citizen News. The proposed new building would be sited with a three-foot setback which is comparable to the setback of Hollywood Citizen News and thus, would present a more visually consistent street wall. Moreover, the proposed new building will feature a two-story podium including guest rooms at the northeastern and southeastern portions of the property with a zero-foot side yard setback. The proposed podium reaches a height of 30 feet, seven feet lower in height than 37-foot tall Hollywood Citizen News, thereby differentiating the new structure while maintaining a massing scheme that is visually compatible with Hollywood Citizen news. At 10 stories (plus a penthouse) in height, the proposed new building would be significantly taller than Hollywood Citizen News, and would block its utilitarian south elevation from public view. Although the project would be a more dominant visual element within its setting, the significance of Hollywood Citizen News is not dependent upon its height or visual dominance, or on the public visibility of the south utilitarian elevation. None of these visual changes to the setting of Hollywood Citizen News would diminish its integrity and, therefore, do not pose an impact to its historical significance. Finally, because there will be no physical connection between Hollywood Citizen News and the proposed new building, the new construction could be removed without impacting it.

Therefore, the project would have a less than significant impact with respect to historic resources.

b) Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

Potentially Significant Unless Mitigation Incorporated. Section 15064.5 of the CEQA Guidelines defines significant archaeological resources as resources which meet the criteria for historical resources, as discussed above, or resources which constitute unique archaeological resources. A project-related significant adverse effect could occur if a project were to affect archaeological resources, which fall under either of these categories.

The project site is located in an urbanized area that has been previously paved and developed. According to the City of Los Angeles Planning Department, there are no designated archaeological sites or survey areas on the project site.[22] The project site is currently developed with a warehouse and associated paved surface parking lot. Since the project site has been previously developed and is highly disturbed, it is not anticipated that any archaeological resources would be encountered during project construction. However, since the project involves the construction of subterranean parking, the possibility exists that archaeological resources could be encountered and impacts to archaeological resources could be significant. With implementation of the mitigation measure below, impacts to archaeological resources would be reduced to a level of less than significant.

Mitigation Measure

The following mitigation measures are recommended to reduce potential impacts to a level of insignificance.

5-1. In the event that buried cultural resources are discovered during project development, construction activities shall stop within 50 feet of the find and a qualified archaeologist shall be consulted to determine whether the resource requires further study:

a. The archaeologist shall make recommendations to the Lead Agency on the measures that shall be implemented to protect the discovered resources, including but not limited to, excavation of and evaluation of the finds in accordance with Section15064.5 of the CEQA Guidelines. Potentially significant cultural resources consist of, but are not limited to, stone, bone, fossils, wood, or shell artifacts or features, including hearths, structural remains, or historic dumpsites. Any previously undiscovered resources found during construction within the project area should be

[22] *City of Los Angeles, Department of City Planning, City of Los Angeles Citywide General Plan Framework Final Environmental Impact Report, 2.15 Cultural Resources, Figure CR-1, Prehistoric and Historic Archaeological Sites and Survey Area in the City of Los Angeles, January 19, 1995. Website: http://cityplanning.lacity.org/. February 20, 2014.*

recorded on appropriate Department of Parks and Recreation (DPR) forms, and evaluated for significance in terms of CEQA criteria.

b. If the discovered resource is determined to be a unique historic resource as defined under Section 15064.5 of the CEQA Guidelines, additional measures shall be identified by the archaeologist and recommended to the Lead Agency. Appropriate measures for significant resources could include avoidance or capping; incorporation of the location of the find as undisturbed green or open space; and/or data recovery excavations of the find.

c. No further ground-disturbing activities shall occur in the vicinity of the find until the Lead Agency approves the measures to protect these resources. Any archaeological artifacts recovered as a result of mitigation shall be donated to a qualified scientific institution approved by the Lead Agency, where they would be afforded long-term preservation to allow future scientific study.

c) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Unless Mitigation Incorporated. A significant adverse effect could occur if grading or excavation activities associated with a project would disturb paleontological resources or geologic features that presently exist within the project site.

The project site is located in an urbanized area that has been previously paved and developed. According to the City of Los Angeles Planning Department, there are no designated paleontological sites or survey areas on the project site.[23] No vertebrate fossil sites have been identified in the vicinity of the project site; therefore, topsoil and previously disturbed superficial soil layers on the project site are not likely to contain substantive vertebrate fossils. The project site is currently developed with a warehouse and associated paved surface parking lot. Since the project site has been previously developed and is highly disturbed, it is not anticipated that any paleontological resources would be encountered during project construction. However, because the project involves the construction of subterranean parking, the possibility exists that paleontological resources could be encountered, and impacts to paleontological resources could be significant. With implementation of the mitigation measure below, impacts to paleontological resources would be reduced to a level of less than significant.

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[23] *City of Los Angeles, Department of City Planning, City of Los Angeles Citywide General Plan Framework Final Environmental Impact Report, 2.15 Cultural Resources, Figure CR-2 , Vertebrate Paleontological Resources in the City of Los Angeles, January 19, 1995. Website: http://cityplanning.lacity.org/. February 20, 2014.*

Mitigation Measure

5-2. In the event that paleontological resources are encountered during the course of grading and/or excavation, all development shall temporarily cease in these areas until a qualified paleontologist is brought onto the project site to properly assess the resources and make recommendations for their disposition. Excavation or disturbance may continue in other areas of the project site that are not reasonably suspected to overlie adjacent paleontological resources.

d) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Potentially Significant Unless Mitigation Incorporated. A significant adverse effect would occur if grading or excavation activities associated with a project were to disturb previously interred human remains. The project site is located in an urbanized area that has been previously paved and developed. No known human burials have been identified on the project site. The project site is currently developed with a warehouse and associated paved surface parking lot. Since the project site has been previously developed and is highly disturbed, it is not anticipated that any human remains would be encountered during project construction. However, since the project involves the construction of subterranean parking, the potential exists that human remains could be encountered. California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 require notification of the County Coroner and the Native American Heritage Commission, who in turn must notify those persons believed to be most likely descended from the deceased Native American for appropriate disposition of the remains. With implementation of the mitigation measure below, impacts to paleontological resources would be reduced to a level of less than significant.

Mitigation Measure

5-3. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

a. Stop immediately and contact the County Coroner:

1104 N. Mission Road
Los Angeles, CA 90033
323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

b. The coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Commission.

c. The Native American Heritage Commission will immediately notify the person it believes to be the most likely descendent of the deceased Native American.

d. The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.

e. If the descendent does not make recommendations within 48 hours the owner shall reinter the remains in an area of the property secure from further disturbance, or;

f. If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the Native American Heritage Commission.

6. GEOLOGY AND SOILS

The following analysis is based on the findings contained in the Preliminary Geotechnical Engineering Investigation, prepared by GeoConcepts, Inc. and dated May 16, 2014. [24] This report is included as Appendix E to this Draft IS/MND.

a) Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. A significant impact may occur if the project site is located within a state-designated Alquist-Priolo Zone or other designated fault zone, and appropriate building practices are not employed. The project site is located in the seismically active region of Southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City of Los Angeles. The criteria for these major groups are based on criteria developed by the California Division of Mines and Geology (CDMG) for the Alquist-Priolo Earthquake Fault Zoning Program. By definition, an active fault is one that shows evidence of surface displacement within Holocene time (about the last 11,000 years). A potentially active fault is one that has demonstrated surface

[24] *Preliminary Geotechnical Engineering Investigation, Proposed Hotel, H.J. Whitley Tract No. 2, Lots 5 & 6, Block 1, 2, 15, and 16 of Hollywood, Block 2, Arb 2, 1523-1541 Wilcox Ave, Hollywood, California. GeoConcepts, Inc. May 2014; California Geological Survey, Earthquake Zones of Required Investigation, Hollywood Quadrange, Preliminary Review Map, released January 8, 2014.*

displacement within the Quaternary age deposits (about the last 1.6 million years). Inactive faults show no signs of surface displacement within the last 1.6 million years.

The Hollywood Fault is the closest active fault to the project site, located approximately 0.5 mile north of the project site.[25] The project site is not located within an Alquist-Priolo Earthquake Fault Zone.[26] However, the Hollywood Fault is considered active by the State Geologist. Additionally, the City of Los Angeles considers the Hollywood Fault active for planning purposes.

The City of Los Angeles Building Code, updated since the 1994 Northridge Earthquake, contains construction requirements to ensure habitable structures are built to a level such that they can withstand acceptable seismic risk. Therefore, impacts related to ground rupture from known earthquake faults would be less than significant.

ii. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?

Less Than Significant Impact. A significant impact may occur if the project were to represent an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region. As with all properties in the seismically active Southern California region, the project site is susceptible to ground shaking during a seismic event. Peak ground acceleration (PGA) at the site associated the design Basis Earthquake (DBE or 475-year return period event) is estimated to be 0.50g [27] Based on the referenced literature and deterministic analysis, the Hollywood Fault, located approximately 0.55 mile north of the subject site, could produce one of the highest peak ground motions at the site. A Maximum Probable Earthquake, that is, the maximum earthquake that is considered likely to occur during a 100-year time interval, of 6.4 Mw (moment magnitude according to USGS) has been assessed along the Hollywood Fault. Estimated peak horizontal ground acceleration

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[25] *Preliminary Geotechnical Engineering Investigation, Proposed Hotel, H.J. Whitley Tract No. 2, Lots 5 & 6, Block 1, 2, 15, and 16 of Hollywood, Block 2, Arb 2, 1523-1541 Wilcox Ave, Hollywood, California. GeoConcepts, Inc. May 2014.*
California Department of Conservation. 2014. Earthquake Fault Zones, Hollywood Quadrangle, Preliminary Review Map, released January 8, 2014. Website: www.consrv.ca.gov/cgs/rghm/ap/Documents/Hollywood_EZRIM.pdf. Accessed November 4, 2014.
California Geological Services (CGS). 1986. State of California Special Studies Zones, Hollywood Quadrangle, Revised Official Map, effective July 1, 1986. Website: www.quake.ca.gov/gmaps/WH/regulatorymaps.htm. Accessed November 4, 2014.

[26] *City of Los Angeles Department of City Planning, Zoning Information and Map Access System. Website: http://zimas.lacity.org/. March 17, 2014.*

[27] *Property Condition Assessment, Building Analytics. March 2012.*

resulting from the above-stated maximum earthquake on the Hollywood fault is on the order of 2.412g should this event occur at the Hollywood Fault's closest approach to the site.[28] Therefore, potential impacts from seismic ground shaking are present throughout Southern California and would be of comparable intensity at the project site as it would be for large parts of the City of Los Angeles and the region. Nevertheless, City requirements would be implemented. Standard Conditions detailed below provide for specific compliance with the California Building Code, Department of Building and Safety Review and approval of the geotechnical report for the project, as well as implementation of geotechnical report recommendations. Based on these considerations, impacts would be less than significant.

Standard Conditions

SC 6-1 The design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.

SC 6-2 Prior to the issuance of grading or building permits, the applicant shall submit a detailed geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The geotechnical report shall assess potential consequences of any soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to: ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures.

SC 6-3 The project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the project, and as it may be subsequently amended or modified.

iii. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction?

Potentially Significant Impact Unless Mitigation Incorporated. A significant impact may occur if the project were located in an area identified as having a high risk of liquefaction, and mitigation measures required within such designated areas were not incorporated into the project. Liquefaction is the process in which saturated silty to cohesionless soils below the groundwater table temporarily lose strength during strong ground shaking as a consequence of increased pore pressure during conditions such as those caused by an earthquake. The vast majority of liquefaction hazards are associated with sandy soils and silty soils of low plasticity. Potentially

[28] *Preliminary Geotechnical Engineering Investigation, GeoConcepts, Inc. May 2014.*

liquefiable soils must be saturated or nearly saturated to be susceptible to liquefaction. Significant factors that affect liquefaction include water level, soil type, particulate size and gradation, relative density, confining pressure, and intensity and duration of shaking. Liquefaction potential has been found to be the greatest where the groundwater level is shallow and submerged loose, fine sands occur within a depth of about 50 feet or less. Liquefaction potential decreases with increasing grain size and clay and gravel content, but it increases as the ground acceleration and duration of shaking increase. Liquefaction is therefore more likely to occur in sand dune areas.

Regional geologic maps indicate that the site is underlain by Holocene (younger) alluvium deposits with a depth to ground water greater than 50 feet. The site in not located within a California Seismic Hazard Zone (SHZ) for liquefaction. Additionally, regional geological information indicates a low liquefaction potential.[29]

The project site is not located within a liquefaction zone; however, it is located in a liquefiable area according to the City of Los Angeles General Plan.[30, 31] Based upon the depth to groundwater, which was encountered at 72 feet by geotechnical subsurface exploration, liquefaction lateral spreads, and surface manifestations of liquefaction should not pose any significant hazard to the proposed development, provided that Mitigation Measures 6-1 through 6-3 are followed and maintained. Implementation of the following mitigation measures would reduce potential impacts with respect to liquefaction to a less than significant level.

Mitigation Measures

6-1. The Project shall be supported on foundations embedded into alluvium.

6-2. The soils chemistry results shall be considered in the design of the Project, subject to the approval of the Department of Building and Safety.

6-3. The property owner shall maintain the site as outlined in the Preliminary Geotechnical Engineering Investigation document, Drainage and Maintenance section prepared by GeoConcepts and dated May 16, 2014.

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29 *Property Condition Assessment, Building Analytics. March 2012.*

30 *City of Los Angeles Department of City Planning, Zoning Information and Map Access System. Website: http://zimas.lacity.org./ March 17, 2014.*

31 *City of Los Angeles, Department of City Planning, City of Los Angeles Citywide General Plan Framework Final Environmental Impact Report, 2.17 Geologic/Seismic Conditions, Figure GS-5, Areas Susceptible to Liquefaction in the City of Los Angeles. January 19, 1995. Website: http://cityplanning.lacity.org/. March 17, 2014.*

iv. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides?

Less Than Significant Impact. A project-related significant effect may occur if the project is located in a hillside area with soil conditions that would suggest a high potential for sliding. The project site is relatively flat and free from the potential of landslides and is not located adjacent to any mountains or steep slopes. Additionally, the project site is not located within an area designated by the City as having potential for landslides.[32] Further, according to the State of California Seismic Hazards Map, the project site is not at risk for earthquake-induced landslides.[33] Therefore, impacts with respect to landslides would be less than significant.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Potentially Significant Impact Unless Mitigation Incorporated. A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. During construction, grading and excavation would expose soils for a limited time, allowing for possible erosion. However, due to the temporary nature of the soil exposure during the grading and excavation processes, substantial erosion would not occur. The project site is relatively flat and excavation would be limited to that necessary for the installation of foundations, utilities, and the three subterranean parking levels. All grading activities require grading permits from the City of Los Angeles Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on site grading and site preparation would comply with all applicable provisions of Chapter IX, Division 70 of the Los Angeles Municipal Code, which addresses grading, excavations, and fills.

The majority of the area surrounding the project site is completely developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the project. During construction, the project will be required to prevent the transport of sediments from the site by stormwater runoff and winds through the use of appropriate Best Management Practices (BMPs). Normally, these BMPs will be detailed in a Stormwater Pollution Prevention Plan (SWPPP), which are required to be acceptable to the City Engineer and in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations.

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[32] *City of Los Angeles, Department of City Planning, City of Los Angeles Citywide General Plan Framework Final Environmental Impact Report, 2.17 Geologic/Seismic Conditions, Figure GS-4. Landslide Inventory & Hillside Areas in the City of Los Angeles, January 19, 1999. Website: http://cityplanning.lacity.org/. March 17, 2014.*

[33] *California Department of Conservation, Seismic Hazards Zoning Program, Seismic Hazard Zone Maps, Southern California, Hollywood Quadrangle. February 27, 2008. Website: http://gmw.consrv.ca.gov /shmp/html/pdf_maps_so.html. March 17, 2014.*

However, as construction of the project would not disturb more than one acre of land, the applicant would not be required to obtain coverage under the General Construction Activity Stormwater Permit (GCASWP), which requires development and implementation of a Stormwater Pollution Prevention Plan (SWPPP).[34] Instead, the BMPs are listed below as Mitigation Measures 6-4 through 6-8. With the implementation of the required construction BMPs, soil erosion impacts will be less than significant.

Long-term operation of the project would not result in substantial soil erosion or loss of topsoil. The majority of the project site would be covered by the structure; thus, no exposed areas subject to erosion would be created or affected by the project. With implementation of operational BMPs, long-term impacts related to erosion or the loss of topsoil would be less than significant.

Mitigation Measures

6-4. Excavation and grading activities shall be scheduled during dry weather periods as feasible. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the project site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.

6-5. Implementation of appropriate erosion control and drainage devices to the satisfaction of the Building and Safety Department shall be incorporated such as: sand bags and inlet and outlet structures, as specified by Section 91.7013 of the Building Code, and planting fast-growing annual and perennial grasses in areas where construction is not immediately planned.

6-6. Stockpiles and excavated soil shall be covered with secured tarps or plastic sheeting.

6-7. All excavation and shoring systems shall meet, at a minimum, the requirements given in the State of California Occupational Safety and Health Standards.

6-8. When rain is forecast, all fill shall be properly compacted prior to stopping work for the day. Once compacted, these fills shall have the surface sloped and use temporary drainage devices to transfer excess water to the street. Drainage shall not be allowed to pond anywhere on the site.

[34] *California Environmental Protection Agency, State Water Resources Control Board, Stormwater Program. Website: http://www.swrcb.ca.gov/water_issues/programs/stormwater/construction.shtml. February 28, 2014.*

c) Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Potentially Significant Impact Unless Mitigation Incorporated. A significant impact may occur if the project is built in an unstable area without proper site preparation or design features to provide adequate foundations for the project buildings, thus posing a hazard to life and property. Construction activities associated with the project must comply with the City of Los Angeles Building Code, which is designed to assure safe construction, including building foundation requirements appropriate to site conditions. As discussed in the response to Question 6(a)(iv) above, the project site is relatively flat and is not at risk for landslides. In addition, because the site is not potentially liquefiable, lateral spreading should not pose any significant hazard to the project, with the implementation of MM 6-1 through 6-3.[35] Therefore, potential impacts related to landslides, subsidence, lateral spreading, liquefaction or collapse, would be less than significant with implementation of MM 6-1 through 6-3, which are detailed under Question 6(a)(iii), above.

d) Would the project be located on expansive soil, as identified in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Less Than Significant Impact. A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings thus posing a hazard to life and property. Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink (decrease in volume) as water is drawn away. If soils consist of expansive clays, foundation movement and/or damage can occur if wetting and drying of the clay does not occur uniformly across the entire area. Expansive soils were encountered on the project site. However, safe construction will be assured through compliance with the City of Los Angeles Uniform Building Code, which includes building foundation requirements appropriate to site conditions. With building code compliance, impacts related to expansive soils would be less than significant.

e) Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. This question would apply to the project only if it were located in an area not served by an existing sewer system. The project site is located in an urbanized area within the City of Los Angeles, which is served by a wastewater collection, conveyance, and treatment system

[35] *Preliminary Geotechnical Engineering Investigation, GeoConcepts, Inc.. May 2014.*

operated by the City. No septic tanks or alternative disposal systems are necessary, and none are proposed. Therefore, no impacts related to alternative wastewater disposal systems would occur.

7. GREENHOUSE GAS EMISSIONS

The following greenhouse gas emissions discussion is based on project-specific air quality modeling and analysis consistent with the Project Description provided in Section 2. Modeling is included as Appendix C to this Draft Initial Study/Mitigated Negative Declaration (IS/MND).

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. Emitting greenhouse gases (GHGs) into the atmosphere is not itself an adverse environmental effect. Rather, it is the increased accumulation of GHGs in the atmosphere that may result in global climate change. The resultant consequences of that climate change can cause adverse environmental effects. Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, it is not possible to predict the specific impact to global climate change from one project's relatively small incremental increase in emissions. Therefore, impacts associated with GHG emissions should not be evaluated on a project-level basis, but instead on a cumulative basis.

On December 5, 2008, the SCAQMD Governing Board adopted an interim greenhouse gas significance threshold for stationary sources, rules, and plans where the SCAQMD is lead agency (SCAQMD permit threshold). The SCAQMD is in the process of preparing recommended significance thresholds for greenhouse gases for local lead agency consideration ("SCAQMD draft local agency threshold"); however, the SCAQMD Board has not approved the thresholds as of the date of this analysis. The current draft thresholds consist of the following tiered approach:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether the project is consistent with a greenhouse gas reduction plan. If a project is consistent with a qualifying local greenhouse gas reduction plan, it does not have significant greenhouse gas emissions.
- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to a project's operational emissions. If a project's emissions are under one of the following screening thresholds, then the project is less than significant:
  - All land use types: 3,000 $MTCO_2e$ per year
  - Based on land use type: residential: 3,500 $MTCO_2e$ per year; commercial: 1,400 $MTCO_2e$ per year; or mixed use: 3,000 $MTCO_2e$ per year

- Tier 4 has the following options:
  - Option 1: Tier 4, option 1: Reduce greenhouse gas emissions from business as usual* by 28.4 percent. The California 2020 emissions target is 427 MMTCO2e and the 2020 baseline (without any AB 32 related regulations) is 596 MMTCO2e (ARB 2008c).

* Business as usual for purposes of the greenhouse gas significance threshold is defined as pre-AB 32. Business as usual greenhouse gas emissions refer to emissions using protocol and emission factors from the period of 2004-2006 (prior to the adoption of AB 32 and related greenhouse gas regulations) and also do not take into account project design features or mitigation measures to reduce greenhouse gas emissions. The California Air Resources Board's Scoping Plan indicates that business as usual is "projected emissions in 2020 without any greenhouse gas reduction measures (business-as-usual case). The 2020 business-as-usual forecast does not take any credit for reductions from measures included in this Plan, including the Pavley greenhouse gas emissions standards for vehicles, full implementation of the Renewables Portfolio Standard beyond current levels of renewable energy, or the solar measures" (ARB 2008). However, since 2008, when SCAQMD wrote these thresholds, the ARB's 2020 forecasts were revised and the percent reduction is currently calculated as 21.7 percent to meet AB32 year 2020 emission reduction goals[36].

- Option 2: Early implementation of applicable AB 32 Scoping Plan measures
- Option 3, 2020 target for service populations (SP), which includes residents and employees: 4.8 $MTCO_2e$/SP/year for projects and 6.6 $MTCO_2e$/SP/year for plans;
- Option 3, 2035 target: 3.0 $MTCO_2e$/SP/year for projects and 4.1 $MTCO_2e$/SP/year for plans

- Tier 5 involves mitigation offsets to achieve target significance threshold.

The SCAQMD discusses its draft thresholds in the following excerpt (SCAQMD 2008b):

> The overarching policy objective with regard to establishing a GHG [greenhouse gas] significance threshold for the purposes of analyzing GHG impacts pursuant to CEQA is to establish a performance standard or target GHG reduction objective that will ultimately contribute to reducing GHG emissions to stabilize climate change. Full implementation of the Governor's Executive Order S-3-05 would reduce GHG emissions 80 percent below 1990 levels or 90 percent below current levels by 2050. It is anticipated that achieving the Executive Order's objective would contribute to worldwide efforts to cap GHG concentrations at 450 ppm, thus, stabilizing global climate.
>
> As described below, staff's recommended interim GHG significance threshold proposal uses a tiered approach to determining significance. Tier 3, which is expected to be the primary tier by which the AQMD will determine significance for projects where it is the lead agency, uses the Executive Order S-3-05 goal as the basis for deriving the screening level.

[36] *California Air Resources Board (ARB). 2011. Status of Scoping Plan Recommended Measures . Website: http://www.arb.ca.gov/cc/scopingplan/sp_measures_implementation_timeline.pdf . March 5, 2014.*

Specifically, the Tier 3 screening level for stationary sources is based on an emission capture rate of 90 percent for all new or modified projects. A 90 percent emission capture rate means that 90 percent of total emissions from all new or modified stationary source projects would be subject to some type of CEQA analysis, including a negative declaration, a mitigated negative declaration, or an environmental impact report.

Therefore, the policy objective of staff's recommended interim GHG significance threshold proposal is to achieve an emission capture rate of 90 percent of all new or modified stationary source projects. A GHG significance threshold based on a 90 percent emission capture rate may be more appropriate to address the long-term adverse impacts associated with global climate change. Further, a 90 percent emission capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. This assertion is based on the fact that staff estimates that these GHG emissions would account for less than one percent of future 2050 statewide GHG emissions target (85 MMTCO2e/yr). In addition, these small projects would be subject to future applicable GHG control regulations that would further reduce their overall future contribution to the statewide GHG inventory.

For this project, Tier 4, option 1 to reduce greenhouse gas emissions by 21.7 percent is used as the significance threshold, in addition to the qualitative thresholds of significance set forth below from Section VII of Appendix G to the CEQA Guidelines. Although the original percentage reduction in 2008 significance thresholds guidance is 28.4 percent, the current year 2020 forecasts show that a 21.7 percent emissions reduction is needed to meet AB32 emission reduction goals.

Greenhouse Gas Inventory

This analysis addresses only greenhouse gases identified by AB 32, which include carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. The project would generate a variety of greenhouse gases during construction and operation, the most common include several defined by AB 32 such as carbon dioxide, methane, and nitrous oxide. However, certain greenhouse gases defined by AB 32 would not be emitted by the project. For example, perfluorocarbons and sulfur hexafluoride are typically used in industrial applications, none of which would be used by the project. Detailed construction equipment and equipment use assumptions are provided in Question 4, Air Quality Analysis. Construction-generated greenhouse gas emissions are provided in Table 4-11 below.

Table 4-11
Project Construction Greenhouse Gas Emissions

Phase	Annual Emissions ($MTCO_2e$)		
	Onsite	Offsite	Total
Demolition – Building	11.34	2.91	14.25
Demolition – Paving	11.34	1.07	12.41
Grading	70.19	179.62	249.81
Building Construction (2016)	60.63	31.03	91.66
Building Construction (2017)	171.46	85.81	257.27
Architectural Coating	8.31	3.35	11.66
Total	—	—	637.07
Averaged Over 30 Years	—	—	21.24

$MTCO_2e$ = metric tons of carbon dioxide equivalents (includes carbon dioxide, methane, and/or nitrous oxide).
Source: CalEEMod output is provided in Appendix C

The draft SCAQMD GHG Threshold Guidance document released in October 2008 recommends that construction emissions be amortized for a project lifetime of 30 years to ensure that GHG reduction measures address construction GHG emissions as part of the operational reduction strategies.[37] Therefore, the project's total construction emissions were distributed over 30 years to yield an average of 21.24 $MTCO_2e$ per year.

[37] *South Coast Air Quality Management District (SCAQMD). 2008. Greenhouse Gases (GHG) CEQA Significance Thresholds. Website: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds. March 5, 2014.*

The project site is currently developed with a warehouse land use. The emissions from the existing land use would no longer occur with the construction of the project. However, the analysis does not account for the removal of existing emissions that would no longer occur as a result of the project, in order to provide a conservative 'worst-case' emissions analysis. The CalEEMod modeling prepared for the project includes emission reduction credit for project design features, neighborhood pedestrian orientation, and the project's proximity to a large employment center, as well as reduction from statewide regulation such as the Renewable Portfolio Standard, 2013 Title 24 Standards, and Pavley Standards.

As is shown in Table 4-12, the project would meet the SCAQMD's draft threshold Tier 4, Option 1 to reduce greenhouse gas emissions by 21.7 percent from the business as usual scenario. Therefore, the project would not generate greenhouse gas emissions, either directly or indirectly, that would have a significant impact on the environment.

Table 4-12
Project Operational Greenhouse Gas Emissions

Phase	Annual Emissions ($MTCO_2e$)		
	Business as Usual	**With Reductions**	**Percent Change**
Area	0.00	0.00	0
Energy	495.21	341.45	31.05
Mobile	4,640.63	3,237.01	30.25
Waste	54.79	44.38	19.00
Water	29.78	25.28	15.11
Subtotal – Operation	*5,220.41*	*3,648.13*	*30.12*
Subtotal – Construction averaged over 30 years	*21.24*	*21.24*	*0*
Total Project Percent Reduction	**5,241.65**	**3,669.37**	**30.00**
Minimum percent reduction Goal	—	—	21.7
Does project meet goal?	—	—	Yes

$MTCO_2e$ = metric tons of carbon dioxide equivalents (includes carbon dioxide, methane, and/or nitrous oxide).
Source: CalEEMod output is provided in Appendix C.

b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. In September 2006, Governor Arnold Schwarzenegger signed in to law AB 32, the California Global Warming Solutions Act of 2006. AB 32 requires the California Air Resources Board (ARB) to adopt regulations to require the reporting and

verification of statewide greenhouse gas emissions and to monitor and enforce compliance with that program.

In October 2006, Governor Schwarzenegger issued an Executive Order in which he designated the California Environmental Protection Agency (Cal/EPA) Secretary with the primary responsibility for implementing AB 32. In response to the Executive Order, the Secretary of Cal/EPA created the Climate Action Team (CAT), which, in March 2006, published the *Climate Action Team Report to Governor Schwarzenegger and the Legislature* (the 2006 CAT Report). The 2006 CAT Report identifies a recommended list of strategies that the State could pursue to reduce climate change greenhouse gas emissions.

The City of Los Angeles has begun to address the issue of global climate change by publishing Green LA, An Action Plan to Lead the Nation in Fighting Global Warming (the LA Green Plan).[38] This document outlines the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities. According to the LA Green Plan, the City is committed to the goal of reducing emissions of CO_2 to 35 percent below 1990 levels. To achieve this, the City will:

- Increase the generation of renewable energy;
- Improve energy conservation and efficiency; and
- Change transportation and land use patterns to reduce dependence on automobiles.

As part of the LA Green Plan, the Los Angeles Green Building Ordinance was passed in April 2008 to promote green building practices by creating a series of requirements and incentives for developers to meet the U.S. Green Building Council's (USGBC's) Leadership in Energy and Environmental Design (LEED) Green Building Rating System. The emphasis of the LA Green Plan is first on municipal facilities and operations. The project is proposed to meet an equivalent of the USGBC's LEED rating. Furthermore, it will improve the sustainability of the project site by removing older, out-dated structures and developing a modern, efficient building that utilizes the latest City and State Green Building Codes.

Significance on a cumulative basis is determined based on consistency with state, regional and local GHG reduction strategies. The consistency of the project with the strategies from the 2006 CAT Report is evaluated in Table 4-13, and Table 4-14 recommends greenhouse gas emission reduction measures.

[38] *Green LA: An Action Plan to Lead the Nation In Fighting Global Warming. City of Los Angeles. May 2007.*

Table 4-13
Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
California Air Resources Board	
Vehicle Climate Change Standards AB 1493 (Pavley) required the state to develop and adopt regulations that achieve the maximum feasible and cost-effective reduction of climate change emissions emitted by passenger vehicles and light duty trucks. Regulations were adopted by ARB in September 2004.	**Consistent.** The vehicles that travel to and from the project site on public roadways would comply with ARB vehicle standards that are in effect at the time of vehicle purchase.
Diesel Anti-Idling In July 2004, ARB adopted a measure to limit diesel-fueled commercial motor vehicle idling.	**Consistent.** The diesel-fueled commercial trucks making deliveries to the project at the project site would be required to comply with all applicable adopted ARB vehicle standards.
Hydrofluorocarbon Reduction 1) Ban retail sale of HFC in small cans. 2) Require that only low GWP refrigerants be used in new vehicular systems. 3) Adopt specifications for new commercial refrigeration. 4) Add refrigerant leak-tightness to the pass criteria for vehicular inspection and maintenance programs. 5) Enforce federal ban on releasing HFCs.	**Consistent.** This strategy applies to consumer products that may be used by the guests associated with the project. All applicable products would be required to comply with the regulations that are in effect at the time of manufacture.
Transportation Refrigeration Units, Off-Road Electrification, Port Electrification (ship to shore) Require all new transportation refrigeration units (TRU) to be equipped with electric standby. Require cold storage facilities to install electric infrastructure to support electric standby TRUs.	**Not applicable.** The project would not involve the use of transportation refrigeration units.
Manure Management Improved management practices, manure handling practices, and lagoon/liquid waste control options.	**Not applicable.** The project would not involve any manure handling.
Semi-Conductor Industry Targets Emission reduction rules for semiconductor operations.	**Not applicable.** The project would not involve any semiconductor operations.
Alternative Fuels: Biodiesel Blends	**Consistent.**

Table 4-13
Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
ARB would develop regulations to require the use of 1 to 4 percent biodiesel displacement of California diesel fuel.	The diesel vehicles that travel to and from the project site on public roadways could utilize this fuel once it is commercially available.
Alternative Fuels: Ethanol Increased use of E-85 fuel.	**Consistent.** Guests and employees of the project could purchase flex-fuel vehicles and utilize this fuel once it is commercially available in the region and local vicinity.
Heavy-Duty Vehicle Emission Reduction Measures Increased efficiency in the design of heavy-duty vehicles and an education program for the heavy-duty vehicle sector.	**Consistent.** The heavy-duty vehicles (e.g., refuse and delivery trucks) that travel to and from the project site on public roadways would be subject to all applicable ARB efficiency standards that are in effect at the time of vehicle manufacture.
Reduced Venting and Leaks on Oil and Gas Systems Improved management practices in the production, processing, transport, and distribution of oil and natural gas.	**Not applicable.** The project does not involve any production, processing, transport, or distribution of oil and natural gas.
Hydrogen Highway The California Hydrogen Highway Network (CA H2 Net) is a State initiative to promote the use of hydrogen as a means of diversifying the sources of transportation energy.	**Not applicable.** The project would not be responsible for promoting the use of hydrogen for transportation energy. However, guests and employees of the project could use this fuel once it becomes commercially available.
Achieve 50% Statewide Recycling Goal Achieving the State's 50 percent waste diversion mandate as established by the Integrated Waste Management Act of 1989, (AB 939, Sher, Chapter 1095, Statutes of 1989), will reduce climate change emissions associated with energy intensive material extraction and production as well as methane emission from landfills. A diversion rate of 48% has been achieved on a statewide basis. Therefore, a 2% additional reduction is needed.	**Consistent.** The project would have access to the City's recycling programs designed to comply with the requirements set forth in AB 939, which requires each city or county to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. There are no requirements that apply to individual projects.
Landfill Methane Capture	**Not applicable.** The project does not involve landfill operations.

Table 4-13
Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
Install direct gas use or electricity projects at landfills to capture and use emitted methane.	
Zero Waste – High Recycling Efforts to exceed the 50 percent goal would allow for additional reductions in climate change emissions.	**Consistent.** The project would have access to the City's recycling programs designed to comply with the requirements of AB 939. In addition, the project site is located within the City of Los Angeles, which surpassed the State-mandated 50 percent diversion rate for the year 2000 and achieved a 58.8 percent diversion rate. In 2001 and 2002, the City achieved a diversion rate of 63 and 62 percent, respectively. Furthermore, in 1999, the Mayor directed City departments to develop strategies to achieve the citywide recycling goal of 70 percent by 2015. The project would also be subject to all applicable State and City requirements for solid waste reduction as they change in the future.
Department of Forestry	
Forest Management Increasing the growth of individual forest trees, the overall age of trees prior to harvest, or dedicating land to older aged trees.	**Not applicable.** The project is not located within or near a forest.
Forest Conservation Provide incentives to maintain an undeveloped forest landscape.	**Not applicable.** The project is not located within or near a forest.
Fuels Management/Biomass Reduce the risk of wildland fire through fuel reduction and biomass development.	**Not applicable.** The project is not located within or near a forest or an area of open space in which fuel accumulation is an issue.
Urban Forestry A new statewide goal of planting 5 million trees in urban areas by 2020 would be achieved through the expansion of local urban forestry programs.	**Consistent.** Landscaping for the project would include the planting of seven southern magnolia trees in the frontage of the project site.
Afforestation/Reforestation	**Not applicable.** The project is not located within or near a forest.

Table 4-13
Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
Reforestation projects focus on restoring native tree cover on lands that were previously forested and are now covered with other vegetative types.	
Department of Water Resources	
Water Use Efficiency Approximately 19 percent of all electricity, 30 percent of all natural gas, and 88 million gallons of diesel are used to convey, treat, distribute and use water and wastewater. Increasing the efficiency of water transport and reducing water use would reduce greenhouse gas emissions.	**Consistent.** The demands of the project would be served by the existing water system and would comply with State and local water conservation measures.
Energy Commission (CEC)	
Building Energy Efficiency Standards in Place and in Progress Public Resources Code 25402 authorizes the CEC to adopt and periodically update its building energy efficiency standards (that apply to newly constructed buildings and additions to and alterations to existing buildings).	**Consistent.** The project would be required to be constructed in compliance with the standards of Title 24 that are in effect at the time of development.
Appliance Energy Efficiency Standards in Place and in Progress Public Resources Code 25402 authorizes the Energy Commission to adopt and periodically update its appliance energy efficiency standards (that apply to devices and equipment using energy that are sold or offered for sale in California).	**Consistent.** Under State law, appliances that are purchased for the project - both pre- and post-development – would be consistent with energy efficiency standards that are in effect at the time of manufacture.
Fuel-Efficient Replacement Tires & Inflation Programs State legislation established a statewide program to encourage the production and use of more efficient tires.	**Consistent.** The project would not be responsible for promoting fuel-efficient tire measures. However, guests and employees of the project could purchase tires for their vehicles that comply with State programs for increased fuel efficiency.
Cement Manufacturing Cost-effective reductions to reduce energy consumption and to lower carbon dioxide emissions in the cement industry.	**Not applicable.** The project does not involve cement manufacturing.

Table 4-13
Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
Municipal Utility Energy Efficiency Programs/Demand Response Includes energy efficiency programs, renewable portfolio standard, combined heat and power, and transitioning away from carbon-intensive generation.	**Not applicable**. While this strategy is not applicable, the project would not preclude the implementation of this strategy by municipal utility providers.
Municipal Utility Renewable Portfolio Standard California's Renewable Portfolio Standard (RPS), established in 2002, requires that all load-serving entities achieve a goal of 20 percent of retail electricity sales from renewable energy sources by 2017, within certain cost constraints.	**Not applicable**. While this strategy is not applicable, the project would not preclude the implementation of this strategy by municipal utility providers.
Municipal Utility Combined Heat and Power Cost effective reduction from fossil fuel consumption in the commercial and industrial sector through the application of onsite power production to meet both heat and electricity loads.	**Not applicable**. While this strategy is not applicable, the project would not preclude the implementation of this strategy by municipal utility providers.
Municipal Utility Electricity Sector Carbon Policy State agencies to address ways to transition investor-owned utilities away from carbon-intensive electricity sources.	**Not applicable.** While this strategy is not applicable, the project would not preclude the implementation of this strategy by municipal utility providers.
Alternative Fuels: Non-Petroleum Fuels Increasing the use of non-petroleum fuels in California's transportation sector, as recommended as recommended in the CEC's 2003 and 2005 Integrated Energy Policy Reports.	**Consistent.** Guests and employees of the project could purchase alternative fuel vehicles and utilize these fuels once they are commercially available in the region and local vicinity.
Business, Transportation and Housing	
Measures to Improve Transportation Energy Efficiency Builds on current efforts to provide a framework for expanded and new initiatives including incentives, tools and information that advance cleaner transportation and reduce climate change emissions.	**Consistent.** The location of the project promotes fuel conservation through nearby access to public transportation to serve the onsite hotel and restaurant services.
Smart Land Use and Intelligent Transportation Systems (ITS)	**Consistent.** The project will create new hotel and restaurant uses onsite and in close proximity to transit.

Table 4-13
Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
Smart land use strategies encourage jobs/housing proximity, promote transit-oriented development, and encourage high-density residential/commercial development along transit corridors. ITS is the application of advanced technology systems and management strategies to improve operational efficiency of transportation systems and movement of people, goods and services. Governor Schwarzenegger is finalizing a comprehensive 10-year strategic growth plan with the intent of developing ways to promote, through state investments, incentives and technical assistance, land use, and technology strategies that provide for a prosperous economy, social equity and a quality environment. Smart land use, demand management, ITS, and value pricing are critical elements in this plan for improving mobility and transportation efficiency. Specific strategies include: promoting jobs/housing proximity and transit-oriented development; encouraging high density residential/commercial development along transit/rail corridor; valuing and congestion pricing; implementing intelligent transportation systems, traveler information/traffic control, incident management; accelerating the development of broadband infrastructure; and comprehensive, integrated, multimodal/intermodal transportation planning.	
Department of Food and Agriculture	
Conservation Tillage/Cover Crops Conservation tillage and cover crops practices are used to improve soil tilt and water use efficiency, and to reduce tillage requirements, labor, fuel, and fertilizer requirements.	**Not applicable.** The project would not include any elements of agriculture.
Enteric Fermentation Cattle emit methane from digestion processes. Changes in diet could result in a reduction in emissions.	**Not applicable.** The project would not include any elements of agriculture.
State and Consumer Services Agency	
Green Buildings Initiative	**Consistent.**

Table 4-13
Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
Green Building Executive Order, S-20-04 (CA 2004), sets a goal of reducing energy use in public and private buildings by 20 percent by the year 2015, as compared with 2003 levels. The Executive Order and related action plan spell out specific actions state agencies are to take with state-owned and –leased buildings. The order and plan also discuss various strategies and incentives to encourage private building owners and operators to achieve the 20 percent target.	The project would be required to be constructed in compliance with the standards of Title 24 that are in effect at the time of development. In addition, the project will be consistent with the City of Los Angeles' Green Building Ordinance by incorporating a variety of green building elements.
Public Utilities Commission (PUC)	
Accelerated Renewable Portfolio Standard The Governor has set a goal of achieving 33 percent renewable in the State's resource mix by 2020. The joint PUC/Energy Commission September 2005 Energy Action Plan II (EAP II) adopts the 33 percent goal.	**Not applicable**. While this strategy is not applicable, the project would not preclude the implementation of this strategy by municipal utility providers.
California Solar Initiative The solar initiative includes installation of 1 million solar roofs or an equivalent 3,000 MW by 2017 on homes and businesses, increased use of solar thermal systems to offset the increasing demand for natural gas, use of advanced metering in solar applications, and creation of a funding source that can provide rebates over 10 years through a declining incentive schedule.	**Not applicable.** The project would not preclude the implementation of this strategy. In addition, solar panels are proposed as part of the project.
Investor-Owned Utility Programs These strategies include energy efficiency programs, combined heat and power initiative, and electricity sector carbon policy for investor owned utilities.	**Not applicable.** While this strategy is not applicable, the project would not preclude the implementation of this strategy by investor-owned utility providers.
Sources: California Environmental Protection Agency, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006;	

Table 4-14
Project Consistency with ARB Scoping Plan Recommended Greenhouse Gas Emission Reduction Measures

Measure	Project Consistency
California Air Resources Board	
California Cap-and-Trade Program Linked to Western Climate Initiative Partner Jurisdictions	**Not applicable.**

Table 4-14
Project Consistency with ARB Scoping Plan Recommended Greenhouse Gas Emission Reduction Measures

Measure	Project Consistency
Implement a broad-based California cap-and-trade program to provide a firm limit on emissions. Link the California cap–and-trade program with other Western Climate Initiative Partner programs to create a regional market system to achieve greater environmental and economic benefits for California. Ensure California's program meets all applicable AB 32 requirements for market-based mechanisms.	While this measure is not specifically applicable to the project, the project would not preclude the implementation of this measure by ARB.
California Light-Duty Vehicle Greenhouse Gas Standards Implement adopted Pavley standards and planned second phase of the program. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.	**Consistent.** The vehicles that travel to and from the project site on public roadways would comply with ARB vehicle standards that are in effect at the time of vehicle purchase.
Energy Efficiency Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California (including both investor-owned and publicly owned utilities).	**Consistent.** The project would be required to be constructed in compliance with the standards of Title 24 that are in effect at the time of development.
Renewables Portfolio Standard Achieve 33 percent renewable energy mix statewide.	**Not applicable.** While this measure is not applicable, the project would not preclude the implementation of this measure by municipal utility providers.
Low Carbon Fuel Standard Develop and adopt the Low Carbon Fuel Standard.	**Consistent.** Guests and employees of the project could purchase low carbon fuel once they are commercially available in the region and local vicinity.
Regional Transportation-Related Greenhouse Gas Targets Develop regional greenhouse gas emissions reduction targets for passenger vehicles.	**Consistent.** The passenger vehicles that travel to and from the project site on public roadways would be subject to all applicable ARB efficiency standards that are in effect at the time of vehicle manufacture.
Vehicle Efficiency Measures Implement light-duty vehicle efficiency measures.	**Consistent.**

Table 4-14
Project Consistency with ARB Scoping Plan Recommended Greenhouse Gas Emission Reduction Measures

Measure	Project Consistency
	The light-duty vehicles that travel to and from the project site on public roadways would be subject to all applicable ARB efficiency standards that are in effect at the time of vehicle manufacture.
Goods Movement Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	**Not applicable.** While this measure is not applicable, the project would not preclude the implementation of this measure by ARB.
Million Solar Roofs Program Install 3,000 MW of solar-electric capacity under California's existing solar programs.	**Not applicable.** The project would not preclude the implementation of this strategy. In addition, solar panels are proposed as part of the project.
Medium/Heavy-Duty Vehicles Adopt medium and heavy-duty vehicle efficiency measures.	**Consistent.** The medium and heavy-duty vehicles that travel to and from the project site on public roadways would be subject to all applicable ARB efficiency standards that are in effect at the time of vehicle manufacture.
Industrial Emissions Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce greenhouse gas emissions and provide other pollution reduction co-benefits. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission. Adopt and implement regulations to control fugitive methane emissions and reduce flaring at refineries.	**Not applicable.** The project is not an industrial facility and would not involve the operation of industrial processes.
High Speed Rail Support implementation of a high-speed rail system.	**Not applicable.** While this measure is not applicable, the project would not preclude the implementation of this measure by the State.
Green Building Strategy Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	**Consistent.** The project will be consistent with the City of Los Angeles' Green Building Ordinance which incorporates a variety of green building elements.
High Global Warming Potential Gases	**Not applicable.**

Table 4-14
Project Consistency with ARB Scoping Plan Recommended Greenhouse Gas Emission Reduction Measures

Measure	Project Consistency
Adopt measures to reduce high global warming potential gases.	While this measure is not applicable, the project would not preclude the implementation of this measure by the State.
Recycling and Waste Reduce methane emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero-waste.	**Consistent.** The project would have access to the City's recycling programs designed to comply with the requirements of AB 939. In addition, the project site is located within the City of Los Angeles, which surpassed the State-mandated 50 percent diversion rate for the year 2000 and achieved a 58.8 percent diversion rate. In 2001 and 2002, the City achieved a diversion rate of 63 and 62 percent, respectively. Furthermore, in 1999, the Mayor directed City departments to develop strategies to achieve the citywide recycling goal of 70 percent by 2015. The project would also be subject to all applicable State and City requirements for solid waste reduction as they change in the future.
Sustainable Forests Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	**Not applicable.** The project is not located within or near a forest.
Water Continue efficiency programs and use cleaner energy sources to move and treat water.	**Consistent.** The demands of the project would be served by the existing water system and would comply with State and local water conservation measures.
Agriculture In the near-term, encourage investment in manure digesters and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.	**Not applicable.** The project would not include any elements of agriculture.
Source: Air Resources Board, Climate Change Proposed Scoping Plan, October 2008.	

As shown above, the project would be consistent with all feasible and applicable strategies of the 2006 CAT Report and the recommended measures of ARB Scoping Plan to reduce greenhouse gas emissions in California. Therefore, the impact of the project would be less than significant.

8. HAZARDS AND HAZARDOUS MATERIALS

The following analysis is based on the findings contained in the Phase I Environmental Site Assessment ("Phase I ESA") for the 1541 Wilcox Avenue Property, Los Angeles, California, prepared by Partner Engineering and Science, Inc. dated November 8, 2013[39]; based upon the results of the Phase I ESA, a Limited Phase II Subsurface Investigation was not required. The Phase I ESA report is included as Appendix F to this Draft IS/MND.

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. A significant impact may occur if the project would involve the use or disposal of hazardous materials as part of its routine operations, or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors.

[39] *Phase I Environmental Assessment for the 1541 Wilcox Avenue Property, Los Angeles, California. Partner Engineering and Science, Inc. November 2013.*

Construction

Construction of the project would involve the use of those hazardous materials that are typically necessary for construction of commercial developments (paints, building materials, cleaners, fuel for construction equipment, etc.). Therefore, construction of the project would involve routine transport, use, and disposal of these types of hazardous materials throughout the duration of construction activities. However, the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, State, and Federal regulations governing such activities. For example, the project would be required to comply with standard BMPs set forth by the City and the Los Angeles Regional Water Quality Control Board (LARWQCB), which would ensure that wastes generated during the construction process are disposed of properly. Therefore, short-term construction-related impacts would be less than significant.

Operation

Other than typical cleaning solvents used for janitorial purposes, landscaping, and maintenance materials, which could be considered hazardous if used inappropriately, no hazardous materials would be used, transported, or disposed of in conjunction with the routine day-to-day operations of the project. No significant hazards to the public or the environment are anticipated as long as common sense and good housekeeping practices are implemented to ensure the proper handling, storage, and transport of these items. The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, impacts related to transport and disposal of hazardous materials would be less than significant.

b) Would the project create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Potentially Significant Impact Unless Mitigation Incorporated. A significant impact may occur if a project utilizes hazardous materials as part of its routine operations and could potentially pose a hazard to nearby sensitive receptors under accident or upset conditions. As discussed in the response to Question 8(a), all hazardous materials onsite would be utilized in limited quantities and would comply with all applicable local, state, and federal regulations.

The Phase I ESA report found that the project site was historically occupied by a commercial printing business from 1948 until 1973. Commercial printing facilities often utilize chlorinated solvents in association with cleaning printing components. In addition, petroleum-based inks may have been utilized as well. Because of the limited quantities of chlorinated solvents, the former printing facility is not considered a significant environmental concern.

Due to the age of the buildings, the potential exists for encountering asbestos containing materials (ACMs), lead based paint (LBP), or polychlorinated biphenyls (PCBs) during project demolition activities. When left intact and undisturbed, ACMs do not pose a health risk to building occupants. There is, however, potential for exposure when ACMs become damaged to the extent that asbestos fibers become airborne and are inhaled. These airborne fibers are carcinogenic and can cause lung disease. The age of a building is directly related to its potential for containing elevated levels of ACMS. LBP was once widely used to coat and decorate buildings, however, LBP can result in lead poisoning when consumed or inhaled. As with ACMs, LBP generally does not pose a health risk to building occupants when left undisturbed; however, deterioration, damage, or disturbance could result in hazardous exposure. Buildings built before the 1978 federal ban of LBP are likely to contain LBP, as well as buildings built shortly thereafter. PCBs are mixtures of chlorinated compounds, which can exist as vapor, oily liquids, or solids and have been used as coolants and lubricants in transformers and other electrical equipment. When PCBs leak into the air, water, and soil, they can result in skin rashes and liver damage in humans.

Consequently, due to the age of the existing structures on the project site, it is possible that ACMs, LBP, or PCBs associated with building components may exist on the project site. During site reconnaissance, a limited visual evaluation of accessible areas for the presence of suspect ACMs was conducted, and suspect ACM was identified in the acoustical ceiling tiles. Due to the commercial nature of the use of the project site, lead-based paint was not considered with the scope of the assessment. No pad-mounted or pole-mounted transformers were observed that may contain PCBs. Additionally, no other potential PCB-containing equipment was observed on the project site. Nonetheless, further investigation is warranted prior to demolition of onsite structures to determine the presence of any of the above materials.

Congress enacted the Toxic Substances Control Act (TSCA) to control the distribution, use, and disposal of harmful chemicals, including asbestos, LBPs, and PCBs.[40] Should ACMs, LBPs, or PCBs be discovered on the project site, removal and disposal of such substances would be carried out in accordance with the Code of Federal Regulations, Title 40. Mitigation Measures 8-1 through 8-3 are required to ensure proper removal and disposal of ACMs, LBP, and PCBs if these substances are detected. With implementation of Mitigation Measures 8-1 through 8-3, impacts related to release of hazardous materials would be less than significant.

Mitigation Measures

8-1. An Operations and Maintenance (O&M) Program would be implemented in order to safely manage the suspect asbestos containing materials (ACMs). The identified suspect ACMs would need to be sampled to confirm the presence or absence of asbestos prior to any demolition activities to prevent potential exposure to workers

[40] *United States Environmental Protection Agency. Website: http://www.epa.gov/region09/toxic/. December 19, 2012.*

and/or building occupants. Prior to the issuance of the demolition permit, the applicant must provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant that no ACMs are present in the buildings. If ACMs are found to be present, a qualified asbestos abatement consultant shall abate the buildings in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other State and Federal rules and regulations.

8-2. A Lead Based Paint (LBP) survey must be conducted onsite. Any contractor who would disturb lead containing surfaces must be notified of the hazard and their requirement to comply with the applicable city, state, and federal regulations. Any additional LBP identified shall be abated by a qualified abatement consultant in accordance with all applicable city, State, and Federal regulations.

8-3. Prior to the issuance of the demolition permit, the applicant must provide a letter to the Department of Building and Safety from a qualified polychlorinated biphenyls (PCB) abatement consultant that no PCBs are present onsite. If PCBs are found to be present, a qualified abatement consultant shall abate the site in compliance with the applicable city, State, and Federal rules and regulations.

c) Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Imapct. A project-related significant adverse effect may occur if the project site is located within 0.25 mile of an existing or proposed school site, and is projected to release toxic emissions, which would pose a health hazard beyond regulatory thresholds. As discussed in the response to Question 8(a), the project does not include uses that require the handling or storage of large amounts of hazardous materials. The project site is located within 0.25 miles of Selma Avenue Elementary School and the Larchmont Charter School West. Selma Avenue Elementary School and Larchmont Charter School West are located approximately 0.13 mile and 0.18 mile northwest respectively of, and are hydraulically upgradient from the project site. Groundwater in the project area trends south-southwest, away from the school. Due to the distance and hydraulically upgradient location, the project site is not anticipated to impact Selma Avenue Elementary School and Larchmont Charter School West.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less Than Significant Impact. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized release from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. This question would apply only if the

project site is included on any of the above-referenced lists, and therefore would pose an environmental hazard to surrounding sensitive uses.

The project site is not listed on any environmental databases; however, it is located adjacent to properties on the following environmental databases:

LUST: The Leaking Underground Storage Tank Information System maintained by the Regional Water Quality Control Board (RWQCB) records incidences of Leaking Underground Storage Tanks (LUSTs).

UST/AST: The RWQCB compiles a list of Underground Storage Tank/Aboveground Storage Tank locations.

A Limited Phase II Subsurface Investigation was not recommended or required for the project site. Based on the results of the Phase I ESA for the project site, no further environmental investigation is recommended. Therefore, the project would not create a significant hazard to the public or the environment, and impacts related to impacted soils would be less than significant.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

No Impact. A significant project-related impact may occur if the project were placed within a public airport land use plan area or within 2 miles of a public airport, and subject to a safety hazard. The nearest airport to the project site is the Bob Hope Airport in Burbank, which is located approximately 7.15 miles to the northeast. The project site is not located within the boundaries of an airport land use plan and would not result in a safety hazard for people residing or working in the project area. No impact related to public airport uses would occur.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact. This question would apply to the project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. The project site is not located in the vicinity of a private airstrip; therefore, no impact related to private airstrip uses would occur.

g) Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. A significant impact may occur if the project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan, or would generate sufficient traffic to create traffic congestion that would interfere with the execution of such a plan. The nearest City-designated disaster route to the

project site is Highland Avenue, approximately 0.41 mile west of the project site.[41] The project would not impede access to or from Highland Avenue. Further, as discussed in the response to Question 16(a), project-generated traffic impacts would be less than significant without the need for mitigation. Therefore, the project would not interfere with an adopted emergency response plan or emergency evacuation plan. Impacts related to emergency plans would be less than significant.

h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. A significant impact may occur if a project is located in proximity to wildland areas and would pose a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The project site is located within the highly urbanized area of Hollywood and is not within a City-designated Wildland Fire Hazard Area.[42] Therefore, no impact related to wildland fires would occur.

9. HYDROLOGY AND WATER QUALITY

a) Would the project violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. A significant impact may occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. The National Pollutant Discharge Elimination System (NPDES) program establishes a comprehensive stormwater quality program to manage urban stormwater and minimize pollution of the environment to the maximum extent practicable. The Standard Urban Stormwater Mitigation Plan identifies the types and sizes of private development projects that are subject to its requirements. Based on the project size (less than one acre) and nature (commercial), the project is not subject to the County's Standard Urban Stormwater Mitigation Plan.[43]

However, the project will be required to implement feasible best management practices (BMPs) identified in the City of Los Angeles Best Management Practices Handbook Part B[44]. The

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[41] *Los Angeles County Department of Public Work, Disaster Route Maps by City, City of Los Angeles – Central Area Map. Website: http://dpw.lacounty.gov/dsg/DisasterRoutes/city.cfm. February 18, 2014.*

[42] *City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles, November 26, 1996. Website: http://cityplanning.lacity.org/. February 18, 2014.*

[43] *City of Los Angeles Stormwater Program, Standard Urban Stormwater Mitigation Plans. Website: www.lastormwater.org/green-la/standard-urban-stormwater-mitigation-plan/. February 28, 2014.*

[44] *City of Los Angeles Development Best Management Practices Handbook, Low Impact Development Manuarl, Part B, Planning Activities, 4th Edition. June 2011.*

handbook was adopted by the City and is authorized by Section 64.72 of the Los Angeles Municipal Code, approved by Ordinance No. 173494. The handbook identifies BMPs that can be implemented to safeguard stormwater quality consistent with NPDES requirements for smaller projects. In addition, the newest addition incorporates low impact development requirements.. BMPs typically used include controlling roadway and parking lot contaminants by installing oil and grease separators at storm drain inlets; cleaning parking lots on a regular basis; incorporating peak-flow reduction and infiltration features (such as grass swales, infiltration trenches, and grass filter strips) into landscaping; and implementing education programs.

The project would require excavation of 0.47 acre (20,682 square feet) of land. Construction activities associated with the project would be subject to City inspection and implementation of at least the minimum stormwater BMPs (see Mitigation Measures 6-4 through 6-8). Further, as construction of the project would not disturb more than one acre of land, the applicant would not be required to obtain coverage under the General Construction Activity Stormwater Permit (GCASWP), which requires development and implementation of a Stormwater Pollution Prevention Plan (SWPPP).[45]

Further, construction projects that include grading activities during the rainy season must also develop a Wet Weather Erosion Control Plan (WWECP). Notwithstanding, as discussed in the response to Question 6(b), the project would comply with Chapter IX, Division 70 of the LAMC which addresses grading, excavations, and fills. Compliance with the BMPs and other provisions of the LAMC would ensure that construction would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. Therefore, impacts related to water quality would be less than significant.

b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Less Than Significant Impact. A significant impact may occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement or includes withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge. According to the Preliminary Geotechnical Engineering Investigation, groundwater in the vicinity of the property was found to be approximately 72 feet below ground surface.[46] Seasonal fluctuations of groundwater levels may occur by varying amounts of rainfall, irrigation,

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[45] *California Environmental Protection Agency, State Water Resources Control Board, Stormwater Program. Website: http://www.swrcb.ca.gov/water_issues/programs/stormwater/construction.shtml. February 28, 2014.*

[46] *Preliminary Geotechnical Engineering Investigation, GeoConcepts, Inc. May 2014.*

and recharge. Excavation activities would extend to approximately 36 feet below ground surface and would not be expected to reach the groundwater level. Therefore, excavation activities would not have the potential to interfere substantially with groundwater recharge or substantially deplete groundwater supplies.

More than 95% of the project site is currently covered with impermeable surfaces. Thus, runoff from the project site currently flows to the existing City storm drain system and does not enter the groundwater supply. Development of the project would not increase the amount of impermeable surfaces on the project site. Additionally, the nearest groundwater well is located approximately 0.89 miles southwest of the project site.[47] The project does not involve any direct extraction of groundwater. Therefore, the project would neither increase the amount of stormwater entering the groundwater table nor deplete groundwater through wells. Impacts related to groundwater depletion would be less than significant.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation during construction or operation of the project. The project site is located in a highly urbanized area. No natural watercourses, including streams and rivers, exist on the project site or in the project vicinity, and the project site does not drain toward a natural watercourse. Currently, the project site is almost entirely covered with impermeable surfaces, and runoff from the project site flows towards the surrounding roadways and is collected by storm drain inlets. With development of the project, the project site would continue to be almost completely covered with impermeable surfaces, and runoff would continue to flow towards the existing storm drain system.

Additionally, as discussed in the response to Question 9(a), the project would comply with Chapter IX, Division 70 of the LAMC, which addresses erosion control during grading, excavation, and fill activities. Thus, the project would not substantially alter the existing drainage pattern of the area surrounding the project site such that it would result in substantial erosion or siltation on- or offsite. Therefore, impacts related to erosion would be less than significant.

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[47] *Los Angeles County Department of Public Works, Ground Water Wells Website: www.dpw.lacounty.gov/wrd/wellinfo/index.cfm. December 20, 2012.*

d) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the project site or nearby properties. As discussed in the response to Question 9(c) above, no natural watercourses exist on or in the vicinity of the project site, and runoff flows toward the existing storm drain system. Therefore, development of the project would not alter the existing drainage pattern of the project site.

The project is currently more than 95% covered with impermeable surfaces. With development of the project, the site would continue to be covered with impermeable surfaces. Thus, no substantial increase in the rate or amount of surface runoff is expected to occur with project development. No flooding is expected to occur on- or offsite due to the grades of the adjacent streets. Thus, the project would not result in a substantial increase in stormwater runoff from the project site above existing levels. Impacts related to runoff would be less than significant.

e) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. A significant impact may occur if a project would increase the volume of stormwater runoff to a level that exceeds the capacity of the storm drain system serving a project site. A project-related significant adverse effect would also occur if a project would substantially increase the probability that polluted runoff would reach the storm drain system. Urban runoff discharged from municipal storm drains is one of the principal causes of water quality problems in most urban areas. Oil and grease from parking lots, pesticides, cleaning solvents, and other toxic chemicals can contaminate stormwater, which can then contaminate receiving waters downstream and, eventually, the Pacific Ocean. As discussed in the response to Question 9(a), the project would be required to comply with the requirements set forth in the LAMC.

Construction

Three general sources of potential short-term construction-related stormwater pollution associated with the project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth-moving activities which, when not controlled, may generate soil erosion and the transportation of pollutants via storm runoff or mechanical equipment. Generally, routine safety precautions for handling and storing construction materials may effectively mitigate the potential pollution of stormwater by these materials. The same types of common sense, "good housekeeping"

procedures can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes.

Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze, or other fluids onto the construction site are also common sources of stormwater pollution and soil contamination. Earth-moving activities that can greatly increase erosion processes are another source of stormwater pollution contamination. Both of these sources of stormwater pollution would generate a potentially significant impact to the project site and vicinity from an increase in polluted stormwater runoff. Two general BMP strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control offsite migration of pollutants. With the implementation of these BMPs short-term construction-related stormwater runoff impacts would be reduced to a level of less than significant.

Operation

As previously described, the existing project site primarily consists of impermeable surfaces. The project would not result in a change in the amount of impervious surface area at the project site, and would therefore not be anticipated to result in an increase in stormwater runoff from the project site. Further, the project would be required to comply with water quality standards and wastewater discharge BMPs set forth by the County of Los Angeles and the State Water Resources Control Board. Through compliance with existing regulations, long-term operational impacts related to stormwater would be less than significant.

See Standard Conditions 9-1 through 9-8 below which details the applicable BMP's. Through compliance with state and local regulations, impacts would be less than significant.

Standard Conditions

SC 9-1 During construction, the project applicant must implement all applicable and mandatory BMPs in accordance with the City of Los Angeles Stormwater Management Program. These BMPs include, but are not limited to, the following:

- Erosion control procedures shall be implemented for exposed areas;
- Appropriate dust suppression techniques, such as watering or tarping, shall be used;
- Construction entrances shall be designed to facilitate the movement of trucks onsite that are hauling debris from the site; and
- Truck loads shall be tarped.

SC 9-2 All construction equipment and vehicles must be inspected for leaks and repaired

according to a regular schedule.

SC 9-3 All waste must be disposed of properly using appropriately labeled recycling bins to recycle construction materials, including solvents, water-based paints, vehicle fluids, broken asphalt and concrete, wood, and vegetation. Non-recyclable materials/wastes must be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed regulated disposal site.

SC 9-4 Leaks, drips, and spills must be cleaned up immediately to prevent contaminated soil on paved surfaces from being washed away into the storm drains.

SC 9-5 Pavement at material spills must not be hosed down. Dry cleanup methods must be used whenever possible.

SC 9-6 Waste containers must be covered and maintained. Uncovered waste containers must be placed under a roof or covered with tarps or plastic sheeting.

SC 9-7 Where truck traffic is frequent, gravel approaches must be used to reduce soil compaction and limit the tracking of sediment into streets.

SC 9-8 All vehicle/equipment maintenance, repair, and washing must be conducted away from storm drains and all major repairs must be conducted offsite. Drip pans or drop cloths must be used to catch drips and spills.

f) Would the project otherwise substantially degrade water quality?

Less Than Significant Impact. A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality. Other than the sources described in the response to Question 8(e) above, the project does not include other sources of contaminants that could substantially degrade water quality. Therefore, impacts to water quality would be less than significant.

g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. This question would apply to the project only if it were placing commercial uses in a 100-year flood zone. The project site is not located within an area designated as a 100-year or 500-year flood zone.[48] Further, the project site is not located within an area designated by the City as

[48] *Federal Emergency Management Agency, Flood Insurance Rate Maps, Search by Street Address. Website: msc.fema.gov/webapp/wcs/stores/servlet/FemaWelcomeView?storeId= 10001&catalogId= 10001&langId= -1. February 28, 2014.*

a 100-year or 500-year flood plain.[49] Therefore, no impacts related to a 100-year flood hazard area would occur.

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. A significant impact may occur if a project were located within a 100-year flood zone, which would impede or redirect flood flows. As discussed in the response to Question 8(g), the project site is not located within an area designated as a 100-year or 500-year flood plain. Therefore, the project would not be at risk of flooding and would not place structures in an area that would impede or redirect flood flows. No impacts to flood flows would occur.

i) Would the project 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?

Less Than Significant Impact. A significant impact may occur if a project were located in an area where a dam or levee could fail, exposing people or structures to a significant risk of loss, injury, or death. Water features in proximity to the project site include the Silver Lake Reservoir, approximately 3.75 miles east; the Los Angeles River, approximately 5.13 miles east; the Mulholland dam, approximately 2 miles north; and the Hollywood Reservoir, approximately 1.33 miles north of the project site. The project site is located within an area designated by the City as being at risk for potential inundation from such water features.[50] Specifically, the project site is located within the dam failure inundation area for Mulholland dam, located in the Santa Monica Mountains. The mapped inundation areas are based on the unlikely event of an earthquake related catastrophic failure of the concrete gravity dam during peak storage, and represent worst- case scenarios for emergency planning purposes.

Dam safety regulations are the primary means of reducing damage or injury due to inundation occurring from dam failure[51]. The California Division of Safety of Dams regulates the siting, design, construction, and periodic review of all dams in the State. In addition, dams and reservoirs are monitored during storms, and measures are instituted in the event of potential overflow. These measures apply to facilities within the City's borders, and facilities owned and

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[49] *City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, Safety Element, Exhibit F, 100-Year & 500-Year Flood Plains in the City of Los Angeles. November 26, 1996. Website: http://cityplanning.lacity.org/, February 28, 2014.*

[50] *City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas in the City of Los Angeles. November 26, 1996. Website: http://cityplanning.lacity.org/. February 28, 2014.*

[51] *City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, pages 2.17-38 and 2.17-40.*

operated by the City within other jurisdictions[52]. Appropriate measures to be implemented in the event of potential overflow are specific to each dam and are based on the risk level associated with the dam. The City determined the risk of each dam that could potentially impact the City based on the age and design of the dam, the holding capacity, as well as the density of the existing and planned development with the inundation area[53]. In addition, the City's Local Hazard Mitigation Plan 2011 contains a comprehensive set of more than 400 hazard mitigation projects and programs designed to reduce the potential risks associated with the hazard categories identified in the City's Local Hazard Mitigation Plan 2011, including dam failure. Mitigation measures include a broad range of approaches to hazard mitigation including retrofit/relocation, code enforcement, development of new regulations, public education, surveillance and security, and development of redundant facilities, among others[54]. Based on the above, the risk of flooding from inundation by dam failure is considered low.

Thus, development of the project would not expose people or structures to risk of loss, injury, or death resulting from flooding from these water features. Impacts related to flooding would be less than significant.

j) Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?

Less Than Significant Impact. A significant impact may occur if a project site is sufficiently close to the ocean or other water body to be potentially at risk for the effects of seismically induced tidal phenomena (seiche and tsunami) or if the project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. The project site is not located within a City-designated Tsunami zone.[55] Additionally, as discussed in the response to Question 9(i), the nearest water body is the Hollywood Reservoir, approximately 1.33 miles north of the project site.

Mitigation of potential seiche hazards has been implemented by the Los Angeles Department of Water and Power through regulation of the level of water in its storage facilities and the provision of walls of extra height to contain seiches and prevent overflow or inundation. These measures apply to facilities within the City's borders, and facilities owned and operated by the City within

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52 *City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles General Plan, adopted by the City Council November 26, 1996, page II-16.*

53 *City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles General Plan, adopted by the City Council November 26, 1996, page 2.17-66.*

54 *City of Los Angeles, Emergency Management Department, Local Hazard Mitigation Plan 2011; http://emergency.lacity.org/index.htm, accessed March 4, 2014.*

55 *City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas in the City of Los Angeles. November 26, 1996. Website: http://cityplanning.lacity.org/. February 28, 2014.*

other jurisdictions. In addition, the City's Local Hazard Mitigation Plan 2011 contains a comprehensive set of more than 400 hazard mitigation projects and programs designed to reduce the potential risks associated with the hazard categories identified in the City's Local Hazard Mitigation Plan 2011. Mitigation measures include a broad range of approaches to hazard mitigation including retrofit/relocation, code enforcement, development of new regulations, public education, surveillance and security, and development of redundant facilities, among others. Based on the above, the risk of flooding from inundation by a seiche is considered low.

Thus, the project would not be susceptible to inundation by seiche. Further, the project site is not located in a Hillside Area or an area identified as being susceptible to landslides.[56] Therefore, development of the project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow. Impacts related to tsunamis, seiches, and mudflow would be less than significant.

10. LAND USE AND PLANNING

a) Would the project physically divide an established community?

Less Than Significant Impact. A significant impact may occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. A typical example would be a project that involved a continuous right-of-way, such as a roadway that would divide a community and impede access between parts of the community. The project is not of the scale or nature that would physically divide an established community. The project site is located within an urbanized area of the Hollywood Community and is consistent with the existing physical arrangement of the properties within the vicinity of the project site. Furthermore, no streets or sidewalks would be permanently closed as a result of the development of the project. No separation of uses or disruption of access between land use types would occur as a result of development of the project. Therefore, implementation of the project would not disrupt or divide the physical arrangement of the established community in which the project site is located. No impacts to the established community are anticipated.

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[56] *City of Los Angeles, Department of City Planning, City of Los Angeles Citywide General Plan Framework Final Environmental Impact Report, 2.17 Geologic/Seismic Conditions, Figure GS-4. Landslide Inventory & Hillside Areas in the City of Los Angeles. January 19, 1995. Website: http://cityplanning.lacity.org/. December 19, 2012.*

b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with applicable land use plans or zoning designations and would cause adverse environmental effects, which these regulations are designed to avoid or mitigate. The project is located within the City of Los Angeles, and development within the project site is governed by several regional and local plans. At the regional/subregional level, the project site is located within the planning area of the Southern California Association of Governments (SCAG), the region's federally designated metropolitan planning organization. SCAG's regional planning policies are contained within the Regional Comprehensive Plan and Guide (RCPG), including the Final 2008 Regional Comprehensive Plan (2008 RCP), which implements strategies and initiatives to improve regional mobility and sustainability; and the Southern California Compass Growth Vision Report, which provides a comprehensive planning vision for the six-county SCAG region. At the city level, the General Plan of the City of Los Angeles provides general guidance on land use issues and planning policy for the entire City. The Land Use Element of the General Plan consists of 35 Community Plans that address issues at the local community level. The project site is located in the Hollywood Community Plan (Community Plan) area, and development within the project site is subject to regulations set forth in the Community Plan. The Project is also located within the boundaries Hollywood Redevelopment Project Area, and must be consistent with the goals and provisions of the Amended Hollywood Redevelopment Plan. Further, all development activity onsite is subject to the land use regulations of the Los Angeles Municipal Code (LAMC), which is intended to guide local land use decisions and development patterns.

Regional Comprehensive Plan and Guide

Adopted policies included in SCAG's RCPG that are related to land use are contained primarily in Chapter 3, Growth Management. The project would be consistent with policies set forth in this chapter as the project would encourage the use of existing urbanized areas accessible to transit through infill and redevelopment; develop in an area that needs recycling and redevelopment; and be located in an area that is generally developed, thereby preserving other open space areas. An analysis of the project's consistency with the RCPG objectives is provided in Table 4-15.

Table 4-15
Project Consistency with Applicable Regional Comprehensive Plan and Guide Objectives

Objective	Project Consistency
Chapter 3: Growth Management	
Encourage patterns of urban development and land use which reduce costs on infrastructure and development.	**Consistent:** The project would reduce the costs of new infrastructure by redeveloping a property in Los Angeles that is largely served by existing infrastructure.

Table 4-15
Project Consistency with Applicable Regional Comprehensive Plan and Guide Objectives

Objective	Project Consistency
Support provisions and incentives created by local jurisdictions to attract housing growth in job rich subregions and job growth in housing rich subregions.	**Consistent:** The project would include development of an twelve-story hotel containing 200 guest rooms and approximately 10,202[1] square feet of restaurant uses, thereby generating new jobs in the Hollywood Community.
Encourage existing or proposed local jurisdictions programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce The number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.	**Consistent:** The project would be developed adjacent to major thoroughfares with access to both Metro and LADOT bus lines and the Metro Red Line, within the vicinity of several other regional transit lines, and within walking distance of many commercial opportunities along Hollywood Boulevard, thereby reducing the overall need for automobile transport. The project also provides bike racks, which would create opportunities for guests and employees to bike to and from the project site, thus reducing the number of auto trips and vehicle miles traveled to and from the project site.
Encourage local jurisdiction plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.	**Consistent:** The project would redevelop properties adjacent to major thoroughfares with access to both Metro and LADOT bus lines, as well as the Metro Red Line in the urbanized Hollywood Community.
Support local jurisdictions strategies to establish mixed-use clusters and other transit-oriented developments around transit stations and along transit corridors.	**Consistent:** The project would include development of a structure consisting of an twelve-story hotel containing 200 guest rooms and approximately 10,202 square feet of commercial uses, including the ground floor restaurant and lounge/bar. The project would be developed adjacent to major thoroughfares with access to local and regional transit lines and stations, including the Metro Red Line Hollywood/Highland and Hollywood/Vine stations, both approximately 0.5 mile northeast and northwest of the project site.
Encourage developments in and around activity centers, transportation corridors, under-utilized infrastructure systems and areas needing recycling and redevelopment.	**Consistent:** The project would redevelop an under-utilized property adjacent to major thoroughfares with access to both Metro and LADOT bus lines, as well as the Metro Red Line in the urbanized Hollywood Community.
Encourage planned development in areas least likely to cause an adverse environmental impact.	**Consistent:** The project would redevelop a property in the urbanized Hollywood Community, reducing many of the potential environmental impacts that could occur if the project were developed elsewhere in the region.

Table 4-15
Project Consistency with Applicable Regional Comprehensive Plan and Guide Objectives

Objective	Project Consistency
Chapter 4: Regional Mobility	
Achieve a substantial decrease in the growth of passenger vehicle trips and vehicle miles traveled in serious, severe, and extreme non-attainment areas.	**Consistent:** The project would be developed adjacent to major thoroughfares with local bus lines, within the vicinity of several other regional transit lines, and would be within walking distance of many commercial opportunities along Hollywood Boulevard, thereby reducing the overall need for automobile transport. The project also provides bike racks, which would create opportunities for guests and employees to bike to and from the project site, thus reducing the number of vehicle trips and vehicle miles traveled to and from the project site.

[1] Square footage based on the commercial uses square footage used to calculate required parking.
Source: Southern California Association of Governments, Regional Comprehensive Plan and Guide, March 1996.
Source (table): FirstCarbon Solution, May 2014.

As shown in Table 4-15, the project would be generally consistent with the goals, objectives, and policies set forth in the RCPG. Therefore, impacts related to project consistency with RCPG objectives would be less than significant.

Final 2008 Regional Comprehensive Plan

The 2008 RCP identifies specific goals related to regional growth, mobility, and sustainability as follows:

- Successfully integrate land and transportation planning and achieve land use and housing sustainability;
- Develop sufficient water supplies through environmentally sustainable imports, local conservation, conjunctive use, reclamation, and reuse;
- Achieve water quality improvements through implementation of land use and transportation policies and programs that promote water stewardship and eliminate water impairments and waste in the region;
- Foster comprehensive and collaborative watershed planning within the region that produces water wise program and projects;
- Reduce our region's consumption of non-renewable energy;
- Reduce emissions of criteria pollutants to attain federal air quality standards by prescribed dates and ambient air quality standards as soon as practicable;
- Reverse current trends in greenhouse gas emissions to support sustainability goals for energy, water supply, agriculture, and other resource areas;

- Minimize land uses that increase risk of adverse air pollution-related health impacts from exposure to toxic air contaminants, particulates (PM_{10}, $PM_{2.5}$, ultrafine), and carbon monoxide; and
- Expand green building practices to reduce energy-related emissions from developments to increase economic benefits to business and residents.

The project supports the 2008 RCP goals because the project site is located in proximity to existing public transit opportunities provided by Metro and the Los Angeles Department of Transportation (LADOT) transit lines, and the Metro Red Line Hollywood/Highland and Hollywood/Vine stations, which provide service in the immediate project vicinity. Locating the project in proximity to local and regional transit lines reduces the need for automobile transit, thereby reducing associated automobile trip emissions and demand on local infrastructure.

Additionally, the project would incorporate the use of existing and planned stormwater catchment systems and would direct stormwater in a manner that would not result in substantial erosion or flooding within the project site or offsite locations. As discussed in Section 17 c), the project would not require or result in the construction of new or expanded stormwater drainage facilities. In addition, the project would be designed to incorporate design features that would help promote a sustainable environment by saving energy, reducing water consumption, making use of recycled materials, and producing better indoor and outdoor environmental quality. Therefore, the project would be generally consistent with the 2008 RCP and related land use impacts would be less than significant.

Compass Growth Vision

The Growth Vision Report outlines principles designed to make the SCAG region a better place to live, work, and play for all residents regardless of race, ethnicity, or income. Several areas throughout the SCAG region, including the project site, have been identified as strategic opportunity areas for application of the above-listed principles. These areas are referred to as the "Compass 2% Strategy Opportunity Areas." The Compass 2% Strategy Opportunity Areas represent key areas of the SCAG region with a high potential to implement projects, plans and/or policies consistent with the principles defined in the Compass Growth Vision Report. An analysis of the project's consistency with the principles of the Compass Growth Vision Report is provided in Table 4-16.

Table 4-16
Compass 2% Strategy Consistency Analysis

Policy	Project Consistency/Comments
Locate New Housing Near Existing Jobs and New Jobs Near Existing Housing.	**Consistent:** The project would generate approximately 149 net new jobs. Residential neighborhoods are located adjacent to the project site to the south as well as throughout the Hollywood Community. Thus, the project would locate new jobs near existing housing and would be consistent with this policy.
Promote a Variety of Travel Choices.	**Consistent:** A number of MTA and LADOT bus routes are within reasonable walking distance from the project site (approximately 0.5 miles), providing access for employees and visitors of the project. Additionally, the proximity of the Hollywood/Highland and the Hollywood/Vine stations (approximately 0.5 mile northwest and 0.5 mile northeast of the project site, respectively) allow immediate access to the Metro Red Line. The project also provides bike racks, which would create opportunities for guests and employees to bike to and from the project site. The project would be consistent with this policy.
Promote In-Fill Development and Redevelopment to Revitalize Existing Communities.	**Consistent:** Implementation of the project would revitalize the existing community and area by redeveloping a project site in the urbanized Hollywood community and constructing commercial uses that would serve the community. The project would be consistent with this policy.
Promote Developments which Provide a Mix of Uses.	**Consistent:** The project would provide a variety of commercial uses on site, including providing hotel guest rooms, restaurant and bar, and meeting space. While the project does not provide office or residential uses, it would not preclude the development of these uses in the project vicinity. Therefore, the project would be consistent with this policy.
Focus Development in Urban Centers and Existing Cities.	**Consistent:** Implementation of the project would include the redevelopment of the project site in an existing urban area. Therefore, the project would be consistent with this policy.

Source: Southern California Association of Governments, Compass Blueprint Growth Vision Report (2004). Website: www.compassblueprint.org/Documents/scag-growthvision2004.pdf
Source (table): FirstCarbon Solutions, May 2015.

The project would be generally consistent with applicable principles identified, as it would maximize an existing urbanized area accessible to transit through infill and redevelopment and be located in an area that is completely developed, thereby preserving other open space areas. Impacts related to the project's consistency with the Compass 2% Strategy would be less than significant.

The Property is located within the boundaries of the Hollywood Redevelopment Plan (the "Redevelopment Plan"). To exceed a Floor Area Ratio of 4.5 to 1, the Project requests approval and execution of an Owner Participation Agreement with CRA/LA, a Designated Local Authority (successor agency to the former Community Redevelopment Agency of the City of Los Angeles). The Redevelopment Plan sets forth a range of goals that include encouraging economic development and promoting centers of tourism and entertainment. An analysis of the project's consistency with the Amended Hollywood Redevelopment Plan is provided in Table 4-17:

Table 4-17
Comparison of Amended Hollywood Redevelopment Plan Goals to Project Characteristics

Policies	Consistency of the Project
Section 300, Goal 2: Preserve and increase employment, and business and investment opportunities through redevelopment programs and, to the greatest extent feasible, promote these opportunities for minorities and women.	**Consistent**: The project would result in a substantial net increase in employment opportunities that will be available to minorities and women.
Section 300, Goal 3: Promote a balanced community meeting the needs of the residential, commercial, industrial, arts and entertainment sectors.	**Consistent**: The project would result in a new hotel meeting the commercial needs of Hollywood while providing ample setbacks and limitations on rooftop music that ensure the continued viability of nearby land for residential, arts or entertainment uses.
Section 300, Goal 5: Improve the quality of the environment, promote a positive image for Hollywood and provide a safe environment through mechanisms such as: a) adopting land use standards; b) promoting architectural and urban design standards including: standards for height, building setback, continuity of street facade, building materials, and compatibility of new construction with existing structures and concealment of mechanical appurtenances; c) promoting landscape criteria and planting programs to ensure additional green space; d) encouraging maintenance of the built environment; e) promoting sign and billboard standards; f) coordinating the provision of high quality public improvements; g) promoting rehabilitation and restoration guidelines; h) integrate public safety concerns into planning efforts.	**Consistent**: The project improves the quality of the environment, promotes a positive image for Hollywood and provides for a safe environment by providing ample residential setbacks at the second floor; utilizing high-quality building materials; designing the building podium to maintain compatibility with the Citizen News Building; and complying with the LAPD's Design Out Crime guidelines.
Section 300, Goal 6: Support and promote Hollywood as the center of the entertainment industry and a tourist destination through the retention, development and expansion of all sectors of the entertainment industry and the preservation of landmarks related to the entertainment industry.	**Consistent**: The project promotes Hollywood as a tourist destination by accommodating unmet demand for hotel rooms, supporting the Hollywood entertainment industry which is dependent on tourism.
Section 506.2.3: to focus development within the Regional Center Commercial designation in order to provide for economic development and guidance in the orderly development of a high quality commercial, recreational and residential urban environment with an emphasis on entertainment oriented uses. Therefore, development within the Regional Center Commercial designation shall be focused on	**Consistent**: The project will seek to obtain authorization and approval of the necessary Owner Participation Agreement as required from CRA/LA, a Designated Local Authority.

Table 4-17
Comparison of Amended Hollywood Redevelopment Plan Goals to Project Characteristics

Policies	Consistency of the Project
areas served by adequate transportation facilities and transportation demand management programs. Proposed development in excess of 4.5:1 F.A.R. up to but not to exceed 6:1 F.A.R. on a specific site may be permitted provided that the proposed development furthers the goals and intent of this Plan and the Community Plan and meets objective "a" and at least one other of the following objectives: a) to concentrate high intensity and/or density development in areas with reasonable proximity or direct access to high capacity transportation facilities or which effectively utilize transportation demand management programs; b) to provide for new development which compliments the existing buildings in areas having architecturally and/or historically significant structures or to encourage appropriate development in areas that do not have architecturally and/or historically significant buildings; c) to provide focal points of entertainment, tourist or pedestrian oriented uses in order to create a quality urban environment; d) to encourage the development of appropriately designed housing to provide a balance in the community; e) to provide for substantial, well designed, public open space in the Project Area; f) to provide social services or facilities for social services which address the community's needs.	

* *This table lists only those policies that are applicable to the Project.*
Source: Amended Hollywood Redevelopment Community Plan adopted May 20, 2003

City of Los Angeles General Plan

General Plan Framework Element

The City's General Plan Framework Element is a strategy for long-term growth that sets a citywide context to guide the update of the Community Plans and other citywide elements. It contains Long Range Land Use Diagrams for regions of the City, which designate land uses that are encouraged in each of these regions. On the Long Range Land Use Diagram for the Metro area (the area containing the project site), the project site is located within an area designated as Regional Center. The purpose of the Regional Center designation is to provide for a focal point of regional commerce, identity and activity and containing a diversity of uses such as corporate and professional offices, residential, retail commercial malls, government buildings, major health

facilities, major entertainment and cultural facilities, and supporting services. Regional centers will fall within the range of floor area ratios from 1.5:1 to 6.0:1 and will be characterized by 6- to 20-stories (or higher). The project would be consistent with this designation as it would develop supporting services uses within an ten-story with penthouse structure adjacent to or nearby existing professional offices, residential uses, and major entertainment and cultural facilities.

Hollywood Community Plan

The currently effective Hollywood Community Plan was adopted by the City Council in 1973 and amended in December 1988 through the General Plan/Zoning Consistency Program, and by limited amendments through the Periodic Plan Review Program. In 2012, the Hollywood Community Plan was updated, through amendments to the Hollywood Community Plan map, text amendments, associated zone and height district changes, and related amendments to the Transportation Element and the General Plan Framework Element. An updated Hollywood Community Plan was completed in 2012. However, due to a Los Angeles Superior Court decision on the Plan's Environmental Impact Report, the City Council took action on April 2, 2014 to rescind the 2012 Hollywood Community Plan Update and repeal the associated zone and height district changes. The City has reverted to the 1988 Hollywood Community Plan and the zoning regulations that existed immediately prior to June 19, 2012 (the date of the adoption of the Hollywood Community Plan Update and ordinance).

The project site is designated for Commercial Regional Center uses in the Hollywood Community Plan. The project is zoned C4-2D which allows for a variety of commercial uses including hotel and retail. The project site's 2D height district allows a by-right FAR of 2:1. The D Limitation, however, allows additional FAR subject to City Planning Commission approval and with an agreement with the CRA. However, a Vesting Height District Change from C4-2D to C4-2 is proposed to allow a FAR of up to 5.5:1 in lieu of 2:1 imposed by the D Limitation of the C4-2D zoning. A 5.5:1 FAR is consistent with the LAMC's Height District 2 and the Hollywood Community Plan's Commercial Regional Center. Given the project site's lot area of 20,682 sq ft, the maximum allowable building area for a 5.5:1 FAR would be 113,751 sq ft, which is consistent with the project design. An analysis of the project's consistency with the Community Plan policies is provided in Table 4-17.1.

Table 4-17.1
Comparison of Hollywood Community Plan Adopted 1988 Policies to Project's Characteristics*

Policies	Consistency of the Project
Coordinate the development of Hollywood with that of other parts of the City of Los Angeles and the metropolitan area; to further the development of Hollywood as a	**Consistent:** Development of the project would support continued development of Hollywood as a regional center because it would provide commercial uses necessary for a regional center, including retail uses. Hollywood does not currently provide

Table 4-17.1
Comparison of Hollywood Community Plan Adopted 1988 Policies to Project's Characteristics*

Policies	Consistency of the Project
major center of population, employment, retail services, and entertainment; and to perpetuate its image as the international center of the motion picture industry.	sufficient hotel infrastructure needed to meet hotel demand. The project would provide new hotel rooms. It would enhance the image of Hollywood and would perpetuate its image as the international center of the motion picture industry because it would provide lodging to support tourism and business visitors to the area. Additionally, the project site is located adjacent to major thoroughfares with access to both Metro and LADOT bus lines, as well as the Metro Rail Red Line, which provides access to several other regional transit lines. Therefore, the project would be easily accessible by public transit. Additionally, employees and visitors of the project would be able to easily access other parts of the City by utilizing public transit lines. As such, development of the project would be coordinated with that of other parts of the City by connecting them with local and regional transit lines.
Make provisions for a circulation system coordinated with land uses and densities and adequate to accommodate traffic; and to encourage the expansion and improvement of public transportation service.	**Consistent:** The project would be developed adjacent to major thoroughfares with access to both Metro and LADOT bus lines and within walking distance of the Metro Red Line Station, providing access to other regional transit lines, such as the Metro Blue Line with access to Long Beach and the Metro Gold Line with access to Pasadena, thereby reducing the need for cars and encouraging the use of public transportation services.

* *This table lists only those policies that are applicable to the project.*
Source: Hollywood Community Plan adopted December 13, 1988.
Source (table): FirstCarbon Solutions. May 2014.

As shown in Table 4-17.1, the project would implement a number of Community Plan policies, thereby assisting the City in meeting many of the Community Plan's goals and objectives. Additionally, development of the project would require the following discretionary actions:

- Pursuant to LAMC Section 12.32, a Vesting Height District Change from C4-2D to C4-2 to permit an FAR of up to 5.5 to 1;
- Pursuant to LAMC Section 12.24-W,1, a Master Conditional Use Permit for the on-site sale and consumption of a full line of alcoholic beverages in the following locations: (a) the ground floor restaurant and lobby bar from 8 a.m. to 2 a.m. daily; (b) the roof restaurant and pool deck from 8 a.m. to 2 a.m. daily; (c) controlled-access liquor cabinets to be located within the guest rooms at all times; and (d) guest rooms by way of room service at all times;
- Pursuant to LAMC Section 12.28, an Adjustment to permit zero-foot side yards on the second story in lieu of the 14-foot side yard required in the C4 Zone;
- Pursuant to LAMC Section 16.05, Site Plan Review for a development creating more than 50 guest rooms;

- Pursuant to Hollywood Redevelopment Plan Section 506.2.3, approval and execution of an Owner Participation Agreement with CRA/LA, a Designated Local Authority to authorize a Floor Area Ratio exceeding 4.5 to 1; and
- Haul Route Approval.

With approval of the discretionary actions from the City and CRA/LA, a Designated Local Authority, the project would be consistent with applicable land use classifications at the time of project buildout. The granting of the requested approvals would have no environmental effects beyond the physical impacts associated with the project. Therefore, impacts related to project consistency with Community Plan policies would be less than significant.

Transportation Element

The Transportation Element of the General Plan identifies goals, objectives and policies to achieve long-term mobility and accessibility within the City of Los Angeles. Transportation Element Policy 10.2 proposes to continue completion of the Highways and Freeways System utilizing generalized cross sections in Chapter VI. Wilcox Avenue is designated a Secondary Highway. The generalized cross section for a Secondary Highway is a 90-foot right-of-way (45 foot half-width) with 10-foot sidewalks, four full-time through lanes, street parking except at intersections and a left-turn lane.

Land Use Compatibility

The project site is located in an urbanized area in the Hollywood Community of the City of Los Angeles. General land uses in the vicinity of the project site include various commercial, multi-family residential, retail, and institutional uses, as well as medical facilities. An office building is located directly north of the project site on Wilcox Avenue, which is adjacent to a vacant structure currently under renovation on the southwest corner of Selma Avenue and Wilcox Avenue. Land uses northwest of the project site include parking and additional multi-family residential apartment complexes. Directly east of the project site, across Wilcox Avenue, is a car service center. Directly west of the project site, fronting Schrader Boulevard is a parking lot and one-story duplex. The area directly south and adjacent to the project site is developed with a two-story multi-family residential structure. Further south fronting Wilcox Avenue are vacant commercial uses, a liquor store, and a copy business.

The project includes development of a structure containing a hotel that would serve tourists, business and other visitors patronizing the area. The restaurant and bar would serve hotel guests as well as local or visiting patrons, while the second-floor meeting rooms and terraces would be accessible only to hotel guests. Overall, the project would improve the visual character and quality of the site and surrounding area by replacing a warehouse and parking lot with little visual character, with a modern hotel in a visually pleasing contemporary architectural design (see response to Question 1(c)). The project would be consistent and compatible with the existing

land uses in the project area. Therefore, impacts with respect to land use compatibility would be less than significant.

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. A significant adverse effect could occur if a project site were located within an area governed by a habitat conservation plan or natural community conservation plan. As discussed in the response to Question 4(f), the project site is not part of any habitat conservation or natural community plans. The project site is located in an area that has been previously disturbed and graded. As such, the project would not conflict with any such plans. Therefore, no impacts to habitat or natural community conservation plans would occur and no further analysis required.

11. MINERAL RESOURCES

a) Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. A significant impact may occur if the project site is located in an area used or available for extraction of a regionally important mineral resource, or if the project would convert an existing or future regionally important mineral extraction use to another use, or if the project would affect access to a site used or potentially available for regionally important mineral resource extraction. The project site is currently developed with a warehouse and associated paved surface parking lot. Neither the project site nor the surrounding area is identified as an area containing mineral deposits of regional or statewide significance.[57] Additionally, the project site is not located within an oil field or oil drilling area, and is not part of any State Designated Oil Field Area[58] Furthermore, no oil wells exist or are known to have previously existed on the project site or the surrounding area.[59]. Therefore, no impacts with respect to mineral resources of regional or statewide significance would occur.

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[57] *City of Los Angeles, Department of City Planning, City of Los Angeles Citywide General Plan Framework Final Environmental Impact Report, 2.17 Geologic/Seismic Conditions, Figure GS-1, Areas Containing Significant Mineral Deposits in the City of Los Angeles. January 19, 1995. Website: http://cityplanning.lacity.org/. February 21, 2014.*

[58] *City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, Safety Element, Exhibit E, Oil Field & Oil Drilling Areas in the City of Los Angeles. November 26, 1996. Website: http://cityplanning.lacity.org/. February 21, 2014.*

[59] *State of California Department of Conservation, Division of Oil, Gas & Geothermal Resources, Oil, Gas & Geothermal Resource Well Finder. Website: http://www.conservation.ca.gov/dog/Pages/WellFinder.aspx. February 21, 2014.*

b) Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. A significant impact would occur if a project is located in an area used or available for extraction of a locally important mineral resource and the project converted an existing or potential future locally important mineral extraction use to another use or if the project affected access to a site in use or potentially available for locally important mineral resource extraction. The project site is located in the Hollywood Community and is not delineated as a locally important mineral resource recovery site on any City plans. Additionally, as discussed in the Response to Question 11(a) above, no oil wells exist or are known to have previously existed on or in the vicinity of the project site. Therefore, no impacts with respect to loss of availability of a locally important mineral resource would occur.

12. NOISE

The following analysis is based on noise data prepared by Pomeroy Environmental Services (PES) included as Appendix G to this Draft Initial Study/Mitigated Negative Declaration (IS/MND).

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady "background" noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, traffic on a major highway.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those scales that are applicable to this analysis are as follows:

- L_{eq} – An L_{eq}, or equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.

- L_{max} – The maximum instantaneous noise level experienced during a given period of time.
- L_{min} – The minimum instantaneous noise level experienced during a given period of time.
- CNEL – The Community Noise Equivalent Level is a 24-hour average L_{eq} with a 5 dBA "weighting" during the hours of 7:00 p.m. to 10:00 p.m. and a 10 dBA "weighting" added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24 hour L_{eq} would result in a measurement of 66.7 dBA CNEL.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. For residential uses, environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60–70 dBA range, and high above 70 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with more noisy urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).

It is widely accepted that in the community noise environment the average healthy ear can barely perceive CNEL noise level changes of 3 dBA. CNEL changes from 3 to 5 dBA may be noticed by some individuals who are extremely sensitive to changes in noise. A 5 dBA CNEL increase is readily noticeable, while the human ear perceives a 10 dBA CNEL increase as a doubling of sound.

Noise levels from a particular source generally decline as distance to the receptor increases. Other factors, such as the weather and reflecting or barriers, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA at acoustically "hard" locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically "soft" locations (i.e., the area between the source and receptor is normal earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. In addition, noise levels are also generally reduced by 1 dBA for each 1,000 feet of distance due to air absorption. Noise levels may also be reduced by intervening structures – generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA. The normal noise attenuation within residential structures with open

windows is about 17 dBA, while the noise attenuation with closed windows is about 25 dBA.[60]

a) Would the Project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact Unless Mitigation Incorporated. A significant impact may occur if the project would generate excess noise that would cause the ambient noise environment at the project site to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance). Implementation of the project would result in an increase in ambient noise levels during both construction and operation, as discussed in further detail below.

Construction Noise

Construction-related noise impacts would be significant if, as indicated in LAMC Section 112.05, noise from construction equipment within 500 feet of a residential zone exceeds 75 dBA at a distance of 50 feet from the noise source. However, the above noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment. Additionally, as defined in the City of Los Angeles CEQA Thresholds Guide threshold for construction noise impacts, a significant impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location. Furthermore, the City of Los Angeles CEQA Thresholds Guide also states that construction activities lasting more than ten days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would also normally result in a significant impact.

Construction of the project would require the use of heavy equipment for demolition, excavation and foundation preparation, the installation of utilities, paving, and building construction. During each construction phase there would be a different mix of equipment operating, and noise levels would vary based on the amount of equipment in operation and the location of each activity.

The U.S. Environmental Protection Agency (EPA) has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. The data pertaining to the types of construction equipment and activities that would occur at the project site are presented in Table 4-18, Noise Range of Typical Construction Equipment, and Table 4-19, Typical Outdoor Construction Noise Levels, respectively, at a distance of 50 feet from the noise source (i.e., reference distance).

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[60] *National Cooperative Highway Research Program Report 117, Highway Noise: A Design Guide for Highway Engineers, 1971.*

The noise levels shown in Table 4-19 represent composite noise levels associated with typical construction activities, which take into account both the number of pieces and spacing of heavy construction equipment that are typically used during each phase of construction. As shown in Table 4-19, construction noise during the heavier initial periods of construction is presented as 86 dBA L_{eq} when measured at a reference distance of 50 feet from the center of construction activity. These noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. For example, a noise level of 84 dBA L_{eq} measured at 50 feet from the noise source to the receptor would reduce to 78 dBA L_{eq} at 100 feet from the source to the receptor, and reduce by another 6 dBA L_{eq} to 72 dBA L_{eq} at 200 feet from the source to the receptor. Construction activities associated with the project would be expected to occur and generate noise. These activities include demolition, excavation and the physical construction of the proposed structure.

Table 4-18
Noise Range of Typical Construction Equipment

Construction Equipment	Noise Level in dBA L_{eq} at 50 Feet[a]
Front Loader	73-86
Trucks	82-95
Cranes (moveable)	75-88
Cranes (derrick)	86-89
Vibrator	68-82
Saws	72-82
Pneumatic Impact Equipment	83-88
Jackhammers	81-98
Pumps	68-72
Generators	71-83
Compressors	75-87
Concrete Mixers	75-88
Concrete Pumps	81-85
Back Hoe	73-95
Tractor	77-98
Scraper/Grader	80-93
Paver	85-88

[a] *Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of noise emissions as that shown in this table.*
Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

Table 4-19
Typical Outdoor Construction Noise Levels

Construction Phase	Noise Levels at 50 Feet with Mufflers (dBA L_{eq})	Noise Levels at 60 Feet with Mufflers (dBA L_{eq})	Noise Levels at 100 Feet with Mufflers (dBA L_{eq})	Noise Levels at 200 Feet with Mufflers (dBA L_{eq})
Ground Clearing	82	80	76	70
Excavation, Grading	86	84	80	74
Foundations	77	75	71	65
Structural	83	81	77	71
Finishing	86	84	80	74

Source: *United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.*

The City of Los Angeles CEQA Thresholds Guide defines noise sensitive uses as residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. The nearest sensitive receptors that could potentially be subject to noise impacts associated with construction of the project primarily include residential and hotel uses. See Figure 1, Noise Monitoring and Sensitive Receptor Location Map, located in Appendix G and described below in Table 4-20. To identify the existing ambient noise levels near these sensitive receptors and in the general vicinity of the project site, noise measurements were taken on February 20, 2014 with a 3M SoundPro SP DL-1 sound level meter, which conforms to industry standards set forth in ANSI S1.4-1983 (R2006) – Specification for Sound Level Meters/Type 1. Additionally, this noise meter meets the requirement specified in LAMC Section 111.01(l) that the instruments be "Type S2A" standard instruments or better. This instrument was calibrated and operated according to the manufacturer's written specifications. At the measurement sites, the microphone was placed at a height of approximately five feet above grade. The measured noise levels are shown in Table 4-20, Existing Ambient Daytime Noise Levels in project Site Vicinity. The noise measurement locations and the noise sensitive receptors are illustrated in Figure 1, Noise Monitoring and Sensitive Receptor Location Map, located in Appendix G. In addition, traffic is the dominant source of ambient noise at and around the project site. Existing traffic volumes for the roadway segment of Wilcox Avenue between Selma Avenue and Sunset Boulevard were used to calculate the existing ambient noise level of 66.7 dBA CNEL (24-hour) for the project site, and the existing peak-hour noise level of 68.4 dBA Leq. See Appendix G to this IS/MND.

Table 4-20
Existing Ambient Daytime Noise Levels in Project Site Vicinity

No.	Location	Primary Noise Sources	Noise Levels (dBA) [a]		
			L_{eq}	L_{min}	L_{max}
1	Near northeast corner of the project site fronting Wilcox Avenue.	Traffic and pedestrian activity along Wilcox Avenue; construction activity across Wilcox Avenue and at the southwest corner of Selma Avenue and Wilcox Avenue.	67.2	54.6	82.1
2	Near southeast corner of the project site fronting Wilcox Avenue.	Traffic and pedestrian activity along Wilcox Avenue.	65.6	54.0	79.5
3	Near western boundary of project site on surface parking lot.	Traffic and pedestrian activity along Schrader Boulevard and parking lot activity.	50.9	47.7	59.5

[a] Noise measurements were taken on February 20, 2014 at each location for a duration of 15 minutes.
See Appendix G to this IS/MND for noise data.

Due to the use of construction equipment during the construction phase, the project would expose surrounding off-site receptors to increased ambient exterior noise levels comparable to those listed previously in Table 4-19. More specifically, Table 4-21, Estimated Exterior Construction Noise at Nearest Sensitive Receptors, shows the estimated construction noise levels that could occur at the nearest sensitive uses during construction of the project. These calculations take into account both the number of pieces and spacing of heavy construction equipment that would be typically used during each phase of construction.

As shown in Table 4-21, the construction noise levels forecast for the proposed construction work during each phase of development associated with the project would result in noise increases at all of the identified Sensitive Receptors. It should be noted, however, that any increase in noise levels at off-site receptors during construction of the project would be temporary in nature, and would not generate continuously high noise levels, although occasional single-event disturbances from construction are possible. In addition, the construction noise during the heavier initial periods of construction (i.e., demolition, grading and site preparation/excavation/foundation work) would typically be reduced in the later construction phases (i.e., interior building construction at the proposed buildings) as the physical structure of the proposed structure would break the line-of-sight noise transmission from the construction area to the nearby sensitive receptors.

Table 4-21
Estimated Exterior Construction Noise at Nearest Sensitive Receptors

Sensitive Land Uses [a]	Distance to Project Site (feet)	Existing Monitored Daytime Ambient Noise Levels (dBA L_{eq})	Estimated Peak Construction Noise Levels (dBA L_{eq})	Noise Level Increase (dBA)
1. Residential use to the south	<1	65.6	120.0	54.4
2. Residential use to the south	15	65.6	96.5	30.9
3. Residential use to the west	<1	50.9	120.0	69.1
4. Commercial office building [b]	<1	67.2	-- [b]	-- [b]
5. Hotel use to the east	60	67.2	84.4	17.2
6. Hotel use to the north	140	67.2	77.1	9.9
7. Residential use to the northwest	40	50.9	87.9	37.0
8. Residential use to the northwest	160	67.2	75.9	8.7
9. YMCA	290	67.2	70.7	3.5

[a] *See Figure 1, Noise Monitoring and Sensitive Receptor Location Map, located in Appendix G.*

Calculations based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006. It should be noted that the peak noise level increase at the nearby sensitive receptors during project construction represents the highest composite noise level that would be generated periodically during a worst-case construction activity and does not represent continuous noise levels occurring throughout the construction day or period.

[b] *Sensitive Receptor No. 4 is a commercial building that is identified as a potential vibration-sensitive structure only, and therefore, potential construction noise levels have not been evaluated for a commercial office use. Please refer to the structural vibration impact discussion herein.*

As defined in the Los Angeles CEQA Thresholds Guide for construction noise impacts, a significant impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location. Furthermore, the City of Los Angeles CEQA Thresholds Guide also states that construction activities lasting more than ten days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would also normally result in a significant impact. Since construction activities associated with the project would last for more than ten days in a three-month period, the project would cause a significant noise impact during construction if the ambient exterior noise levels at the identified off-site sensitive receptors would be increased by 5 dBA or more. Based on the results shown in Table 4-21, the ambient exterior noise levels would be exceeded by 5 dBA at Sensitive Receptor Nos. 1 through 8. Thus, based on criteria established in the City of Los Angeles CEQA Threshold Guide, a substantial temporary or periodic increase in ambient noise levels would occur at off-site sensitive receptors.

LAMC Section 41.40 regulates noise from construction activities. Exterior construction activities that generate noise are prohibited between the hours of 9:00 p.m. to 7:00 a.m. Monday through Friday, and between 6:00 p.m. to 8:00 a.m. on Saturdays. Demolition and construction activities

are prohibited on Sundays and all federal holidays. The construction activities associated with the project would comply with these LAMC requirements. In addition, pursuant the City Noise Ordinance (LAMC Section 112.05), construction noise levels are exempt from the 75 dBA noise threshold because all technically feasible noise attenuation measures are implemented.

Although the estimated construction-related noise levels associated with the project would exceed the numerical noise threshold of 75 dBA at 50 feet from the noise source as outlined in the City Noise Ordinance, and the typical construction noise levels associated with the project would exceed the existing ambient noise levels at the identified off-site sensitive receptors by more than the 5 dBA threshold established by the City of Los Angeles CEQA Thresholds Guide during all construction phases, implementation of the following mitigation measures would reduce the noise levels associated with construction of the project to the maximum extent that is technically feasible. Thus, based on the provisions set forth in LAMC 112.05, implementation of Mitigation Measures 12-1 through 12-7 would reduce impacts associated with construction-related noise levels to the maximum extent feasible, and temporary construction-related noise impacts would be considered less than significant.

Mitigation Measures

12-1. The project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

12-2. Construction and demolition shall be restricted to the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday. Construction and demolition shall not occur on Sundays or any federal holiday.

12-3. Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

12-4. Where feasible, the project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

12-5. Noise and groundborne vibration 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- and vibration-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.

12-6. The project developer shall install a temporary noise control barrier on the southern property line of the construction site abutting residential uses. The noise control barrier shall be engineered to reduce construction-related noise levels at the adjacent multi-family residential structures with a goal of a reduction of 10 dBA. The barrier shall be a similar height to the multi-family residential building to the south of the project site. The supporting structure shall be engineered and erected according to applicable codes. The temporary barrier shall remain in place until all windows have been installed in the south façade of the new hotel building and paving activities in the hotel project site are complete.

12-7. The project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

Operational Noise

Stationary/Mechanical Sources

Upon completion and operation of the project, onsite operational noise would be generated by heating, ventilation, and air conditioning (HVAC) equipment installed for the new structure. However, the noise levels generated by these equipment types are not anticipated to be substantially greater than those generated by the current HVAC equipment serving the existing buildings on the project site and in the project vicinity. As such, the HVAC equipment associated with the project would not represent a new source of noise in the project site vicinity. In addition, the operation of this and any other onsite stationary sources of noise would be required to comply with LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. This impact would be considered less than significant.

Ground Floor Indoor Restaurant

The Project's fully-enclosed ground floor restaurant will feature live entertainment and no dancing is proposed. Based on a review the proposed 1st floor plan, the fully-enclosed restaurant area is located within the northern footprint of the building, the farthest possible distance from the nearest noise-sensitive receptors to the south and west. In addition, multiple indoor uses and intervening interior walls associated with the kitchen, lobby, and access to the subterranean parking levels would separate and buffer the live entertainment area within the restaurant from the nearest sensitive receptors. Furthermore, the project plans identify solid concrete/stucco exterior walls for the 1st floor facing the north, south and west. According to the FHWA Noise Barrier Design Handbook, light to dense concrete carries a sound transmission loss value of approximately 36-40 dBA.[61] Based on the factors identified above, noise levels associated with live entertainment within the fully-enclosed ground floor restaurant are anticipated to be imperceptible at off-site sensitive receptor locations, and this impact would be less than significant.

It should also be noted that operational noise levels would be regulated by LAMC Section 116.01 (Loud, Unnecessary and Unusual Noise) and LAMC Section 112.01 (Radios, Television Sets, and Similar Devices). Specifically, LAMC Section 116.01 prohibits all future users of the project to willfully make or continue, or cause to be made or continued, any loud, unnecessary, and unusual noise which disturbs the peace or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area. LAMC Section 112.01 states, in part, that it shall be unlawful for any person within any zone of the City to use or operate any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or any reasonable person residing or working in the area. Compliance with these code provisions would further ensure noise impacts remain less than significant.

Second Story Terrace

The project provides for outdoor usable spaces on the second and rooftop levels, which would create the potential for increased noise levels attributable to people using these spaces. Specifically, the second level terrace would be open to hotel guests only, with the southern portion of the terrace serving as private balconies for guest rooms and the northern portion of the terrace serving as a break space for meeting rooms. No eating or drinking is proposed for the second floor terrace. No live entertainment, ambient background music or amplified sound of any kind is proposed for the second level terrace. Primary noise sources from the second level terrace would include people talking, which would result in noise levels of approximately 60-65 dBA at three feet.[62] These noise levels are below the existing monitored and modeled noise levels for the project site vicinity

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[61] *See Table 3 of the FHWA Noise Barrier Design Handbook (webpage accessed May 13, 2015); http://www.fhwa.dot.gov/environment/noise/noise_barriers/design_construction/design/design03.cfm.*

[62] *California Department of Transportation, Technical Noise Supplement, October 1998.*

identified previously. Furthermore, the project's design, setbacks, and elevation differences would minimize second level terrace related noise propagation to off-site sensitive receptors. The proposed second level terrace would be approximately 20 feet above ground level. Sensitive Receptor Nos. 1 and 2 to the south are both two-story residential buildings approximately 20-22 feet in height. Their northern facades, which primarily face the portion of the terrace that serves as private balconies for individual guest rooms, consist of windows approximately 16 feet above ground level and there are no existing balconies or useable outdoor spaces on the northern facades. Thus, based on the elevation of these existing uses and the proposed second level terrace 20 feet above grade, the existing residences to the south would not have a direct line of sight to the second level terrace. Sensitive Receptor No. 3 to the west is a single-story residential use. As the second level terrace is located approximately 20 feet above grade on the northern and southern boundaries of the building, Sensitive Receptor No. 3 to the west would not have a direct line of sight to the second level terrace on the north and south. Based on the factors identified above, impacts with respect to noise levels associated with the second level terrace would be less than significant.

Penthouse Restaurant and Rooftop Pool Deck

The penthouse and roof would include a restaurant open to the public, a fitness center open to hotel guests only, and an outdoor pool deck open to the public. The penthouse restaurant and fitness center will have operable glass walls. No live entertainment is proposed for the pool deck, but food and bar service will be available. Only ambient background music is proposed for the pool deck, and all ambient background music on the pool deck will cease at 10 p.m. Sunday through Wednesday and 11 p.m. Thursday through Saturday. By definition, ambient background music is intended to create a relaxing, peaceful atmosphere conducive to social gatherings and conversation. As such, noise levels associated with the proposed ambient background music would not be substantively louder than normal speech, so as not to drown-out normal conversation. Therefore, based on the noise reference data provided previously for normal speech at 3 feet, it is anticipated that the Project's ambient background music would generate noise levels of approximately 60-65 dBA. With respect to potential swimming pool noise, typical noise levels for recreational swimming including children playing range from approximately 58 to 67 Leq dBA at distances of 15 to 75 feet from the source, depending on the number of people, types of activity, and acoustical environment.[63] As noted previously, existing ambient daytime noise levels in the vicinity of the project site were monitored at up to approximately 67 dBA Leq, and existing noise levels along Wilcox Avenue were modeled at 68.4 dBA Leq (peak hour traffic sources) and 66.7 dBA CNEL (24-hour traffic sources). Thus, the Project's ambient background music and pool noise levels would be substantially similar to existing ambient noise levels associated with the heavily urbanized project site vicinity. In addition, any noise levels generated on the pool deck or in the penthouse restaurant would be reduced with distance (approximately 115 feet above grade), and

[63] *Berryessa Villasport Draft IS/MND, prepared by FirstCarbon Solutions, April 3, 2014, page 64; and Harker Elementary School Project Noise Assessment, prepared by Jared McDaniel and Fred Svinth, INCE, Assoc. AIA, and Illingworth & Rodkin, Inc., August 20, 2012, page 11.*

attenuation would be provided by the proposed 6-foot plexiglass wall and perimeter landscaped buffer. According to the FHWA Noise Barrier Design Handbook, plexiglass carries a sound transmission loss value of approximately 22 dBA.[64] Based on the factors identified above, impacts with respect to noise levels associated with the penthouse and pool deck would be less than significant.

It should also be noted that operational noise levels would be regulated by LAMC Section 116.01 (Loud, Unnecessary and Unusual Noise) and LAMC Section 112.01 (Radios, Television Sets, and Similar Devices). Specifically, LAMC Section 116.01 prohibits all future users of the project to willfully make or continue, or cause to be made or continued, any loud, unnecessary, and unusual noise which disturbs the peace or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area. LAMC Section 112.01 states, in part, that it shall be unlawful for any person within any zone of the City to use or operate any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or any reasonable person residing or working in the area. As such, Mitigation Measures 12-8 and 12-9 have been identified to ensure code compliance and operational noise levels remain less than significant.

Mitigation Measures

12-8. The rooftop deck shall be enclosed on all sides with a six-foot tall plexiglass perimeter wall and include landscaping (i.e., shrubbery and trees) to minimize noise levels at off-site locations to the maximum extent feasible. Based on a review of the FHWA Noise Barrier Design Handbook, the rooftop deck plexiglass perimeter wall shown in the project plans would achieve approximately 5 to 10 dBA of noise attenuation.

12-9. Upon operation of the outdoor spaces on the second and eleventh levels, the project applicant shall provide the adjacent uses to the north, south, and west, a building manager contact and phone number to report any loud, unnecessary, and unusual noise, which disturbs the peace or quiet for the adjacent uses.

b) Would the Project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact Unless Mitigation Incorporated. Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of

[64] *See Table 3 of the FHWA Noise Barrier Design Handbook (webpage accessed May 13, 2015); http://www.fhwa.dot.gov/environment/noise/noise_barriers/design_construction/design/design03.cfm.*

the vibration level, while RMS is defined as the square root of the average of the squared amplitude of the level. PPV is typically used for evaluating potential building damage, while RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Construction

Construction activities for the project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate though the ground and diminishes in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. The construction activities associated with the project could have an adverse impact on both sensitive structures (i.e., building damage) and populations (i.e., annoyance).

In terms of construction-related impacts on buildings, the City of Los Angeles has not adopted policies or guidelines relative to groundborne vibration. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to groundborne vibrations from long-term operational activities, not construction. Consequently, as both the City of Los Angeles and the County of Los Angeles do not have a significance threshold to assess vibration impacts during construction, the Federal Transit Administration (FTA) and California Department of Transportation's (Caltrans) adopted vibration standards for buildings which are used to evaluate potential impacts related to construction. Based on the FTA and Caltrans criteria, construction impacts relative to groundborne vibration would be considered significant if the following were to occur:[65]

- project construction activities would cause a PPV groundborne vibration level to exceed 0.5 inches per second at any building that is constructed with reinforced-concrete, steel, or timber;

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65 Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006; and California Department of Transportation, Transportation- and Construction –Induced Vibration Guidance Manual, June 2004.

- project construction activities would cause a PPV groundborne vibration level to exceed 0.3 inches per second at any engineered concrete and masonry buildings;
- project construction activities would cause a PPV groundborne vibration level to exceed 0.2 inches per second at any non-engineered timber and masonry buildings; or
- project construction activities would cause a PPV ground-borne vibration level to exceed 0.12 inches per second at any historical building or building that is extremely susceptible to vibration damage.

In addition, the City of Los Angeles has not adopted any thresholds associated with human annoyance for groundborne vibration impacts. Therefore, this analysis uses the FTA's vibration impact thresholds for human annoyance. These thresholds include 80 VdB at residences and buildings where people normally sleep (e.g., nearby residences) and 83 VdB at institutional buildings, which includes schools and churches. No thresholds have been adopted or recommended for commercial and office uses.

Table 4-22, Vibration Source Levels for Construction Equipment, identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that would operate at the project site during construction. As shown in Table 4-22, vibration velocities could range from 0.003 to 0.089 inch/sec PPV at 25 feet from the source activity, with corresponding vibration levels ranging from 58 VdB to 87 VdB at 25 feet from the source activity, depending on the type of construction equipment in use.

Table 4-22
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV (in/sec)					Approximate RMS (VdB)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, 2006.

With respect to construction vibration impacts upon off-site structures, existing buildings are located immediately adjacent to the project site's property line to the north, south and west. As described in detail in the project's Cultural Resources Technical Report,[66] the Hollywood Citizen

[66] *1541 Wilcox Avenue Cultural Resources Technical Report, prepared by ICF International, May 2014.*

News building located to the north of the project site at 1545 Wilcox Avenue has been identified as a historical resource for the purposes of CEQA. The residential buildings located immediately adjacent to the south and west were not determined to be a historical resource under CEQA. However, because of the age of these structures and their location along the project's property lines to the south and west, both of these structures are conservatively considered buildings that are extremely susceptible to vibration damage. The project proposes excavation up to the property line on the north, south and west to accommodate four levels of subterranean parking. Due to the close proximity of the identified off-site structures to the project site, vibration levels as the result of project construction and earthwork activities could have the potential to adversely impact the immediately adjacent off-site buildings. Based on the information presented in Table 4-22 above and the receptor's close proximity to the proposed construction activity, the project would have the potential to cause a PPV ground-borne vibration level to exceed 0.12 inches per second at historical buildings and/or buildings that are extremely susceptible to vibration damage. However, as detailed in Mitigation Measure 12-10 and 12-11 below, the project will be required to implement a structure-monitoring program during construction activities to ensure the structural stability of the adjacent buildings is not compromised. As such, construction-related vibration impacts with respect to building damage would be mitigated to a less-than-significant level.

In terms of human annoyance resulting from vibration generated during construction, the sensitive receptors located in the vicinity of the project site could be exposed to increased vibration levels. Table 4-23, Estimated Vibration Levels at Nearest Sensitive Receptors, shows that construction-generated vibration levels would exceed the 80 VdB human annoyance threshold at Sensitive Receptor Nos. 1, 2, 3, and 7. However, it should be noted that although construction will approach the property lines, much of the construction work would be conducted away from the property lines and vibration levels experienced in the project vicinity would be reduced when the construction activities are located toward the center of the project site. Furthermore, consistent with LAMC Section 112.05, construction vibration levels would be considered exempt from the threshold if all technically feasible noise and vibration attenuation measures are implemented. Mitigation Measures 12-1 through 12-7 presented previously would serve to reduce construction related vibration levels to the maximum extent feasible. As such, human annoyance impacts with respect to construction-generated vibration increases would be less than significant.

Table 4-23
Estimated Vibration Levels at Nearest Sensitive Receptors

Sensitive Land Uses	Distance to Project Site (feet)	Estimated Vibration Levels (VdB)
1. Residential use to the south	<1	129.0
2. Residential use to the south	15	93.7
3. Residential use to the west	<1	129.0
4. Commercial office building [a]	--	--

Table 4-23
Estimated Vibration Levels at Nearest Sensitive Receptors

5. Hotel use the east	60	75.6
6. Hotel use to the north	140	64.6
7. Residential use to the northwest	40	80.9
8. Residential use to the northwest	160	62.8
9. YMCA	290	55.1

[a] *Sensitive Receptor No. 4 is a commercial building that is identified as potential vibration-sensitive structure only, and therefore, potential human annoyance vibration impacts have not been provided for a commercial office use. Please refer to the structural vibration impact discussion herein.*

Calculations based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006.

Operation

The project consists of a hotel use and would not involve the use of stationary equipment that would result in high vibration levels, which are more typical for large commercial and industrial projects. Although groundborne vibration at the project site and immediate vicinity may currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) on the nearby local roadways, the proposed land use at the project site would not result in the increased use of these heavy-duty vehicles on the public roadways. While refuse trucks would be used for the removal of solid waste at the project site, these trips would typically only occur once a week and would not be any different than those presently occurring in the vicinity of the project site. The project proposes live entertainment in the ground floor lobby and restaurant. As discussed in greater detail in Questions 12(a), the implementation of Mitigation Measures 12-8 and 12-9 and compliance with LAMC Sections 112.01 and 116.01 would ensure operational noise and vibration levels would not be loud and raucous or unreasonably jarring, disturbing, annoying or a nuisance to reasonable persons of normal sensitiveness within the area of audibility. As such, vibration impacts associated with operation of the project would be less than significant.

Mitigation Measures

12-10. All new construction work shall be performed so as not to adversely affect the structural integrity of the immediately adjacent buildings to the south, north and west of the project site (i.e., Sensitive Receptor Nos. 1, 2, 3 and 4). Preconstruction surveys shall be performed to document conditions of the adjacent structures. A structural monitoring program shall be implemented and recorded during construction.

12-11. The performance standards of the structure monitoring plan shall include the following:

a) Documentation shall consist of video and/or photographic documentation of accessible and visible areas on the exterior and select interior facades of the

buildings. A registered civil engineer or certified engineering geologist shall develop recommendations for the adjacent structure-monitoring program that will include, but not be limited to, vibration monitoring, elevation and lateral monitoring points, crack monitors and other instrumentation deemed necessary to protect the structures from construction-related damage.

b) The monitoring program shall survey for vertical and horizontal movement, as well as vibration thresholds. If the thresholds are met or exceeded, or noticeable structural damage becomes evident to the project contractor, work shall stop in the area of the affected building until measures have been taken to stabilize the affected building to prevent construction-related damage to the structure.

c) The structure-monitoring program shall be submitted to the Department of Building and Safety and received into the case file for the associated discretionary action permitting the project prior to initiating any construction activities.

c) Would the Project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Impact Unless Mitigation Incorporated. A significant impact may occur if the project were to result in a substantial permanent increase in ambient noise levels above existing ambient noise levels without the project. As defined in the City of Los Angeles CEQA Thresholds Guide threshold for operational noise impacts, a project would normally have a significant impact on noise levels from project operations if the project causes the ambient noise level measured at the property line of affected uses that are shown in Table 4-24, Community Noise Exposure (CNEL), to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase. Thus, a significant impact would occur if noise levels associated with operation of the project would increase the ambient noise levels by 3 dBA CNEL at homes where the resulting noise level would be at least 70 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more is considered to cause a significant impact. Generally, in order to achieve a 3 dBA CNEL increase in ambient noise from traffic, the volume on any given roadway would need to double. In addition to analyzing potential impacts in terms of CNEL, the analysis also addresses increases in onsite noise sources per the provisions of the LAMC, which establishes a Leq standard of 5 dBA over ambient conditions as constituting a LAMC violation.

Table 4-24
Community Noise Exposure (CNEL)

Land Use	Normally Acceptable[a]	Conditionally Acceptable[b]	Normally Unacceptable[c]	Clearly Unacceptable[d]
Single-family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	above 75
Multi-Family Homes	50 - 65	60 - 70	70 - 75	above 75

Table 4-24
Community Noise Exposure (CNEL)

Land Use	Normally Acceptable[a]	Conditionally Acceptable[b]	Normally Unacceptable[c]	Clearly Unacceptable[d]
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Transient Lodging – Motels, Hotels	50 - 65	60 - 70	70 - 80	above 75
Auditoriums, Concert Halls, Amphitheaters	—-	50 - 70	—-	above 70
Sports Arena, Outdoor Spectator Sports	—-	50 - 75	—-	above 75
Playgrounds, Neighborhood Parks	50 - 70	—-	67 - 75	above 75
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 75	—-	70 - 80	above 80
Office Buildings, Business and Professional Commercial	50 - 70	67 - 77	above 75	—-
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	above 75	—-

[a] Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

[b] Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

[c] Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

[d] Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: Office of Planning and Research, State of California Genera Plan Guidelines, October 2003 (in coordination with the California Department of Health Services); City of Los Angeles, General Plan Noise Element, adopted February 1999.

Traffic Noise

In order for a new noise source to be audible, there would need to be a 3 dBA or greater CNEL noise increase. As discussed above, the traffic volume on any given roadway would need to double in order for a 3 dBA increase in ambient noise to occur. According to the City of Los Angeles CEQA Thresholds Guide, if a project would result in traffic that is less than double the existing traffic, then the project's mobile noise impacts can be assumed to be less than significant.

According to the traffic analysis provided for the project, the proposed development would result in 3,410 gross daily trips, with a maximum net increase of 3,359 daily vehicle trips over existing trips, including 183 AM peak hour trips and 261 PM peak hour trips. As shown in greater detail in the project Traffic Study, the highest project-related trip increase would occur at intersection number 4 (Selma Avenue & Wilcox Avenue) during the PM peak hour with 156 peak hour trips. When compared to the existing 1,270 vehicle trips occurring at intersection number 4 during the

PM peak hour, it is clear that the project would not have the potential to double the traffic volumes on any roadway segment in the vicinity of the project site. As such, the project would not have the potential to increase roadway noise levels by 3 dBA, and thus traffic generated noise impacts would be considered less than significant.

Stationary/Mechanical Noise Sources

New stationary sources of noise, such as mechanical HVAC equipment would be installed for the proposed buildings at the project site. As discussed in Question 12(a) above, the design of this equipment would be required to comply with LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Thus, because the noise levels generated by the HVAC equipment serving the project would not be allowed to exceed the ambient noise level by five decibels on the premises of the adjacent properties, a substantial permanent increase in noise levels would not occur at the nearby sensitive receptors. This impact would be less than significant.

Parking Noise

Noise would be generated by activities within the new subterranean parking structure associated with the project. Sources of noise within the parking structure would include engines accelerating, doors slamming, car alarms, and people talking. Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. Noise levels would be highest when vehicles enter and exit the project site. Cars entering and exiting the structure at all hours of the day and night can become a nuisance to occupants of the building and adjacent buildings. As such, the Department of City Planning recommends the driveway ramps be constructed of noise-attenuating materials such as concrete surfaces. As the parking levels serving the project would be below ground and enclosed, noise generated at these levels would likely be imperceptible at ground level locations on and adjacent to the project site. Any parking noise that may be audible from outside of the parking garage would be substantially similar to the existing noise generated by existing roadway activity, street parking, and parking associated with adjacent residential and commercial uses in the project vicinity. In addition, operational-related noise generated by motor driven vehicles within the project site is regulated under the LAMC. Specifically, with regard to motor driven vehicles, LAMC Section 114.02 prohibits the operation of any motor driven vehicles upon any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than five decibels. With implementation of Mitigation Measures 12-13 and 12-14, operational noise impacts associated with the project's subterranean parking structure would be less than significant.

Ground Floor Indoor Restaurant

The Project's fully-enclosed ground floor restaurant will feature live entertainment and no dancing is proposed. As described in greater detail in Question 12(a), above, noise levels associated with live entertainment within the fully-enclosed ground floor restaurant are anticipated to be

imperceptible at off-site sensitive receptor locations, and this impact would be less than significant. Please refer to Question 12(a).

Outdoor Usable Spaces

The Project provides for outdoor usable spaces on the second and rooftop levels, which would create the potential for increased noise levels attributable to people using these spaces. As described in greater detail in Question 12(a), above, impacts with respect to noise levels associated with the second and rooftop levels would be less than significant. Please refer to Question 12(a).

Mitigation Measures

12-12. Concrete, not metal, shall be used for construction of parking ramps.

12-13. The interior ramps shall be textured to prevent tire squeal at turning areas.

d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the project were to result in a substantial temporary or periodic increase in ambient noise levels above existing ambient noise levels without the project. As defined in the City of Los Angeles CEQA Thresholds Guide, a significant impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location. In addition, the City of Los Angeles Thresholds Guide also states that construction activities lasting more than ten days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would also normally result in a significant impact.

As discussed above, impacts are expected to be less than significant for construction and operational noise. The implementation of Mitigation Measures 12-1 through 12-13 would ensure impacts with respect to substantial temporary or periodic increase in ambient noise levels would be less than significant.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. A significant impact may occur if the project were located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the project site. There are no airports within a two-mile radius of the project site, and the project site is not within any airport land use plan or airport hazard zone. The project would not expose people to excessive noise levels associated with airport uses. No impact would occur.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. The project site is not located in the vicinity of a private airstrip. As no such facilities are located in the vicinity of the project site, no impact would occur.

13. POPULATION AND HOUSING

a) Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. A significant impact would occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the project area that would otherwise not have occurred as rapidly or in as great a magnitude.

Construction Impacts

Construction of the project would result in increased employment opportunities in the construction field, which could potentially result in increased permanent population and demand for housing in the Hollywood Community. However, it is not likely that construction workers would relocate their households as a consequence of the construction employment associated with the project. The construction industry differs from other employment sectors in that many construction workers are highly specialized and move from job site to job site as dictated by the demand for their skills and remain at a job site only for the period in which their specific skills are needed to complete a particular phase of the construction process. Therefore, project-related construction workers would not likely relocate their place of residence as a consequence of working on the project, and significant impacts would not result from construction of the project. No impact would occur and no further analysis of this issue is required.

Operational Impacts

Southern California Association of Governments Regional Growth projection

Employment projections

As part of its comprehensive planning process for the Southern California region, the Southern California Association of Governments (SCAG) has divided its planning jurisdiction into 14 subregional organizations. The project site is located within the City of Los Angeles, which is one of the aforementioned subregions.

For the City, SCAG estimates a citywide increase of 82,500 employees between the years 2008 and 2020[67]. As shown in Table 4-25, the project would provide approximately 149 jobs, and offset the estimated 38 jobs associated with the existing warehouse use, resulting in a net increase in 111 jobs. The project site is located within Census Tract 1907, and with the community of Hollywood, generally represented by Census Tracts 1898 through 1919.[68] SCAG has forecasted that the total employment level for the census tracts in the Hollywood community will increase by approximately 2,679 jobs between the years 2010 and 2020[69]. Thus, the project would contribute to approximately 5.5% of the forecasted employment growth in this area. The kinds of labor force skills required for the proposed hotel and restaurant uses are those from the hospitality industry and are of the types that are typically filled by workers who are already present in the local labor force. It is therefore reasonable to expect that many of the project's estimated employees would be drawn from the local labor force population readily available in the City and surrounding communities, including those areas with lower forecasted employment growth and higher unemployment rates than the census tracts within the Hollywood community. Therefore, substantial population growth is not expected to occur because of the employment opportunities resulting from project buildout, and impacts would be less than significant.

Table 4-25
Existing and Estimated Permanent Employment Generation for the Project

Land Use	Size	Employee Generation Factor[a]	Total Employees
Existing Uses			
Warehouse	14,058 sq ft	2.70 employees/1,000 sf	38
		Subtotal	***38***
Project			
Hotel	103,549[b] sq ft	1.11325 employees/1,000 sq ft	115
Commercial Uses (including resatuarnt bar, outdoor eating area and pool deck)	15,029[c] sq ft	2.2371 employees/1,000 sq ft	34
		Subtotal	***149***
		Total Net Increase in Employees (Project – Existing)	**111**

[a] *Los Angeles Unified School District, School Fee Justification Studies for Los Angeles Unified School District, Table ES-1, September 2002.*

[67] *Southern California Association of Governments. Regional Transportation Plan 2012-2035, Growth Forecast Appendix, Adopted 2012.*

[68] *American FactFinder. Website: http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml. February 2012.*

[69] *Southern California Association of Governments. Socio Economic Library: Adopted 2008 RTP Growth Forecast by Census Tract. 2008.*

Table 4-25
Existing and Estimated Permanent Employment Generation for the Project

Land Use	Size	Employee Generation Factor[a]	Total Employees
b Total area of the hotel (113,751 sq ft) less the area of the commercial floor area.			
Source (table): FirstCarbon Solutions, May 2015.			
c Total commercial floor area (10,020 sq ft) plus outdoor eating area (1,085 sq ft) plus rooftop pool deck (3,924 sq ft)			

With regard to population and housing, the project would not remove or create housing, and therefore would not be expected to have an impact on population or housing. Impacts related to housing and housing growth would be less than significant.

b) Would the Project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. Development of the project would not result in the displacement of residential units necessitating the construction of replacement housing elsewhere. No impact would occur.

c) Would the Project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. As discussed above, development of the project would not result in the displacement of residential units from the project site. The project would not displace substantial numbers of people necessitating the construction of replacement housing. No impact would occur.

14. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective for any of the following public services: Fire protection?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the City of Los Angeles Fire Department (LAFD) could not adequately serve the project based upon response time, access, or fire hydrant/water availability.

The LAFD considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. For residential and neighborhood commercial projects, the maximum response distance is 1.5 miles from an LAFD Truck or Engine Company. For access, a level of service on area roadways above level of service (LOS) E or F is desirable, and project driveways must be adequate for fire equipment to navigate.

LAFD Station 27, the first-in response unit serving the project site, is approximately 0.25 mile from the project site. It is located at 1327 North Cole Avenue and consists of 48 staff members assigned to three different Forces (truck and engine company), three ambulances, one ladder truck, one fire engine, and one pump[70] . The project site is located within the recommended response distance; therefore, no impact related to response time or distance is anticipated.

As shown in Figure 2-3, Floor Plan – First Floor Plan, vehicular ingress and egress to the hotel and associated parking would be provided from Wilcox Avenue into the ground floor level-parking garage on the south side of the project site. Pedestrian access to the hotel restaurants would be provided from the parking levels and from the surrounding streets. Project driveways would be in compliance with the City of Los Angeles Uniform Building Code, and with the City of Los Angeles Fire Code. With building code and fire code compliance, impacts related to driveway access would be less than significant.

Overland Traffic Consultants conducted a critical movement analysis for eight of the intersections in the project site's vicinity. This analysis was conducted at Hollywood Boulevard & Wilcox Avenue, Cahuenga Boulevard & Hollywood Boulevard, Highland Avenue & Selma Avenue, Selma Avenue & Wilcox Avenue, Cahuenga Boulevard & Selma Avenue, Highland Avenue & Sunset Boulevard, Sunset Boulevard & Wilcox Avenue, Cahuenga Boulevard & Sunset Boulevard. The Cahuenga Boulevard & Hollywood Boulevard intersection was estimated to operate at Level of Service (LOS) E during AM Peak Hour for Future (2018) with project and the Highland Avenue & Sunset Boulevard intersection was estimated to operate at LOS E during both of the AM and PM peak hours for Future (2018) with project. With the implementation of Mitigation Measures 14-1, impacts from the impacted intersections on response times would be reduced to a level of less than significant.

The adequacy of fire protection is based in part upon the required fire flow. The quantity of water necessary for fire protection varies with the type of development, occupancy rates, life hazard, and the degree of fire hazard. City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas, to 12,000 gpm in high-density commercial or industrial areas. According to the Fire Code, the overall fire flow requirement for the project site is 6,000 to 9,000 gpm from six fire hydrants flowing simultaneously with a 20-pounds-square-inch minimum residual pressure.[71] Should it be determined that the existing water main infrastructure is unable to accommodate the estimated fire flow requirements of the project, impacts on fire flow would be potentially significant. Thus, the project would be required to address any fire flow deficiencies to provide appropriate fire protection for the project. In addition, the project would provide a water storage tank on-site to support fire protection. With

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[70] *Telephone correspondence with LAFD Station 27 fire fighter. March 6, 2014. A letter to request LAFD input had been previously sent on February 19, 2014.*

[71] *City of Los Angeles Municipal Code, Chapter 5, Public Safety and Protection, Article 7, Fire Protection and Prevention, Division 9, Access, Hydrants, and Fire Flow, Section 57.507.3.3, Table 57.507.3.3.*

the implementation of Mitigation Measures 14-1, impacts on fire flow would be reduced to a level of less than significant.

Mitigation Measures

14-1. 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 project shall provide fire hydrants to meet LAFD fire flow requirements. The number, sizes and locations of hydrants will be determined in conjunction with the Fire Department, either prior to recordation of the final map or approval of the building permit. The project shall provide an on-site water storage tank. The location and sizing of the tank will be determined in conjunction with the Fire Department. The plot plan shall include the following minimum design features: all structures must be within 300 feet of an approved fire hydrant, entrances to any guest room shall not be more than 150 feet in distance in horizontal travel from the entry/exit or vertical stair, and the stairway shall be within 150 feet from the edge of the roadway of an improved street or approved fire lane. Design of the project site shall provide adequate access for the Fire Department equipment and personnel to the structure. In addition, the project applicant shall install an automatic sprinkler system in accordance with Fire Code Section 57.118.11 and in conformance with LAFD Standard No. 59.

b) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective for any of the following public services: Police protection?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project would result in an increase in demand for police services that would exceed the capacity of the Police Department, thereby necessitating new or physically altered facilities. The Los Angeles Police Department (LAPD) is the local law enforcement agency responsible for providing police protection services to the project site and immediate project vicinity. The project site is located within the LAPD's West Bureau and is served by the Hollywood Area Station, located at 1358 N. Wilcox Avenue. The LAPD measures demand for services based upon residential population. The project may impact police protection services by bringing employees to the area during construction of the structure, during the operation of the commercial uses, and through the demand for services by hotel staff, hotel guests, or restaurant/bar patrons.

The average response time for the Hollywood Area Station during 2013 was approximately 5.0 minutes, which is below the citywide average for 2013 of approximately 5.9 minutes.[72] As discussed in Transportation and Traffic, the project does not create any significant traffic impacts.

The Hollywood Area Station serves an approximately 13.34 square-mile area and a population of approximately 300,000 residents.[73] The Hollywood Area Station provides police service for the area, which is generally encompassed by the following boundaries:

Normandy Avenue on the east, Los Angeles City boundary line on the west, Griffith Park Boundary on the north, and Melrose Avenue on the south. With 354 sworn officers, the Hollywood Area Station currently provides an officer-to-population ratio of approximately 1.18 officer per 1,000 residents.[74] The Hollywood Area Station is also staffed with 16 civilian support staff.

The frequency and nature of future emergency calls from the project are difficult to predict. Nonetheless, as the intensity of activity within an area increases, so could the potential incidence of emergency calls. The LAPD does not have a specific officer-to-population standard, and deployment levels are based on a needs assessment done by each reporting district. However, many cities use 1.0 officer per 1,000 people as an ideal ratio. Development of the project site involves the construction of approximately 200 hotel rooms, a ground floor lobby restaurant and bar, second-floor meeting rooms and a terrace, a penthouse restaurant and rooftop pool deck potentially generating an estimated 302[75] hotel guests and an estimated 149 employees, total. Using the 1.0 officer per 1,000 people ratio described above, the generation of 149 employees and potentially generating an estimated 302 hotel guests would not require the LAPD to hire more officers or staff, nor would the project be expected to impact LAPD's response time to emergency calls. However, in order to address the potential increase in response times and crime rates, LAPD may be required to provide increased services and equipment, which would be a significant impact. Following the recommendation of the LAPD, these impacts could be reduced to less than significant impacts with consultation with LAPD to incorporate any design features or components recommended by LAPD. Consultation with LAPD would mitigate any potentially significant impact; therefore, with implementation of Mitigation Measure 14-9, impacts to police services would be less than significant.

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[72] *Letter from Officer Leonid A. Tsap, Community Relations Section, City of Los Angeles Police Department, April 11, 2014.*

[73] *Los Angeles Police Department. "About Hollywood". http://www.lapdonline.org/hollywood_community_police_station/content_basic_view/1665. Accessed March 6, 2014.*

[74] *[(354 officers * 1,000 residents) ÷ 300,000 Hollywood Community residents] = 1.18 officers per 1,000 residents.*

[75] *200 (number of hotel rooms) * 1.5 (occupants per room based on City guidelines) = 300 potential hotel guest generation.*

Mitigation Measure

14-2. The plans shall incorporate the design guidelines relative to security, semi-public and privates spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space design with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

c) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective for any of the following public services: Schools?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project includes substantial employment or population growth, which could generate demand for school facilities that exceeds the capacity of the school district(s) responsible for serving the project site.

The project involves the construction of approximately 200 hotel rooms, a ground floor lobby restaurant, and bar with a second-floor pool deck/bar, meeting rooms, a penthouse restaurant and rooftop deck potentially generating a maximum of 302 hotel guests and 149 employees total. The project would not generate any students as it is a commercial land use.

The project does not contain any residential uses and would not directly induce population growth. The new employment opportunities created by the project would not induce substantial population growth into the area from outside areas. In addition, Senate Bill 50, adopted in 1998, requires that impacts to school facilities be mitigated through payment of mandatory development impact fees. Payment of these fees is considered complete mitigation of school related impacts. The project would pay all applicable impact fees, and would therefore, not result in physical impacts associated with the provision of, or the need for, new or physically/altered governmental facilities. Payment of such fees, as established by LAUSD, would mitigate the project's indirect impacts on schools. Furthermore, with the implementation of Mitigation Measures 14-3 through 14-5, impacts to schools would be reduced to a level of less than significant.

Mitigation Measures

14-3. Prior to construction of the project, the applicant shall install barriers and/or fencing around the project site to secure construction equipment, to prevent trespassing, vandalism, and attractive nuisances and shall review potential impacts to bus routes with the Los Angeles Unified School District (LAUSD) Transportation Branch.

14-4. During construction, the applicant shall provide crossing guards at impacted school crossings so as not to compromise the safety of students during construction related activities, shall not park construction and/or worker transport vehicles adjacent to school sites, shall not haul past affected school sites when school is in session or during school arrival and dismissal times, shall maintain communication with school administration to provide sufficient notice when existing pedestrian and vehicle routes to the school site may be impacted, shall maintain unrestricted access for school buses, and shall comply with provisions of the California Vehicle Code by requiring construction vehicles to stop when encountering school buses using red flashing lights.

14-5. The applicant shall maintain safe and convenient pedestrian routes to LAUSD schools and not endanger passenger safety or delay student-drop off or pickup due to traffic patterns, lane-adjustments, altered bus stops, or traffic lights by installing appropriate traffic controls (signs and signals) to ensure vehicular and pedestrian safety.

14-9. The applicant shall pay school fees as required by applicable law.

d) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective for any of the following public services: Parks?

Less Than Significant Impact. A significant impact would occur if the available City of Los Angeles Department of Recreation and Parks (LADRP) recreation and park services could not accommodate a project, necessitating new or physically altered facilities, the construction of which could cause significant environmental impacts.

The project would have employees, hotel guests, and restaurant/bar patrons. Onsite recreation facilities include a pool and gym. The project may also provide additional common areas where hotel guests and patrons can lounge or socialize.

The following LADRP parks and recreational facilities services are in the project vicinity: De Longpre Park is a 1.37-acre park located at 1350 N. Cherokee Avenue; Hollywood Recreation Center is a 3.12 acre park located at 1122 N. Cole Ave; Las Palmas Senior Citizen Center is a 1.14 acre facility located at 1820 N. Las Palmas Ave; Selma Park is a 0.22 acre pocket park located at 6567 W, Selma Ave, Smith Park is a 0.49 acre pocket park located at 7020 W. Franklin

Ave; Wattles Garden Park is a 47.58 acre community park located at 1824 N. Curson Ave; and Runyon Canyon is a 136.76 acre regional park located at 2000 N. Fuller Ave.

The parks and recreational facilities listed above do not adequately meet the project area's current demand for parks and recreational facilities. The ratio of local neighborhood and community parks within the Hollywood Community plan area is 0.41acres per 1,000 residents. The City of Los Angeles General Plan calls for a ratio of 4 acres per 1,000 residents. The Hollywood Community plan area is underserved.

Most of the hotel guests are likely to use onsite facilities, and visit local attractions in the area to satisfy recreation and fitness interests. A small percentage of guests may take advantage of access to the closest parks. Employees may visit parks during their breaks or off hours. Thus, parks may experience a very minor increase in use associated with the project.

The project is not subject to the LAMC Parkland Fee (Dwelling Unit Construction tax) as the hotel use is not considered a dwelling unit as defined by the Section 12.03 of the Code. The project is also not subject to LADRP pursuant to Section 12.33 because the project requests a height district change, rather than a zone change triggering payment of parks fees. Moreover, as a hotel, the project does not constitute a "multiple residential use" because it is considered a transient occupancy. Potential impacts from hotel guest's utilization of park areas will be minimal, and would not be expected to contribute to the physical deterioration of vicinity parks, and as such will have a less than significant impact.

e) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective for any of the following public services: Other public facilities?

Less Than Significant Impact. A significant impact may occur if the project includes substantial employment or population growth that could generate a demand for other public facilities, such as libraries, which would exceed the capacity to service the project site.

Development of the project would not increase the permanent residential population occupying the project site since it is a commercial land use. However, the project will increase the number of employees working on the site.

The City of Los Angeles Framework EIR advocates using the State of California standards of 0.5 square feet of facility space per capita and two volumes of permanent collection per resident. The Frances Howard Goldwyn - Hollywood Regional Library would serve the project. It is located at 1623 N. Ivar Avenue, approximately 0.25 mile northeast of the project site.

The Frances Howard Goldwyn - Hollywood Regional Library is a 19,000-square-foot facility with seven full time employees. The Frances Howard Goldwyn - Hollywood Regional Library

serves both the residential and the retail/commercial community 7 days a week. It has a collection size of 84,117 volumes and circulation. The 2010 population of the area is 52,388. There are no planned improvements to add capacity through expansion. On February 8, 2007, The Board of Library Commissioners approved a new Branch Facilities Plan. This plan includes criteria for new libraries, which recommends new size standards for the provision of Los Angeles Public Library. facilities: 12,500 square feet for a community with less than a population of 45,000, and 14,500 square feet for a community with more than a population of 45,000, as well as up to 20,000 square feet for a Regional branch. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for the area. Populations are determined by the service boundary for each individual library. At this time, there are no plans for the development of any other new libraries to serve this community.

Any increase in the residential population that is in close proximity to this branch has a direct impact on library services with increased demands for library materials, computers and information services. Although the Frances Howard Goldwyn - Hollywood Regional Library adequately meets the current demand for library services, at 19,000 square feet, the Library does not adequately meet the demand for library services in the community. Furthermore, the Library does not meet the Branch Facilities Plan enacted by the Board of Library Commissioners on February 8, 2007 that would require Regional Branch libraries to offer 20,000 square feet of facilities.[76]

Employees may visit local library facilities during breaks and off hours, and are likely to be existing members of the community already using library services, and therefore not likely to contribute adverse impacts to demands for library services. A small proportion of hotel guests may visit local libraries, and review onsite materials (no check out privileges). Hotel guest usage of local library facilities is expected to be so minimal as to be negligible. Therefore, impacts to library services would be less than significant.

15. RECREATION

a) Would the project 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?

Less Than Significant Impact. A significant impact may occur if a project would include substantial employment or population growth that could generate an increased demand for public park facilities that exceeds the capacities of existing parks and causes premature deterioration of the park facilities.

[76] *Letter from Joseph Molles, Library Facilities Division, Los Angeles Public Library, December 2012.*

The project would have employees, hotel guests, and restaurant/bar patrons. Onsite recreation facilities include a pool and gym. The project may also provide additional common areas where hotel guests and patrons can lounge or socialize.

The LADRP parks and recreational facilities in the project vicinity that serve the project are identified in Section 14, Public Services, Question d) above. The parks and recreational facilities listed do not adequately meet the project area's current demand for parks and recreational facilities. Most of the hotel guests are likely to use onsite facilities, and visit local attractions in the area to satisfy recreation and fitness interests. A small percentage of guests may take advantage of access to the closest parks. Employees may visit parks during their breaks or off hours. Thus, parks may experience a very minor increase in use associated with the project.

The project is not subject to the LAMC Parkland Fee (Dwelling Unit Construction tax) as the hotel use is not considered a dwelling unit as defined by the Section 12.03 of the Code. The project is also not subject to LADRP pursuant to Section 12.33 because the project requests a height district change, rather than a zone change triggering payment of parks fees. Moreover, as a hotel, the project does not constitute a "multiple residential use" because it is considered a transient occupancy. Potential impacts from hotel guest's utilization of park areas will be minimal, and would not be expected to contribute to the physical deterioration of vicinity parks, and as such will have a less than significant impact.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact. A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment.

The project would have employees, hotel guests, and restaurant/bar patrons. Onsite recreation facilities include a pool and gym. The project may also provide additional common areas where hotel guests and patrons can lounge or socialize.

The LADRP parks and recreational facilities in the project vicinity that serve the project are identified in Section 14, Public Services, Question d) above. The parks and recreational facilities listed do not adequately meet the project area's current demand for parks and recreational facilities. Although employees of commercial developments typically do not generally frequent parks during working hours, there is a possibility that hotel guests may take advantage of neighborhood or regional parks. Some increase in their use should be accounted for along with a corresponding increase in the physical deterioration.

Most of the hotel guests are likely to use onsite facilities, and visit local attractions in the area to satisfy recreation and fitness interests. A small percentage of guests may take advantage of access

to the closest parks. Employees may visit parks during their breaks or off hours. Thus, parks may experience a very minor increase in use associated with the project.

The project is not subject to the LAMC Parkland Fee (Dwelling Unit Construction tax) as the hotel use is not considered a dwelling unit as defined by the Section 12.03 of the Code. The project is also not subject to LADRP pursuant to Section 12.33 because the project requests a height district change, rather than a zone change triggering payment of parks fees. Moreover, as a hotel, the project does not constitute a "multiple residential use" because it is considered a transient occupancy. Potential impacts from hotel guest's utilization of park areas will be minimal, and would not be expected to contribute to the physical deterioration of vicinity parks, and as such will have a less than significant impact.

16. TRANSPORTATION AND TRAFFIC

The following analysis is based on the Traffic Impact Analysis Sunset and Wilcox Hotel 1541 Wilcox Avenue, Hollywood (TIA), prepared by Overland Traffic Consultants, February 2014 and updated April 2015 to account for two new related projects. [77] The Los Angeles City Department of Transportation indicated that the Traffic Impact Analysis adequately evaluated the project's traffic impacts on the surrounding community. Both the TIA and letter from the Department of Transportation are located in Appendix H.

A traffic study was prepared for the project by Overland Traffic Consultants, February 2014 and analyzed a larger project than the one currently proposed. The TIA analyzed a 12-story, 137,554 square foot hotel with 225 rooms, 26,694 square feet of various commercial uses, and excavation of 51 feet for the subterranean parking structure. The traffic study, therefore, contains a conservative analysis by studying a larger project than currently proposed. This study evaluates the potential traffic impacts at eight intersections. The traffic study determined that no significant traffic impacts would occur with the development of the larger project. A revision letter dated April 23, 2015 revised the analysis to account for subsequent related projects at 1525 N. Cahuenga Boulevard and 6500 Selma Avenue. This supplemental analysis is included in Appendix H of this Draft IS/MND.

a) Would the Project conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Less Than Significant Impact. A significant impact may occur if the project conflicted with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance

[77] *Traffic Impact Analysis Sunset and Wilcox Hotel 1541 Wilcox Avenue, Hollywood (TIA). Overland Traffic Consultants, April 2015.*

of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.

The project includes three levels of subterranean parking with access from the south end of the project site. Exit from the garage will be from the same access point as the entry. Valet service for the project will occur on Wilcox Avenue. The portion of Wilcox Avenue fronting the property is currently a designated loading zone, so no on-street parking will be displaced. The proposed valet arrangement will allow valet attendants to move vehicles from Wilcox Avenue to the project's subterranean parking by turning right into the driveway without entering travel lanes on Wilcox Avenue. Moreover, compliance with Standard Condition 16-1, requiring compliance with the Valet Parking Permit Ordinance, would ensure the valet operation does not disrupt circulation on Wilcox Avenue.

Parking for the project would be provided in accordance with the LAMC's parking requirements. The LAMC requires a hotel to provide one space per hotel guest room for the first 30 rooms, one space for every two guest rooms for the next 30 rooms and one space for every 3 rooms for remaining guest rooms, and the commercial restaurants and bar are required to provide 1 space per 500 square feet. With 200 hotel guest rooms and 10,020 square feet of commercial space including a restaurant lounge and bar, the total required parking spaces is 111 parking spaces. The project will meet this requirement.

Overland Traffic Consultants assessed the project's potential impacts on the surrounding roadway system. The analysis was prepared in accordance with the assumptions, methodology and procedures approved by LADOT. This report presents the results of an analysis of Existing (2013) and Future (2018) traffic conditions before and after the completion of the project. The project is expected to be completed and occupied by future year 2018. The analysis contains a detailed evaluation of traffic conditions during the AM and PM peak hours at the following eight study intersections:

- Hollywood Boulevard and Wilcox Avenue
- Cahuenga Boulevard and Hollywood Boulevard
- Highland Avenue and Selma Avenue
- Selma Avenue and Wilcox Avenue
- Cahuenga Boulevard and Selma Avenue
- Highland Avenue and Sunset Boulevard
- Sunset Boulevard and Wilcox Avenue
- Cahuenga Boulevard and Sunset Boulevard

The locations of these eight study intersections relative to the project site are shown in Figure 3 in Appendix H. These study intersections are expected to be most directly affected by project traffic.

Freeways

The Hollywood Freeway (US-101) is approximately one mile east and ¾ mile north of the project site. The Hollywood Freeway provides a direct route through the Cahuenga Pass to the San Fernando Valley. Near Downtown Los Angeles, the Hollywood Freeway interchanges with the Harbor/Pasadena Freeways (I-110/SR-110). The Hollywood Freeway extends southeast of Downtown Los Angeles where it merges with the Golden State Freeway (I-5). In the vicinity of the project site, the Hollywood Freeway has four travel lanes per direction. Full surface street access is provided on Hollywood Boulevard, Sunset Boulevard, which are located less than one mile east of the project site, and on Cahuenga Boulevard, and Highland Avenue, which are all located less than one mile north of the project site.

Traffic volumes on the Hollywood Freeway north of Hollywood Boulevard are approximately 213,000 vehicles per day (VPD), with peak-hour volumes of approximately 12,800 vehicles per hour (VPH).

Streets and Highways

Cahuenga Boulevard, located east of the project site, is a north-south roadway designated as a Modified Secondary Highway by the City of Los Angeles Hollywood Community Plan. Cahuenga Boulevard provides two lanes in each direction in the project area. Left turn lanes are not provided at all signalized intersection. At some of these locations, left turn peak hour restrictions are in place. Approximately 0.60 miles northeast of the project site, Cahuenga Boulevard has full ramp access with the 101 Freeway.

Highland Avenue, located west of the project site, is a north-south roadway designated as a Modified Secondary Highway by the City of Los Angeles Hollywood Community Plan. Three lanes in each direction are provided in the project area during peak hours. Left turn lanes are provided at major intersections. Some one-hour time, limited metered parking, is available near the project during the off-peak hours on Highland Avenue. Approximately 0.89 miles northwest of the project site, Cahuenga Boulevard has limited ramp access with the 101 Freeway.

Hollywood Boulevard, located north of the project site, is an east-west Major Class II Highway. This street has full ramp access with the Hollywood Freeway one mile to the east of the project site. Around the project area, Hollywood Boulevard provides two travel lanes per direction, along with left-turn channelization at major intersections. One-hour metered parking from 8:00 a.m. to 6:00 p.m. exists on Hollywood Boulevard.

Selma Avenue, which is directly to the north of the project site, is an east-west roadway designated as a Local Street by the City of Los Angeles Hollywood Community Plan. One lane in each direction is provided in the project area. Two-hour time limited parking is provided in the project area. Short term metered parking is provided west of Wilcox Avenue around the existing U.S. Post Office.

Sunset Boulevard, located south of the project site, Sunset Boulevard is a Class II Modified Major Highway by the city of Los Angeles, which provides continuous access between Downtown Los Angeles and the Cities of West Hollywood, Beverly Hills, and Santa Monica. A northbound Hollywood Freeway off-ramp and southbound freeway onramp are located on Sunset Boulevard, approximately one mile southwest of the project site. In the project vicinity, Sunset Boulevard provides three travel lanes in each direction at Highland Avenue and Wilcox Avenue, but reduced to two lands in each direction at Cahuenga Boulevard. One-hour time, limited metered parking is provided during off-peak hours in Highland Avenue and Wilcox Avenue area on Sunset Boulevard.

Wilcox Avenue, which forms the project's eastern boundary, is a north-south roadway designated as a Secondary Highway by the City of Los Angeles Hollywood Community Plan. One lane in each direction with left turn lanes at some intersections are provided in the project area. One-hour time, limited metered parking is available in the project area, but the full length of the property's frontage is designated as a loading zone. Secondary Highways require a 90-foot right-of-way comprised of a 70-foot roadway and 10-foot sidewalks. Wilcox Avenue along the property's frontage is currently dedicated to a half right-of-way of 35 feet on the northern 100 linear feet and 30 feet on the southern 50 linear feet.

Existing (2013) Traffic Volumes

Traffic volume data used in the peak hour intersectional analysis were based on traffic counts conducted by National Data Systems, an independent traffic data collection company. Traffic counts were conducted on December 4, 2013 during a typical weekday when there were no holidays, no rain, and schools were in session. Traffic counts were conducted during morning peak and evening peak hours. Traffic count data sheets are included in the TIA, Appendix H.

Public Transit

The Los Angeles County Metropolitan Transportation Authority (Metro) and the City of Los Angeles Department of Transportation Dash service (DASH), subway Metro Rail, and Metro Express provide the public transportation in the study area. There are Metro Red Line Rail stations located at Hollywood Boulevard and Highland Avenue and at Hollywood Boulevard and Vine Street, which are both located approximately one half mile from the project site, providing access for project employees and patrons. The public transit routes most closely serving the project are described in below.

Metro Local Lines provide service in the project area, which includes:

1. Along Hollywood Boulevard:

    - Metro Red Line between Downtown Los Angeles, Hollywood, and the San Fernando Valley Connecting to the Orange Line and Purple Line Directly and other downtown.
    - Route 217 between Westchester and Hollywood along La Cienega Avenue, Fairfax Avenue and Hollywood Boulevard.
    - Route 780 is a Rapid Service between Pasadena, Eagle Rock, Glendale, Loz Feliz and Hollywood.

2. Along Highland Avenue:

    - Route 156/656 operates between Hollywood and East San Fernando Valley including Studio City, Van Nuys and Panorama City.

3. Along Sunset Avenue:

    - Route 2/302 operates between Pacific Palisades, Westwood, West Hollywood, Hollywood and downtown Los Angeles.

Local shuttle lines are provided by DASH Hollywood, Hollywood/Wilshire and Beachwood Canyon.

Analysis of Existing (2013) Traffic Conditions

An analysis of existing weekday AM and PM peak-hour traffic conditions was performed at the eight study intersections. The analysis used the Critical Movement Analysis (CMA) method. The study intersections were evaluated using the methodology pursuant to the criteria established by the City of Los Angeles Department of Transportation for signalized intersections. The CMA procedure uses a ration of the traffic volume to the capacity of an intersection. This volume-to-capacity (V/C) ration defines the proportion of an hour necessary to accommodate all the traffic moving through the intersection assuming full capacity. V/C ratios provide an ideal means for quantifying intersection-operating characteristics. Ratios are calculated, and operating characteristics are assigned a level of service (LOS) grade (A through F) to estimate the level of congestion and stability of the traffic flow. A LOS A to C generally operates quite well. LOS D typically is the level for which a metropolitan area street system is designed. LOS E represents volumes at or near the capacity of the highway that might result in stoppages of momentary duration and fairly unstable flow. LOS F occurs when a facility is overloaded, and is characterized by stop-and-go traffic with stoppages of long duration.

"Capacity" represents the maximum total hourly movement volume of vehicles in the critical lanes that have a reasonable expectation of passing through an intersection under prevailing roadway and

traffic conditions. For planning purposes, capacity equates to the maximum value of Level of Service E. The CMA values used in this study were calculated by dividing the sum of critical movement volumes by the appropriate capacity value based on the number of signal phases present at the study intersections. Thus, the LOS corresponding to a range of CMA values is shown in Table 4-26.

Table 4-26
Level of Service As a Function of CMA Values

Level of Service	Description of Operating Characteristics	Range of CMA Values
A	Uncongested conditions; vehicles clear in a single cycle.	<0.60
B	Similar to above.	>0.60<0.70
C	Light congestion; occasional backups on critical approaches.	>0.70<0.80
D	Congestion on critical approaches, but intersection functional. Vehicles required waiting through more than one cycle during short peaks. No long-standing lines formed.	>0.80<0.90
E	Severe congestion with some long-standing lines on critical approaches. Blockage of intersection may occur if traffic signal does not provide for protection turning movements.	>0.90<1.00
F	Forced flow with stoppages of long duration.	>1.00
Source: Overland Traffic Consultants, February 2014.		

Table 4-27 shows the Level of Service for Existing Conditions. As shown in Table 4-27, all of the study intersections are currently operating at LOS C or better during both AM and PM peak hours, except for the intersection of Highland Avenue and Sunset Boulevard currently operating at LOS D during the AM and PM peak hour.

Table 4-27
CMA Summary Existing (2013) Traffic Conditions

No.	Intersection	AM Peak Hour		PM Peak Hour	
		V/C	LOS	V/C	LOS
1	Hollywood Blvd. & Wilcox Ave.	0.612	B	0.523	A
2	Cahuenga Blvd. & Hollywood Blvd.	0.780	C	0.638	B
3	Highland Ave. & Selma Ave.	0.428	A	0.401	A
4	Selma Ave. & Wilcox Ave.	0.369	A	0.417	A

Table 4-27
CMA Summary Existing (2013) Traffic Conditions

No.	Intersection	AM Peak Hour		PM Peak Hour	
		V/C	LOS	V/C	LOS
5	Cahuenga Blvd. & Selma Ave.	0.461	A	0.499	A
6	Highland Ave. & Sunset Blvd.	0.877	D	0.816	D
7	Sunset Blvd. & Wilcox Ave.	0.528	A	0.547	A
8	Cahuenga Blvd. & Sunset Blvd.	0.776	C	0.694	B

Source: Overland Traffic Consultants, February 2014.

Project Trip Generation

Traffic-generating characteristics of various land uses have been surveyed and documented in studies conducted under the auspices of the Institute of Transportation Engineers (ITE). This information is available in the manual, Trip Generation, 9th Edition, 2012, published by ITE. The trip generation rates in the ITE manual are nationally recognized, and are used as the basis for most traffic studies conducted in the City of Los Angeles and the surrounding region.

Accordingly, for this analysis, the ITE Trip Generation rates were used to determine the daily, AM and PM peak-hour trips generated by the proposed and existing site uses. The ITE trip generation rates provide a conservative condition, as these rates do not account for trip-reducing factors such as multi-purpose trips, extensive transit use, walk-in trips and pass-by trips. These factors play a significant role in determining the actual traffic generating characteristics for this project, and therefore, adjustments to the traffic generation estimates were deemed appropriate in this case.

The traffic study analyzes a project with 225 hotel rooms, an 11,797 square-foot lobby restaurant/bar, 10,454 square feet of meeting roms, and 4,443 square feet of rooftop restaurant/bar area. Each compontent of the proposed project is smaller than what the traffic study analyzed, providing a conservative analysis. Moreover, while the traffic study assumes banquet space will be open to the public and independently generate traffic, the project's meetings will be open only to hotel guests. In order to provide a conservative estimate of project trip generation, these uses within the hotel were evaluated as separate trip generators. It is anticipated that many of the hotel patrons will make use of the additional amenities. A conservative 10% internal trip reduction was incorporated into the analysis to account for this activity.

The use of public transportation is an important consideration in the evaluation of the project's trip making potential. As noted previously in the Public Transit section, transit service within the study area is extensive. It is anticipated that employees and patrons will make use of these amenities. A conservative 15% transit reduction was incorporated into the analysis.

LADOT has established pass-by credits for several land uses. The pass-by reductions incorporated into the analysis include 20% for the lobby restaurant and 10% for the rooftop restaurant.

The results of the project trip generation calculations, including adjustments for internal, transit/alternative mode and pass-by trips, are summarized in Table 4-28. As shown, the studied project is expected to result in 3,410 gross daily trips which is an increase over the existing number of trips. This equals approximately 3,359 net daily trips, including 183 trips during the AM peak hour (103 inbound, 80 outbound) and 261 trips during the PM peak hour (147, inbound, 114 outbound). However, as discussed above, the traffic study analyzed a larger project than the one currently proposed and the estimated number of daily trips is a more conservative estimate.

Table 4-28
Project Trip Generation

LU	Use/ Description	Size	Units	Daily	AM Peak Hour			PM Peak Hour		
					Total	I/B	O/B	Total	I/B	O/B
Proposed Uses										
310	Hotel	225	Rooms	1,383	119	70	49	135	61	74
932	Lobby Restaurant/Bar	11,797	sq ft	1,500	128	70	58	116	70	46
931	Banquet/Meeting Rooms	10,454	sq ft	855	8	4	4	71	48	23
931	Rooftop Restaurant/Bar	4,443	sq ft	400	4	2	2	33	22	11
Subtotal				4,138	259	146	113	355	201	154
Internal Capture										
	Lobby Restaurant/Bar	10%		(150)	(13)	(7)	(6)	(12)	(7)	(5)
	Banquet/Meeting Rooms	10%		(85)	(1)	(1)	(0)	(7)	(5)	(2)
	Rooftop Restaurant/Bar	10%		(40)	(0)	(0)	(0)	(3)	(2)	(1)
Subtotal				275	(14)	(8)	(6)	(22)	(14)	(8)
Transit/Alternative Mode Trips										
	Hotel	15%		(273)	(18)	(11)	(7)	(20)	(9)	(11)

Table 4-28
Project Trip Generation

LU	Use/ Description	Size	Units	Daily	AM Peak Hour			PM Peak Hour		
					Total	I/B	O/B	Total	I/B	O/B
	Lobby Restaurant/Bar	15%		(202)	(17)	(9)	(8)	(15)	(9)	(6)
	Banquet/Meeting Rooms	15%		(115)	(1)	(0)	(1)	(9)	(6)	(3)
	Rooftop Restaurant/Bar	15%		(54)	(0)	(0)	(0)	(4)	(3)	(1)
Subtotal				(664)	(36)	(20)	(16)	(48)	(27)	(21)
Pass-by Trips (% of External Auto)										
	Lobby Restaurant/Bar	20%		(229)	(20)	(11)	(9)	(18)	(11)	(7)
	Rooftop Restaurant/Bar	10%		(31)	(0)	(0)	(0)	(3)	(2)	(1)
Subtotal				(260)	(20)	(11)	(9)	(21)	(13)	(8)
Total Proposed Project				3,410	187	106	81	266	148	118
Existing Uses (To be Removed)										
150	Warehouse	14,208	sq ft	51	4	3	1	5	1	4
Subtotal				51	4	3	1	5	1	4
Net Increase				**3,359**	**183**	**103**	**80**	**261**	**147**	**114**

Source: Overland Traffic Consultants, May 2014.

Project Trip Assignment

A primary factor affecting project's trip direction is the spatial distribution destination points, which would generate project trip origins and destination. The estimated project directional trip distribution is also based on the study area roadway network, freeway locations, traffic flow patterns in an out of this area of the City of Los Angeles and consistency with previously approved traffic studies for this area of Los Angeles.

Figures 4 and 5, in Appendix H, illustrate the estimated are wide project traffic distribution percentages and show the estimated project traffic percentages details at each of the selected study intersections respectively.

Future (2018) Traffic Conditions

Future traffic volume projections have been developed to analyze the traffic conditions after completion of other planned land developments including the project. The future cumulative

analysis includes other development projects located within the study area that are either under construction or planned.

The traffic impact of traffic volume increases have been calculated by adding existing traffic volume, the ambient growth factor, and traffic from other related development projects.

Traffic Growth

Based on an analysis of the trends in traffic growth in the Hollywood community over the last several years, an annual traffic growth factor of 1.0 percent for the area street system was applied, as approved by LADOT. This growth factor was assumed to account for increases in traffic due to potential projects not yet proposed or projects outside the study area. Compounded annually, the growth factor was applied to the existing traffic volumes to develop the estimated baseline volumes for the study year 2018.

Related Projects

In addition to the use of the ambient growth rate, listings of potential related projects in the study area that might be developed within the study time frame were obtained from LADOT and recent studies of projects in the area. A review of the information currently available indicated that 48 projects could add traffic to the study intersections.

The locations of these related projects are shown in Figure 4-1. The number of trips expected to be generated by the related projects were determined by applying appropriate trip generation rates from the ITE manual, *Trip Generation, 9th Edition*. All trip generation rates used are provided in Appendix F of the traffic study. The related project descriptions and trip generation estimates are summarized in Table 4-29. As noted previously, the ambient traffic growth rate would generally be sufficient to estimate increases in traffic volumes at the study locations. However, for a more conservative estimate of cumulative traffic volumes, the trips generated by the related projects were also included.

For the analysis of Future (2018) "Without Project" traffic conditions, the related projects trip generation was assigned to the study area street system, using methodologies similar to those previously described for the project trip assignment. The total related project only traffic volumes assigned to the study intersections are illustrated in Figure 10 in Appendix H for the AM and PM peak hours.

Table 4-29
Related Projects Location, Description, and Trip Generation

Map No.	Address	Size	Description	Daily	AM Peak Hour			PM Peak Hour		
					I/B	O/B	Total	I/B	O/B	Total
1	6311 Romain St.		Television Center	365	29	7	36	7	30	37
		9,992 sq ft	Health Club Expansion	—	—	—	—	—	—	—
		3,120 sq ft	Wrhs to Studio Office	—	—	—	—	—	—	—
2	7002 Clinton St.	60 Students	Daycare	305	30	8	38	5	18	23
		120 Students	Kindergarten	—	—	—	—	—	—	—
3	1460 Gordon St.	224 units	Student Housing	1938	127	182	309	170	122	292
		16 units	Faculty/Staff	—	—	—	—	—	—	—
		12,700 sq ft	Retail	—	—	—	—	—	—	—
4	6381 Hollywood Blvd.	80 room	Hotel	1020	(19)	11	(8)	62	4	66
		15,920 sq ft	Restaurant	—	—	—	—	—	—	—
		(9,838 sq ft)	Remove restaurant	—	—	—	—	—	—	—
5	956 Seward St.	130,000 sq ft	Office	1240	—	—	186	—	—	180
6	1800 Argyle Ave.	225 rooms	Hotel	1206	—	—	57	—	—	65
7	6601 W. Romain St.		Hollywood Center Studios	808	88	4	92	12	39	51
		104,155 sq ft	Office	—	—	—	—	—	—	—
		1,970 sq ft	Storage	—	—	—	—	—	—	—
8	6225 Hollywood Blvd.	214,000 sq ft	Theater Office (Pantages)	1,918	221	55	276	51	203	254
9	7045 Lanewood	43 units	Apartments	289	18	4	22	5	22	27
10	1149 Gower	21 units	Apartments	735	6	23	29	23	12	35
		36 units	Condominiums	—	—	—	—	—	—	—
11		200 units	Apartments	6,327	477	211	688	254	428	682

Table 4-29
Related Projects Location, Description, and Trip Generation

Map No.	Address	Size	Description	Daily	AM Peak Hour			PM Peak Hour		
					I/B	O/B	Total	I/B	O/B	Total
	6121 Sunset Blvd.	23,500 sq ft	HTO Restaurant	—	—	—	—	—	—	—
		422,500 sq ft	Office	—	—	—	—	—	—	—
		2,000 sq ft	Fast Food Restaurant	—	—	—	—	—	—	—
		15,000 sq ft	Health Club	—	—	—	—	—	—	—
		16,500 sq ft	Retail	—	—	—	—	—	—	—
12	Boulevard 6200	1,042 units	Residential	14,772	238	512	750	852	700	1,552
		175,000 sq ft	Retail	—	—	—	—	—	—	—
		24 units	Live-Work	—	—	—	—	—	—	—
13	6100 Hollywood Blvd.	151 units	Apartments	1,397	21	72	93	76	45	121
		6,200 sq ft	Retail	—	—	—	—	—	—	—
14	5935 Sunset Blvd.	311 units	Condominium	1,248	66	103	169	62	65	127
		5,000 sq ft	Retail	—	—	—	—	—	—	—
		8,500 sq ft	Restaurant	—	—	—	—	—	—	—
		40,000 sq ft	Office	—	—	—	—	—	—	—
		0.5 acre	Park	—	—	—	—	—	—	—
15	915 N. La Brea Ave.	179 units	Apartments	2,615	5	86	91	200	158	90
		33,500 sq ft	Market	—	—	—	—	—	—	—
16	6515-6526 Selma	85,000 sq ft	Office	936	116	16	132	21	105	127
17	5800 Sunset Blvd.	535,396 sq ft	Office/Studio	2,690	256	48	404	64	314	378

Table 4-29
Related Projects Location, Description, and Trip Generation

Map No.	Address	Size	Description	Daily	AM Peak Hour			PM Peak Hour		
					I/B	O/B	Total	I/B	O/B	Total
18	1411 Highland Ave.	76 units	Residential	823	23	43	66	45	27	72
		2,500 sq ft	Retail	—	—	—	—	—	—	—
19	1601 N. Vine St.	121,609 sq ft	Office	1,239	155	27	182	39	145	184
		2,613 sq ft	Retail	—	—	—	—	—	—	—
20	6230 W. Yucca S.t	180 units	Apartments	473	5	27	32	26	12	38
		13,442 sq ft	Office	—	—	—	—	—	—	—
		6,177 sq ft	Work space	—	—	—	—	—	—	—
		8 units	Live-work	—	—	—	—	—	—	—
21	6677 Santa Monica Blvd.	786 units	Residential	1,938	127	182	309	170	122	292
		12,700 sq ft	Retail	—	—	—	—	—	—	—
		9,500 sq ft	Restaurant	—	—	—	—	—	—	—
22	6417 W. Selma Ave.	180 rooms	Hotel	2,069	94	72	165	114	72	186
		990 sq ft	Lobby Bar	—	—	—	—	—	—	—
		2,413 sq ft	Restaurant	—	—	—	—	—	—	—
		6,000 sq ft	Pool Deck Bar/Lounge	—	—	—	—	—	—	—
23	6523 Hollywood Blvd.	4,074 sq ft	Office	547	(16)	(11)	(27)	32	4	36
		10,402 sq ft	Restaurant	—	—	—	—	—	—	—
24	1603 N. Cherokee Ave.	66 units	Affordable Apts.	439	7	27	34	26	15	41
25	6608 Hollywood Blvd.	11,400 sq ft	Restaurant	1,292	13	2	15	129	66	195
		6,100 sq ft	Special Events	—	—	—	—	—	—	—
		9,400 sq ft	Bar/Lounge	—	—	—	—	—	—	—
		3,000 sq ft	Office	—	—	—	—	—	—	—
26	1540 N. Vine St.	306 units	Apartments	3,049	57	78	135	158	136	294
		68,000 sq ft	Retail	—	—	—	—	—	—	—

Table 4-29
Related Projects Location, Description, and Trip Generation

Map No.	Address	Size	Description	Daily	AM Peak Hour			PM Peak Hour		
					I/B	O/B	Total	I/B	O/B	Total
27	1718-1730 N. Las Palmas and 1719-1727 Cherokee		Hollywood Cherokee Project	1496	23	92	115	91	49	140
		225 units	Apartments	—	—	—	—	—	—	—
28	1740 N. Vine St.		Millennium Hollywood	9,922	321	253	574	486	438	924
		461 units	Apartments	—	—	—	—	—	—	—
		254 rooms	Hotel	—	—	—	—	—	—	—
		80,000 sq ft	Health Club	—	—	—	—	—	—	—
		264,303 sq ft	Office	—	—	—	—	—	—	—
		100,000 sq ft	Retail	—	—	—	—	—	—	—
		2,500 sq ft	Restaurant	—	—	—	—	—	—	—
29	1610 N. Highland Ave.	248 units	Apartments	1,805	22	90	112	96	54	150
		14,710 sq ft	Retail	—	—	—	—	—	—	—
30	1133 N. Vine St.	118 rooms	New Hotel	457	19	13	32	18	15	33
31	1824 N. Highland Ave.	118 units	Apartments	667	10	41	51	40	22	62
32	1841 N. Highland Ave.	100 rooms	Hotel	694	29	19	48	26	24	50
33	959 N. Seward St.	240,000 sq ft	Office	2,337	297	39	336	58	252	310
34	7120 W. Sunset Blvd.	44 units	Apartments	397	0	0	0	23	6	29
		2,900 sq ft	Restaurant	—	—	—	—	—	—	—

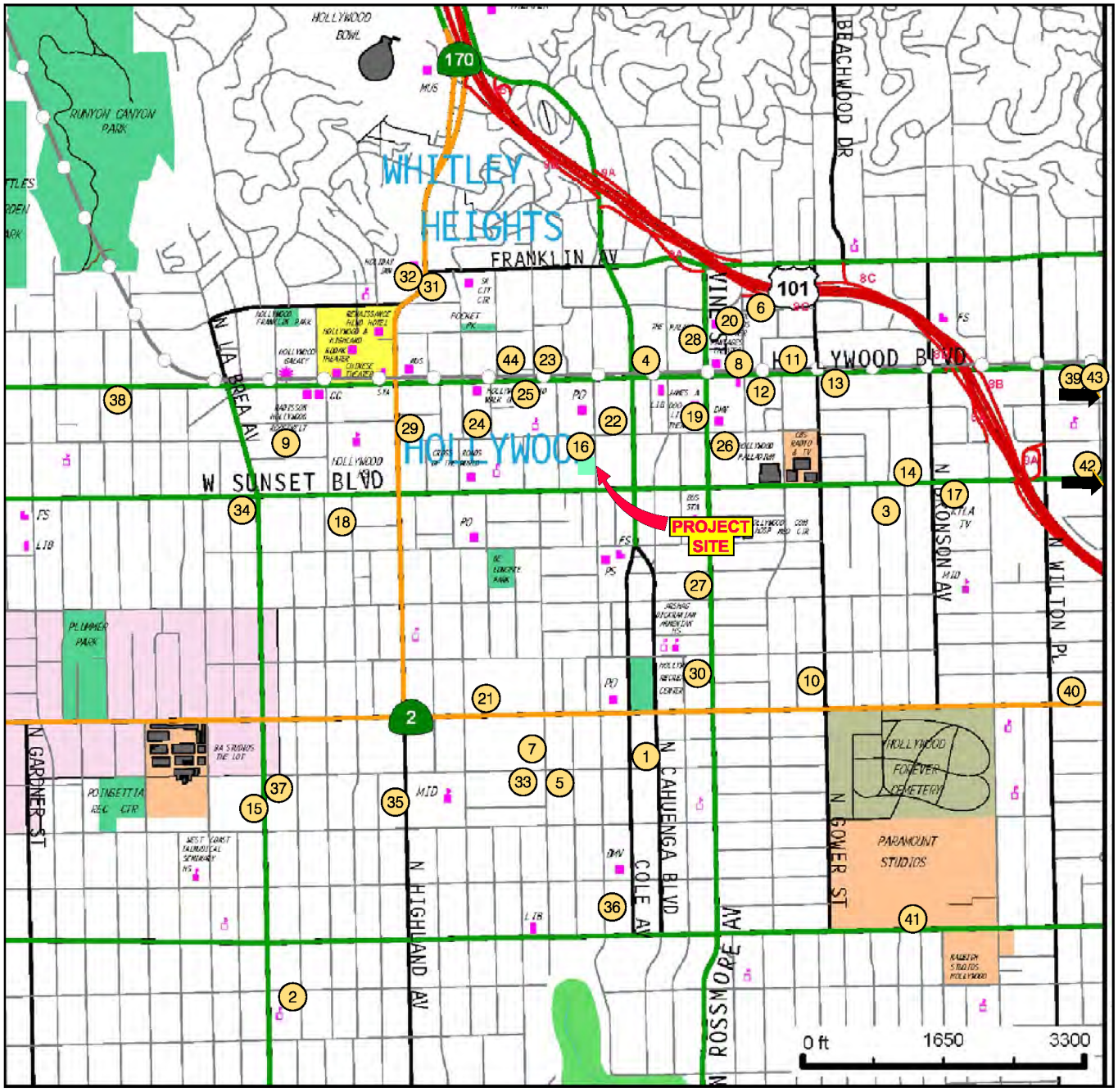
Table 4-29
Related Projects Location, Description, and Trip Generation

Map No.	Address	Size	Description	Daily	AM Peak Hour			PM Peak Hour		
					I/B	O/B	Total	I/B	O/B	Total
35	927 N. Highland Ave.	100 Students	Tutoring Center	155	4	(1)	3	23	17	40
36	712 N. Wilcox Ave.	100 units	Apartments	550	34	8	42	41	10	51
37	936 N. LaBrea Ave.	88,750 sq ft	Office	911	24	5	29	14	37	51
		12,000 sq ft	Retail	—	—	—	—	—	—	—
38	7300 Hollywood Blvd.		Temple Israel School Improvement	2,615	5	86	91	158	90	248
39	5550 Hollywood Blvd.	278 units	Apartments	1,267	(3)	43	40	47	17	64
		12,500 sq ft	Retail	—	—	—	—	—	—	—
40	5651 W. Santa Monica Blvd.	437 units	Apartments	6,734	91	160	251	136	297	633
		378,000 sq ft	Retail	—	—	—	—	—	—	—
41	5555 W. Melrose Ave.		Paramount Studios	9,830	712	213	925	297	736	1,033
		21,000 sq ft	Sound Stage	—	—	—	—	—	—	—
		1,900 sq ft	Stage Support	—	—	—	—	—	—	—
		635,500 sq ft	Production Office	—	—	—	—	—	—	—
		638,100 sq ft	General Office	—	—	—	—	—	—	—
		64,200 sq ft	Retail	—	—	—	—	—	—	—
42	5520 W. Sunset Blvd.	163,862 sq ft	Target Store	4,903	52	21	73	211	211	42
		30,887 sq ft	Retail	—	—	—	—	—	—	—
43	5500 Hollywood Blvd.	4,648 sq ft	Restaurant	441	6	6	12	22	15	37
		1,000 sq ft	Deli	—	—	—	—	—	—	—
44		195 rooms	All Suites Hotel	784	32	23	55	26	46	72

Table 4-29
Related Projects Location, Description, and Trip Generation

Map No.	Address	Size	Description	Daily	AM Peak Hour			PM Peak Hour		
					I/B	O/B	Total	I/B	O/B	Total
	6611-6637 Hollywood Blvd.	24,000 sq ft	Grocery Store	—	—	—	—	—	—	—
		4,200 sq ft	Retail	—	—	—	—	—	—	—
			Removal of existing	—	—	—	—	—	—	—
45	925 La Brea	110 units	Apartments	732	11	45	56	44	24	68
46	5901 Sunset Blvd.	26,000 sq ft	Retail	4,132	491	60	551	45	495	540
		274,000 sq ft	Office	—	—	—	—	—	—	—
47	1525 Cahuenga	64 rooms	Hotel	523	20	14	34	20	19	38
		3,550 sf	Restaurant	451	21	17	38	21	14	35
		1,495 sf	Commercial	64	1	1	1	3	3	6
48	6500 Selma	3,070 sf	Retail to restaurant	259	17	14	30	11	8	19
		1,250 sf	Rooftop Restaurant	159	7	6	14	7	5	12

.Source: Overland Traffic Consultants, April 2015. Related Projects 1 through 48.



Source: Overland Traffic Consultants, Inc. 2014

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Exhibit 4-1
Related Projects Locations

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Intersection Impacts

According to LADOT's *Traffic Study Policies and Procedures* manual, a significant project-related intersection traffic impact is a function of the CMA value (V/C ratio). However, the changes in level of service do not in and of themselves indicate whether an impact is considered "significant." LADOT defines a significant traffic impact attributable to a project based on a "stepped scale," with intersections at high volume-to-capacity ratios being more sensitive to additional traffic than those operating with available surplus capacity. A significant impact would occur if project-related intersection traffic would result in one or more of the following:

(a) CMA increase of 0.010 when the final (With Project) LOS is E or F;

(b) CMA increase of 0.020 or more when the final LOS is D; or

(c) CMA increase of 0.040 or more when the final LOS is C.

No significant impacts are deemed to occur at LOS A or B, as these operating conditions exhibit sufficient surplus capacities to accommodate large traffic increases with little effect on traffic flows. These stepped criteria are summarized in Table 4-30 below.

Table 4-30
LADOT Criteria for Significant Intersection Traffic Impact

LOS	Final CMA Value	Project-Related Increase in CMA Value
C	0.700 - 0.800	equal to or greater than 0.040
D	> 0.800 - 0.900	equal to or greater than 0.020
E, F	> 0.900	equal to or greater than 0.010

Source: Overland Traffic Consultants, May 2014.

Analysis of Future (2013) Traffic Conditions, Without and With Project

The analysis of future traffic conditions at the study intersections was performed using the same analysis procedures described previously in this report regarding the analysis of future Project traffic impacts.

Future (2018) baseline traffic volumes for the "Without Project" condition were determined by combining area ambient traffic growth with the total related projects' traffic volumes. The Future (2018) "Without Project" traffic volumes are illustrated in Figures 11 and 12 for the AM and PM peak hours, in Appendix H.

The project volumes found were then combined with the Future (2018) "Without Project" volumes to develop the Future (2018) "With Project" volumes, which were used to determine traffic impacts directly attributable to the project. The Future "With Project" AM and PM peak-hour traffic volumes are shown in Figures 13 and 14 in Appendix H.

The results of the analysis of future traffic conditions at the eight study intersections are summarized in Table 4-31. As shown in this table, the addition of the project's traffic is not expected to result in a change in level of service at the study intersections compared to future "Without Project" conditions, except for the intersection of Hollywood Boulevard and Wilcox Avenue where it is expected to operate at LOS B without the project and LOS C with the project during the PM peak hour; Selma Avenue and Wilcox Avenue where it is expected to operate at LOS A without the project and LOS B with the project during the PM peak hour; and Sunset Boulevard & Wilcox Avenue where it is expected to operate at LOS A without the project and LOS B with the project during the AM peak hour. Based on the City's significant traffic impact criteria, shown previously in Table 4-30, the project traffic is also not expected to have a significant impact at any of the study intersections.

Standard Conditions

SC 16-1 The project shall comply with all applicable provisions of the Valet Parking Permit Ordinance (Ord. No. 182,742). Specifically, the Permittee shall ensure that Valet Parking operation at no time interferes with the normal flow of vehicle traffic on the public right-of-way. No vehicle queuing is allowed on the public right-of-way at any time. No vehicle may stop or stand at a drop-off or loading area for longer than five minutes, except for a maximum of ten minutes where signs indicating a ten minute limit are posted.

b) Would the Project conflict with and applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Less Than Significant Impact. A significant impact may occur if the adopted California Department of Transportation (Caltrans) and Los Angeles County Metropolitan Transportation Authority (Metro) thresholds for a significant project impact would be exceeded. The Congestion Management Program (CMP) was created Statewide as a result of Proposition 111 and has been implemented locally by Metro. The CMP designated a transportation network including all state highways and some arterials within the County to be monitored by a local jurisdiction. If LOS standards deteriorate on the CMP network, then local jurisdictions must prepare a deficiency plan to be in conformance with the program. Local jurisdictions found to be in nonconformance with the CMP risk the loss of state gas tax funding.

For purposes of the CMP LOS analysis, an increase in freeway volume by 150 vehicles per hour during the am or pm peak hours in any direction requires further analysis. A substantial change in freeway segments is defined as an increase or decrease of 2% in the demand to capacity ratio when at LOS F. For purposes of CMP intersections, an increase of 50 vehicles or more during the am or pm peak requires further analysis.

The intersection of Santa Monica and Highland Avenue is the nearest CMP intersection. This CMP intersection is approximately three quarters of a mile from the project site. It is anticipated that a conservative maximum of project trips to go through this intersection during the peak periods would be 26 trips. This is below the CMP significance threshold.

The project volumes on the area freeways are anticipated to be dispersed through the system. The project is closest to the Hollywood Freeway. It is anticipated that, conservatively, no more than 20% of the project volumes will be using any one segment of the freeways. The maximum number of freeway trips on any one freeway would then be 52 vehicles during peak hours. This amount of traffic is below the threshold needed for further evaluation of freeway segments.

Table 4-31
CMA Summary, Future (2018) Traffic Conditions – Without and With Project

No.	Intersection	Peak Hour	Without Project		With Project			
			V/C	LOS	V/C	LOS	Impact	Significant Impact
1	Hollywood Blvd. & Wilcox Ave.	AM	0.731	C	0.743	C	0.012	NO
		PM	0.682	B	0.709	C	0.027	NO
2	Cahuenga Blvd. & Hollywood Blvd.	AM	0.935	E	0.941	E	0.006	NO
		PM	0.850	D	0.863	D	0.013	NO
3	Highland Ave. & Selma Ave.	AM	0.515	A	0.530	A	0.015	NO
		PM	0.519	A	0.541	A	0.022	NO
4	Selma Ave. & Wilcox Ave.	AM	0.447	A	0.493	A	0.046	NO
		PM	0.581	A	0.642	B	0.061	NO
5	Cahuenga Blvd. & Selma Ave.	AM	0.569	A	0.581	A	0.012	NO
		PM	0.671	B	0.685	B	0.014	NO
6	Highland Ave. & Sunset Blvd.	AM	0.967	E	0.970	E	0.003	NO
		PM	0.966	E	0.971	E	0.005	NO
7	Sunset Blvd. & Wilcox Ave.	AM	0.591	A	0.619	B	0.028	NO
		PM	0.654	B	0.682	B	0.028	NO
8	Cahuenga Blvd. & Sunset Blvd.	AM	0.873	D	0.887	D	0.014	NO
		PM	0.888	D	0.899	D	0.011	NO

Source: Overland Traffic Consultants, April 2015.

In summary, the Caltrans and Metro thresholds would not be exceeded, and impacts would be less than significant.

c) Would the Project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. This question would apply to the project only if it were an aviation-related use. The project site does not contain any aviation-related uses and the project does not include development of any aviation-related uses. As such, due to its nature and scope, development of the project would not have the potential to result in a change in air traffic patterns. Therefore, no impact related to air traffic patterns would occur.

d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. A significant impact may occur if a project were to include a new roadway design, introduce a new land use or project features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project access or other features were designed in such a way as to create hazardous conditions. The project does not include any sharp curves, dangerous intersections, or incompatible uses. No offsite traffic improvements are proposed or warranted in the area surrounding the project site. Therefore, no impact resulting from hazardous design features would occur.

e) Would the project result in inadequate emergency access?

Less Than Significant Impact. A significant impact may occur if a project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the project site or adjacent uses. Vehicular ingress and egress to the hotel use and the guest parking would be provided from Wilcox Avenue into the ground floor level-parking garage on the south side of the project site. Although development of the project would result in a net increase in trip generation, traffic impacts are not considered significant by LADOT standards (see the response to Question 16(a) above). No offsite traffic improvements are proposed or warranted in the area surrounding the project site. Therefore, development of the project would not result in inadequate emergency access to the project site or surrounding area. Impacts related to emergency access would be less than significant.

f) Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

Less Than Significant Impact. A significant impact may occur if a project would conflict with adopted policies plans or programs, regarding public transit, bicycle, or pedestrian facilities, or otherwise decease the performance or safety of such facilities. Although the project would generate an increase in the number of trips, traffic impacts would be less than significant by LADOT standards and no offsite traffic improvements are warranted in the area surrounding the

project site. Development of the project would not alter any existing bus routes.[78] Additionally, no City-designated bike paths or lanes run on or adjacent to the project site.[79] A total of 30 (15 short-term and 15 long-term) guest bike parking spaces are also provided on the project site. Therefore, the project would have a less than significant impact on the adopted policies, plans, or programs supporting alternative transportation.

17. UTILITIES AND SERVICE SYSTEMS

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact. A significant impact may occur if a project would discharge wastewater whose content exceeds the regulatory limits established by the governing agency. The City of Los Angeles Department of Public Works, Bureau of Sanitation provides sewer conveyance infrastructure and wastewater treatment services for the project site. Specifically, the Bureau of Sanitation provides advance planning and financial management, and maintains and operates the sewage collection and treatment system. Wastewater generated by the project during the construction phase would be similar to that generated by other projects of similar size and scale, for which no pre-treatment is required. Wastewater is treated by standard (primary, secondary, and tertiary) treatment processes. Any wastewater discharged by the project must comply with NPDES requirements, as discussed in the response to Question 9(a). Additionally, the project must also comply with all applicable wastewater treatment requirements of the LARWQCB. Therefore, impacts related to wastewater treatment requirements would be less than significant.

b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded. The City of Los Angeles Department of Water and Power (LADWP) currently supplies water to the project site. The City's water supplies come from the following sources: the eastern Sierra Nevada Mountains by way of the Los Angeles

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[78] *Los Angeles County Metropolitan Transportation Authority, Metro Bus & Metro Rail System Map. Website: http://www.metro.net/riding_metro/maps/default.htm, March 3, 2014.*

[79] *City of Los Angeles, Department of City Planning, Los Angeles Department of City Planning, 2010 Bicycle Plan, A Component of the City of Los Angeles Transportation Element, 2010 Bicycle Plan Designated Bikeways, March 1, 2011. Website: http://cityplanning.lacity.org/, March 3, 2014.*

Aqueduct system, local groundwater, and purchases from the Metropolitan Water District, and an additional fourth source, recycled water.[80]

Water

Existing water main infrastructure in the vicinity of the project site includes an 8-inch line along Selma Avenue, an 8-inch line along Schrader Boulevard and an 8-inch line along Sunset Boulevard.[81]

As shown in Table 4-32, the project is anticipated to consume approximately 43,197 gallons per day (gpd); an increase of approximately 42,344 gpd over existing conditions. This analysis assumes a larger project than proposed and represents a conservative analysis.

Table 4-32
Existing and Project Estimated Water Demand

Land Use	Size	Consumption Rate[a]	Total (gallons/day)
Existing Uses			
Warehouse	14,208 sq ft	60 gallons/1,000 sq ft/day	853
		Subtotal	***853***
Project			
Hotel	200 rooms	144 gallons/room/day	28,944
Commercial Uses (Restaurant, Bar, Outdoor Eating Area and Pool Deck)	15,029 sq ft[b]	864 gallons/1,000 sq ft/day	12,985
Meeting Rooms	3,020 sq ft	420 gallons/1,000 sq ft/day	1,268
		Subtotal	***43,197***
		Total Net Water Consumption (Project – Existing Uses)	**42,344**

[a] Letter provided by the City of Los Angeles Bureau of Sanitation, dated April 2, 2014. Water consumption is assumed to be 120% of wastewater.

[b] Total commercial floor area (10,020 sq ft) plus outdoor eating area (1,085 sq ft) plus rooftop pool deck (3,924 sq ft)

Source (table): FirstCarbon Solutions. May 2015.

[80] *City of Los Angeles Department of Water and Power, 2010 Urban Water Management Plan, Executive Summary, Existing Water Supplies.*

[81] *Letter from Amir Tabakh, Chief of Energy Efficiency Engineering, City of Los Angeles Department of Water and Power, March 21, 2014.*

CEQA Guidelines § 15083.5 requires a Lead Agency to identify water systems to provide water supplies for projects over specified thresholds. Water Code § 10912, *et* seq. ("SB 610") outlines requirements for projects including Hotels with 500 or more rooms, which require a water supply assessment to be prepared. The project is not subject to SB 610, because it is not a proposed hotel or motel having more than 500 rooms. Therefore, a water supply assessment is not needed. Additionally, the project is not subject to SB 221 because the project is a hotel project.

According to LADWP, it would be able to accommodate the estimated increase in water demand resulting from the project.[82] Additionally, according to its Final Year 2010 Urban Water Management Plan, LADWP anticipates that it can provide adequate water supplies for the City through the year 2035.[83] Further, the project would be required to comply with applicable water conservation ordinances and regulations. Given the incremental increase in water consumption for the project, and compliance with applicable water conservation regulations, the project would not require or result in the construction of new or expanded water treatment facilities. Therefore, impacts related to water treatment facilities would be less than significant.

Wastewater

Wastewater generated at the project site flows to the Hyperion Treatment Plant (HTP), located west of the Los Angeles International Airport in Playa del Rey.

As shown in Table 4-33, the project is anticipated to generate approximately 36,997 gpd; an increase of approximately 35,287 gpd of wastewater over existing conditions.

Table 4-33
Existing and Project Estimated Wastewater Generation

Land Use	Size	Generation Rate[a]	Total (gallons/day)
Existing Uses			
Warehouse	14,208 sq ft	50 gallons/1,000 sq ft/day	710
		Subtotal	***710***
Project			
Hotel	200 rooms	120 gallons/room/day	24,120
Commercial Uses (Restaurant/Lounge)	15,029 sq ft	720 gallons/1,000 sq ft/day	10,820
Meeting Rooms	3,020 sq ft	350 gallons/1,000 sq ft/day	1,057
		Subtotal	***35,997***

[82] *Letter from Amir Tabakh, Chief of Energy Efficiency Engineering, City of Los Angeles Department of Water and Power, March 21, 2014.*

[83] *City of Los Angeles Department of Water and Power, 2010 Urban Water Management Plan, Executive Summary, Water Supply Reliability.*

Land Use	Size	Generation Rate[a]	Total (gallons/day)
Total Net Wastewater Generation (Project – Existing Uses)			**35,287**

[a] *Letter provided by the City of Los Angeles Bureau of Sanitation, dated April 2, 2014.*
[b] *Total commercial floor area (10,020 sq ft) plus outdoor eating area (1,085 sq ft) plus rooftop pool deck (3,924 sq ft)*
Source (table): FirstCarbon Solutions. May 2015.

As discussed, wastewater generated by the project would be treated at the HTP. The HTP has a design capacity of approximately 450 million gpd and currently treats an average of approximately 362 million gpd to primary and secondary treatment standards.[84] Thus, the HTP has a remaining capacity of approximately 88 million gpd and has sufficient remaining capacity to treat the 35,555 gpd net increase in wastewater estimated to be generated by the project. Therefore, the project would not require or result in the construction of new or expanded wastewater treatment facilities. Impacts related to wastewater treatment facilities would be less than significant.

c) Would the Project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact may occur if the volume of stormwater runoff increases to a level exceeding the capacity of the storm drain system serving the project site, or if a project would substantially increase the probability that polluted runoff would reach the storm drain system. Storm drain facilities are maintained by the City of Los Angeles Department of Public Works, Bureau of Sanitation. Runoff from the project site is collected by stormwater drainage facilities on Wilcox Avenue to the east and Sunset Boulevard to the south. The project site is currently developed with warehouse and associated paved surface parking lot. With development of the project, the amount of impermeable surfaces would be roughly similar between the existing project site and the project. Furthermore, runoff from the project site would continue to drain to the existing storm drain inlets in the area surrounding the project site. Since the amount of impermeable surfaces would remain the same, and the runoff flow and direction would remain the same, there would be no change in the amount of stormwater runoff between the existing project site and the project. Therefore, the project would not require or result in the construction of new or expanded stormwater drainage facilities. Impacts related to storm drains would be less than significant.

[84] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Wastewater, Facts & Figures. Website: http://www.lasewers.org/treatment_plants/hyperion/ August 21, 2009.*

d) Would the Project have significant water supplies available to serve the Project from existing entitlements and resources, or are new or expanded entitlements needed?

Less Than Significant Impact. A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. As discussed in the response to Question 17(b), the project is not subject to either SB 221 or SB 610 and, therefore, does not require preparation of a water supply assessment. Further, the project would be required to comply with the City's water conservation policies, further reducing the project's water demand. Therefore, the project would not require new or expanded entitlements. Project impacts related to water supplies would be less than significant.

e) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded. As discussed in the response to Question 17(b), wastewater generated by the project would be conveyed to the HTP. The project is anticipated to generate a net increase of approximately 35,555 gpd of wastewater over existing uses. This net increase represents approximately 0.04 percent of the 88 million gpd remaining capacity at the HTP. Therefore, the HTP has adequate remaining capacity to serve the project. Impacts related to wastewater treatment capacity would be less than significant.

f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Within the City of Los Angeles, solid waste management, including collection and disposal services and landfill operations are administered by various public agencies and private companies. Private contractors collect waste generated by all commercial/industrial sources. Waste disposal sites are operated by both the City and County of Los Angeles, as well as by private companies. Solid waste generated at the project site is disposed of at one of two landfills, either the Scholl Canyon Landfill or the Burbank Landfill No.3.

The California Integrated Waste Management Act of 1989 (AB 939) was enacted to reduce, recycle, and reuse solid waste generated in the State to the maximum amount feasible. Specifically, AB 939 required city and county jurisdictions to identify an implementation schedule to divert 50 percent of the total waste stream from landfill disposal by the year 2000. AB 939 also requires each city and county to promote source reduction, recycling, and safe disposal or

transformation. City of Los Angeles Ordinance 181519 provides details on permits, and haul contractor permits, AB 939 compliance, and recycling requirements for permit haulers and disposal services.

Construction Impacts

Demolition and construction activities associated with development of the project would generate construction debris that would need to be disposed of at landfills. Debris from an assumed 14,208 square feet of structures from the site would be exported to a landfill. The 14,208 square feet of structures would produce a total of 650 tons of construction debris. Construction debris includes concrete, asphalt, wood, drywall, metals, and other miscellaneous and composite materials. The project site would be shored, excavated, and graded to accommodate the foundations for the proposed building structures. An estimated 41,140 cubic yards of excavated soil would be exported. Haul trucks were assumed to have a 16 cubic yard capacity, for a total of 5,143 soil-hauling trips.

Consistent with AB 939 requirements, much of this material would be recycled and salvaged to the maximum extent feasible. Materials not recycled would be disposed of at landfills. By recycling most of the solid waste generated by construction of the project, short-term construction impacts on landfills would be less than significant.

Operational Impacts

As shown in Table 4-34, operation of the project is anticipated to generate a net increase of 369 pounds per day of solid waste over existing uses, before recycling activities.

Table 4-34
Existing and Project Estimated Solid Waste Generation

Land Use	Size	Generation Rate[a]	Total (pounds/day)
Existing Uses			
Warehouse	38 Employees (estimated)	13.82 pounds/ employee/day[b]	526
		Subtotal	526
Project			
Hotel	200 rooms	4 lbs / room /day	804
Commercial Areas (including outdoor eating areas and rooftop pool deck)	15,029 sq ft[c]	0.005 lbs / sq ft / day	75
Meeting rooms	3,020 sq ft	0.005 lbs / sq ft / day	16
		Subtotal	895
		Total Net Solid Waste Generation (Project – Existing Uses)	369

[a] CalRecycle. "Estimated Solid Waste Generation Rates". 2015.
[b] Calculated utilizing the "Warehouse" generation rate.

Table 4-34
Existing and Project Estimated Solid Waste Generation

Land Use	Size	Generation Rate[a]	Total (pounds/day)
[c] Total commercial floor area (10,020 sq ft) plus outdoor eating area (1,085 sq ft) plus rooftop pool deck (3,924 sq ft)			

Source (table): FirstCarbon Solutions. May 2015.

As discussed, solid waste generated by the project would be disposed of at either the Scholl Canyon Landfill or the Burbank Landfill No.3. The Scholl Canyon Landfill is permitted to intake a maximum of 3,400 tons per day, while the Burbank Landfill No.3 is permitted to intake a maximum of 240 tons per day.[85]

The project would generate a net increase of approximately 369 pounds (or 0.18 tons) of solid waste per day. Thus, the amount of solid waste generated by the project would represent approximately 0.006 percent of maximum permitted daily intake at the Scholl Canyon Landfill and approximately 0.09 percent of the maximum permitted daily intake at the Burbank Landfill No.3. Therefore, either the Scholl Canyon Landfill or the Burbank Landfill No.3 would have sufficient capacity to accommodate the project solid waste disposal needs. Further, operations on the project site would continue to be subject to requirements set forth in AB 939 requiring each city and county to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. Additionally, as required by the California Solid Waste Reuse and Recycling Access Act of 1991, the applicant would be required to provide adequate storage areas for the collection and storage of recyclable waste materials. Therefore, impacts to landfills would be less than significant. Standard Conditions 17-1 and 17-2 address the recycling for construction waste, and project operation. Impacts related to solid waste would be less than significant.

Standard Conditions

SC 17-1 Recycling bins shall be provided at the appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as part of the project's regular solid waste disposal program.

SC 17-2 Prior to the issuance of any demolition or construction permit, the applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety. The demolition and construction contractor(s) shall

[85] *State of California Integrated Waste Management Board, Solid Waste Information System, Facility Search. Website: http://www.ciwmb.ca.gov/SWIS/. March 4, 2014.*

only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes.

g) Would the Project comply with federal, state, and local statutes and regulations related to solid waste?

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. As discussed in the response to Question 17(b), the California Integrated Waste Management Act of 1989 (AB 939) was enacted to reduce, recycle, and reuse solid waste generated in the State to the maximum amount feasible. Specifically, AB 939 required City and County jurisdictions to identify an implementation schedule to divert 50 percent of the total waste stream from landfill disposal by the year 2000 and 70 percent by the year 2020. AB 939 also requires each city and county to promote source reduction, recycling, and safe disposal or transformation. City of Los Angeles Ordinance 181519 provides details on permits, and haul contractor permits, AB 939 compliance, and recycling requirements for permit haulers and disposal services.

AB 939 further requires each city to conduct a Solid Waste Generation Study and to prepare a Source Reduction and Recycling Element (SRRE) to describe how it would reach the goals. The SRRE contains programs and policies for fulfillment of the goals of AB 939, including the above-noted diversion goals, and must be updated annually to account for changing market and infrastructure conditions. California cities and counties are required to submit annual reports to the California Integrated Waste Management Board to update the Board on the city's progress toward the AB 939 goals.

The City of Los Angeles Municipal Code Section 66.32 Ordinance 174706 states that in order to meet AB 939 diversion goals and the City's diversion goal of 70 percent by the year 2020, private solid waste haulers and recyclers shall register with the City and display a permit decal and number issued by the City through the Department of Public Works, Bureau of Sanitation. Waste haulers shall pay an AB 939 compliance fee as set forth in sections 66.32.1 through 66.32.8 based on gross receipts of solid waste collected.

Construction Impacts

Demolition and construction activities associated with development of the project would generate construction debris that would need to be disposed of at landfills. Construction debris includes concrete, asphalt, wood, drywall, metals, and other miscellaneous and composite materials. Consistent with AB 939 requirements, much of this material would be recycled and salvaged to the maximum extent feasible. Materials not recycled would be disposed of at landfills. Because of the small amount of demolition involved, combined with compliance with AB 939 (requiring that at least 50 percent of the construction and demolition waste be recycled/reused) most of the solid waste generated by the demolition and construction phases would be recycled. By recycling most of the solid waste generated by construction of the project, short-term construction impacts on landfills would be less than significant.

Operational Impacts

As shown in Table 4-34, operation of the project is anticipated to generate a net increase of 369 pounds per day of solid waste over existing uses, before recycling activities.

Solid waste generated by the project would be disposed of at either the Scholl Canyon Landfill or the Burbank Landfill No.3. The Scholl Canyon Landfill is permitted to intake a maximum of 3,400 tons per day, while the Burbank Landfill No.3 is permitted to intake a maximum of 240 tons per day.

The project would generate a net increase of approximately 369 pounds (or 0.2 tons) of solid waste per day. Thus, the amount of solid waste generated by the project would represent approximately 0.02 percent of the remaining capacity at the Scholl Canyon Landfill and approximately 0.2 percent of the maximum permitted daily intake at the Burbank Landfill No.3. Therefore, both the Sunshine Canyon Landfill and the Chiquita Canyon Landfill would have sufficient capacity to accommodate the project solid waste disposal needs. Further, operations on the project site would continue to be subject to requirements set forth in AB 939 requiring each city and county to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. Additionally, as required by the California Solid Waste Reuse and Recycling Access Act of 1991, the applicant would be required to provide adequate storage areas for the collection and storage of recyclable waste materials. Therefore, impacts to landfills would be less than significant.

The solid waste collection and disposal needs during the construction and operation of the project would be met by private contractors. Solid waste generated at the project site would be disposed of in accordance with all applicable Federal, State, and local regulations related to solid waste as described above. Furthermore, as discussed in the response to Question 7(a) above, other than typical products utilized in commercial uses for cleaning, no hazardous wastes would be disposed of by the project. Therefore, impacts with respect to solid waste regulations would be less than significant. The implementation of Standard Conditions 17-1 and 17-2 address recycling from project operation and construction waste, and Standard Condition 17-3 addresses proper waste disposal. Impacts related to solid waste would be less than significant.

Standard Condition

SC 17-3 All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle demolition and construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation. Non-recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed regulated disposal site.

18. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact. The project site is located in an urbanized area of the Hollywood Community and is currently developed with a warehouse and an associated paved surface parking lot. Landscaping onsite is limited to ornamental and street trees and does not include any native vegetation. There are no candidate, sensitive, or special-status species present within the project site. In addition, no fish or wildlife habitat exists on the project site. Therefore, as discussed in Responses 4(a) through 4(f), development of the project site would not degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause such a species to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal.

The existing building located on the project site at 1541 Wilcox Avenue was evaluated in 2010 as not eligible for the NRHP, CRHR, or as a HCM and, therefore, is not considered a historical resource for the purposed of CEQA. In addition, it was determined that the historical resources in the vicinity of the project site would not be affect by the demolition of the current building on site or the construction of the project.

Therefore, development of the project would not result in the elimination of important examples of major periods of California history or prehistory. A less than significant impact would occur.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. A significant impact may occur if the project, in conjunction with other related projects in the area of the project site, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together.

As described in this analysis, the project's incremental contribution to cumulative impacts related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, geology/soils, green house gas emissions, hazards/hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, and utilities would be less than significant. Each is discussed below more in depth. The project's contribution to cumulative impacts would be less than significant.

See Table 4-29 in Section 16 on Transportation and Traffic for a list of related projects.

Aesthetics

Development of the project in conjunction with the related projects, identified in Section 16(a), Table 4-29, would result in a mix of new development and redevelopment, or infilling, of residential, educational, industrial, and commercial land uses in the Hollywood community. There are no related projects adjacent to or in the immediate vicinity of the project site that would contribute a cumulatively significant aesthetic, visual, or light and glare impact.

Air Quality

A significant impact may occur if a project would add a considerable cumulative contribution to federal or state non-attainment pollutant. If an area is in nonattainment for a criteria pollutant, then the background concentration of that pollutant has historically exceeded the ambient air quality standard. It follows that if a project exceeds the regional threshold for that nonattainment pollutant, then it would result in a cumulatively considerable net increase of that pollutant and result in a significant cumulative impact. The South Coast Air Basin is in nonattainment for PM_{10}, $PM_{2.5}$, nitrogen dioxide, and ozone. Therefore, if the project exceeds the regional thresholds for PM_{10}, or $PM_{2.5}$, then it contributes to a cumulatively considerable impact for those pollutants. If the project exceeds the regional threshold for NO_x or ROG, then it follows that the project would contribute to a cumulatively considerable impact for ozone. If the project exceeds the NO_x threshold, it could contribute cumulatively to nitrogen dioxide concentrations.

With respect to determining the significance of the project contribution, the SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Furthermore, SCAQMD states that if an individual development project generates less-than-significant construction or operational emissions impacts, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment.

As discussed in the response to Question 3(b) above, the project would not generate emissions that exceed the SCAQMD's recommended regional thresholds. With the implementation of Standard Condition 3-1, the project would not generate a cumulatively considerable increase in emissions for the pollutants for which the Basin is in nonattainment and impacts would be less than significant.

Noise

Development of the project in conjunction with the related projects identified above in Section 16(a), Table 4-29, would result in an increase in construction-related and traffic-related noise as well as onsite stationary noise sources in an already urbanized area of the City of Los Angeles. The project Applicant has no control over the timing or sequencing of the related projects that have been identified within the project study area. Therefore, any quantitative analysis that assumes multiple, concurrent construction projects would be speculative. Construction-period

noise for the project and each related project (that has not yet been built) would be localized. In addition, each of the related projects would be required to comply with the City's noise ordinance, as well as include mitigation measures that may be prescribed pursuant to CEQA provisions that require potentially significant impacts to be reduced to the extent feasible. Moreover, none of the identified related projects is located in the project site's immediate vicinity. With respect to cumulative traffic noise impacts, it should be noted that the project's mobile source vehicular noise impacts are based on the predicted traffic volumes as presented in the project Traffic Study. Thus, the future predicted noise levels include the traffic volumes from the project and future traffic levels associated with ambient growth and the related projects. Based on the project's estimated trip generation, it is clear that the project would not have the potential to double the traffic volumes on any roadway segment or study intersection in the vicinity of the project site. As such, the project's noise volumes would not be cumulatively considerable. Thus, the cumulative impact associated with noise would be less than significant.

Population/Housing and Employment

The project would not remove or create housing. The project, however, would result in a net increase of 111 jobs. Related projects in the Hollywood Community are projected to generate approximately 15,454 jobs, and when combined with the project, would result in approximately 15,568 jobs in the project area. Thus, the project would contribute less than 1% to the cumulative projects for the area. SCAG has forecasted that the total employment level for the census tracts in the Hollywood community will increase by approximately 2,679 jobs between the years 2010 and 2020. Thus, the cumulative projects would exceed SCAG projected employment growth. The basis for this is speculative, but may be due to accelerated growth following a period of development depression. The overall job growth may indirectly induce population growth by increasing an increase in housing demand in the region for those attracted to jobs. However, given continued, relatively highunemployment in the region, the jobs are likely to attract individuals already in the region, particularly those from neighboring census tracts outside of the Hollywood community that have lower job growth forecasts or higher rates of unemployment. The project's contribution to this job growth is less than 1%, an amount insufficient to create cumulatively considerable project impacts due to increased population. Therefore, cumulative impacts related to population and housing would be less than significant.

Fire

As discussed previously, the project site is currently served by Fire Station No. 27, with supplemental fire services provided by Fire Station No. 82 and Fire Station No. 41. Of the 46 related projects, nine related projects (Related Project Nos. 4, 16, 19, 22, 23, 24, 25, 28, and 44) would also be primarily served by Fire Station No. 27. A total of 15 related projects (Related project Nos. 3, 6, 8, 10-14, 17, 20, 26, 39, 42, 43, and 46) would be primarily served by Fire Station No. 82, and nine related projects (Related Project No. 9, 18, 27, 29, 31, 32, 34, 38, and 39) would be primarily served by Fire Station No. 41. All other related projects would be served by other fire stations in Battalion 5. Therefore, the project would combine with nine of the

related projects identified to create a cumulative demand for fire protection services from Fire Station No. 27. The project would also combine with 15 of the related projects identified to create a cumulative demand for fire protection services from Fire Station No. 82, and would combine with nine of the related projects identified to create a cumulative demand for fire protection services from Fire Station No. 41.

The LAFD determines adequate fire protection based on fire flows, response distance, and LAFD review of hydrants and access. LAFD does not determine the adequacy of fire protection based on response times or number of EMS or fire-related incidents. Overall, the project would have a less than significant impact with implementation of the required mitigation measures. The project would not combine with related projects to create a cumulatively incremental effect upon fire protection services. With both the project and related projects' adherence to all applicable local and State fire regulations, cumulative impacts would be less than significant.

Police

As discussed previously, the project is located within the Hollywood Area Station, which has an existing police service population of approximately 300,000 persons.[86] In addition, of the 46 related projects identified, all but three of the related projects (Related Project Nos. 15, 45 and 2) would also be served by the Hollywood Area Station. As the related projects are developed it may be necessary to provide a new, expanded, consolidated, or relocated police facility. Similar to the 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 adequately address police protection service demands. Furthermore, each related project would also contribute additional tax revenue or fees that could be used for commensurate expansion of police services and the hiring of additional police officers as needed by the LAPD. Therefore, cumulative impacts with respect to police protection services would be less than significant.

Schools

There are a total of 46 related projects. A total of 25 of the 46 related projects do not have the potential to generate any elementary, middle, or high school students (Related Project Nos. 1-8, 16-17, 19, 22-23, 25, 30, 32-33, 35, 37-38, 41-44, and 46), similar to the project.

Further, similar to the project, the applicants of the related commercial projects would be expected to pay required developer school fees to the LAUSD (pursuant to SB 50) to help reduce any impacts they may have on school services. Pursuant to SB 50, payment of developer fees is deemed to provide full and complete mitigation of school facilities impacts. The payment of

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[86] *Los Angeles Police Department. "About Hollywood". http://www.lapdonline.org/hollywood_community_police_station/content_basic_view/1665. Accessed March 6, 2014.*

these fees by the project and the related projects would be mandatory and would reduce the cumulative impact upon school services to a less than significant level.

Parks

Local residential populations are most likely to utilize parks. Residential projects in the vicinity would have an impact on these facilities. However, employees generated by the commercial projects would not typically enjoy long periods of time during the workday to visit parks and/or recreational facilities, and the hotel's employees would therefore not contribute to the future demand on park services. Potential impacts from hotel guest's utilization of park areas will be minimal. As discussed in Sections 14 (d) and 15 (a) and (b), above, although the project is not required to pay parkland fees, other related projects (such as residential projects) would be require to pay such fees in accordance with the LAMC, thereby offsetting those project's contribution to any cumulative impact. Therefore, the cumulative impacts to parks would be less than significant.

Libraries

Related projects include residential and commercial projects. Residential projects are most likely to utilize libraries, and as a result would have an impact on local libraries. In general, the employees and guests that would be generated by the related commercial projects would not be expected to patronize local libraries to a great extent. Employees may visit local library facilities during breaks and off hours, and are likely to be existing members of the community already using library services. A small proportion of hotel guests may visit local libraries, and review onsite materials (no check out privileges). Hotel guest usage is expected to be so minimal as to be negligible. Therefore, the project will not result in a cumulative impact to library services.

Traffic

As discussed in Question 16, the addition of the project's traffic is not expected to result in a change in level of service at the study intersections when compared to future "Without Project" conditions, except for the intersection of Hollywood Boulevard and Wilcox Avenue (LOS B to C during PM Peak Hour), Selma Avenue and Wilcox Avenue (LOS A to LOS B during PM Peak Hour), and Sunset Boulevard and Wilcox Avenue (LOS A to B during A peak Hour). Based on the City's significant traffic impact criteria, the project traffic is also not expected to have a cumulatively considerable significant impact at any of the study intersections.

Water

Implementation of the project in combination with the identified related projects would increase the demand for water. Cumulative water consumption of the related projects in combination with the project would be approximately 3,639,389 gallons of water per day. The LADWP anticipates that its projected water supplies is currently available to accommodate the demand of the project with the existing capacity of the Los Angeles Aqueduct Filtration Plant (LAAFP), however future infrastructure upgrades may be required for specific project/development needs.[87] Further, each related project would be required to implement the mitigation measures put in place by LADWP. Therefore, cumulative impacts on water supply would be less than significant.

Wastewater

Sewer conveyance for the identified related projects would be provided by LABS. Each of the related projects would need to obtain a final approval from the Bureau of Sanitation for a sewer capacity connection permit. The sewer line capacity for each related project would be evaluated on a case-by-case basis and would be mitigated to the extent feasible in accordance with CEQA. Therefore, cumulative impacts on wastewater conveyance infrastructure would be less than significant.

It is assumed that all of the related projects would rely on the wastewater treatment services by the HTP. As previously discussed, the design capacity of the HTP is 450 million gallons per day and the HTP's current average wastewater flow is 362 million gallons per day. Therefore, the HTP has a remaining capacity of approximately 88 million gallons per day. The cumulative sewage generation of approximately 3,032,270 gpd would be well within the design capacity of the HTP, representing about 3.45 percent of the remaining capacity. Cumulative impacts on wastewater treatment capacity would be less than significant.

Solid Waste

Related projects would generate approximately 127,255 pounds of solid waste per day, or approximately 63.6 tons per day. As set forth above, the project would generate 369 pounds of solid waste per day. Similar to the project, the related projects would participate in regional source reduction and recycling programs pursuant to AB 939, further reducing the amount of solid waste to be disposed of at the landfills described above. Each related project would have the option of choosing its own recycling facility from over 55 facilities listed by the Bureau of Sanitation, County Department of Public Works, and CIWMB.

As discussed in Question 17(f) the Scholl Canyon Landfill and Burbank Landfill No.3 are currently permitted to accept 3,400 tons/day and 240 tons/day respectively. In total, the two landfills may accept up to 3,640 tons of solid waste per day. The project in conjunction with the related projects would cumulatively generate approximately 128,343 pounds per day, or 64.2

[87] *Letter from Amir Tabakh, Chief of Energy Efficiency Engineering, City of Los Angeles Department of Water and Power, March 21, 2014.*

tons per day. This represents approximately 1.9 percent of the remaining daily intake capacity at the Scholl Canyon Landfill, and approximately 26.7 percent of the permitted capacity at the Burbank Landfill No.3. The cumulative increase in solid waste generated by the project and the related projects would not result in the need for additional disposal facilities.

Further, operations on the project site and at the related projects would be subject to requirements set forth in AB 939 requiring each city and county to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. Additionally, as required by the California Solid Waste Reuse and Recycling Access Act of 1991, the applicant would be required to provide adequate storage areas for the collection and storage of recyclable waste materials. Therefore, cumulative impacts associated with solid waste services would be less than significant.

Remaining impacts related to the project, would either be less than significant, would be mitigated to less than significant levels, or otherwise sufficiently limited to preclude any substantial contribution to cumulative effects. Therefore, the project would not result in impacts that are individually limited, but cumulatively considerable.

c) Does the Project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

No Impact. As noted in the evaluations above, with implementation of the recommended mitigation measures, the project would not result in any unmitigated significant adverse impacts. Thus, the project would not have the potential to result in substantial adverse effects on human beings. No impact would occur and no further analysis is of this issue is required.

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