

## FINDINGS

(As amended by the Central Los Angeles Area Planning Commission on May 28, 2019)

### FINDINGS OF FACT (CEQA)

#### I. INTRODUCTION

The Environmental Impact Report (“EIR”), consisting of the Draft EIR (“Draft EIR”) and the Final EIR (“Final EIR”), was prepared as an informational document for public agency decision makers and the general public regarding the objectives and components of the Edinburgh Avenue SLS Project (“Project”) pursuant to the California Environmental Quality Act (“CEQA”). BLDG Edinburgh, LLC (“Applicant”) proposed to develop a small-lot subdivision project (“Project”) at 750–756 ½ North Edinburgh Avenue, on an approximately 0.27-acre site at the intersection of North Edinburgh Avenue and Waring Avenue (“Project Site”). The Project would have consisted of approximately 14,088 square feet (sf) of floor area with a floor area ratio (“FAR”) of approximately 1.18:1, and eight single-family residences plus parking and patio/yard areas.

#### II. ENVIRONMENTAL DOCUMENTATION BACKGROUND

The Project was reviewed by the Los Angeles Department of City Planning, Major Projects Section (serving as Lead Agency) in accordance with the requirements of CEQA. The City of Los Angeles (“City”) prepared an Initial Study in accordance with Section 15063(a) of the State CEQA Guidelines. Pursuant to the provisions of Section 15082 of the State CEQA Guidelines, the City then circulated a Notice of Preparation (“NOP”) to State, regional and local agencies, and members of the public for a 31-day period commencing January 11, 2017, and ending February 10, 2017. The purpose of the NOP was to formally convey that the City was preparing a Draft EIR for the Project and to solicit input regarding the scope and content of the Draft EIR. The NOP, Initial Study, and comments received during the comment period are included in Appendix A, Notice of Preparation (NOP), Initial Study, and NOP/Initial Study Comments, of the Draft EIR.

The Draft EIR evaluated in detail the potential effects of the Project. It also analyzed the effects of a reasonable range of six alternatives to the Project, including a No Project Alternative. The Draft EIR for the Project (State Clearinghouse No. 2017011016), incorporated herein by reference in full, was prepared pursuant to CEQA, State and City CEQA Guidelines. (Pub. Resources Code § 21000, et seq.; 14 Cal. Code Regs. §15000, et seq.; the City of Los Angeles Environmental Quality Act Guidelines and the 2006 LA City Threshold Guide.) The Draft EIR was circulated for a 47-day public comment period beginning on August 2, 2018 and ending on September 17, 2018, pursuant to the requirements of CEQA Guidelines Section 15105(a). Copies of the written comments received to the Draft EIR are provided in the Final EIR. Pursuant to Section 15088 of the CEQA Guidelines, the Lead Agency, reviewed all comments received during the review period, and responded to each comment in Chapter II of the Final EIR.

The City published a Final EIR for the Project on January 4, 2019, which is hereby incorporated by reference in full. Responses to comments were sent to all public agencies that made comments on the Draft EIR at least 10 days prior to certification of the Final EIR pursuant to CEQA Guidelines Section 15088(b). The Final EIR was made available for review on the City’s website. Flash drives of the Final EIR were also made available at five libraries and CDs of the Final EIR were made available at the City Department of Planning. Notices regarding availability of the Final EIR were sent to owners and occupants within a 500-foot radius of the Project Site as well as agencies; organizations and individuals who commented on the Draft EIR, provided comments during the NOP comment period, and all other interested parties made known to the Department of City Planning.

A duly noticed public hearing on the Project was held by the Hearing Offices for the Deputy Advisory Agency on January 16, 2018.

The documents and other materials that constitute the record of proceedings on which the City's CEQA findings are based are located at the Department of City Planning, Environmental Review Section, 200 North Main Street, Room 750, Los Angeles, California 90012. This information is provided in compliance with Public Resources Code section 21081.6(a)(2).

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

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

- (i) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR;
- (ii) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency; and
- (iii) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

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

- (1) Description of Effects - A specific description of the environmental effects identified in the EIR;
- (2) Project Design Features, if any - Identified project design features that are a part of the Project (numbering of the features corresponds to the numbering in the Draft EIR);
- (3) Mitigation Measures, if any - Identified mitigation measures or actions that are required as part of the Project (numbering of the mitigation measures corresponds to the Mitigation Monitoring and Reporting Program, which is included as Chapter IV of the Final EIR);
- (4) Findings - One or more of the three specific findings in direct response to CEQA Section 21081 and CEQA Guidelines Section 15091;
- (5) Rationale for Findings - A summary of the reasons for the finding(s); and,
- (6) References - A notation on the specific section in the Draft EIR which includes the evidence and discussion of the identified impact.

### **IV. DESCRIPTION OF THE PROJECT**

The Project would demolish the existing structures on the Project Site, subdivide the parcel into eight lots under Vesting Tentative Tract Map No. 74201 as a Small Lot Subdivision, and develop on each lot a three-story single-family residence, two covered parking spaces, and private patio/yard areas. The lots and residences would be arranged in a configuration similar to the existing apartment units (i.e., in two parallel rows separated by an east-west central driveway) that would be accessed via Edinburgh Avenue. Five units would be located on the north side of the central driveway and three units would be located on the south side of the central driveway. In total, the Project would provide 14,088 sf of residential floor area for an FAR of 1.18:1 averaged over the Project Site. The Project's 16 covered parking spaces would be accessed via the central driveway.

Each residence would be constructed on-grade and configured with three bedrooms and three full and one-half bathrooms. Each residence would include private patio/landscaped areas, and the central driveway would be composed of appropriate hardscape materials so as to function as a *woonerf* or living street. The Project would provide patios and balconies that would function as private open space ranging in size per lot. The Project also proposes a 5-foot-wide street dedication along the northern property boundary on the south side of Waring Avenue to allow for the potential future widening of this street as suggested under the street standard guidelines established by the Mobility Plan 2035 for a Local Street.

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

The Department of City Planning prepared an Initial Study dated January 11, 2017. The Initial Study found that for the following environmental impact areas, the Project impacts are not significant or less than significant. The rationale for these conclusions is summarized below (and set forth in the Draft EIR, Chapter VI and Appendix A.) Based on that rationale and other evidence in the administrative record related to the Project, the City finds and determines that the Project will not result in any significant impacts, or will result in less than significant impacts, in the environmental impact categories discussed below, and, therefore, that no additional mitigation measures or further analysis are needed for those impact categories.

**A. Aesthetics:** Pursuant to Senate Bill (SB) 743 and Department of City Planning Zoning Information File (ZI) No. 2452, the Project Site falls within a Transit Priority Area. The Project would meet the criteria set forth in SB 743 and ZI No. 2452 because it is a residential project located within a Transit Priority Area as it is well-served by various bus lines along Melrose/Fairfax Avenues, Crescent Heights Boulevard/Melrose Avenue, and Santa Monica Boulevard/Fairfax Avenue that are within one-half mile of the Project Site. Therefore, potential aesthetic effects of the Project need not be studied in the EIR. Nonetheless for informational purposes, the Project Site is located in the urbanized Hollywood community and the Project's height and density would be similar to other development in the area. Thus, the Project would not result in a substantial adverse effect on a scenic vista and impacts would be less than significant. In addition, the Project Site is not located within a designated State or City scenic highway or associated view corridor and therefore no impact would occur. No impact would occur due to the visual character or quality of the Project Site and its surroundings as the Project would be designed in keeping with the Small Lot Design Guidelines (which were in effect at the time the vesting tentative tract map was deemed complete). Also impacts associated with light and glare would be less than significant as all lighting would be shielded and building materials would comply with Los Angeles Municipal Code (LAMC) requirements.

**B. Agricultural and Forestry Resources:** The Project Site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program. Therefore, the Project would not convert Farmland to non-agricultural uses. Also, the Project Site is located within the City's Hollywood Community Plan (HCP) Area and has a General Plan land use designation of Low Medium II Residential and is zoned RD1.5-1XL (Restricted Density Multiple Dwelling Zone, 1XL Height District). Agricultural uses are not permitted within the RD1.5-1XL zone, and the Project Site is not enrolled in a Williamson Act contract. Further, no agricultural zoning is present in the surrounding area, and no nearby lands are enrolled under the Williamson Act.

In addition, the Project would not conflict with existing zoning or cause the rezoning of forest land, timberland, or timberland production land, and no impact would result. The Project Site is also located within a built-out urbanized area and there would be no impact on forest lands, nor conversion of forest lands to forest land use. Furthermore, no agricultural resources or operations currently exist on or near the Project Site, and therefore the Project would not involve conversions of Farmland to non-agricultural uses.

**C. Air Quality:** Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. Odors are also associated with such uses as sewage treatment facilities and landfills. The Project involves the development of

residential uses, and would not introduce any major odor-producing uses that would have the potential to affect a substantial number of people. Therefore, impacts would be less than significant.

**D. Biological Resources:** The Project Site is located in an urbanized area and is developed with the existing bungalow court apartment units, a one-story garage building, a courtyard area, and areas with ornamental landscaping. Accordingly, the Project Site and surrounding area do not support habitat for candidate, sensitive, or special status species. Therefore, no impacts would occur.

Also, the Project Site does not contain any riparian habitat or other sensitive natural communities as indicated in the City or regional plans or in regulations by the California Department of Fish and Wildlife (CDFW) or US Fish and Wildlife Service (USFWS). Furthermore, the Project Site is not located in or adjacent to a Significant Ecological Area (SEA) as defined by the City. Therefore, no impacts would occur. In addition, the Project is in an urban area and does not contain any wetlands as defined by Section 404 of the Clean Water Act, and therefore, would have no impact on wetlands.

Due to the urban nature of the Project Site and surrounding area, the lack of water bodies and natural habitat in the area, as well as the limited number of trees, the Project Site does not contain substantial habitat for native resident or migratory species, or native nursery sites. However, the potential exists for removal of existing trees to disturb active bird nests. Should trees slated for removal contain active bird nests, Mitigation Measure BIO-1 would require a delay in tree removal to occur outside of nesting season, in accordance with the Federal Migratory Bird Treaty Act and would ensure that impacts on nesting birds are less than significant. Therefore, the Project would not substantially interfere 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 nursery sites.

Finally, there are no locally protected biological resources located on the Project Site and there would be no conflict with the Protected Tree Ordinance. Project landscaping treatments would comply with the Small Lot Design Guidelines and the proposed Small Lot Code Amendment and Policy Update. Therefore, the Project would not conflict with local policies or ordinances protecting biological resources. Similarly, the Project Site is not located within a habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan, and therefore there would be no impact.

**E. Cultural Resources (Archaeological Resources, Paleontological Resources, Human Remains):** analysis of archaeological resources is based on a cultural resources records search through the California Historical Resources Information System South Central Coastal Information Center (CHRIS-SCCIC), a Sacred Lands File (SLF) search from the Native American Heritage Commission (NAHC) in Sacramento, follow-up consultation with Native American groups or individuals, land use history research, a review of the Geotechnical Investigation, and a review of the proposed excavation parameters. It is likely that excavations associated with the construction of the Bungalow Court in 1923 have displaced any prehistoric archaeological resources on the surface or at shallow depths that may have existed prior to the improvements. Given this research, the potential to encounter subsurface archaeological resources during the construction of the Project is considered low. However, in the unlikely event that previously unknown prehistoric or historic archaeological resources (e.g., bottles, foundations, refuse dumps/privies, Native American artifacts, etc.) are encountered during construction excavations, Mitigation Measure CULT-1 is prescribed to ensure that potentially significant impacts on these resources are reduced to a less than significant level.

Similarly, the analysis of paleontological resources is based on a paleontological records search that was commissioned through the Natural History Museum of Los Angeles County (NHMLAC), a review of the Geotechnical Investigation prepared for the Project, and a review of the proposed excavation parameters. Although paleontological resources have been recovered nearby at shallow depths in the same sediments that underlie the Project Site, the potential to encounter buried resources is low since the proposed excavations would only reach depths of approximately five feet below the surface and the original construction of the current uses has likely displaced paleontological resources that may have existed within the Project Site. However, in the event that previously unknown paleontological resources are encountered during construction excavations, Mitigation Measure

CULT-2 is prescribed to ensure that potentially significant impacts to paleontological resources are reduced to a less than significant level.

The results of the SLF search and SCCIC records search did not reveal the presence of known human remain resources within the Project Site or a half-mile radius. However, the negative results of the SCCIC records search and the developed nature of the Project Site do not preclude the existence of buried human remains that may be encountered during construction. As a result, in the event that previously unknown human remains are encountered during construction excavations, Mitigation Measure CULT-3 is prescribed to ensure that potentially significant impacts to them are reduced to a less than significant level.

Finally, the analysis of tribal cultural resources is based on Project notification and request to consult letters that the City submitted to 10 Native American individuals and organizations on the City's Assembly Bill (AB) 52 Notification List on June 3, 2016. In accordance with AB 52 and as stated in the request to consult letters, the tribes have 30 days to respond. As of October 24, 2016, the City has not received any responses to these notification letters and the consultation period has now closed.

**F. Geology and Soils:** The Project Site is not located within a currently established Alquist-Priolo Earthquake Fault Zone for surface fault rupture and no active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. The closest boundary of the Alquist-Priolo Earthquake Fault Zone is located approximately one mile north of the Project Site and 0.8 miles to the northwest of the Project Site. Therefore, the potential for fault rupture is considered low and impacts are less than significant. Similarly, the Project is located within the seismically active Southern California region and is not exposed to a greater than normal seismic risk than other properties in the City. The Project would be required to conform to current seismic design provisions in the City's 2014 Building Code, which incorporates relevant provisions of the 2013 California Building Code (CBC). Therefore impacts associated with seismic ground shaking would be less than significant. The Project Site is not located in an area potentially affected by liquefaction and therefore impacts would be less than significant. Also, the Project Site is not within a City-designated Landslide Inventory and Hillside Grading Area, is not subject to the City's Hillside Ordinance and is not located in a City-designated Landslide area. Therefore, the Project is not susceptible to on- or off-site landslides. While ground disturbing activities would occur during construction, these activities would not result in substantial erosion or siltation due to stringent City controls and therefore impacts would be less than significant. Also, Project excavation of up to five feet would cause removal of near surface fill material and soil, however all excavations would be sloped and shored properly and impacts associated with lateral spreading, subsidence, or collapse would be less than significant. The soils lying below the Project Site consist of fill and soil over Quaternary Age Alluvium, which would require excavation and compaction in accordance with applicable regulations and therefore impacts with respect to expansive soils would be less than significant. Finally, the Project would connect into existing wastewater infrastructure and therefore not use septic tanks so no impact would occur.

**G. Greenhouse Gas Emissions:** Based on the Project's incorporation of energy and water efficiency building design standards pursuant to compliance with the current Title 24-2016 standards and City of Los Angeles Green Building Code, and the Project's location in proximity to existing off-site destinations and public transportation options that would tend to reduce vehicle trips and vehicle miles traveled (VMT), the Project would not generate greenhouse gas emissions (GHG) either directly or indirectly, that may have a significant impact on the environment. The net change in GHG emissions resulting from the Project is substantially less than the 3,000 MTCO<sub>2</sub>e criteria proposed by SCAQMD, compared to the previous residential use on the Project Site. The net Project increase of 9,832 sf of floor area would not result in a substantial increase in building energy, water, and waste GHG emissions compared to the existing square footage and previous residential use of the Project Site given the compliance with applicable efficiency standards. The net increase of 23 vehicle trips would also not result in a substantial increase in transportation-related GHG emissions compared to the previous residential use on the Project Site, particularly given the potential for residents to replace private vehicle trips with walking or public transportation to off-site destinations. Therefore, the Project is determined to result in a less than significant impact with respect to GHG emissions.

Similarly, the Project would not conflict with any applicable plan, policy, or regulation to reduce GHG emissions and impacts would be less than significant based on the Project's compliance with the Los Angeles Green Building Code, Title 24-2016 standards and the CALGreen Code. In addition, the Project's infill location with nearby access to off-site destinations and public transportation option would be consistent with the overall goals of AB 32, SB 375 and the SCAG Regional Transportation Plan/ Sustain Communities Strategy to reduce per capita mobile sources GHG emissions, and thus would not conflict with any applicable plan, policy or regulation to reduce GHG emissions and impacts would be less than significant.

**H. Hazards and Hazardous Materials:** Potentially hazardous materials used during construction and operation of the Project would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Accordingly, operation of the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Based upon the findings of the Phase I Environmental Site Assessment (Appendix F-1 of the Initial Study) and compliance with applicable regulatory requirements, impacts associated with asbestos-containing materials (ACMs) and lead-based paints (LBPs) would be reduced to less than significant.

The nearest schools to the Project Site are Laurel Span Elementary School located approximately 0.13 miles to the north, Fairfax Senior High School located approximately 0.16 miles to the southeast, and ABC Little School approximately 0.21 miles to the northeast. The Project would result in a less than significant impact related to hazardous materials at any existing or proposed schools as construction would involve temporary use of hazardous substances and operation would involve small quantities of potentially hazardous materials that would be used, stored, and disposed of in accordance with manufacturers' instructions. Also, the Project Site was not identified on any of the Federal, State, tribal, or EDR Proprietary databases and therefore impacts would be less than significant. The Project Site is also not located in the vicinity of an airport land use plan or public or private airport. As the Project Site is located in an urban area, it is well served by a roadway network, and in particular, Melrose Avenue, a Selected Disaster Route. Therefore, while the Project would generate some additional traffic, emergency response and evacuation plan impacts would be less than significant. Finally, no wildlands are present on or near the Project Site and therefore, the Project would not expose people or structures to a significant risk involving wildland fires.

**I. Hydrology and Water Quality:** Construction of the Project Site would require earthwork activities, including grading and excavation of the Project Site. All activities would require grading permits from the Los Angeles Department of Building and Safety, which would include requirements and standards designed to limit potential impacts associated with erosions to permitted levels. In addition, grading and site preparation would comply with all applicable provisions of Chapter IX, Division 70 of the LAMC, which includes requirements related to erosion control. The Applicant would also be required to meet the provisions of the Project-specific Stormwater Pollution Prevention Plan (SWPPP) in accordance with the National Pollutant Discharge Elimination System (NPDES) permit during construction. During operation, the Project would be required to incorporate operational Best Management Practices (BMPs) per the City's Standard Urban Stormwater Management Plan (SUSMP) permit requirements and in accordance with the City's Low Impact Development (LID) Ordinance, including installation of planter boxes. The Project would not substantially deplete groundwater supplies or interfere with recharge because although the Project Site does include some pervious surface area, the small size of the Project Site limits its potential to contribute to recharge of groundwater sources. In addition, development of the Project Site would maintain approximately the same pervious surface area. Also, the Project would not substantially alter on- or off-site drainage patterns and would not result in on- or off-site flooding because the Project Site is relatively flat and the amount of pervious surface area would be similar to existing conditions. Further, the Project would implement LID and SUSMP BMPs to reduce the volume and intensity of stormwater leaving the Project Site and runoff would not increase over existing conditions. The Project would also not degrade water quality due to the implementation of BMPs and good housekeeping practices during construction and operation that would preclude sediment and hazardous substances from entering stormwater flows. Finally, no impact would occur regarding flooding or inundation as the Project is not located within a 100-year or 500-year flood plain, so therefore it would not place housing within a 100-year flood plain and would not impede or redirect flood flows within a 100-year flood plain. Further, the Project is not located within a tsunami hazard area or a potential inundation area. The Project Site is

located approximately nine miles inland from the Pacific Ocean. Therefore, either no impacts or less than significant impacts would occur related to hydrology and water quality.

**J. Land Use and Planning:** The Project Site is located within the HCP Area and currently contains a bungalow court comprised of four, one-story buildings arranged in a quad formation around a central courtyard located on approximately 0.27 acres. Because the Project Site is already developed with structures, the Project would be compatible with adjacent residential uses. Also, because the Project Site is relatively small, the Project would not physically divide an established community, and no impact would occur.

The 1988 HCP designates the Project Site as Low Medium II Residential which permits residential development at a density of 12 to 24 dwelling units per gross acre (which includes one-half of the abutting street width). Based on the Project Site gross acreage of 19,457 sf and the eight units proposed, the residential density would be approximately 18 units per acre. The Project proposes a Vesting Tentative Tract Map which would subdivide the Project Site into eight small lot parcels in accordance with LAMC requirements. The Project complies with applicable plans and policies, including the 1988 HCP, and LAMC Sections 12.21 (because the Project building heights would be 30 feet and the FAR would be less than 3:1), 12.22.C.27 (Small Lot Subdivision development standards), and the Small Lot Design Guidelines (which were in effect at the time the Vesting Tentative Tract Map was deemed complete. Thus, the Project would not 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, a specific plan, a local coastal program, or the zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. Similarly, the Project Site is located in an urbanized area and is not located within a habitat conservation plan or natural community conservation plan, and therefore would not conflict with the provisions of any adopted conservation plan and no impact would occur.

**K. Mineral Resources:** The Project Site is not classified by the City as an area containing significant mineral deposits, nor is the Project Site designated as an existing mineral resource extraction area by the State. Project implementation would not result in the loss of availability of a known mineral resource of value to the region and residents of the State, nor of a locally important mineral resource recovery site. Therefore, there would be no impacts to mineral resources.

**L. Noise:** The Project Site is not located within an airport land use plan or within the vicinity of a private airstrip. Therefore, the Project would not expose an on- or off-site population or people residing or working in the area to excessive noise levels from airport use and no impacts would occur.

**M. Public Services:** The Los Angeles Fire Department (LAFD) provides fire protection and emergency medical services in the City. The nearest fire station to the Project Site is Fire Station No. 41 at 1439 N. Gardner Street, approximately one mile to the northeast. Fire Station No. 41 has an average response time of 5 minutes and 13 seconds and an emergency response time of 4 minutes 31 seconds. LAFD response times would be similar to previous conditions and impacts would be less than significant. The Los Angeles Police Department (LAPD) provides police protection services and the Project Site is served by the Wilshire Community Police Station located at 4861 West Venice Boulevard (approximately three miles to the southeast). The Project would slightly increase the residential population of the Project Site, however demand would be similar to previous conditions and impacts would be less than significant.

The Project Site is located within the jurisdiction of the Los Angeles Unified School District (LAUSD), Local District West. LAUSD schools serving the Project Site include Laurel Elementary (grades K-8) and Fairfax Senior High School (grades 9- 12). The Project would generate an incremental increase of 0.52 students and would have a less than significant impact on schools with the payment of school fees. With regard to parks, the Project Site is served by at least eight area parks. The Project would incrementally increase demand for parks due to the potential addition of families with children. However with the payment of Quimby fees and on-site private open space provided, impacts would be less than significant. Finally, the following three public libraries would provide library services to the Project Site: 1) the Will and Ariel Durant Branch Library at 7140 West Sunset Boulevard; 2) the John C. Fremont Branch Library at 6121 Melrose Avenue; and 3) the Frances Howard Goldwyn-Hollywood Regional

Library at 1623 North Ivar Avenue. Due to the incremental increase of approximately eight persons compared to previous conditions, the existing libraries would be able to serve the Project and impacts would be less than significant.

**N. Recreation:** The Project would only incrementally increase demand on neighborhood or regional parks so impacts on those facilities would be less than significant. No recreational facilities are required or proposed as part of the Project and no construction or expansion of recreational facilities would be required. The Project meets City open space requirements. Therefore, impacts would be less than significant.

**O. Transportation/Traffic:** The nearest airport is the Burbank Bob Hope Airport located approximately eight miles north of the Project Site. As such, the Project would not result in a change in air traffic patterns including increases in traffic levels or changes in location that would result in substantial safety risks. Therefore, no impact would occur in this regard.

**P. Utilities and Service Systems (Wastewater, Water, Solid Waste):** Development of the Project would incrementally increase the generation of wastewater that would require conveyance and treatment. Given the amount of wastewater generated by the Project compared to previous conditions, and the existing wastewater treatment capacity at the Hyperion Treatment Plant (HTP), adequate wastewater treatment capacity would be available to serve the Project. The Project Site is served by existing sewer lines which have adequate capacity to serve the Project. This would be reviewed by the Bureau of Sanitation (BOS) to ensure that there would be sufficient capacity to accept the Project's wastewater generation and convey it to the HTP for treatment, and the Project would result in a less than significant impact with respect to wastewater. The Project Site is also served by existing Los Angeles Department of Water and Power (LADWP) water mains and there would be only an incremental increase in water demand as compared to previous conditions. Therefore water impacts would be less than significant. Construction solid waste would be served by the Azusa Land Reclamation Facility, which has adequate capacity for Project construction. Similarly, operational solid waste would incrementally increase over previous conditions and the existing landfills have adequate capacity to accommodate operational solid waste. The Project would also be consistent with applicable regulations associated with solid waste. Therefore, wastewater, water, and solid waste impacts would be less than significant.

## **VI. ENVIRONMENTAL IMPACTS FOUND NOT TO BE SIGNIFICANT OR LESS THAN SIGNIFICANT PRIOR TO MITIGATION**

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

### **A. Air Quality**

#### **a. Description of Effects:**

i. **Construction Impacts:** Project construction would take place in a single phase of approximately 12 months. Phases of construction would include demolition, grading, trenching, building construction, paving and architectural coating. Approximately 500 cubic yards of soil would be excavated and exported off-site. Construction of the Project has the potential to generate temporary criteria pollutant emissions through the use of heavy-duty construction equipment, such as excavators and forklifts, and through vehicle trips generated from workers and haul trucks traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. During the finishing phases of a building, paving operations and the application of architectural coatings and other building materials would potentially release volatile organic compounds (VOCs). Daily regional emissions during construction are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source and fugitive dust emissions factors.

ii. **Operation Impacts:** Operation of the Project has the potential to generate criteria pollutant emissions through vehicle trips traveling to and from the Project Site. In addition, emissions would result from area



sources on-site such as natural gas combustion, landscaping equipment, and use of consumer products. Operational impacts were assessed for the buildout year. The operational emissions are estimated using the CalEEMod software.

iii. Toxic Air Contaminants (TACs) Impacts: The greatest potential for TAC emissions during construction would be related to diesel particulate matter emissions associated with heavy-duty equipment during demolition, excavation and grading activities. Construction activities associated with the Project would be sporadic, transitory, and short term in nature. With regard to operational TAC emissions, sensitive land uses can be impacted by the introduction of new sources or additional TAC emissions from existing sources.

iv. Plan Consistency: The Southern California Air Quality Management District (SCAQMD) is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment of the U.S. National Ambient Air Quality Standards (NAAQS) (e.g., ozone and PM<sub>2.5</sub>). The SCAQMD's 2012 Air Quality Management Plan (AQMP) and 2016 AQMP contain a comprehensive list of pollution control strategies directed at reducing emissions and achieving the NAAQS. These strategies are developed, in part, based on regional growth projections prepared by the Southern California Association of Governments (SCAG). Projects that are consistent with the assumptions used in the AQMP do not interfere with attainment because the growth is included in the projections utilized in the formulation of the AQMP. Thus, projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's numeric indicators. In addition, the City's General Plan defines Citywide policies regarding a range of City resources and services, some of which are relevant to air quality.

v. Cumulative Impacts: The SCAQMD recommends that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality. With respect to the Project's short-term construction-related air quality emissions and cumulative conditions, the SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the Clean Air Act mandates. Because the County portion of the Air Basin is currently in nonattainment for ozone, NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>, cumulative projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance.

b. Project Design Features: None.

c. Findings: Changes or alternations have been required in, or incorporated into, the Project that avoid or substantially lessen potential significant environmental effects of air quality impacts of the Project to less than significant levels.

i. Construction Impacts: Construction impacts related to air quality will be less than significant. No mitigation measures are required.

ii. Operation Impacts: Operations impacts related to air quality will be less than significant. No mitigation measures are required.

iii. TAC Impacts: Project air quality impacts related to TACs will be less than significant. No mitigations measures are required.

iv. Plan Consistency: The Project will be consistent with applicable AQMP and Air Quality Element of the General Plan and as such impacts will be less than significant. No mitigation measures are required.

v. Cumulative Impacts: Cumulative air quality impacts will be less than significant. No mitigation measures are required.

d. Rationale for Findings:

i. Construction Impacts:

*Regional Impacts:* Construction of the Project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. The maximum daily construction emissions were estimated for each construction phase of the Project. Some individual construction phases potentially overlap and the maximum daily emissions take into account the overlapped emissions. The results of the criteria pollutant calculations are presented in Draft EIR Table IV.A-6, Maximum Unmitigated Regional Construction Emissions. As shown therein, construction-related daily emissions for the criteria and precursor pollutants (VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>) fall well below and would not exceed the SCAQMD numeric indicators. These calculations include appropriate dust control measures required to be implemented during each phase of development, as required by SCAQMD Rule 403 (Control of Fugitive Dust).

*Localized Impacts:* The localized construction air quality analysis was conducted using the methodology described in the SCAQMD Localized Significance Threshold Methodology. The screening criteria provided in the Localized Significance Threshold Methodology were used to determine localized construction emissions thresholds for the Project. The maximum daily localized emissions for each of the construction phases and localized significance thresholds are presented in Draft EIR Table IV.A-8, Maximum Unmitigated Localized Construction Emissions. As shown therein, maximum localized construction emissions for sensitive receptors would not exceed the localized thresholds for NOX, CO, PM10, and PM2.5.

ii. Operation Impacts:

*Regional Impacts:* Operational emissions were assessed for mobile, area, and stationary sources. Operational criteria pollutant emissions were calculated for the Project for the full buildout year. Daily trip generation rates for the Project were provided in the Updated Traffic Impact Analysis. Results of the criteria pollutant calculations are presented in Draft EIR Table IV.A-7, Maximum Unmitigated Regional Operational Emissions. The Project's operational emissions, both with and without the site emissions associated with occupied conditions for the criteria and precursor pollutants (VOC, NOX, CO, SO2, PM10, and PM2.5) would not exceed the SCAQMD thresholds of significance.

*Localized Impacts:* The localized operational air quality analysis was conducted using the methodology described in the SCAQMD Localized Significance Threshold Methodology. The screening criteria provided in the Localized Significance Threshold Methodology were used to determine localized operational emissions thresholds for the Project. The Project's localized operational emissions, both with and without the site localized emissions associated with occupied conditions, and the localized significance thresholds are presented in Draft EIR Table IV.A-9, Maximum Unmitigated Localized Operational Emissions. As shown therein, the increase in maximum localized operational emissions for sensitive receptors would not exceed the localized thresholds for NOX, CO, PM10, and PM2.5.

iii. TAC Impacts: Project construction would result in short-term emissions of diesel particulate matter, which is a TAC. Diesel particulate matter poses a carcinogenic health risk that is generally measured using an exposure period of 30 years for sensitive residential receptors. Offroad heavy-duty diesel equipment would emit diesel particulate matter over the course of the approximately 12-month construction period. Sensitive receptors are located adjacent to the Project Site; however, localized diesel particulate matter emissions (strongly correlated with PM2.5 emissions) would be minimal and would be substantially below localized thresholds as presented in Draft EIR Table IV.A-8, Maximum Unmitigated Localized Construction Emissions. Compliance with the California Air Resources Board (CARB) Airborne Toxic Control Measures (ATCM) anti-idling measure, which limits idling to no more than five minutes at any location for diesel-fueled commercial vehicles, would further minimize diesel particulate matter emissions in the Project area. The Project would utilize a construction contractor(s) that complies with required and applicable Best Available Control Technology (BACT) and the In-Use Off-Road Diesel Vehicle Regulation. Thus, sensitive receptors would be exposed to diesel particulate emissions below thresholds. Also, Project operations would generate only minor amounts of diesel emissions from residential delivery trucks and incidental maintenance activities. Trucks would comply with the applicable provisions of the CARB Truck and Bus regulation to minimize and reduce emissions from existing diesel trucks. Therefore, the Project operations would be below thresholds.

iv. Plan Consistency: The Project will not conflict with or obstruct implementation of the AQMP or relevant air quality polices in the General Plan or other adopted regional and local plans pertaining to reducing air quality impacts.

*AQMP:* The SCAQMD recommends that lead agencies demonstrate that a project would not directly obstruct implementation of an applicable air quality plan and that a project be consistent with the assumptions (typically land-use related, such as resultant employment or residential units) upon which the air quality plan is based. The Project would result in an increase in short-term employment due to temporary construction jobs. According to the CalEEMod estimates, construction of the Project would require approximately five to 12 workers on the Project Site per day and up to five haul trucks (e.g., five haul truck drivers) on a maximum day during temporary grading and excavation activities. Being relatively small in number and temporary in nature, construction jobs under the Project would not conflict with the long-term employment projections upon which the AQMP are based. Because the Project would not conflict with the long-term growth projections (jobs and housing) used in the development of the

AQMP, and would be consistent with the control strategies intended to reduce emissions from construction equipment, the Project would not conflict with or obstruct implementation of the AQMP, and impacts would be less than significant.

The AQMP includes Transportation Control Measures that are intended to reduce regional mobile source emissions. While the majority of the measures are implemented by cities, counties, and other regional agencies such as SCAG and SCAQMD, the Project would support measures related to reducing vehicle trips for residents. The 2016 AQMP includes strategies related to encouraging the deployment of zero and near-zero-emissions technologies. The Project would support this strategy by including electric vehicle supply equipment (EVSE) in accordance with California Green Building Standards Code requirements for the residential units. As such, the Project would be consistent with the growth projections in the AQMP and would support relevant Transportation Control Measures aimed at reducing vehicle trips.

*General Plan:* The City's General Plan defines Citywide policies regarding a range of City resources and services, some of which are relevant to air quality. Draft EIR Table IV.A-5, Comparison of the Project to Applicable Air Quality Policies of the General Plan, evaluates the consistency of the Project with the applicable air quality goals, objectives, and policies in the Air Quality Element of the General Plan. As shown in Draft EIR Table IV.A-5, the Project would comply with the applicable regulatory requirements of Title 24, California Green Building Standards Code, and the City Green Building Code. The Project would also reduce VMT as a result of its urban infill location, with nearby access to public transportation within a quarter-mile of the Project Site, and its proximity to other destinations including job centers, retail and entertainment. The Project would add new infill residential units, which would allow people to live near work and recreational amenities. As the Project would provide infill development near existing public transportation, would be located near commercial and employment centers, and would be designed to meet the applicable State of California Green Building Standards Code and the City Green Building Code, the Project would be consistent with applicable goals and policies of the General Plan. Accordingly, the Project will be in substantial compliance with the relevant adopted air quality plans and policies.

v. Cumulative Impacts: According to the SCAQMD, individual construction impacts that exceed SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants which the Air Basin is in nonattainment. No criteria pollutant emissions would exceed the applicable threshold. Therefore, the Project would not result in a cumulatively considerable net increase for any non-attainment pollutants. As such, the Project's contribution to cumulatively significant construction impacts to air quality would not be cumulatively considerable. Future operations would generate ozone precursors (VOC, NOX) as well as emissions of CO, PM10, and PM2.5. Operational emissions would not exceed the SCAQMD regional or local thresholds and would not be expected to result in ground level concentrations that exceed the NAAQS or CAAQS. Since the Project would not introduce any substantial stationary sources of emissions, CO is the benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations. Based on the magnitude of traffic the Project is anticipated to create, no violations of the State and federal carbon monoxide standards are projected to occur for the Project. The Project's incremental contribution to long-term emissions of non-attainment pollutants and ozone precursors, considered together with cumulative projects within the Hollywood Community Plan area, would not be cumulatively considerable.

e. References: For a complete discussion of impacts associated with Air Quality, please see Draft EIR Section IV.A, Air Quality, Appendix B Air Quality Emissions Technical Report.

## **B. Cultural Resources – Historical Resources (Indirect Impacts & Cumulative Impacts)**

### **a. Description of Effects:**

i. Indirect Impacts: Indirect impacts were analyzed to determine if the Project would result in a substantial material change to the integrity and significance of historical resources or their contributing setting within the Project vicinity. Within a quarter-mile of the Project Site, there are 21 historic-age properties, five of which are recorded historic resources, and 16 potential historic resources. There is one Los Angeles Historic Cultural Monument (LAHCM) (also listed on the National Register), El Greco Apartment located at 817 N. Hayworth Avenue, within 230 feet of the Project Site.

ii. Cumulative Impacts: Cumulative impacts to historical resources would occur if the impacts of the Project and related projects when taken as a whole, would substantially diminish the number of historic

resources within the same or similar context or property type. Impacts to historic resources, if any, tend to be site specific, however cumulative impacts can occur if the Project and related Projects would together adversely affect historic resources on the Project Site or in the vicinity or contribute to adverse changes within the same historic district, or involve historical resources that are examples of the same style or property type as those within the Project Site. The Draft EIR analyzed a list of 180 properties matching a Bungalow Court Property Type in the Hollywood Redevelopment Area, and HCP Area, 110 of which are Spanish Colonial Revival style, five are listed on the National Register and nine are locally designated. Of these, two are considered threatened by development: the Maycrest Bungalows at 4215-4221 ½ Maycrest Avenue and the Wurfl Court Bungalow at 1450-1456 ½ North Echo Park Avenue, 1461-1465 N. Fairbanks Place.

b. Project Design Features: None.

c. Findings:

i. Indirect Impacts: The Project would not materially or visually impair the eligibility of any recorded historical resources in the Project vicinity. Therefore, the Project would not cause any indirect impacts to historical resources. No mitigation measures are required.

ii. Cumulative Impacts: The cumulative impact of the Project on surrounding historic resources would be less than significant. No mitigation measures are required.

d. Rationale for Findings:

i. Indirect Impacts: The El Greco Apartment would have no view of the Project due to the intervening built environment of taller buildings to the south and west. The Project would not destroy historic materials, features, or spatial relationships that characterize El Greco Apartment within the Project vicinity. Of the additional 20 recorded and potential historic resources in proximity to the Project Site, three would have no view, 13 would have indirect views, and four would have a direct view of the Project Site. Of these, three potentially eligible historical resources are located directly adjacent to the Project Site: 1) 744 N. Edinburgh Avenue; 2) 751 N. Hayworth Avenue; and 3) 745 N. Hayworth Avenue. The Project would not destroy historic materials, features, or spatial relationships that characterize these adjacent properties. Furthermore, removal of the Bungalow Court and Garage would have a minimal impact on the surrounding setting, which has already been altered by later infill development in a variety of architectural styles. Furthermore, the Project would be differentiated and compatible with the surrounding setting in scale and proportion, materials, features, size and massing. After Project completion, the eligibility of the potential and recorded historic resources adjacent to the Project Site and in the vicinity would remain unaffected. Furthermore, construction of the Project would have a minimal impact on the surrounding setting, which has already been altered by later infill development in a variety of architectural styles.

ii. Cumulative Impacts: Of the 180 resources compiled, over 110 are of the Spanish Colonial Revival style. Furthermore, five are listed on the National Register, and another nine are locally designated. Of these, two are considered threatened by development, the Maycrest Bungalows and the Wurfl Court Bungalow. Of the two, the Wurfl Court Bungalow is located in the Echo Park neighborhood and is in the Spanish Colonial Revival Style, the same style as the Project Site. This style is the most prominent style of Bungalow Courts in the HCP and Hollywood Redevelopment area. Following the implementation of the Project and the possible redevelopment of the Wurfl Court Bungalow and the Maycrest Bungalows, the Spanish Colonial Revival style would remain as a dominant style of Bungalow Court Property Type within the Hollywood and greater Los Angeles area. Furthermore, with the implementation of the Project, and the redevelopment of the Maycrest Bungalows in El Serrano and the Wurfl Court Bungalow in Echo Park, potential cumulative impacts would not be cumulatively considerable to the Bungalow Court Property Type.

e. References: For a complete discussion of impacts associated with Cultural Resources, please see Draft EIR Section IV.B, Historical Resources, Appendix C Historical Resources Assessment Report, and Final EIR Chapter II, Responses to Comments.

### **C. Noise (Off-Site Construction Truck Noise, Operational Noise, Construction & Operational Vibration, Cumulative Impacts)**

a. Description of Effects:

i. Off-Site Construction Truck Noise: Delivery truck trips would occur throughout the construction period. Trucks traveling to and from the Project Site would be required to travel along the haul route approved by the City for the Project. Construction-related traffic would use North Edinburgh Avenue and Waring Avenue. An estimated maximum of approximately 10 haul truck trips would occur per day during the construction

hours of 7:00 A.M. and 9:00 P.M., Monday through Friday, and 8:00 A.M. and 6:00 P.M. on Saturday. Haul truck traffic would take the most direct route to the appropriate freeway ramp. The haul route for incoming deliveries is generally expected to be from US 101, along Melrose Avenue, and right on Edinburgh Avenue. Outgoing deliveries are generally expected to turn right on Edinburgh Avenue, right on Waring Avenue, right on Fairfax Avenue, and left on Melrose Avenue to US 101

ii. Operational Noise: Operational noise would include roadway noise associated with the Project, along with the operation of mechanical equipment typically installed for developments like the Project, such as air conditioners, fans, and generators. In addition, refuse collection areas, and parking areas generate operational noise.

iii. Construction Vibration: Construction machinery and operations can generate varying degrees of ground vibration, depending on the construction procedures and the construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of a construction site often varies depending on soil type, ground strata, and construction characteristics of the receptor buildings. The results from 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 at the highest levels. Ground-borne vibration from construction activities rarely reaches the levels that damage structures.

iv. Operational Vibration: The Project's operation would include typical residential-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the proposed parking area.

v. Cumulative Impacts: The geographic context for the analysis of cumulative noise impacts depends on the impact being analyzed. Noise is by definition a localized phenomenon, and significantly reduces in magnitude as the distance from the source increases. As such, only projects and growth due to occur in the immediate Project area would be likely to contribute to cumulative noise impacts. However, the cumulative impacts on roadway noise would be affected by traffic from all of the cumulative projects throughout a larger vicinity.

b. Project Design Features: The City finds that Project Design Feature PDF-NOISE-1, which is incorporated into the Project and incorporated into these Findings as though fully set forth herein, will reduce noise impacts of the Project. This Project Design Feature was taken into account in the analysis of potential impacts.

c. Findings:

i. Off-Site Construction Truck Noise: Project off-site construction traffic noise levels would be less than significant. No mitigation measures are required.

ii. Operational Noise: Project operational noise impacts would be less than significant. No mitigation measures are required.

iii. Construction Vibration: Construction vibration impacts at the nearest off-site residential buildings would be less than significant. No mitigation measures are required.

iv. Operational Vibration: The Project would not result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels. Therefore, impacts would be less than significant and no mitigation measures are required.

v. Cumulative Impacts: Cumulative noise impacts would be less than significant. No mitigation measures are required.

d. Rationale for Finding:

Off-Site Construction Truck Noise: The Project's truck trips would generate noise levels of approximately 45.5 dBA, CNEL at 25 feet distance along North Edinburgh Avenue and Waring Avenue. As shown in Table IV.C-7, the existing noise levels are 58.3 dBA, CNEL along North Edinburgh Avenue, between Waring Avenue and Melrose Avenue, and 58.2 dBA along Waring Avenue, between North Edinburgh Avenue and Hayworth Avenue. Construction traffic noise levels generated by truck trips would increase traffic noise levels along North Edinburgh Avenue and along Waring Avenue by up to 0.2 dBA. The noise level increases by truck trips would be below the significance threshold of 5 dBA.

i. Operational Noise: Future roadway noise levels were calculated along various arterial segments adjacent to the Project Site. Project impacts are shown in Draft EIR Table IV.C-12, Off-Site Traffic Noise Impacts-Existing Conditions Plus Project. As indicated, Project-related traffic noise levels would not increase the existing ambient noise levels. Future roadway noise levels were also calculated along various arterial segments

adjacent to the Project as compared to 2019 baseline traffic noise levels that would occur primarily under ambient growth and implementation of cumulative projects assumed for the area based on the Updated Traffic Impact Analysis. Project impacts are shown in Draft EIR Table IV.C-13, Off-Site Traffic Noise Impacts – Future Conditions Plus Project. As indicated, the Project-related noise increases, when measured against the 2019 baseline conditions, would be less than the threshold. In addition, all Project mechanical equipment would be designed with appropriate noise control devices, such as sound attenuators, acoustic louvers, or sound screens/parapet walls to comply with noise limitation requirements provided in Section 112.02 of the LAMC, which prevents the noise from such equipment from causing an increase in the ambient noise level of more than five decibels. Similarly, refuse and recycling bins would be consolidated into a dedicated area and collection would comply with LAMC Section 113.01. Also, the at-grade parking would be blocked by the Project buildings, so parking-related noise would be lower and would not increase the ambient noise levels at off-site sensitive receptor locations.

ii. Construction Vibration:

*Structural Impacts:* Draft EIR Table IV.C-14, Typical Vibration Velocities for Potential Project Construction Equipment, indicates vibration velocities from the operation of construction equipment would range from approximately 0.003 to 0.089 inches per second peak particle velocity (PPV) at 25 feet from the equipment. Usually, ground-borne vibration decreases rapidly with distance. As indicated in Draft EIR Table IV.C-14, the vibration velocity of 0.089 inches per second PPV at a distance of 25 feet from construction equipment would be reduced to 0.031 inches per second PPV at 50 feet distance. At a distance of 200 feet from the source of activity, vibration velocities from the construction equipment would further reduce to 0.004 inch/second PPV. The nearest residential uses, including the duplex building along North Edinburgh Avenue south of the Project Site and the two story apartment complex building to the east are located within approximately 15 feet from the Project Site. Construction activities immediately adjacent to the property line would produce vibration velocities of up to approximately 0.19 inches per second PPV at those off-site residential buildings when heavy construction equipment operates within approximately 15 feet from the residential buildings. This value would not exceed the 0.5 inch per second PPV significance threshold for potential residential building damage.

iii. Operational Vibration: Groundborne vibration generated by Project operation activities would generate approximately up to 0.005 inches per second PPV adjacent to the Project Site. The potential vibration levels from all Project operational sources at the closest existing and future sensitive receptor locations would be less than the significance threshold of 0.035 inches per second PPV for perceptibility. As such, vibration impacts associated with operation of the Project would be below the significance threshold.

iv. Cumulative Impacts: Noise from construction of the Project plus related projects would be localized, thereby potentially affecting areas immediately within 500 feet from the construction site. The nearest related projects (Related Project Nos. 4 and 8) are located approximately 3,000 feet south of the Project Site. Due to distance attenuation (more than 500 feet away) and intervening structures, construction noise from one site would not result in a noticeable increase in noise at sensitive receptors near another site, precluding a cumulative noise impact. Therefore, the Project's contribution to cumulative construction noise impacts would not be cumulatively considerable. The Project Site and surrounding area would be developed and would generate noise that would contribute to cumulative noise from a number of community noise sources including vehicle travel, mechanical equipment (e.g., HVAC systems), and lawn maintenance activities. Due to City's provisions that limit on-site stationary-source noise such as outdoor air-conditioning equipment, noise levels would be less than significant at the property line for each related project. As the Project's stationary-source impacts would be less than significant and no related projects were identified within 500 feet of the proposed Project, stationary-source noise impacts attributable to cumulative development would be less than significant. However, the proposed Project and other developments in the general Project vicinity would produce traffic volumes that are capable of generating a roadway noise impacts. Cumulative noise impacts due to roadway traffic have been assessed based on the difference between noise generated by existing traffic volumes and traffic volumes projected at the Project opening year (2019) and are presented in Draft EIR Table IV.C-15, Off-Site Traffic Noise Impacts – Future 2019 Cumulative Increment, which provides cumulative traffic related noise impacts would be less than significant. Finally, due to the rapid attenuation characteristics of ground-borne vibration and distance of any cumulative projects to the Project Site, there is no potential for cumulative construction or operational-period impacts with respect to ground-borne vibration.

e. References: For a complete discussion of impacts associated with Noise, please see Draft EIR Section IV.C, Noise, Appendix D Noise and Vibration Technical Report, and Final EIR Chapter 3, Revisions, Clarifications, and Corrections.

#### **D. Population and Housing**

a. Description of Effects:

i. Population Growth: Construction of the Project would require the participation of construction employees that would be hired from a mobile regional construction work force that moves from project to project and which is an existing labor pool. The number of construction workers would vary from five workers per day to 13 workers per day. The Project would replace the now vacated eight one-bedroom apartments with eight three-bedroom single-family residences, which would add new residents to the HCP area and the City. The new units are estimated to accommodate an increase of eight people over the estimated previous Project Site conditions or an increase of 24 people compared to the existing vacant units.

ii. Population and Housing Displacement: The Project would replace eight units with eight units and would neither add to nor reduce the number of housing units; therefore, the Project would not have an effect regarding the number of households in the City. There is no existing on-site population that would be affected. Implementation of the Project would accommodate 24 new residents, or eight more residents than previously occupied the Project Site. However, the Project would change the size, condition, and cost of the units, and would therefore change the characteristics of the housing mix in the City and its ability to accommodate population needs.

iii. Cumulative Impacts: The cumulative development in the Project vicinity would comprise 6.15 percent of the expected increase in population in the HCP Area and 0.18 percent of the development within the City as compared to the previous Project Site conditions. The increase in households would be 6.25 percent of the expected growth in the HCP area and 0.29 percent of the expected housing growth in the City.

b. Project Design Features: None.

c. Findings:

i. Population Growth: The Project would not induce substantial population growth to the area and impacts would be less than significant. No mitigation measures are required.

ii. Population and Housing Displacement: Population and housing impacts would be less than significant. No mitigation measures are required.

iii. Cumulative Impacts: Cumulative impacts with respect to population and housing would be less than significant. No mitigation measures are required.

d. Rationale for Findings:

i. Growth Projections: The number of construction workers would vary on a day-to-day basis ranging from five construction workers during early construction activity to 13 construction workers during later construction activity. As the Project would draw on an existing labor pool and would require a minimal number of construction workers, the construction impacts of the Project on the number of employees in the region would be negligible. Therefore, construction workers would not generate a notable impact on the demand for housing, or affect general housing occupancy and population patterns.

In addition, the new units created by the Project are estimated to accommodate an increase of eight people over the estimated previous Project Site population of 16 people or a population increase of approximately 24 people compared to existing conditions on the Project Site. As indicated in Draft EIR Table IV.D-3, Project Population and Housing Impacts, the Project's increase in population, as compared to previous occupancy would represent 0.462 percent of the population growth expected within the HCP area by Project buildout year 2019 and 0.019 percent of the projected Citywide population growth in 2019. Also Draft EIR Table IV.D-3 shows the Project impacts on projected growth between 2017 and 2040, the horizon year in the RTP/SCS. The Project would comprise a much smaller increment of growth over that longer period, representing 0.041 percent of the added population increment in the HCP area; and not increase the number of housing units projected over the longer time-frame. Using the increase of 24 people, the increase in the HCP area would be 0.123 percent. The new housing units would support 1988 HCP objectives regarding the provision of housing to meet varying needs. The small lot subdivision style of development provides benefits of a single-family home, and full fee-simple ownership with the conveniences of a townhouse lifestyle. As such, it helps to meet an alternative niche market to the single-family and condominium

housing markets. The new residential units would have site densities that are consistent with existing zoning and compatible with densities in the Project vicinity. Furthermore, the Project would replace the eight existing units, which would neither add to nor reduce the number of housing units, and therefore would not have an effect regarding the number of households in the City. Moreover, the Project's eight replacement units, with an increase in population of approximately eight people, would not be considered a regionally significant project subject to the concerns of the SCAG policies.

ii. Population and Housing Displacement: The Project would improve the condition of the housing stock in the City, and support a negligible increase of eight persons in the population supported by the City's housing stock, albeit at a higher housing cost than the existing units on the Project Site. However, the existing buildings show evidence of severe termite damage, termite infestation, fungus and dry-rot. In addition, the buildings are located on expansive soil, which contributes to the deterioration of the structures, such as cracks in the perimeter walls, cracks in the footings supporting the walls, and sloping and uneven floors. The Project would provide new buildings, built to meet current building standards that would be able to contribute to housing stock for the foreseeable future. Further, the Project's small lot subdivision would add to diversity in the types of housing that are available in the City. Such small lot units would be priced significantly lower when compared to traditional single-family homes in the area. This would provide home ownership opportunities to a greater number of people than would otherwise be available.

The Project's apartment units were vacated pursuant to the provisions of the City's Rent Stabilization Ordinance (RSO)/Ellis Act requirements. The vacancy process was commenced on April 15, 2015, with notices served to tenants on April 23, 2015. Relocation assistance payments were determined in April 2015 by Paragon Partners, Ltd., working under contract with the Los Angeles Housing Department (LAHD). The process allowed for early withdrawal of the relocation funds by tenants in order to assist with security deposits and moving expenses. The last resident moved out on August 25, 2015. Neither the Ellis Act nor the City's implementation regulations require the Applicant to construct or set aside affordable housing to replace the rental units that would be demolished, and the Project is consistent with applicable regulations regarding the loss of these units. Moreover, the Ellis Act gives landlords the right to go out of the rental business and provides a mandatory directive to the City to allow landlords to do so.

Moreover, although, the eight units on the Project Site are subject to the RSO, no units on the property have been specifically protected for use by very low- or low-income households; and the rental rates at the Project Site at the time of vacancy were reflective of market rents for the neighborhood, taking into account the poor condition of the property. Only six units were being rented at the time of vacancy due to the poor condition of the other two units. Even if those two units could have been rented, those rents could have been set at market level and were not restricted to rents that may have been affordable to low- or very low- income households. There is no evidence that any very low- or low-income individuals lived at the Project Site. The RSO does not guarantee that the residents of RSO units qualify as low-income households.

iii. Cumulative Impacts: The number of housing units and the number increase in population associated with the additional housing units is shown in Draft EIR Table IV.D-4, Cumulative Development. As indicated, two of the Projects are located in the City of West Hollywood. The Project would provide no new housing units and no new population to the City of West Hollywood; and therefore would not contribute to cumulative impacts in the City of West Hollywood. The contribution of cumulative development (Project plus nearby related projects) contributions to population and housing in the HCP area are compared to the SCAG projections for the estimated increase in growth for the 2040 horizon year of the RTP/SCS in Draft EIR Table IV.D-5, Cumulative Project and Housing Impacts. The 2040 horizon year is an appropriate timeline for evaluation of cumulative development as other new development would not necessarily be completed within the Project's short 2019 buildout timeline, particularly larger more complex projects. The cumulative development in the Project vicinity would comprise 6.15 percent of the expected increase in population in the HCP Area and 0.18 percent of the development within the City as compared to the previous Project Site conditions. The increase in households would be 6.25 percent of the expected growth in the HCP area and 0.29 percent of the expected housing growth in the City. Development associated with related Projects could in some cases require demolition of existing units to accommodate new development, including the loss of affordable units. Economic issues are not the focus of CEQA,



and related projects would be subject to the provisions of City's RSO/Ellis Act requirements to offset the effects of displacement of population, as discussed in more detail above and incorporated fully herein.

The contribution of new housing projects increases the number of units to help meet the substantial shortfall of available housing units in the City. Furthermore, increasing the supply of housing to meet housing demand has a positive effect regarding housing costs. Notwithstanding, the City has been losing affordable/lower cost units with the development of newer units.

The Project, would not contribute notably to changes in the cumulative availability of housing that might affect relocation/dislocation of population. The Project would not result in a reduction in the availability of housing stock. Further, while the Project housing would be costlier than the previous housing, there are a number of factors that off-set its potential contributions to increased housing costs in the City generally. Most notably, no units on the Project Site have been specifically protected (either by covenant or other agreement or City approval) for use by very low- or low-income households; and the rental rates at the Project Site at the time of vacancy were reflective of market rents for the neighborhood, taking into account the poor condition of the property. Further, the small lot development would provide new ownership opportunities at a lower cost than traditional single family development.

e. References: For a complete discussion of impacts associated with Population and Housing, please see Draft EIR Section IV.D Population & Housing, and Final EIR Chapter II, Responses to Comments and Chapter 3, Revisions, Clarifications, and Corrections.

## **E. Transportation and Traffic**

### **a. Description of Effects:**

i. Construction Impacts: Construction of the Project would take place in a single phase over approximately 12 months. As described in Draft EIR Section IV.C, Noise, construction activities would be limited by Section 41.40 of the LAMC to between the hours of 7:00 A.M. to 9:00 P.M. on weekdays and 8:00 A.M. to 6:00 P.M. on Saturdays. No construction would occur on Sundays. Phases of construction would include demolition, grading, trenching, building construction, paving and architectural coating. Project construction would add haul trucks, equipment and delivery trucks, and trips generated by the construction workers to the local roadway network. Peak hauling activity is anticipated to occur during the grading phase of construction. It is anticipated that Project Site excavation would involve the removal of approximately 500 cubic yards of earth over approximately two weeks. Haul truck traffic would take the most direct route to the appropriate freeway ramp, along the haul route approved by the City for the Project. The haul route for incoming deliveries is generally expected to be from US 101, along Melrose Avenue, and right on Edinburgh Avenue. Outgoing deliveries are generally expected to turn right on Edinburgh Avenue, right on Waring Avenue, right on Fairfax Avenue, and left on Melrose Avenue to US 101 south or from Melrose Avenue, left on Normandie Avenue, and left on Monroe Avenue to US 101 north. The number of construction workers would vary during other phases of construction. Based on construction projections, a maximum of 12 workers would be on the construction site at one time during the building, paving, and architectural coating stage.

ii. Operations Impacts: The Draft EIR analyzed Existing with Project Conditions and Future with Project Conditions on residential street segments. The street segments were: 1) Edinburgh Avenue between Willoughby Avenue and Waring Avenue; 2) Edinburgh Avenue between Waring Avenue and Melrose Avenue; 3) Waring Avenue between Laurel Avenue and Edinburgh Avenue; and 4) Waring Avenue between Edinburgh Avenue and Hayworth Avenue.

iii. Design Feature Hazards: Vehicle, pedestrian and bicycle access would be altered by the Project. The Project would replace the existing driveway at Waring Avenue, which previously provided limited vehicular access to the Project Site, with a central driveway on Edinburgh Avenue that would provide vehicular access to on-site parking. Also, the Project would include pedestrian pathways through the Project Site and each unit would provide individual front entryways. Pedestrian access to the front entryways of the five northern residences would be from a sidewalk along Waring Avenue. Pedestrian access to the three southern residences would be from a pedestrian pathway adjacent to the central driveway. In addition, residents and visitors arriving by bicycle would access the Project via the central driveway on Edinburgh Avenue, which provides common vehicular and bicycle access. The central driveway is designed to be multi-functional for shared bicycle, pedestrian, and vehicle space for the eight single-family small lot units. Therefore, no safety or operational impact is anticipated due to the size and type of use proposed.

iv. Parking: Under SB 743 (CEQA Statute Section 21099(d)(1)), aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a Transit Priority Area shall not be considered significant impacts on the environment. As the Project is an infill residential project within a Transit Priority Area, its impacts on parking are considered less than significant. Although based on SB 743 parking would not be considered significant, vehicle parking would be provided as required by the LAMC.

v. Cumulative Impacts: Impacts on traffic associated with construction (e.g., an intermittent reduction in street and intersection operating capacity) are typically considered short-term adverse impacts, but not significant. The Traffic Impact Analysis was developed to address potential impacts in the context of existing baseline conditions and future (Year 2019) conditions. The future conditions scenario takes into account the 10 related projects, as well as a growth factor to account for other ambient growth occurring in the region.

b. Project Design Features: The City finds that Project Design Features PDF-TRAF-1 and PDF-TRAF-2, which are incorporated into the Project and incorporated into these Findings as though fully set forth herein, will reduce construction-generated traffic and parking impacts of the Project. This Project Design Feature was taken into account in the analysis of potential impacts.

c. Findings:

i. Construction Impacts: With the implementation of the Project Design Features, impacts to traffic flow, pedestrians, bicyclists, and access during construction would be less than significant. No mitigation measures are required.

ii. Operations Impacts: Operational traffic impacts on residential street segments would be less than significant. No mitigation measures are required.

iii. Design Feature Hazards: Impacts resulting from hazards created by a Project design feature or incompatible Project uses would be less than significant. No mitigation measures are required.

iv. Parking: The Project would provide vehicle parking as required by the LAMC and impacts related to parking would be less than significant. No mitigations measures are required.

v. Cumulative Impacts: Cumulative impacts with respect to transportation and traffic would be less than significant. No mitigation measures are required.

d. Rationale for Findings:

i. Construction Impacts: Assuming approximately 50 CY of material exported each work day, this would result in 5 haul trucks per work day based on an anticipated haul truck capacity of 10 CY each. Thus, up to 10 daily truck trips (5 inbound, 5 outbound) are forecast to occur during the excavation and grading period. Using a passenger car equivalency (PCE) of 2.0, the 10 truck trips would be equivalent to 20 daily PCE trips. The number of construction workers required during this phase (approximately 10) is slightly less compared to the building and finishing stages of construction (approximately 12), and most of those workers would arrive and depart outside of the peak periods. More specifically, the hours of construction typically require workers to be on-site before the weekday A.M. commuter peak period and allow them to leave before or after the P.M. commuter peak period (i.e., arrive at the site prior to 7:00 A.M. and depart before 4:00 P.M. or after 6:00 P.M.). Therefore, most, if not all, construction worker trips would occur outside of the typical weekday commuter peak periods. With the implementation of the Construction Traffic Management Plan, it is anticipated that almost all haul truck activity to and from the Project Site would occur outside of the peak hours. Furthermore, the addition of truck trips and worker vehicles of approximately 40 ADT total (or approximately 2 percent of the existing ADT of the analyzed street segments), would not exceed the ADT threshold of 12 percent or more of the existing ADT within the Study Area street segments.

Assuming an average vehicle occupancy (AVO) of 1.135 persons per vehicle, 12 workers would result in a total of approximately 11 vehicles that would arrive and depart from the Project Site each day, for a total of 22 daily trips (11 inbound and 11 outbound trips). Nearly all of those trips would occur outside of the peak hours. The number of construction worker trips would be less than the number of trips generated by the Project, which identifies 23 net new trips or 76 trips attributed to the Project. Therefore, since the Project did not identify any significant street segment impacts under Existing With Project Conditions, the building phase of Project construction is not expected to cause a significant traffic impact at any of the Study Area street segments.

Construction activities would be primarily contained within the Project Site boundaries. However, on-street parking along Edinburgh Avenue and Waring Avenue adjacent to the Project Site, which currently provides approximately

10 parking spaces, would be restricted during construction hours to accommodate worker parking, deliveries, construction vehicles, and construction access. The construction of new sidewalks and curbs would result in the temporary closure of the parking lanes and sidewalks along Edinburgh Avenue and Waring Avenue for approximately one week. In addition, there could be intermittent blockage of travel lanes along Edinburgh Avenue and Waring Avenue for major deliveries and use of forklifts for hoisting of materials (such as structural steel, framing lumber, and appliances). These construction activities would temporarily impede vehicular, bicycle, and pedestrian access. Temporary traffic controls, such as flagpersons, would be provided to direct vehicle and bicycle traffic as required in the Construction Traffic Management Plan. Travel lanes would be maintained in each direction on both streets throughout the construction period, and emergency access would not be impeded. No bus stops are located along the Edinburgh Avenue and Waring Avenue frontages, therefore no bus stops would be affected by construction activities.

i. Operations Impacts:

*Existing with Project Conditions:* As summarized on Draft EIR Table IV.E-2, Street Segment Analysis – Existing with Project Conditions (Year 2017), there is an average of 1,871 daily vehicles (north and south combined) on Edinburgh Avenue between Willoughby Avenue and Waring Avenue; 1,914 daily vehicles on Edinburgh Avenue between Waring Avenue and Melrose Avenue; 1,738 daily vehicles (east and west combined) on Waring Avenue between Laurel Avenue and Edinburgh Avenue; and 1,897 daily vehicles on Waring Avenue between Edinburgh Avenue and Hayworth Avenue. Based on the thresholds established by LADOT, the Project would result in a significant impact if the Project related increase in ADT on these street segments is 12 percent or more of the final ADT (Projected ADT with Project), (based on the final ADT shown in Draft EIR Table IV.E-2, is equivalent to approximately 209 to 228 daily vehicles). As shown on Draft EIR Table IV.E-2, the Project would add between two and nine daily trips to the four analyzed street segments. Thus, the Project-related increase in ADT would range from between 0.1 percent to 0.5 percent and would therefore be well below the threshold of 12 percent.

*Future with Project Conditions:* As summarized on Draft EIR Table IV.E-3, Street Segment Analysis – Future with Project Conditions (Year 2019), after applying an ambient growth factor of one percent per year compounded annually and with consideration of related projects, under Future Without Project Conditions, an average of 1,909 daily vehicles (north and south combined) are estimated on Edinburgh Avenue between Willoughby Avenue and Waring Avenue; 1,952 daily vehicles are estimated on Edinburgh Avenue between Waring Avenue and Melrose Avenue; 1,773 daily vehicles (east and west combined) are estimated on Waring Avenue between Laurel Avenue and Edinburgh Avenue; and 1,935 daily vehicles are estimated on Waring Avenue between Edinburgh Avenue and Hayworth Avenue. Based on the thresholds established by LADOT, the Project would result in a significant impact if the Project-related increase in ADT on these street segments is 12 percent or more of the final ADT (Projected ADT with Project), (based on the final ADT shown in Table IV.E.-3, is equivalent to approximately 213 and 235 daily vehicles). The Project would add between two and nine daily trips to the four analyzed street segments. Thus, the Project-related increase in ADT would range from between 0.1 percent to 0.5 percent and would therefore be well below the threshold of 12 percent.

ii. Design Feature Hazards: Although the relocation of the driveway and increased parking on site may alter access patterns and increase turning movements to the Project Site, these changes would not significantly alter the traffic patterns of adjacent streets due to the low number of vehicle trips generated by the Project, especially during the A.M. and P.M. peak hours. The driveway would also provide access for deliveries and trash pick-up. Ingress and egress from the driveway would be clear and unobstructed. All driveway dimensions, internal circulation, and site access would be designed in accordance with LADOT standards and would be subject to review and approval by LADOT. The Project would include a proposed 5-foot-wide street dedication along the northern property boundary to allow for the potential future widening of Waring Avenue as outlined in the Mobility Plan, which could enhance vehicular or bicycle movement. The Project access locations would be designed to meet City standards and would provide adequate sight distance to protect pedestrian safety. Building setbacks and landscaping would be designed to minimize or avoid potential view obstruction. In conformance with the Small Lot Guidelines, access to parking would be via a central driveway on Edinburgh Avenue, which would provide a single access point for vehicles and would be clearly identified, which would minimize potential vehicle/pedestrian conflicts. No dedicated bicycle lanes currently exist on Edinburgh Avenue or Waring Avenue; although these streets are designated as Bicycle Friendly Streets in the City's Bicycle Plan and as such are proposed for street treatments. However, the exact nature of the potential improvements has not yet been identified by the City, nor is there any

schedule for implementation. There is no feature of the Project's design that would preclude the implementation of bicycle-friendly street treatments. Furthermore, the proposed widening of Waring Avenue could accommodate bicycle improvements.

iii. Parking: Although based on SB 743 parking would not be considered significant, the following parking analysis is provided for public disclosure. As described in LAMC, Section 12.21.A.4(a), the parking requirements for single-family dwelling units is two parking spaces on the same lot with the dwelling unit. As stated in LAMC, Section 12.21.A.5(c), all parking stalls in excess of one parking stall per unit may be designated for compact vehicles. In conformance with these LAMC requirements, the eight single-family dwelling units would provide two parking spaces per lot, one standard and one compact for a total of 16 spaces. This represents an increase of on-site parking compared to the previous Project Site conditions, where parking for only two vehicles was provided on-site and the remaining parking was provided on the surrounding streets. Although bicycle parking is not required for single-family residential uses, bicycle parking could be accommodated within the individual garages/carports.

iv. Cumulative Impacts: The Project would result in a less than significant traffic impact during construction with the implementation of a Construction Traffic Management Plan and Pedestrian Safety Plan (PDF-TRAF-1 and PDF-TRAF-2) that would incorporate notification and safety procedures and other construction traffic controls. The closest related projects (Related Projects 4 and 9) are approximately 3,000 feet south of the Project Site. Furthermore, each related project would be required to comply with City requirements regarding haul routes and would implement mitigation measures and/or include project characteristics, such as traffic controls and safety procedures, to reduce potential traffic impacts during construction. Therefore, given the size of the Project and distance of the Project Site from the closest related projects, the Project would not contribute to a significant cumulative construction traffic impact. In addition, the analysis of future (Year 2019) conditions provides the cumulative analysis since it considers traffic generated by future planned land uses. As indicated in Draft EIR Table IV.E-3, under Future with Project Conditions (Year 2019) impacts on the identified street segments would be less than significant, in part due to the distance of the related projects from the street segments within the Study Area. Furthermore, the Project would not result in a significant impact on access and circulation, and vehicle parking. Any related project would be reviewed by the City to ensure compliance with the City's requirements for access and circulation, and parking.

e. References: For a complete discussion of impacts associated with Transportation and Traffic, please see Draft EIR Section IV.E, Transportation and Traffic, Appendix E, Updated Traffic Impact Analysis, Traffic Impact Analysis, and LADOT Approval Letters.

## **F. Energy**

### **a. Description of Effects:**

i. Construction Impacts: The Project would be constructed in a single phase with overlapping development activities. Construction energy consumption would result primarily from transportation fuels (e.g., diesel and gasoline) used for haul trucks, heavy-duty construction equipment, and construction workers traveling to and from the Project Site. Construction activities can vary substantially from day to day, depending on the specific type of construction activity and the number of workers and vendors traveling to the Project Site. This analysis considers these factors and provides the estimated maximum construction energy consumption for the purposes of evaluating the associated impacts on energy resources.

ii. Operations Impacts: Operation of the Project would require energy in the form of electricity and natural gas for building heating, cooling, cooking, lighting, water demand and wastewater treatment, consumer electronics, and other energy needs, and transportation-fuels, primarily gasoline, for vehicles traveling to and from the Project Site. The energy usage required for Project operations and routine and incidental maintenance activities is estimated based on the net change in energy demand from the new buildings and facilities compared to the existing residential uses. The energy usage takes into account building energy standards pursuant to the Title 24 Building Standards Code and CALGreen Code.

iii. Cumulative Impacts: The geographic context for the cumulative analysis of electricity is LADWP's service area. Growth within this geography is anticipated to increase the demand for electricity and the need for infrastructure, such as new or expanded facilities. The geographic context for the cumulative analysis of natural gas is the SoCalGas service area. Growth within this geography is anticipated to increase the demand for natural gas and the need for infrastructure, such as new or expanded facilities. Also, buildout of the Project and

related projects in the region would be expected to increase overall VMT; however, the effect on transportation fuel demand would be minimized by future improvements to vehicle fuel economy pursuant to federal and state regulations.

b. Project Design Features: None.

c. Findings:

i. Construction Impacts: Energy impacts associated with Project construction would be less than significant. No mitigation measures are required.

ii. Operations Impacts: Energy impacts associated with Project operations would be less than significant. No mitigation measures are required.

iii. Cumulative Impacts: Cumulative impacts related to energy would be less than significant. No mitigation measures are required.

d. Rationale for Findings:

i. Construction Impacts:

*Electricity:* Overall, demolition and construction activities would require minimal electricity consumption and would not be expected to have any adverse impact on available electricity supplies and infrastructure. The City's noise ordinance generally restricts construction during nighttime hours (see LAMC Section 41.40 (Construction Noise) as well as Section IV.C, Noise, of the Draft EIR), which would minimize the need for nighttime lighting. Additionally, electrical consumption due to the conveyance of water used for dust control would be negligible and was not quantified. The electrical demand would vary throughout the construction period based on the construction activities being conducted. Additionally, when not in use, electrical equipment would be powered off to avoid unnecessary energy consumption. Specifically, for this project, any electrical usage during construction would be offset by the reduction in electrical demand associated with the demolition of the existing facility.

*Natural Gas:* Natural gas is not expected to be consumed in any substantial quantities during Project construction.

*Transportation Energy:* A summary of the annual fuel consumption during construction of the Project is provided in Draft EIR Table IV.F-1, Project Construction Fuel Usage. Construction of the Project would utilize fuel efficient equipment consistent with state and federal regulations, and would comply with State measures to reduce the inefficient, wasteful, and unnecessary consumption of energy. While these regulations are intended to reduce construction emissions, compliance with the above anti-idling and emissions regulations would also result in energy savings from the use of more fuel-efficient engines. In addition, per the City's regulatory requirements, the Project would implement a construction waste management plan to divert mixed construction and demolition debris to City certified construction and demolition waste processors, consistent with the Los Angeles City Council approved Ordinance No. 181519 (LAMC Chapter VI, Article 6, Section 66.32-66.32.5). Implementation of the construction waste management plan would reduce truck trips to landfills, which are typically located some distance away from City centers, and increase the amount of waste recovered (e.g., recycled, reused, etc.) at material recovery facilities, thereby further reducing transportation fuel consumption.

ii. Operations Impacts:

*Electricity:* The Project's estimated net operational electricity demand, including from water demand, is provided in Draft EIR Table IV.F-2, Project Operational Energy Usage. The Project would comply with the applicable provisions of Title 24 and the CALGreen Code in effect at the time of building permit issuance. Compliance with the Los Angeles Green Building Program Ordinance would minimize energy and water consumption by incorporating strategies such as low-flow toilets, low-flow faucets, low-flow showers, and other energy and resource conservation measures. The heating, ventilation, and air conditioning (HVAC) system would be sized and designed in compliance with the CALGreen Code to maximize energy efficiency caused by heat loss and heat gain. The Project would also support the recycling and waste diversion goals of the City by incorporating recycling collection areas in the Project design. As such, the Project would minimize energy demand. Therefore, with the incorporation of these features, operation of the Project would not result in the wasteful, inefficient, or unnecessary consumption of electricity.

*Natural Gas:* The Project would increase the demand for natural gas as compared to existing on-site uses. The Project's estimated net operational natural gas demand is provided in Draft EIR Table IV.F-2. As previously discussed, the Project Site currently contains residential uses that consume natural gas. The Project would result in

net new consumption of natural gas within the Project Site. The Project would comply with the applicable provisions of Title 24 and the CALGreen Code in effect at the time of building permit issuance to minimize natural gas demand. As such, the Project would minimize energy demand. According to SoCalGas data, natural gas sales have been relatively stable over the past three years. Based on the Project's estimated natural gas consumption as shown in Draft EIR Table IV.F-3, Project Energy Usage and State and Regional Energy Supply, the Project would account for a very small percentage of SoCalGas for the Project's buildout year.

*Transportation Energy:* The Project's estimated operational transportation fuel demand is provided in Draft EIR Table IV.F-2. The Project would support statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. By locating residential uses at an infill location in proximity to existing off-site commercial, residential, and retail destinations and in close proximity to existing public transit stops, the Project would minimize vehicle trips and VMT. The Project would also include the installation of EVSE in garages, pursuant to the CALGreen Code. According to the EMFAC2014 model, electric vehicles are predicted to account for approximately 0.86 percent of passenger vehicles in 2019 in the Air Basin region.

### iii. Cumulative Impacts

*Electricity:* Buildout of the Project, the related projects, and additional growth forecasted to occur in the City would increase electricity consumption during Project construction and operation, and may cumulatively increase the need for energy supplies. LADWP forecasts that its peak electricity demand in the 2018-2019 fiscal year, the Project buildout year, would be approximately 23,264 million kWh. As shown in Draft EIR Table IV.F-3, the Project's estimated net new electrical consumption would account for approximately 0.00015 percent of LADWP's projected electricity sales for the Project's build-out year. Future development would result in the irreversible use of electricity resources that could limit future energy availability. However, as shown in Draft EIR Table IV.F-3, the net increase in demand of such resources would be minor compared to existing supply and infrastructure within the LADWP service area and would be consistent with growth expectations for LADWP's service area based on LADWP forecast data included in its Retail Electric Sales and Demand Forecast.

*Natural Gas:* Buildout of the Project and related projects in the SoCalGas service area is expected to increase natural gas consumption and the need for natural gas supplies. According to SoCalGas data, natural gas sales have been relatively stable over the past three years with a slight increase from 287 billion cubic feet in 2014 to 294 billion cubic feet in 2016. Based on the Project's estimated natural gas consumption as shown in Draft EIR Table IV.F-3, the Project would account for approximately 0.00003 percent of SoCalGas for the Project's buildout year. Although future development projects would result in irreversible use of natural gas resources which could limit future availability, the use of such resources would be on a relatively small scale and would be consistent with regional and local growth expectations for SoCalGas's service area based on data outlined in the California Gas Report.

*Transportation Energy:* Buildout of the Project and related projects in the region would be expected to increase overall VMT; however, the effect on transportation fuel demand would be minimized by future improvements to vehicle fuel economy pursuant to federal and state regulations. By 2025, vehicles are required to achieve 54.5 mpg (based on USEPA measurements), which is a 54 percent increase from the 35.5 mpg standard in the 2012-2016 standards. The Project would support statewide efforts to improve transportation energy efficiency and would co-locate residential uses at an infill site near major bus lines. Siting land use development projects at infill sites is consistent with the State's overall goals to reduce VMT pursuant to SB 375, and as outlined in the 2016 RTP/SCS for the region, which seeks improved access and mobility by placing "destinations closer together, thereby decreasing the time and cost of traveling between them." Related projects would need to demonstrate consistency with these goals and incorporate project design features or mitigation measures as required under CEQA, which would also ensure related projects contribute to transportation energy efficiency. Furthermore, according to the USEIA's International Energy Outlook 2016, the global supply of crude oil, other liquid hydrocarbons, and biofuels is expected to be adequate to meet the world's demand for liquid fuels through 2040. Therefore, as the Project would incorporate land use characteristics consistent with state goals for reducing VMT, the Project would not have a cumulatively considerable impact related to transportation energy.

e. References: For a complete discussion of impacts associated with Energy, please see Draft EIR Section IV.F Energy.

## VII. ENVIRONMENTAL IMPACTS FOUND TO BE LESS THAN SIGNIFICANT AFTER MITIGATION

The following impact area was concluded by the Draft EIR to be less than significant with the implementation of mitigation measures described in the Final EIR. Based on that analysis and other evidence in the administrative record relating to the project, the City finds and determines that mitigation measures described in the Final EIR reduce potentially significant impacts identified for the following environmental impact category to below the level of significance.

### A. Noise (Construction Noise and Vibration)

#### a. Description of Effects:

i. On-Site Construction Noise: Noise impacts from construction activities are generally a function of the noise generated by construction equipment, equipment locations, the sensitivity of nearby land uses, and the timing and duration of the noise-generating activities. Construction would be undertaken in five stages: (1) demolition; (2) grading; (3) trenching; (4) building construction; and (5) paving/architectural coatings. Project construction would require the use of mobile heavy equipment with high noise-level characteristics, as shown in Table IV.C-10, Construction Equipment Noise Levels. The estimated usage factor for the equipment is also shown in Table IV.C-10. The usage factors are based on Federal Highway Administration's (FHWA's) Roadway Construction Noise Model User's Guide. The Project would be constructed using typical construction techniques; no blasting or impact pile driving would be used. Project construction would take place in a single phase of approximately 12 months.

ii. Construction Vibration: Construction machinery and operations can generate varying degrees of ground vibration, depending on the construction procedures and the construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of a construction site often varies depending on soil type, ground strata, and construction characteristics of the receptor buildings. The results from 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 at the highest levels. Ground-borne vibration from construction activities rarely reaches the levels that damage structures.

b. Project Design Features: The City finds that Project Design Feature PDF-NOISE-1, which is incorporated into the Project and incorporated into these Findings as though fully set forth herein, will reduce noise impacts of the Project. This Project Design Feature was taken into account in the analysis of potential impacts.

c. Mitigation Measures: The City finds that Mitigation Measures MM-NOISE-1 and MM-NOISE-2, which are incorporated into the Project and incorporated into these Findings as though fully set forth herein, will reduce construction noise and vibration impacts and therefore, are required. These Mitigation Measures were taken into account in the analysis of Project impacts.

#### d. Findings:

i. On-Site Construction Noise: Project construction activities would increase noise levels at off-site sensitive receptors in excess of applicable thresholds. With the implementation of Mitigation Measures MM-NOISE-1 and MM-NOISE-2 and Project Design Feature PDF-NOISE-1, construction noise impacts would be less than significant.

ii. Construction Vibration: Project construction would increase vibration impacts in excess of applicable thresholds. With the implementation of Mitigation Measure MM-NOISE-2, construction vibration impacts would be less than significant.

#### e. Rationale for Findings:

i. Construction Noise: Project construction would require the use of mobile heavy equipment with high noise level characteristics, as shown in Final EIR Table IV.C-10, Construction Equipment Noise Levels. Within the analysis, all construction equipment was assumed to operate simultaneously with an estimated usage factor at the construction area nearest to potentially affected residential receptors (at the fence line), because equipment used on construction sites usually operates intermittently over the course of a construction day. These assumptions represent a worst-case noise scenario as all construction equipment used in a given phase would not

typically operate concurrently and at full power, and the location of activities is routinely spread across the construction site, rather than concentrated close to the nearest noise-sensitive receptors. A summary of construction noise impacts at the nearby sensitive receptors is provided in Draft EIR Table IV.C-11, which assumes noisy heavy equipment would be used for more than 10 days. As shown in Table IV.C-11, Estimate of Construction Noise Levels (Leq) at Off-Site Sensitive Receptor Locations, construction noise levels are estimated to reach a maximum of 99 dBA at receptor location R3 east and south of the Project Site; 85 dBA at receptor location R1 north of the Project Site along Waring Avenue; and receptor location R2 west of the Project Site along North Edinburgh Avenue. Construction related activity noise levels would exceed the significance thresholds of 63 dBA at R1 (average daytime noise level of 58 dBA plus 5 dBA), 60 dBA at R2 (ambient noise level of 55 dBA plus 5 dBA), and 65 dBA at R3 (ambient noise level of 60 dBA plus 5 dBA). Implementation of Mitigation Measures MM-NOISE-1, MM-NOISE-2, and Project Design Feature PDF-NOISE-1 would limit the use of noise heavy construction to 10 days or less, provide measure to achieve a 15dBA noise level reduction performance standard, reduce noise at adjacent noise sensitive receptors south and east of the Project Site, and reduce construction equipment noise levels. Therefore, implementation of Mitigation Measure MM-NOISE-1 and Project Design Feature PDF-NOISE-1 would reduce the construction noise levels of 85 dBA Leq to 65 dBA Leq, which would be within the significance threshold of 68 dBA Leq at noise receptor location R1 (ambient of 58 dBA Leq plus 10 dBA) and 65 dBA Leq at noise receptor location R2 (ambient of 55 dBA Leq plus 10 dBA). Furthermore, implementation of Mitigation Measures MM-NOISE-1, MM-NOISE-2, and Project Design Feature PDF-NOISE-1 would reduce the construction noise levels of 99 dBA Leq to 69 dBA Leq, which would be below the significance threshold of 70 dBA Leq at the adjacent sensitive receptor location R3 (ambient of 60 dBA Leq plus 10 dBA). Accordingly, less than significant impacts would occur at the multi-family uses north and west of the Project Site (R1 and R2) and the adjacent multi-family residential uses east and south of the Project Site (R3).

ii. Construction Vibration: Under the Caltrans' vibration annoyance potential criteria (refer to Draft EIR Table IV.C-4, Caltrans Vibration Annoyance Potential Criteria), vibration levels exceeding 0.035 inches per second PPV for continuous/frequent intermittent sources would be considered distinctly perceptible. The nearest residential buildings would be exposed to vibration velocities from construction activities approximately up to 0.19 inches per second PPV, when construction activities occur near the property line. Mitigation Measure MM-NOISE-2 would result in vibration levels of 0.007 inches per second PPV at the residential buildings to the south and east of the Project Site, which would be below Caltrans vibration criteria.

f. References: For a complete discussion of impacts associated with Cultural Resources, please see Draft EIR Section IV.C, Noise, Appendix D Noise and Vibration Technical Report, and Final EIR Chapter 3, Revisions, Clarifications, and Corrections and Appendix B, Revised Construction Noise Calculations.

## VIII. ENVIRONMENTAL IMPACTS FOUND TO BE SIGNIFICANT AND UNAVOIDABLE

The Project results in the following impact, which is found to be significant and unavoidable.

### A. Cultural Resources (Direct Impacts)

a. Description of Effect: The Project would demolish the Bungalow Court and Garage, a LAHCM, and a historical resource under CEQA. Because the demolition of a historical resource constitutes a substantial adverse change to the resource such that its eligibility for listing would be lost, this impact is considered significant.

b. Project Design Features: None.

c. Mitigation Measures: The City finds that Mitigation Measures MM-HIST-1 and MM-HIST-2, which are incorporated into the Project and incorporated into these Findings as though fully set forth herein, will reduce the direct impacts to historical resources and therefore, are required. These Mitigation Measures were taken into account in the analysis of Project impacts.

d. Finding: Mitigation Measures have been required for or incorporated into the Project to reduce unavoidable direct impacts to historical resources to the greatest extent possible. Although relocation to a suitable site pursuant to Mitigation Measure MM-HIST-2, would reduce impacts to historical resources to a less than significant level, it is speculative to assume that an interested party and suitable site will be found. Therefore, it is conservatively concluded that impacts would remain significant and unavoidable due to the demolition of the locally-designated historical resource (Bungalow Court and Garage). There are no additional measures which the City can impose that would reduce the direct impacts to less than significant levels.



e. Rationale for Finding: To reduce potential direct impacts to historical resources, it is recommended that Photographic Recordation (Mitigation Measure MM-HIST-1) be prepared, which would include digital photographs of the Bungalow Court and Garage's existing appearance and character-defining features. Following implementation of MM-HIST-1, mitigation is also proposed to pursue relocation of the Bungalow Court and Garage (Mitigation Measure MM-HIST-2), in accordance with the Standards for Rehabilitation. While relocation to a suitable site pursuant to Mitigation Measure MM-HIST-2 would reduce impacts and retain the eligibility of the historical resource, it is unclear whether an interested party and suitable site would be found. Therefore, due to the uncertainty associated with relocation of the Bungalow Court and Garage, it is conservatively concluded that demolition could occur and that the impact of the Project on the historical resource would be significant and unavoidable.

f. References: For a complete discussion of impacts associated with Cultural Resources, please see Draft EIR Section IV.B, Historical Resources, Appendix C Historical Resources Assessment Report, and Final EIR Chapter II, Responses to Comments.

## **IX. ALTERNATIVES TO THE PROJECT**

In addition to the Project, the Draft EIR evaluated a reasonable range of six alternatives to the project. These alternatives are: (1) No Project Alternative; (2) Full Preservation Alternative; (3) Rehabilitation Alternative; (4) Rehabilitation With Addition Alternative; (5) Rehabilitation With Partial Addition and Underground Parking Alternative; and (6) Construction Of Two Single-Family Residential Units Alternative. In accordance with CEQA requirements, the alternatives to the Project include a "No Project" alternative and alternatives capable of eliminating the significant adverse impacts of the Project. These alternatives and their impacts, which are summarized below, are more fully described in Section V, Alternatives of the Draft EIR.

### **A. Summary of Findings**

Based upon the following analysis, the City finds, pursuant to CEQA Guidelines section 15091(a)(3), the City cannot make findings that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR. Additionally, pursuant to CEQA Guidelines section 15093(b), the City cannot make a Statement of Overriding Considerations to support approval of the project.

### **B. Project Objectives**

An important consideration in the analysis of alternatives to the Project is the degree to which such alternatives would achieve the objectives of the Project. As more thoroughly described in the Draft EIR Section II, Project Description, both the City and Applicant have established specific objectives concerning the Project, which are incorporated by reference herein and discussed further below.

### **C. Project Alternatives Analyzed**

#### **a. Alternative 1 - No Project Alternative**

i. Description: Under Alternative 1, the Project Site would remain as developed under current conditions with a Bungalow Court and Garage (i.e., four vacant buildings, each of which contains two, one-bedroom apartment units, and a garage building, secured by a construction fence with windows and doors boarded, and utilities disconnected).

ii. Impact Summary: Under Alternative 1, the Bungalow Court and Garage structures and landscape would continue to deteriorate. Soil erosion would continue to degrade the foundation, causing further damage to the overall condition of the Bungalow Court and Garage. The vacant structures would continue to pose a hazard through potential criminal activity such as squatters, trespassers, drug dealing, and vandalism. As indicated in Draft EIR Table V-1, Comparison of the Project and Alternatives, compared to the Project, Alternative 1 would reduce the total residential floor area by 10,024 sf or 71 percent. Under Alternative 1, no construction would occur and the Project Site would remain in its existing condition.

iii. Findings: Alternative 1 would reduce adverse environmental impacts when compared to the Project. However, Alternative 1 would not satisfy any of the Project Objectives nor contain any of the Project's

beneficial components. Pursuant to Public Resources Code Section 21081(a)(3), the City finds that the specific economic, legal, social, technological, or other considerations, including considerations identified in Section XI of these Findings (Statement of Overriding Considerations), make Alternative 1 infeasible.

iv. Rationale For Findings: Alternative 1 would not achieve any of the six Project Objectives. First, Alternative 1 would not redevelop the Project Site with residential buildings and a site design that is consistent with the existing and proposed HCP and underlying zoning designation. The Project Site would remain as developed under current conditions with a Bungalow Court and Garage (i.e., four vacant buildings, each of which contains two, one-bedroom apartment units, and a garage building, secured by a construction fence with windows and doors boarded, and utilities disconnected). The Bungalow Court and Garage structures and landscape would continue to deteriorate.

Second, Alternative 1 would not provide housing with high-quality architecture and landscape design that would improve and be compatible with the eclectic visual character of the neighborhood and the Hollywood community. The Bungalow Court and Garage would remain boarded up and the existing architecture and landscaping would continue to deteriorate, especially as the utilities have been disconnected and no landscaping is being watered. The high-quality architecture of the Project would not be implemented.

Third, Alternative 1 would not support sustainable design through development that would optimize site energy efficiency, water conservation, and runoff water quality. Alternative 1 would not provide the same benefits the Project would have related to consistency with State and Federal energy standards, energy-efficient technologies or infill development with public transit access and nearby commercial, retail, restaurant, or entertainment land uses.

Fourth, Alternative 1 would not provide housing to help accommodate regional and Citywide housing demand in a Transit Priority Area. Alternative 1 would maintain the existing conditions with a Bungalow Court and Garage that are boarded up and deteriorating. No housing would be provided under Alternative 1, as the existing structures show evidence of termite damage, termite infestation, fungus, dry-rot, and cracks in the structures and are not currently habitable. Under Alternative 1, impacts on housing supply would be greater than the Project, since no additional housing would be provided.

Fifth, Alternative 1 would not provide a diversity of housing choices within the neighborhood relating to unit size, number of bedrooms, and ownership. As indicated in Draft EIR Table V-1, compared to the Project, the No Project Alternative would reduce the total residential floor area by 10,024 sf or 71 percent. This would mean that the now vacant and uninhabitable units would not be replaced by 8 new homes, and a diversity of ownership options for residents looking to live in the area would not be provided.

Sixth, Alternative 1 would not develop an economically viable residential project. A feasibility study was completed by Page & Turnbull, Inc. in July 2017 (Feasibility Study) for the Bungalow Court and Garage (the Feasibility Study is provided in Appendix I of the Historical Resource Assessment Report included in the Appendix C of the Draft EIR). Page & Turnbull, Inc. visually observed the following conditions at the Project Site: "soil is expansive, which has resulted in significant bulging at the cripple walls; floors are generally uneven and in some instances, there is a gap between the floor and the exterior walls that is possibly due to uneven settlement, and the sill plate is not continuous at the foundation; the concrete footings appear to be of poor quality and several shims at the posts have failed." Furthermore, they concurred with structural assessments by John Labib & Associates, Structural Engineers November 2015 report that the bungalow foundations appears to be inadequate and would require complete replacement instead of repair. The structural assessment also advised that "salvaging these structures would not be structurally or economically feasible and that they should be rebuilt to ensure code compliance and life safety." In 2016, Nabih Yousseff Associates, Structural Engineers reviewed John Labib & Associates' structural evaluation and also agreed with their findings.

v. Reference: For a complete discussion of impacts associated with Alternative 1, please see Draft EIR Section V, Alternatives, Appendix C, Historic Resources Assessment Report, Appendix G, Comparison of Project Alternatives, Appendix H, Market and Financial Feasibility Analysis and Other Cost Feasibility Data, and Appendix I Peer Review: Market Analysis.

b. Alternative 2 - Full Preservation Alternative

i. Description: Alternative 2 would maintain and rehabilitate the existing structures. Alternative 2 would include eight units (with a total residential floor area of 4,064 sf) and maintain the existing building layout, including the garage building. The buildings would need to be lifted to facilitate repairs to the foundations and the installation of new plywood shear walls, which would require additional work to the interior and/or exterior, and woodwork surrounding the windows and doors. New mechanical, electrical, and plumbing systems would be installed, and damaged original materials would be repaired or replaced in accordance to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Standards), or if necessary, the Standards for Reconstruction. Exterior walls would be patched and repaired and new windows and doors would be replaced in kind. The missing east courtyard arch would be reconstructed in accordance to the Standards for Reconstruction.

The adjacent garage would be structurally upgraded and repaired but would not meet current LAMC requirements for either the number of parking spaces provided or the size of the garage. Parking would continue to be provided within two tandem spaces within the internal driveway. Furthermore, structural upgrades to the garage would require the removal of interior or exterior walls and ceilings. An additional entitlement would be required to maintain parking below the number of spaces required by the Zoning Code. Alternative 2 would also require the excavation of expansive soil to approximately 4 feet below grade and the replacement with new, engineered soil beneath the buildings and the garage.

ii. Impact Summary: As indicated in Draft EIR Table V-1, compared to the Project, Alternative 2 would reduce the total residential floor area by 10,024 sf or 71 percent. The Feasibility Study, included as Appendix I of the Historical Resource Assessment Report (included in Appendix C of the Draft EIR) contains a more detailed description of Alternative 2, including the recommended repair work, overall estimate of replacement materials, structural upgrades, exterior and interior repairs, description of new construction, and parking. In Alternative 2, the units would be offered at market rate either for sale or for rent. Approval of a subdivision map for condominium purposes would be required if the units were to be offered for sale.

iii. Findings: The Full Preservation Alternative would avoid the Project's significant and unavoidable impacts on historical resources with implementation of preservation recommendations, and the resource would remain a designated LAHCM. The Full Preservation Alternative would have similar less than significant construction noise and construction vibration impacts (with mitigation) as the Project since off-site excavation of expansive soils would occur near off-site residences.

The Full Preservation Alternative would have reduced impacts related to air quality, operational noise and vibration, construction and operational traffic, and energy, compared to the Project due to reduced construction activity and smaller unit size. The Full Preservation Alternative would have similar impacts as the Project related to population and housing, since the number of units would remain the same, and similar impacts as the Project regarding design feature hazards, since less traffic would be generated but sidewalk and roadway improvements would not occur.

iv. Rationale For Findings: The Full Preservation Alternative is presumed to meet the Secretary of Interior Standards, although it would require substantial reconstruction and rehabilitation, including the lifting of the buildings, which would require a lifting and bracing plan due to the poor condition of the structures. Furthermore, new mechanical, electrical, and plumbing could cause additional damage to the buildings, and a rehabilitation plan would be required. However, the Full Preservation Alternative would avoid the deterioration that would continue to occur under Alternative 1, No Project Alternative.

Furthermore, the Full Preservation Alternative would meet three of the six Project Objectives and potentially meet one other. It would meet the Project Objectives of providing a diversity of housing choices within the neighborhood, would provide housing with high quality architecture and landscape design, and would provide high quality housing to accommodate demand within a Transit Priority Area. The project would potentially meet the objective to develop an economically viable residential project. It would not meet the objective to redevelop the Project Site with residential buildings and a site design that is consistent with the existing and proposed Hollywood Community Plan and underlying zoning designation, although it would be consistent with the Hollywood Community Plan and

underlying zoning designation. It would also not meet the objective to support sustainable design through development that would optimize site energy efficiency, water conservation, and runoff water quality, since it would not be built using modern green building standards, although renovation of an existing building rather than building a new one has environmental benefits because fewer new resources are required.

v. Reference: For a complete discussion of impacts associated with Alternative 2, please see Draft EIR Section V, Alternatives, Appendix C, Historic Resources Assessment Report, Appendix G, Comparison of Project Alternatives, Appendix H, Market and Financial Feasibility Analysis and Other Cost Feasibility Data, and Appendix I Peer Review: Market Analysis; and Final EIR Chapter II, Revisions, Clarifications, and Corrections.

c. Alternative 3 - Rehabilitation Alternative

i. Description: Alternative 3 would retain the existing one-story structures and combine the units in each building for a total of four units with a total residential floor area of 4,984 sf. Each unit would include three bedrooms, two bathrooms, and a new small basement (230 sf) with exterior stairs. The buildings would be lifted to facilitate repairs of the foundations, the installation of new plywood shear walls, and construction of the basement, and a lifting and bracing plan would need to be created to reduce potential impacts to the Bungalow Court and Garage. New mechanical, electrical, and plumbing systems would be installed, and damaged original materials would be repaired or replaced in conformance with the Standards; exterior walls would be patched and repaired and new compatible or in-kind windows and doors would be installed. The missing east courtyard arch would be reconstructed in conformance with the Standards for Reconstruction. The adjacent garage would be structurally upgraded and repaired but would not meet current LAMC requirements for either the number of parking spaces provided or the size of the garage. Parking would continue to be provided within two tandem spaces within the internal driveway. Alternative 3 would require the excavation of expansive soil to approximately 4 feet below grade and the replacement with new, engineered soil beneath the buildings and the garage. Alternative 3 would also require the excavation of approximately 10-11 feet below grade (or 6-7 feet below the excavation of expansive soil) for the 230-squarefoot basement.

ii. Impact Summary: As indicated in Draft EIR Table V-1, compared to the three-story Project, Alternative 3 would reduce the total residential floor area by 9,104 sf or 65 percent. In Alternative 3, the units would be offered as market rate rental or for sale units. Approval of a subdivision map for condominium purposes would be required if the units were to be offered for sale.

iii. Findings: The Alternative 3 would reduce adverse environmental impacts when compared to the Project. However, Alternative 3 would not satisfy many of the Project Objectives nor contain many of the Project's beneficial components. Pursuant to Public Resources Code Section 21081(a)(3), the City finds that the specific economic, legal, social, technological, or other considerations, including considerations identified in Section XI of these Findings (Statement of Overriding Considerations), make Alternative 3 infeasible.

iv. Rationale For Findings: Alternative 3 would not achieve many of the six Project Objectives. First, Alternative 3 would not redevelop the Project Site with residential buildings and a site design that is consistent with the existing and proposed HCP and underlying zoning designation to the same extent as the Project. Instead, the Project Site would be rehabilitated, not redeveloped.

Second, Alternative 3 would only partially provide housing with high-quality architecture and landscape design that would improve and be compatible with the eclectic visual character of the neighborhood and the Hollywood Community. Although Alternative 3 would include new landscaping and the Bungalow Court and Garage would be rehabilitated, it would not provide new housing.

Third, Alternative 3 would partially support sustainable design through development that would optimize site energy efficiency, water conservation, and runoff water quality. The existing units would be rehabilitated, and the rehabilitation would be subject to the Historic Building Code, which exempts historic buildings from certain sustainability and green standards. For instance, it would meet the applicable requirements of Title 24 and the CALGreen Code to a lesser extent than the Project. Also, Alternative 3 would not include Project features such as roofs that are pre-wired for future installation of solar panels, parking spaces with electric vehicle charging outlets, and biofiltration; or other Code requirements that could compromise the integrity of the historic buildings. However,

the construction and operation of Alternative 2 would require less electricity, natural gas, and transportation energy than the Project.

As further described in the Feasibility Study, included as Appendix I of the Historical Resource Assessment Report (included in Appendix C of the Draft EIR), Alternative 3 is presumed to meet the Standards. Alternative 3 assumes preparation of a Historic Structures Report and Standards Plan Review and construction monitoring by a qualified preservation. However, Alternative 3 would require substantial reconstruction and rehabilitation, including the lifting of the buildings, which would require preparation of a lifting and bracing plan to reduce damage because of the poor condition of the structures. Furthermore, the buildings would need to be rehabilitated with new mechanical, electrical, and plumbing in conformance with the Standards.

Fourth, Alternative 3 would partially provide high quality housing to help accommodate regional and Citywide housing demand in a Transit Priority Area. However, less housing would be provided and the housing units would be rehabilitated rather than constructed to meet modern residential design standards. Although Alternative 3 would include new landscaping and the Bungalow Court and Garage would be rehabilitated, it would not represent new housing.

Fifth, Alternative 3 would not provide a diversity of housing choices within the neighborhood relating to unit size, number of bedrooms, and ownership. Unlike the Project, residents under Alternative 3 may not have the option of homeownership. The small lot subdivision style of development provides benefits of a single-family home, and full fee-simple ownership with the conveniences of a townhouse lifestyle. As such, it helps to meet an alternative niche market to the single-family and condominium housing markets. Further, the Project's small lot subdivision would add to diversity in the types of housing that are available in the City. Such small lot units would be priced significantly lower when compared to traditional single-family homes in the area. This would provide home ownership opportunities to a greater number of people than would otherwise be available. Also, the two units in each building would be combined for a total of four units, resulting in a reduction in the number of units. This in turn would have an incremental affect regarding the number of households in the City.

Sixth, Alternative 3 would not develop an economically viable residential project. The Market Analysis (included as Appendix H of the Draft EIR) concluded that the cost to develop Alternative 3 as a rental project would be \$6,920,373 and the project return would be \$4,047,573, which would result in a loss of \$2,872,800 (a negative 58 percent return on cost). The Market Analysis concluded that the cost to develop Alternative 3 as a for sale project would be \$7,342,873 and the project return would be \$3,642,873, which would result in a loss of \$4,788,000 (a negative 50 percent return on cost). Therefore, this Alternative is infeasible.

v. Reference: For a complete discussion of impacts associated with Alternative 3, please see Draft EIR Section V, Alternatives, Appendix C, Historic Resources Assessment Report, Appendix G, Comparison of Project Alternatives, Appendix H, Market and Financial Feasibility Analysis and Other Cost Feasibility Data, and Appendix I Peer Review: Market Analysis; and Final EIR Chapter II, Revisions, Clarifications, and Corrections.

d. Alternative 4 - Rehabilitation With Addition Alternative

i. Description: Alternative 4 would retain the existing one-story buildings and combine the units in each building for a total of four units and would also construct a smaller second floor addition, for a total residential floor area of 6,860 sf. Each unit would include three bedrooms, three bathrooms, a new 470 square foot second floor, a new 350 square foot roof deck, a new small balcony and steps at the courtyard, and new exterior stairs. The new second floor addition would increase the existing building height by 9 feet to a height of 22 feet. The buildings would be lifted to facilitate repairs of the foundations and the installation of new plywood shear walls. New mechanical, electrical, and plumbing systems would be installed, and damaged original materials would be repaired or replaced. Exterior walls would be patched and repaired, and new windows and doors would be installed. The missing east courtyard arch would be reconstructed. The adjacent garage would be structurally upgraded and repaired but remain at its current size and therefore would not be adequately sized to provide additional parking per current LAMC requirements. Parking would continue to be provided within two tandem spaces within the internal

driveway. As with all of the preservation and rehabilitation alternatives, Alternative 4 would require the excavation of expansive soil to approximately four feet below grade and the replacement with new, engineered soil beneath the buildings and the garage.

ii. Impact Summary: As indicated in Draft EIR Table V-1, compared to the three-story Project, the Rehabilitation with Addition Alternative would reduce the total residential floor area by 7,228 sf or 51 percent. In this Alternative, the units would be offered as market rate rental or for sale units. Approval of a subdivision map for condominium purposes would be required if the units were to be offered for sale.

iii. Findings: Alternative 4 would reduce adverse environmental impacts when compared to the Project. However, Alternative 4 would not satisfy many of the Project Objectives nor contain many of the Project's beneficial components. Pursuant to Public Resources Code Section 21081(a)(3), the City finds that the specific economic, legal, social, technological, or other considerations, including considerations identified in Section XI of these Findings (Statement of Overriding Considerations), make Alternative 4 infeasible.

iv. Rationale For Findings: Alternative 4 would not achieve many of the six Project Objectives. First, Alternative 4 would not redevelop the Project Site with residential buildings and a site design that is consistent with the existing and proposed HCP and underlying zoning designation to the same extent as the Project. Instead, the Project Site would be rehabilitated, not redeveloped.

Second, Alternative 4 would only partially provide housing with high-quality architecture and landscape design that would improve and be compatible with the eclectic visual character of the neighborhood and the Hollywood Community. Although Alternative 4 would include new landscaping, some newly constructed residential units, and rehabilitation of the Bungalow Court and Garage, it would not represent all new housing.

Third, Alternative 4 would partially support sustainable design through development that would optimize site energy efficiency, water conservation, and runoff water quality. The existing units would be rehabilitated, and the rehabilitation would be subject to the Historic Building Code, which exempts historic buildings from certain sustainability and green standards. For instance, it would meet the applicable requirements of Title 24 and the CALGreen Code to a lesser extent than the Project. Also, Alternative 4 would not include Project features such as roofs that are pre-wired for future installation of solar panels, parking spaces with electric vehicle charging outlets, and biofiltration; or other Code requirements that could compromise the integrity of the historic buildings. However, the construction and operation of Alternative 2 would require less electricity, natural gas, and transportation energy than the Project.

Although Alternative 4 would not meet the Standards, it would involve preparation of a Historic Structures Report and Standards Plan Review and construction monitoring by a qualified preservation consultant. But, as further described in the Feasibility Study, included as Appendix I of the Historical Resource Assessment Report (included in Appendix C of the Draft EIR), Alternative 4 would require substantial reconstruction and rehabilitation, including the lifting of the buildings, requiring a lifting and bracing plan to reduce damage due to the poor condition of the structures. Furthermore, new mechanical, electrical, and plumbing could cause additional damage to the buildings and would need to be completed in conformance with the Standards.

Fourth, Alternative 4 would partially provide high quality housing to help accommodate regional and Citywide housing demand in a Transit Priority Area. Nonetheless, substantially less housing would be provided as Alternative 4 would produce four units rather than eight units, and the units would be rehabilitated rather than constructed to meet modern residential design standards.

Fifth, Alternative 4 would provide a diversity of housing choices within the neighborhood relating to unit size, number of bedrooms, and ownership. Unlike the Project, residents under Alternative 4 may not have the option of homeownership. The small lot subdivision style of development provides benefits of a single-family home, and full fee-simple ownership with the conveniences of a townhouse lifestyle. As such, it helps to meet an alternative niche market to the single-family and condominium housing markets. Further, the Project's small lot subdivision would add to diversity in the types of housing that are available in the City. Such small lot units would be priced significantly lower when compared to traditional single-family homes in the area. This would provide home ownership opportunities to a greater number of people than would otherwise be available. Also, the two units in

each building would be combined for a total of four units, resulting in a reduction in the number of units. This in turn would have an incremental affect regarding the number of households in the City.

Sixth, Alternative 4 would not develop an economically viable residential project. The Market Analysis concluded that the cost to develop Alternative 4 as a rental project would be \$7,570,985 and the project return would be \$3,995,945, which would result in a loss of \$3,575,040 (a negative 53 percent return on cost). The Market Analysis concluded that the cost to develop this Alternative as a for sale project would be \$8,103,485 and the project return would be \$3,303,485, which would result in a loss of \$5,958,400 (a negative 41 percent return on cost). Therefore, this Alternative is infeasible.

v. Reference: For a complete discussion of impacts associated with Alternative 4, please see Draft EIR Section V, Alternatives, Appendix C, Historic Resources Assessment Report, Appendix G, Comparison of Project Alternatives, Appendix H, Market and Financial Feasibility Analysis and Other Cost Feasibility Data, and Appendix I Peer Review: Market Analysis; and Final EIR Chapter II, Revisions, Clarifications, and Corrections.

e. Alternative 5 - Rehabilitation With Partial Addition And Underground Parking Alternative

i. Description: Alternative 5 would retain the existing buildings and combine the units in each of the buildings to create four ground floor units and would also add two new second floor units to create a total of six units. The two ground floor units to the rear or east would be expanded by 330 sf with two new second floor units, 920 sf each, provided as additions, for a total residential floor area of 7,434 sf. Access to the second floor units would be by stairs and an elevator. Each unit would include three bedrooms and three bathrooms. The new second floor units would increase the existing building height by 9 feet to a height of 22 feet. Alternative 5 would include a new one level 12 space underground parking structure to the rear of the lot that would be accessed from the existing driveway at Waring Avenue. The existing garage building would be demolished and the north façade reconstructed as a one-way driveway (ingress and egress) with a flashing light at the top of the driveway as the access point to the underground parking. To accommodate the construction of the parking structure, the existing buildings would be temporarily removed from the Project Site. This effort would include lifting the buildings to create underground parking, which would require a lifting and bracing plan to reduce damage to the buildings due to the poor condition of the Bungalow Court. Furthermore, to reduce potential damage to the buildings during transit that could materially impair character-defining features, or potentially destroy historic fabric beyond preservation or rehabilitation, a relocation and rehabilitation plan would be required. Once the buildings are replaced on the Project Site they would be retrofitted with new plywood shear walls. New mechanical, electrical, and plumbing systems would be installed, and damaged original materials would be repaired or replaced. Exterior walls would be patched and repaired and new windows and doors would be installed. The missing east courtyard arch would be reconstructed, all in conformance with the Standards. Alternative 5 would require the excavation of expansive soil to approximately four feet below grade and the replacement with new, engineered soil and excavation of approximately 12-13 feet below grade for the new underground parking structure beneath the majority of the Project Site.

ii. Impact Summary: As indicated in Draft EIR Table V-1, compared to the three-story Project, Alternative 5 would reduce the total residential floor area by 6,654 sf or 47 percent. In Alternative 5, the units would be offered as market rate rental or for sale units. Approval of a subdivision map for condominium purposes would be required if the units were to be offered for sale.

iii. Findings: Alternative 5 would reduce adverse environmental impacts when compared to the Project. However, Alternative 5 would not satisfy many of the Project Objectives nor contain many of the Project's beneficial components. Pursuant to Public Resources Code Section 21081(a)(3), the City finds that the specific economic, legal, social, technological, or other considerations, including considerations identified in Section XI of these Findings (Statement of Overriding Considerations), make Alternative 5 infeasible.

iv. Rationale For Findings: Alternative 5 would not achieve many of the six Project Objectives. First, Alternative 5 would not redevelop the Project Site with residential buildings and a site design that is consistent with the existing and proposed HCP and underlying zoning designation to the same extent as the Project. Instead, the existing units would be rehabilitated.

Second, Alternative 5 would only partially provide housing with high-quality architecture and landscape design that

would improve and be compatible with the eclectic visual character of the neighborhood and the Hollywood Community. Although Alternative 5 would include new landscaping some newly constructed residential units, and rehabilitation of the Bungalow Court, it would not represent all new housing.

Third, Alternative 5 would partially support sustainable design through development that would optimize site energy efficiency, water conservation, and runoff water quality. The existing units would be rehabilitated, and the rehabilitation would be subject to the Historic Building Code, which exempts historic buildings from certain sustainability and green standards. For instance, it would meet the applicable requirements of Title 24 and the CALGreen Code to a lesser extent than the Project. Also, Alternative 5 would not include Project features such as roofs that are pre-wired for future installation of solar panels, parking spaces with electric vehicle charging outlets, and biofiltration; or other Code requirements that could compromise the integrity of the historic buildings. However, the construction and operation of Alternative 2 would require less electricity, natural gas, and transportation energy than the Project.

Alternative 5 would not meet the Standards and due to loss of integrity including alterations and additions to the Bungalow Court and demolition of the Garage, Alternative 5 would not retain the eligibility and historic significance of the Bungalow Court, and would result in a significant impact. Although it would involve preparation of a Historic Structures Report and Standards Plan Review and construction monitoring by a qualified preservation consultant, these measures would not reduce potential impacts to less than significant. Furthermore, as described in the Feasibility Study, included as Appendix I of the Historical Resource Assessment Report (included in Appendix C of the Draft EIR), Alternative 5 would require substantial reconstruction and rehabilitation, including the lifting of the buildings, which would require a lifting and bracing plan due to the poor condition of the structures. Additionally, new mechanical, electrical, and plumbing could cause additional damage to the buildings, so a rehabilitation plan would be required to conform with the Standards. Mitigation Measures MM-HIST-1: Photograph Recordation, and MM-HIST-2: Relocation and Rehabilitation would be required to reduce impacts from relocation during construction, alterations and additions to the Bungalow Court, and demolition of the Garage. However, similar to the Project, even with incorporation of the recommended preservation recommendations and mitigation measures, the impacts would still be considered significant and unavoidable.

Fourth, Alternative 5 would partially provide high quality housing to help accommodate regional and Citywide housing demand in a Transit Priority Area. Nonetheless, substantially less housing would be provided as Alternative 5 would produce six units rather than eight units, and the units would be rehabilitated rather than constructed to meet modern residential design standards.

Fifth, Alternative 5 would provide a diversity of housing choices within the neighborhood relating to unit size, number of bedrooms, and ownership. Yet unlike the Project, residents under Alternative 5 may not have the option of homeownership. The small lot subdivision style of development provides benefits of a single-family home, and full fee-simple ownership with the conveniences of a townhouse lifestyle. As such, it helps to meet an alternative niche market to the single-family and condominium housing markets. Further, the Project's small lot subdivision would add to diversity in the types of housing that are available in the City. Such small lot units would be priced significantly lower when compared to traditional single-family homes in the area. This would provide home ownership opportunities to a greater number of people than would otherwise be available. Also, the two units in each building would be combined for a total of four units and two new second floor units, resulting in a reduction in the number of units. This in turn would have an incremental affect regarding the number of households in the City.

Sixth, Alternative 5 would not develop an economically viable residential project. The Market Analysis (included as Appendix H of the Draft EIR) concluded that the cost to develop Alternative 5 as a rental project would be \$10,009,380 and the project return would be \$6,067,260, which would result in a loss of \$3,942,120 (a negative 61 percent return on cost). The Market Analysis concluded that the cost to develop Alternative 5 as a for sale project would be \$10,531,880 and the Project return would be \$5,831,880, which would result in a loss of \$6,570,200 (a negative 55 percent return on cost). Therefore, this Alternative is infeasible.

v. Reference: For a complete discussion of impacts associated with Alternative 5, please see Draft EIR Section V, Alternatives, Appendix C, Historic Resources Assessment Report, Appendix G,



Comparison of Project Alternatives, Appendix H, Market and Financial Feasibility Analysis and Other Cost Feasibility Data, and Appendix I Peer Review: Market Analysis; and Final EIR Chapter II, Revisions, Clarifications, and Corrections.

f. Alternative 6 - Construction Of Two Single-Family Residential Units Alternative

i. Description: Alternative 6 would consist of demolition of the existing buildings, removal of the lot tie between the parcels, and construction of two single-family dwelling units, 30 feet in height. Access to the parcels would be from Waring Avenue and North Edinburgh Avenue, respectively. The dwelling units would be each be approximately 4,000 sf, with four bedrooms, and two garage parking spaces each and constructed on an approximately 5,959 square foot lot (assuming the same dedication along Waring Avenue as the Project). This would result in a FAR of 0.67. The dwelling units would comply with all current LAMC regulations, including those related height (30-foot height limit), floor area (maximum FAR of 3.0:1), density (1 dwelling unit per 1,500 sf site area), setback (15-foot front and rear yard setback, and 5-foot side yard setback), lot dimensions (50-foot minimum width, and 5,000 sf minimum lot area), and massing. Alternative 6 would provide four parking spaces, in compliance with LAMC requirements. Alternative 6 would require the excavation of expansive soil to approximately four feet below grade and the replacement with new, engineered soil beneath the footprint of the new residential structures.

ii. Impact Summary: As indicated in Draft EIR Table V-1, compared to the Project, Alternative 6 would reduce the total residential floor area by 6,088 sf or 43 percent.

iii. Findings: Alternative 6 would reduce adverse environmental impacts when compared to the Project. However, the Alternative 6 would not satisfy many of the Project Objectives nor contain many of the Project's beneficial components. Pursuant to Public Resources Code Section 21081(a)(3), the City finds that the specific economic, legal, social, technological, or other considerations, including considerations identified in Section XI of these Findings (Statement of Overriding Considerations), make Alternative 6 infeasible.

iv. Rationale For Findings: Alternative 6 would only achieve a few of the six Project Objectives. First, Alternative 6 would redevelop the Project Site with residential buildings and a site design that is consistent with the existing and proposed HCP and underlying zoning designation, but not to the same extent as the Project. Second, Alternative 6 would provide housing with high-quality architecture and landscape design that would improve and be compatible with the eclectic visual character of the neighborhood and the Hollywood Community. Third, Alternative 6 would support sustainable design through development that would optimize site energy efficiency, water conservation, and runoff water quality.

Fourth, Alternative 6 would provide high quality housing to help accommodate regional and Citywide housing demand in a Transit Priority Area. However, with only two single-family residences, Alternative 6 would not maximize new housing opportunities to meet demand. Alternative 6 would only provide two housing units, whereas the Project would provide eight.

Fifth, Alternative 6 would not provide a diversity of housing choices within the neighborhood relating to unit size, number of bedrooms, and ownership. Alternative 6 would provide for-sale residences, however given their size, these residences would not provide the same level of home ownership affordability as provided by the Project. This would create an extra high barrier for first-time homebuyers looking to enter the market within their neighborhood. The small lot subdivision style of development provides benefits of a single-family home, and full fee-simple ownership with the conveniences of a townhouse lifestyle. As such, it helps to meet an alternative niche market to the single-family and condominium housing markets. Further, the Project's small lot subdivision would add to diversity in the types of housing that are available in the City. Such small lot units would be priced significantly lower when compared to traditional single-family homes in the area. This would provide home ownership opportunities to a greater number of people than would otherwise be available. The two units contemplated in Alternative 2 would be priced more like other traditional single family homes in the area, reducing opportunities for home ownership.

Sixth, Alternative 6 would not develop an economically viable residential project. Due to the reduction in housing density, the economic viability of Alternative 6 as a residential project would be negatively impacted.

v. Reference: For a complete discussion of impacts associated with Alternative 6, please see Draft EIR Section V, Alternatives, Appendix C, Historic Resources Assessment Report, Appendix G,

Comparison of Project Alternatives, Appendix H, Market and Financial Feasibility Analysis and Other Cost Feasibility Data, and Appendix I Peer Review: Market Analysis.

#### **D. Alternatives Rejected as Being Infeasible**

In addition to the six alternatives listed above, another eight alternatives were considered and rejected for the reasons discussed on pages V-5 to V-12 of the Draft EIR. The following summarizes the conclusions of the Draft EIR.

##### **a. Alternative Off-Site Locations**

CEQA does not require that analysis of alternative sites always be included in an EIR. However, if all the surrounding circumstances make it reasonable to consider an alternative site, then an alternative location should be considered and analyzed in the EIR. In making the decision to include or exclude analysis of an alternative site, according to the State CEQA Guidelines, Section 15126.6(f)(2) the “key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR.” If no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion. Among the factors that may be considered when addressing the feasibility of an alternative site is suitability, economic viability, availability of infrastructure, general plan consistency, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site.

While the development of the Project at an off-site location would avoid or reduce a significant unavoidable impact on historical resources, development of the Project at an off-site location would not meet the basic Project Objectives of redeveloping the Project Site with high quality architecture and landscaping, providing housing within a Transit Priority Area, or providing a diversity of housing choices within the neighborhood. Furthermore, the Applicant does not own or control another suitable location in the area. In addition, given the investment in the Project to date and the reduction in value based on the Project’s historic designation, even with the sale of the property and possible acquisition of another suitable property, it would not be economically viable for the Applicant to plan, design and develop the Project at an off-site location. Therefore, an offsite alternative was deemed infeasible and not considered for further analysis in the EIR.

##### **b. Alternative On-Site Locations**

The following seven alternative on-site uses, as shown in Draft EIR Figure V-1, On-Site Alternatives Not Pursued, were considered but rejected as preservation alternatives in the Feasibility Study and preliminary design concepts. The seven residential design alternatives were ultimately rejected as infeasible based on failure to maintain historic integrity of the site resulting in ineligibility to maintain status as a LAHCM, failure to meet the Project Objectives, and financial infeasibility.

###### **i. New 30-foot Tall Southeast Back Building**

This alternative considered preserving three of the four existing buildings closest to the North Edinburgh Avenue and Waring Avenue street frontages and the existing garage building, while replacing the existing southeast building (the least visible from the street fronts) with a new 30-foot tall, three story building. The new building would include either a stepped parapet (similar in style with the existing bungalows) or a sloped roof. This alternative would consist of a total of six units, three parking spaces and a total floor area of 6,096 sf. This alternative would comply with existing General Plan and zoning designations but would not meet current parking requirements and therefore would require a discretionary approval from the Planning Director. This alternative was not pursued because it would not conform with the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Standards), and furthermore, it would not retain the eligibility of the LAHCM. Significant adverse impacts would include the full demolition of one of four existing character-defining bungalows, and construction of a new 30-foot tall, three-story building that would be incompatible with the smaller scale of the three existing one-story bungalows to remain. The new building would substantially alter the existing character-defining scale, massing and spatial relationships of the LAHCM, resulting in an awkward, incompatible arrangement of buildings on the Project Site that would materially impair the eligibility of the LAHCM. The alternative would result in loss of over a quarter of the existing character-defining features and after completion the Bungalow Court and Garage’s essential form and integrity would be such that it would no longer be eligible as a LAHCM. This

alternative also would not comply with most of the other Project Objectives. Therefore, this alternatives was deemed to be infeasible.

ii. New 30-foot Tall East Building

This alternative considered preserving the two buildings along the North Edinburgh Avenue street frontage and replacing the two existing eastern buildings toward the rear of the lot with a new 30-foot tall, three story building, enclosing the courtyard. New underground parking that is accessed from the existing garage building would be provided. This alternative would consist of a total of eight units, three parking spaces, and a total of 11,482 sf. This alternative would comply with the existing General Plan and zoning designations but would not meet current parking requirements and therefore would require a discretionary approval from the Planning Director.

This alternative was not pursued because it would not conform with the Standards, and furthermore, it would not retain the eligibility of the LAHCM. Significant adverse impacts would include demolition of two of four existing character-defining bungalows, removal of half of the existing character-defining open courtyard, and construction of a new 30-foot tall, three-story building that would be incompatible with the smaller scale of the two existing one-story bungalows to remain. The new building would substantially alter the existing character-defining scale, massing and spatial relationships of the LAHCM, resulting in a design that would overwhelm the original two western-most bungalows that would be retained. This alternative would result in loss of over half of the existing character-defining features and the Bungalow Court's essential form and after completion the integrity of the Bungalow Court and Garage would be such that it would no longer be eligible as a LAHCM. This alternative also would not comply with most of the Project Objectives. Therefore, this alternatives was deemed to be infeasible.

iii. New 30-Foot Tall Southeast Building With Site Parking

This alternative considered preserving the two buildings along the North Edinburgh Avenue street frontage, while demolishing the existing garage building and replacing the existing southeast building with a new 30-foot tall, three story building, creating a driveway through the center courtyard, and a new surface parking for 11 vehicles. This alternative would consist of six units and a total floor area of 7,098 sf. This alternative would comply with the existing General Plan and zoning designations but would not meet current parking requirements and therefore would require a discretionary approval from the Planning Director. Similar to the other alternatives described above that were considered and rejected, this alternative was not carried forward for full evaluation because it would not conform with the Standards, and furthermore, it would not retain the eligibility of the LAHCM. This alternative would demolish the character-defining southeast building and garage, and alter the character-defining courtyard, which would result in a significant impact to the historical resource. In addition, this alternative would alter the existing character-defining scale, massing and spatial relationships of the subject property. Overall, this alternative was not pursued because demolition and alteration of the Bungalow Court and Garage would substantially change the Bungalow Court and Garage's essential form and integrity such that after completion the remaining existing buildings would no longer be eligible as a LAHCM. In addition, this alternative would create surface parking on the east side of the Project Site and the number of parking spaces would not meet current parking requirements. This alternative also would not comply with most of the Project Objectives. Therefore, this alternatives was deemed to be infeasible.

iv. New 50-Foot Tall East Building

This alternative considered preserving the two buildings along the North Edinburgh Avenue street frontage and replacing the two existing eastern buildings toward the rear of the lot with a new 50-foot tall building, enclosing the courtyard. New underground parking that is accessed from the existing garage building would be provided. This alternative would consist of 14 units (including 8 low income units), 11 parking spaces, and a total floor area of 16,322 sf. The purpose of considering this alternative was to determine whether increased density at the site would result in a financially feasible project.

This alternative was not pursued because it would not conform with the Standards, and furthermore, it would not retain the eligibility of the LAHCM. Significant adverse impacts would occur with demolition of two of the four existing character-defining bungalows, removal of half of the existing character-defining open courtyard, and construction of a new 50-foot tall building that would be incompatible with the smaller scale of the two existing one-story bungalows to remain. The new building would overwhelm the two western one-story buildings, which are part of the character defining features of the LAHCM, and would alter the existing character-defining scale, massing and spatial relationships of this historical resource. Overall, this alternative was not pursued because demolition of the

two buildings and the other alterations would substantially compromise the Bungalow Court and Garage's essential form and integrity such that after completion the remaining existing buildings would no longer be eligible as a LAHCM.

In addition, the height of the new building would overwhelm the adjacent buildings in the neighborhood and would be inconsistent with the HCP. Furthermore, this alternative would only contain eleven parking spaces, significantly fewer than would be required by the Zoning Code and therefore would require a discretionary approval from the Planning Director. This alternative also would not comply with most of the other Project Objectives. This alternative would require General Plan Amendment and Zone Change to exceed the 30-foot height limit and density of one unit per 1,500 sf currently permitted within the RD1.5-1XL zone. Pursuant to Measure JJJ, any project that receives a height or density change is subject to the following conditions: training, local hiring and prevailing wage requirements, and replacement of rent stabilized units or affordable units. Even with increase in density, these additional requirements under Measure JJJ would further make this alternative financially infeasible. Therefore, this alternative was deemed to be infeasible.

v. Façade Wrap 55-Foot Tall East Building

This alternative would preserve two buildings, fully demolish two existing buildings, cut off the open courtyard, and overwhelm the original two western-most existing bungalows and adjacent buildings in the neighborhood with a new 55-foot tall east building. This alternative would construct 14 units (including 8 low income units), have a total floor area of 19,657 sf, demolish the existing garage building, and build underground parking with 22 parking spaces. Similar to the above, this alternative was not pursued because it would not conform with the Standards, and furthermore, it would not retain the eligibility of the LAHCM. This alternative would also require General Plan Amendment and Zone Change to exceed the 30-foot height limit and density of one unit per 1,500 sf currently permitted within the RD1.5-1XL zone. Pursuant to Measure JJJ, any project that receives a height or density change is subject to the following conditions: training, local hiring and prevailing wage requirements, and replacement of rent stabilized units or affordable units. Even with increase in density, these additional requirements under Measure JJJ would make this alternative financially infeasible. This alternative also would not comply with most of the Project Objectives. Therefore, this alternative was deemed to be infeasible.

vi. Façade Wrap 115-Foot Tall East Building

This alternative would preserve two existing bungalow buildings, fully demolish two existing bungalow buildings, cut off the open courtyard, and overwhelm the original two western-most existing bungalows and adjacent buildings in the neighborhood with a new 115-foot tall east building. This alternative would construct 24 units (including 8 low income units), have a total floor area of 37,282 sf, demolish the existing garage, and build underground parking with 48 parking spaces. This alternative was not pursued because it would not conform with the Standards, and furthermore, it would not retain the eligibility of the LAHCM. This alternative would also require General Plan Amendment and Zone Change to exceed the 30-foot height limit and density of one unit per 1,500 sf currently permitted within the RD1.5-1XL zone. Pursuant to Measure JJJ, any project that receives a height or density change is subject to the following conditions: training, local hiring and prevailing wage requirements, and replacement of rent stabilized units or affordable units. Even with increase in density, these additional requirements under Measure JJJ would make this alternative financially infeasible. Therefore, this alternative was deemed to be infeasible.

vii. New 42-Foot East Building Using Transit Oriented Communities Affordable Housing Incentive Program (TOC) Incentives

This alternative would preserve two existing bungalow buildings, fully demolish two of the existing bungalow buildings, does not preserve the one-story scale and massing of the existing bungalow buildings, cuts off the open courtyard and disrupts spatial relationships, and overwhelms the two western-most bungalows and adjacent buildings in the neighborhood with a new 42-foot tall East Building Using TOC Incentives pursuant to Measure JJJ. TOC incentives for the provision of affordable housing within one-half mile radius of a major transit stop may include an increase in residential density, an increase in the allowable FAR, a decrease in the amount of residential parking requirements, setbacks, open space, lot coverage, density, and building height. This alternative would construct 12 units (including 8 low income units), have a total floor area of 12,922 sf, and provide 9 surface parking spaces, which would not meet current parking requirements and therefore would require a discretionary approval from the Planning Director. Similar to the above, this alternative was not pursued because it would not conform with the Standards, and furthermore, it would not retain the eligibility of the LAHCM. Because this alternative would exceed the 30-foot height limit, density, and parking requirements, the Applicant would apply for TOC incentives in

exchange for providing affordable housing near a major transit stop. However, even with these incentives, additional requirements under Measure JJJ would make this alternative infeasible. Similar to the other rejected alternatives, this alternative also would not comply with most of the Project Objectives. Therefore, this alternative was deemed to be infeasible.

#### **E. Environmentally Superior Alternative**

Alternative 2 - Full Preservation Alternative, would avoid the Project's significant and unavoidable impacts on historical resources with implementation of preservation recommendations, and the resource would remain a designated LAHCM. Alternative 2 is presumed to meet the Standards, although it would require substantial reconstruction and rehabilitation, including the lifting of the buildings, which would require a lifting and bracing plan due to the poor condition of the structures. Furthermore, new mechanical, electrical, and plumbing could cause additional damage to the buildings, and a rehabilitation plan would be required. However, Alternative 2 would avoid the deterioration that would continue to occur under Alternative 1. Alternative 2 would have similar less than significant construction noise and construction vibration impacts (with mitigation) as the Project since off-site excavation of expansive soils would occur near off-site residences.

Alternative 2 would have reduced impacts related to air quality, operational noise and vibration, construction and operational traffic, and energy, compared to the Project due to reduced construction activity and smaller unit size. Alternative 2 would have similar impacts as the Project related to population and housing, since the number of units would remain the same, and similar impacts as the Project regarding design feature hazards, since less traffic would be generated but sidewalk and roadway improvements would not occur. Furthermore, the Full Preservation Alternative would meet three of the six Project Objectives and potentially meet one more. It would meet the Project Objectives of providing a diversity of housing choices within the neighborhood, would provide housing with high quality architecture and landscape design, and would provide high quality housing to accommodate demand within a Transit Priority Area. It would potentially meet the objective to develop an economically viable residential project. It would not meet the objective to redevelop the Project Site with residential buildings and a site design that is consistent with the existing and proposed Hollywood Community Plan and underlying zoning designation, although it would be consistent with the Hollywood Community Plan and underlying zoning designation. It would also not meet the objective to support sustainable design through development that would optimize site energy efficiency, water conservation, and runoff water quality, since it would not be built using modern green building standards, although renovation of an existing building rather than building a new one has environmental benefits because fewer new resources are required. None of the other alternatives (Alternatives 2 through 6) would avoid the less than significant impacts (with mitigation) associated with construction noise and construction vibration, since excavation of expansive soil near off-site residential uses would occur under these alternatives.

### **X. OTHER CEQA CONSIDERATIONS**

#### **A. Significant Irreversible Environmental Changes**

Pursuant to Section 15126.2(c) of the CEQA Guidelines, the Draft EIR addressed whether there would be any significant irreversible environmental changes that would occur should the Project be implemented. (See Draft EIR pages VI-2 to VI-3.) The Project would necessarily consume limited, slowly renewable and non-renewable resources. This consumption would occur during the construction phase of the Project and would continue throughout its operational lifetime. Project development would require a commitment of resources that would include: (1) building materials, (2) fuel and operational materials/resources, and (3) the transportation of goods and people to and from the Project Site. Project construction would require the consumption of resources that are non-replenishable or may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: certain types of lumber and other forest products; aggregate materials used in concrete and asphalt such as sand, gravel and stone; metals such as steel, copper, and lead; petrochemical construction materials such as plastics; and water. Furthermore, nonrenewable fossil fuels such as gasoline and oil would also be consumed in the use of construction vehicles and equipment, as well as the transportation of goods and people to and from the Project Site.

Similar to the prior residential uses on the Project Site, operation of the Project would expend nonrenewable

resources such as electricity and natural gas, petroleum-based fuels required for vehicle-trips, fossil fuels, and water. Fossil fuels would represent the primary energy source associated with both construction and ongoing operation of the Project, and the existing, finite supplies of these natural resources would be incrementally reduced.

At the same time, the Project is an infill development located within a Transit Priority Area that would reduce reliance on private automobiles and the consumption of non-renewable resources. Most notably, the Project would provide single-family residential units near existing commercial and retail destinations and public transit stops along Melrose Avenue and Fairfax Avenue. These factors would contribute to a land use pattern that is considered to reduce the consumption of non-renewable resources.

Furthermore, the Project would be built in accordance with the Building Sustainability guideline of the Small Lot Design Guidelines. In addition, the Project's design would comply with the Los Angeles Green Building Code, which builds upon the 2016 CALGreen Code. The Project would include drought-tolerant landscaping and water efficient irrigation systems and the rooftop of each residence would dedicate a portion of roof area to be pre-wired for the future installation of solar panels. The garage/carport areas in each individual residence would also include an electrical outlet appropriate to charge an electric vehicle, so that all of the on-site parking spaces would be providing electric-vehicle charging outlets. Additional Project features that would contribute to energy efficiencies may include, but are not limited to, the installation of HVAC systems that utilize ozone-friendly refrigerants; high-efficiency appliances; and the incorporation of water conservation features per the Landscape guideline of the Small Lot Design Guidelines. All of these features would provide greater energy and resource conservation compared to the current residential buildings and prior occupancy on the Project Site. The Project would achieve objectives of the City's General Plan Framework Element, Air Quality Element and proposed HCP Update; SCAG's RTP/SCS; and SCAQMD's AQMP for establishing a regional land use pattern that promotes sustainability.

The Project's continued use of non-renewable resources would fall within and be consistent with regional and local growth forecasts in the area, as well as State and local goals for reductions in the consumption of such resources. Furthermore, the Project would not affect access to existing resources, or interfere with the production or delivery of such resources. The Project Site contains no energy resources that would be precluded from future use through Project implementation. Therefore, the Project's irreversible changes to the environment related to the consumption of non-renewable resources would not be significant.

## **B. Energy**

Section 21100(b) of the State CEQA Guidelines requires that an EIR include a detailed statement setting forth mitigation measures proposed to minimize a project's significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy. Section IV.F Energy of the Draft EIR provides relevant information and analyses that address the energy implications of the Project. With the evaluation emphasis on the potential to avoid or reduce inefficient, wasteful, and unnecessary consumption of energy, the analysis concluded that, due to compliance with existing requirements, the location of the Project, and the size of the Project, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy.

## **C. Growth Inducing Impacts**

The Project would replace eight one-bedroom apartments with eight three-bedroom, single-family residences as a Small Lot Subdivision for a total residential population of 24 people. As described in Draft EIR Section IV.D, Population and Housing, this would result in an increase in the residential population on the Project Site of approximately eight persons over the estimated previous residential population of 16 people. When compared to the existing vacated conditions at the Project Site there would be an increase of approximately 24 residents. During construction, the number of construction workers is estimated to range from five temporary employees to a maximum of 13 temporary employees. The Project would not have indirect effects on growth through such mechanisms as the extension of roads and infrastructure, since this infill development would use the existing transportation and utility infrastructure to serve the Project. Conformance with the existing and proposed HCP, relevant LAMC Small Lot Subdivision requirements, and applicable Small Lot Design Guidelines<sup>3</sup> would ensure that the Project would be compatible with adjacent uses. The Project's new development and growth represents a small

increment that is well within the range of development anticipated within the established SCAG regional forecast for the City and HCP area. The Project would not increase or induce residential density growth not otherwise anticipated.

The Project Site is located in an urbanized area that is served by current infrastructure (e.g., roads and utilities), and community service facilities. The Project's only off-site infrastructure improvements would consist of tie-ins to the existing utility main-lines already serving the Project Site and surrounding area. The Project would not require the construction of off-site infrastructure that would provide additional infrastructure capacity for other future development. It would not open inaccessible sites to new development other than existing opportunities for development that are already available.

Therefore, the Project would not spur additional growth other than that already anticipated and would not eliminate impediments to growth. Consequently, the Project would not foster growth inducing impacts.

#### **D. Potential Secondary Effects**

The following provides a discussion of the potential secondary effects on those topics that could occur as a result of implementation of the required mitigation measures. (See Draft EIR pages VI-5 to VI-7.) For the reasons stated below, the City finds that the Project's mitigation measures will not result in significant secondary impacts.

##### **a. Historical Resources**

Mitigation Measure MM-HIST-1 requires photographic recordation prior to demolition or relocation of the Bungalow Court and Garage. Once completed, digital copies would be provided to the Los Angeles Public Library and South Central Coastal Information Center. This mitigation measure would be specific to the Project Site and would not result in any significant secondary impacts not addressed in the Draft EIR.

Mitigation Measure MM-HIST-2 requires that efforts shall be made to relocate the Bungalow Court and Garage, ideally within an area of Hollywood associated with similar single-family or multi-family residential development. The Rehabilitation and Relocation Plan would follow the relocation methodology recommended by the National Park Service in the booklet "Moving Historic Buildings," by John Obed Curtis (1979). Any relocation of the buildings would be undertaken in accordance with a Relocation and Rehabilitation Plan to be reviewed and approved by the City's Office of Historic Resources prior to implementation. Upon relocation of the Bungalow Court and Garage to the new site, any work performed in conjunction with the relocation of the Bungalow Court and Garage would be undertaken in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Properties. A plaque describing the date of the move and original location would be placed in a visible location near the Bungalow Court. Any subsequent alterations of the Bungalow Court and Garage requiring a building permit would be subject to the standards and principles of the City's Historic Preservation Ordinance.

Relocation of the buildings would require a transportation permit from Caltrans if transported on State highways, for the use of oversized-transport vehicles. This permit would identify the haul route and hours for the transportation of the buildings. Potential impacts on traffic would be limited, of short duration, and a onetime event. Conformance with the permit requirement would reduce any potential secondary construction traffic impacts due to the use of oversized vehicles on the State transportation system to a less than significant level.

##### **b. Noise**

Mitigation Measures MM-NOISE-1 and MM-NOISE-2 would provide mitigation related to construction noise and vibration. Mitigation Measure MM-NOISE-1 would require the implementation of noise reduction strategies, such as construction noise barriers, between the Project construction site and residential development along the entire south, east, north, and west boundaries of the Project Site, with the capability of achieving a 15 dBA noise level reduction performance standard. The temporary noise barriers would be used during early Project construction phases (up to the start of framing) when the use of heavy equipment is prevalent. The construction noise barriers located along the southern and eastern property boundaries would partially block private views from these two adjacent properties to the Project Site during construction. These views are not valued public views which are the focus of aesthetic impact analysis under CEQA and pursuant to the L.A. CEQA Thresholds Guide. The construction noise barriers located along the western and northern property boundaries adjacent to North Edinburgh Avenue and

Waring Avenue would partially block public views from these streets. However, the existing views from Edinburgh Avenue and Waring Avenue of the Project Site includes construction fencing and boarded windows and doors. Furthermore, the Project Site does not contain any visual resources and the construction noise barrier would be temporary and only used during the early phases of construction. Therefore, no significant secondary impacts related to aesthetics are anticipated.

Mitigation Measure MM-NOISE-2 prohibits the use of large bulldozers and loaded trucks within 45 feet of existing residential structures located south and east of the Project Site during construction to reduce vibration and noise impacts. Instead small bulldozers would be used within this area during demolition, grading, and excavation operations. This mitigation measure would be site-specific and would not result in significant secondary impacts not addressed in the Draft EIR.

### **E. Effects Found Not To Be Significant**

Section 15128 of the State CEQA Guidelines states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. Pursuant to Section 15128, such a statement may be contained in an attached copy of an Initial Study. An Initial Study was prepared for the Project and is included in Appendix A of the Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each topical area is or is not analyzed further in the Draft EIR. The City has determined that the Project would not result in potentially significant impacts related to: aesthetics; agricultural and forestry resources; air quality; biological resources, cultural resources (except direct Historical Resources); geology and soils; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; mineral resources; noise; population and housing; public services; recreation; transportation/traffic; and utilities and service systems.

In response to comments received on the NOP and Initial Study and recent approval of the Small Lot Subdivision Standards, additional documentation for informational purposes regarding the issues of tribal cultural resources, land use and planning, and population and housing is provided in Appendices J, K and L, and Section IV.D, Population and Housing, of the Draft EIR. Regarding tribal cultural resources, the City prepared and distributed AB 52 Project Notification letters to ten Native American individuals and organizations on June 3, 2016 and did not receive any response to these letters. However, in response to the City's NOP, Mr. Salas, Chairman of the Gabrieleno Band of Mission Indians – Kizh Nation, requested tribal consultation per AB 52, due to the Project's location and high sensitivity of the area location (received by the City on January 17, 2017). On January 26, 2017, the City sent a letter to Mr. Salas requesting evidence of tribal cultural resources within the Project vicinity, data to support the need for Native American construction monitoring, and precise language for any proposed mitigation measures, within 30 days of receipt of the letter. No response was received from Mr. Salas by the City. Therefore, on August 30, 2017 the City concluded AB 52 Tribal Consultation with Mr. Salas. No additional impacts on tribal cultural resources were identified by Mr. Salas. As determined in the Initial Study, with implementation of Mitigation Measures CULT-1 and CULT-3, impacts on Cultural Resources would be less than significant. A copy of this correspondence is provided in Appendix J, AB 52 Tribal Consultation Documentation, of the Draft EIR.

Regarding Land Use, a policy consistency analysis is provided to expand upon the information contained in the Initial Study, Checklist Question X (b) about the proposed Hollywood Community Plan Update (HCPU) and the Small Lot Subdivision Standards. Tables K-1 and K-2, provide a comparison of the Project to applicable objectives of the Hollywood Community Plan (HCP) and proposed Hollywood Community Plan Update (HCPU), and are included in Appendix K, Policy Consistency Analysis with the 1988 Hollywood Community Plan and 2017 Hollywood Community Plan Update, of this EIR. As stated therein, the Project would generally be consistent with the applicable objectives and policies of the HCP and HCPU, with the exception of objectives and policies regarding preservation and rehabilitation of housing and historic resources. Preservation and rehabilitation of the existing Bungalow Court is addressed in Section IV.B, Historical Resources, Section IV.D, Population and Housing, and Chapter V, Alternatives, of the Draft EIR. Since preparation of the Initial Study, the Small Lot Code Amendment, Small Lot Design Standards, and Small Lot Map Standards were approved and are in effect as of April 18, 2018. Therefore, Draft EIR Table L-1, Project Consistency with Small Lot Map Standards, Design Standards, and Ordinance is included in Appendix L, Policy Consistency Analysis with the 2018 Small Lot Subdivision Standards. Draft EIR



Table L-1 provides an update to Table C1, Project Consistency with Proposed Small Lot Code Amendment and Policy Update, in Appendix C of the Initial Study (included in Appendix A of the Draft EIR). However, because a vesting tentative map for the Project has been filed and deemed complete, a consistency analysis is provided for informational purposes. As presented in Table L-1, the Project would be substantially consistent with the Small Lot Map Standards, Small Lot Design Standards, and Small Lot Code Amendment, with the exception of guest parking requirements and some walkway, building massing variation, and side yard and rear yard setback requirements. No additional impacts on consistency with land uses plans, policies, or regulations were identified.

Regarding population and housing, an additional analysis is provided to address the potential residential and housing displacement impacts of the Project associated with housing affordability and rent stabilized housing. As analyzed in Section IV.D, Population and Housing, of the Draft EIR, impacts regarding potential population and housing displacement would be less than significant due to the small number of units involved and relocation of previous tenants in compliance with City and State requirements.

#### **F. CEQA Considerations**

a. The City finds that the EIR was prepared in compliance with CEQA and the CEQA Guidelines. The City finds that it has independently reviewed and analyzed the EIR for the Project, that the Draft EIR which was circulated for public review reflected its independent judgment and that the Final EIR reflects the independent judgment of the City.

b. The EIR evaluated the following potential Project and cumulative environmental impacts: Air Quality; Cultural Resources (Historical Resources); Noise; Population and Housing; Transportation and Traffic; and Utilities (Energy). Additionally, the EIR considered: Significant Irreversible Environmental Changes, Energy, Growth Inducing Impacts, Potential Secondary Effects and Effects Found Not to Be Significant. The significant environmental impacts of the Project and the alternatives were also identified in the EIR.

c. The City finds that the EIR provides objective information to assist the decisions makers and the public at large in their consideration of the environmental consequences of the Project. The public review period provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding the Draft EIR. The Final EIR was prepared after the review period and responds to comments made during the public review period.

d. Textual refinements and errata were compiled and presented to the decision makers for review and consideration. The City staff has made every effort to notify the decision makers and the interested public/agencies of each textual change in the various documents associated with Project review. These textual refinements arose for a variety of reasons. First, it is inevitable that draft documents would contain errors and would require clarifications and corrections. Second, textual clarifications were necessitated in order to describe refinements suggested as part of the public participation process.

e. The Department of City Planning evaluated comments on environmental issues received from persons who reviewed the Draft EIR. In accordance with CEQA, the Department of City Planning prepared written responses describing the disposition of significant environmental issues raised. The Final EIR provides adequate, good faith and reasoned response to the comments. The Department of City Planning reviewed the comments received and responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts to the Draft EIR. The Lead Agency has based its actions on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental impacts identified and analyzed in the EIR.

f. The Final EIR contains changes to the Draft EIR. The Final EIR provides additional information that was not included in the Draft EIR. Having reviewed the information contained in the Draft EIR and the Final EIR and in the administrative record, as well as the requirements of CEQA and the CEQA Guidelines regarding recirculation of Draft EIRs, the City finds that there is no new significant impacts, substantial increase in the severity of a previously disclosed impact, significant information in the record of proceedings or other criteria under CEQA that would require recirculation of the Draft EIR, or preparation of a supplemental or subsequent EIR. Specifically, the City finds that:

i. The Responses to Comments contained in the Final EIR fully considered and responded to comments claiming that the Project would have significant impacts or more severe impacts not disclosed in the Draft EIR and include substantial evidence that none of these comments provided substantial evidence that the

Project would result in changed circumstances, significant new information, considerably different mitigation measures, or new or more severe significant impacts than were discussed in the Draft EIR.

ii. The City has thoroughly reviewed the public comments received regarding the Project and the Final EIR as it relates to the Project to determine whether under the requirements of CEQA, any of the public comments provide substantial evidence that would require recirculation of the EIR prior to its adoption and has determined that recirculation of the EIR is not required.

iii. None of the information submitted after publication of the Final EIR, including testimony at the public hearings on the Project, constitutes significant new information or otherwise requires preparation of a supplemental or subsequent EIR. The City does not find this information and testimony to be credible evidence of a significant impact, a substantial increase in the severity of an impact disclosed in the Final EIR, or a feasible mitigation measure or alternative not included in the Final EIR.

g. The Mitigation Measures and Project Design Features identified for the Project were included in the Draft and Final EIRs. As revised, the final Project Design Features and final Mitigation Measures for the Project are described in the Mitigation Monitoring Program (MMP). Each of the Project Design Features and Mitigation Measures identified in the MMP is incorporated into the Project. The City finds that the impacts of the Project have been mitigated to the extent feasible by the Project Design Features and the Mitigation Measures identified in the MMP.

h. As the City has not approved the project, no Mitigation Monitoring Program is adopted.

i. In accordance with the requirements of Public Resources Section 21081.6, the City hereby adopts each of the Mitigation Measures expressly set forth herein as conditions of approval for the Project.

j. The custodian of the documents or other material which constitute the record of proceedings upon which the City's decision is based is the Department of City Planning.

k. The City finds and declares that substantial evidence for each and every finding made herein is contained in the EIR, which is incorporated herein by this reference, or is in the record of proceedings in the matter.

l. The City is certifying an EIR for, and is approving and adopting findings for, the entirety of the actions described in these Findings and in the EIR as comprising the Project.

m. The City finds that none of the public comments to the Draft EIR or subsequent public comments or other evidence in the record, including the changes in the Project in response to input from the community and the Council Office, include or constitute substantial evidence that would require recirculation of the Final EIR prior to its certification and that there is no substantial evidence elsewhere in the record of proceedings that would require substantial revision of the Final EIR prior to its certification, and that the Final EIR need not be recirculated prior to its certification.

## **XI. STATEMENT OF OVERRIDING CONSIDERATIONS**

The EIR has identified unavoidable significant impacts that would result from implementation of the Project. California Public Resources Code Section 21081 and CEQA Guidelines Section 15093(b) provide that when the decision of the public agency allows the occurrence of significant impacts that are identified in the EIR, but are not at least substantially mitigated, the agency must state in writing the reasons to support its action based on the complete EIR and/or other information in the record.

The City finds that it cannot make the findings necessary for a Statement of Overriding Considerations for this Project. This finding is based on substantial evidence in the record, including but not limited to the EIR, and documents and materials that constitute the record of proceedings. Cultural Resources (Direct Impacts) are not mitigated to a less than significant level for the Project, as identified in the EIR.

The Project would demolish the Bungalow Court and Garage, designated as Los Angeles Historic Cultural Monument No. 1105, a historical resource under CEQA. Because the demolition of a historical resource constitutes a substantial adverse change to the resource such that its eligibility for listing would be lost, this impact is considered significant. Changes and alterations, Project Design Features and Mitigation Measures, where available, have been required for or incorporated into the Project to reduce unavoidable direct impacts to historical resources to the greatest extent possible. Although relocation to a suitable site pursuant to Mitigation Measure MM-HIST-2, would reduce impacts to historical resources to a less than significant level, it is speculative to assume that

an interested party and suitable site will be found. Therefore, it is conservatively concluded that impacts would remain significant and unavoidable due to the demolition of the locally-designated historical resource (Bungalow Court and Garage). There are no additional measures which the City can impose that would reduce the direct impacts to less than significant levels if the Project were implemented.

**Finding:** For the foregoing reasons, the City finds that the benefits of the Project, as proposed, do not outweigh and override the significant and unavoidable impacts identified above.

**FINDINGS OF FACT (SUBDIVISION MAP ACT):**

In connection with the denial of Vesting Tentative Tract Map No. 74201-SL, pursuant to Section 66575 of the State of California Government Code (the Subdivision Map Act), the Advisory Agency of the City of Los Angeles makes the prescribed findings as follows:

(a) PROPOSED MAP IS NOT CONSISTENT WITH APPLICABLE GENERAL PLAN AND SPECIFIC PLANS.

The Land Use Element of the General Plan consists of the 35 Community Plans within the City of Los Angeles. The project site is located within the Hollywood Community Plan, which establishes goal, objectives, and policies for future developments at a neighborhood level. Additionally, through the Land Use Map, the Community Plan designates parcels with a land use designation and zone. The Land Use Element is further implemented through the Los Angeles Municipal Code (LAMC). The zoning regulations contained within the LAMC regulates, but is not limited to, the maximum permitted density, height, parking, and the subdivision of land.

The subdivision of land is regulated pursuant to Article 7 of the LAMC. Specifically, Section 17.05 C requires that the Vesting Tentative Tract Map be designed in compliance with the zoning regulation applicable to the project site. The project site is located within the Hollywood Community Plan, which designates the site with a Low Medium II Residential land use designation. The land use designation lists the RD1.5 Zone as the corresponding zone. The Project Site is zoned RD1.5, which is consistent with the land use designation. The RD1.5-1XL zone permits single- and multi-family residential uses with a maximum floor-to-area ration (FAR) of 3.0:1 FAR and a 30-foot height limitation. The RD1.5 zone also establishes a maximum density of one residential unit per 1,500 square feet of site area. The project site has approximately 11,899 net-square feet, thus the maximum allowed density is eight units. As shown on the tract map, the project proposes to subdivide the project site into eight small lots, pursuant to LAMC 12.22 C.27, which is consistent with the density permitted by the zone. The site is not located within a specific plan area or other overlay.

However, the Vesting Tentative Tract Map would not be consistent with policies contained in the Conservation Element of the General Plan. In particular, the Project would not be consistent with the Historic and Cultural Objective to “protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes” or the Historic and Cultural Policy to “continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition or property modification activities,” as it would require the demolition of Historic Cultural Monument No. 1105, the Bungalow Court and Garage existing on the site. In addition to LAMC Section 17.05 C, LAMC Section 17.06 B requires that the tract map be prepared by or under the direction of a licensed surveyor or registered civil engineer. The tract map was prepared by Eric Lieberman and contains information regarding the boundaries of the project site, as well as the abutting public rights-of-way, existing and proposed dedication, and improvements of the tract map. The tract map indicated the tract number, notes, legal description, contact information for the owner, applicant, and engineer, as well as other pertinent information as required by LAMC Section 17.06 B. Additionally, as a small lot subdivision, the map indicates the common access easement for vehicular and pedestrian access to the proposed small lots, consistent with LAMC 12.22 C.27. Therefore, the proposed map demonstrates compliance with LAMC Section 17.05 C, 17.06 B and 12.22 C.27 but is nevertheless inconsistent with the General Plan.

(b) THE DESIGN AND IMPROVEMENT OF THE PROPOSED SUBDIVISION ARE NOT CONSISTENT WITH APPLICABLE GENERAL AND SPECIFIC PLANS.

For purposes of a subdivision, design and improvement is defined by Section 66418 of the Subdivision Map Act and LAMC Section 17.02. Design refers to the configuration and layout of the proposed lots in addition to the proposed site plan layout. LAMC Section 17.05 enumerates the design standards for a tract map and requires that each map be designed in conformance with the Street Design Standards and in conformance with the General Plan. As indicated in Finding (a), LAMC Section 17.05 C requires that the tract map be

designed in conformance with the zoning regulations of the project site. The project site is zoned RD1.5 on an approximately 12,163 net-square-foot lot. As the map is proposed for an eight small lot subdivision, it is consistent with the density permitted by the zone. As a small lot subdivision, the map indicates the common access easements from Edinburgh Avenue for vehicular access.

The improvement of the proposed subdivision, however, would require the demolition of Historic Cultural Monument No. 1105, the Bungalow Court and Garage existing on the site. Therefore, the Project would not be consistent with the objectives and policies of the Conservation Element of the General Plan. Specifically, it is not consistent with the Historic and Cultural Objective to “protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes” and the Historic and Cultural Policy to “continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition or property modification activities.”

The tract map was distributed to and reviewed by the various city agencies of the Subdivision Committee that have the authority to make dedication, and/or improvement recommendations. The Bureau of Engineering reviewed the tract map for compliance with the Street Design Standards. The Bureau of Engineering has recommended a three-foot-wide dedication along the northern property boundary on the south side of Waring Avenue. Despite these conditions, however, the design and improvements of the proposed subdivision are not consistent with the General Plan due to the inconsistency with the Conservation Element of the General Plan.

(c) THE SITE IS NOT PHYSICALLY SUITABLE FOR THE PROPOSED TYPE OF DEVELOPMENT.

The project site is made up of one 12,163-square-foot parcel. The site is currently developed with a bungalow court designated as Historic Cultural Monument No. 1105, comprised of four, one-story buildings and a one-story garage building, all of which will be demolished as part of the implementation of the proposed project. The proposed subdivision for eight single-family dwellings on Small Lots as allowable under the current RD1.5 Zone, and the Low Medium II Residential land use designation. The project site is located within two miles from the Hollywood Fault, but is not located within the Alquist-Priolo Fault Zone. The project site is not located within a designated hillside area or within the BOE Special Grading Area. The project site is not located within a high fire hazard severity zone, flood zone, landslide, liquefaction, or tsunami inundation zone. The project site is not identified as having hazardous waste or past remediation. The project site is not within a flood zone. Nevertheless, the presence of the Historic Cultural Monument on the site precludes the suitability of the site for development with the proposed Project, as the Historic Cultural Monument would have to be demolished for the proposed Project to be implemented.

The Grading Division of the Department of Building and Safety concluded on January 24, 2017, that no geology and soils report is required prior to planning approval and has determined that the applicant shall comply with any requirements with the Department of Building and Safety, Grading Division for recordation of the final map and issuance of any permit. Nevertheless, the project site is not physically suitable for the proposed type of development due to the conflict with the Historic Cultural Monument on site.

(d) THE SITE IS PHYSICALLY SUITABLE FOR THE PROPOSED DENSITY OF DEVELOPMENT.

The adjacent properties to the north, south, east, and west are zoned RD-1.5-1XL, have land use designations of Low Medium II Residential, and consist of a mix of residential duplexes, triplexes, apartment buildings, and condominium buildings. The project site consists of a single approximately 12,163 net-square foot lot located on the southeast corner of the intersection of Edinburgh and Waring Avenues. The project site is currently developed with a bungalow court designated as Historic Cultural Monument No, 1105 and comprised of four, one-story buildings and a one-story garage building. The project proposes to construct eight small lot homes, which would be three stories with a maximum height of 30 feet as shown on the stamped map dated April 18, 2016. The project will adhere to the maximum permitted 30-foot building height, and therefore the height and density will be consistent with the zone and land use designation, which



would permit a maximum of eight dwelling units and a height of 30 feet. Additionally, prior to the issuance of a demolition, grading, or building permit, the project would be required to comply with conditions herein and applicable requirements of the LAMC. While the proposed tract map is physically suitable for the proposed density of the development, the required removal of the historic cultural monument to make way for the development of the project renders the site unsuitable for implementation of the proposed Vesting Tentative Tract Map.

- (e) THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS ARE LIKELY TO CAUSE SUBSTANTIAL ENVIRONMENTAL DAMAGE BUT NOT SUBSTANTIALLY AND AVOIDABLY INJURE FISH OR WILDLIFE OR THEIR HABITAT.

The Environmental Impact Report for the Project identified that implementation of the proposed Project would result in a Significant and Unavoidable Environmental Impact to historic resources due to the demolition of the Bungalow Court and Garage, Historic Cultural Monument No. 1105. The Environmental Impact Report prepared for the project did not identify any potential adverse impacts on fish or wildlife resources as far as earth, air, water, plant life, animal life, or risk of upset to these resources is concerned. The Property is located in an urbanized and developed area with similar structures and land uses that do not provide a natural habitat for fish or wildlife. Therefore, the Project would cause substantial impacts on the environment, but not specifically any injury to fish, wildlife, or their habitat.

- (f) THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS ARE NOT LIKELY TO CAUSE SERIOUS PUBLIC HEALTH PROBLEMS.

The proposed subdivision and subsequent improvements are subject to the provisions of the Subdivision Map Act, the LAMC, the California Building Code, and the City's Green Development Standards. Additional and more relevant health and safety related requirements as mandated by law will apply where applicable to ensure the public health and welfare during the construction and operation of the Project. There would be no potential public health problems caused by the design or improvement of the proposed subdivision. The development is required to be connected to the City's sanitary sewer system, where the sewage will be directed to the LA Hyperion Treatment Plant, which has been upgraded to meet Statewide ocean discharge standards. The Bureau of Engineering has reported that the proposed subdivision does not violate the existing California Water Code because the subdivision would be connected to the public sewer system and would have only a minor incremental impact on the quality of the effluent from the Hyperion Treatment Plant.

- (g) THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS WILL NOT CONFLICT WITH EASEMENTS ACQUIRED BY THE PUBLIC AT LARGE FOR ACCESS THROUGH OR USE OF PROPERTY WITHIN THE PROPOSED SUBDIVISION.

There are no recorded instruments identifying easements encumbering the project site for the purpose of providing public access. The project site is surrounded by private properties that adjoin improved public streets (Edinburgh Avenue and Waring Avenue) and sidewalks designed and improved for the specific purpose of providing public access throughout the area. The project site does not adjoin or provide access to a public resource, natural habitat, public park, or any officially recognized public recreation area. Necessary public access for roads and utilities will be acquired by the City prior to recordation of the proposed map. Therefore, the design of the subdivision and the proposed improvements would not conflict with easements acquired by the public at large for access through or use of property with the proposed subdivision.

- (h) THE DESIGN OF THE PROPOSED SUBDIVISION SHALL PROVIDE, TO THE EXTENT FEASIBLE, FOR FUTURE PASSIVE OR NATURAL HEATING OR COOLING OPPORTUNITIES IN THE SUBDIVISION.

In assessing the feasibility of passive or natural heating or cooling opportunities in the proposed subdivision design, the applicant has prepared and submitted a Solar Energy Feasibility Report which consider the local

climate, contours, configuration of the parcel(s) to be subdivided and other design and improvement requirements. Although no specific passive features are contemplated at this time, the project will be developed consistent with current Title 24 standards, including a minimum R-13 and R-30 insulation in walls and roofs. Providing for passive or natural heating or cooling opportunities will not result in reducing allowable densities or the percentage of a lot which may be occupied by a building or structure under applicable planning and zoning in effect at the time the tentative map was filed. The topography of the site is flat. Solar access to roof areas is good and prevailing breezes are not blocked by any adjacent structures.

Likewise, the project will not create obstructions to solar access for adjacent properties with sufficient separation between adjacent buildings. Also, access to the prevailing winds from the west for the lower stories is fair because of the distance to, and height of, the multi-unit buildings across Edinburgh Avenue. In addition, prior to obtaining a building permit, the subdivider shall consider building construction techniques, such as overhanging eaves, location of windows, insulation, exhaust fans; planting of trees for shade purposes and the height of the buildings on the site in relation to adjacent development.