ADDENDUM TO THE CERTIFIED EIR
FOR THE TARGET AT SUNSET AND WESTERN PROJECT
CASE NO. ENV-2008-1421-EIR

INTRODUCTION

This document was prepared pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code §§ 21000, *et seq*.) and CEQA Guidelines (California Code of Regulations, Title 14, §§ 15000, *et seq*.). The City of Los Angeles ("City") prepared this addendum to the Certified Environmental Impact Report (EIR) for Target at Sunset and Western Project ("Certified EIR") to evaluate whether project and permit modifications, or changes in circumstances relating to the proposed modifications for the Target at Sunset and Western Project ("Project") have potential environmental effects. The project applicant is Target Stores, a division of Target Corporation.

The Certified EIR is a Project EIR that analyzed the environmental effects of a commercial development located in the Hollywood Community of the City of Los Angeles. The project evaluated in the Certified EIR consisted of the demolition of 59,561 square feet of existing single-story buildings, electrical substation and parking lot, and development of commercial retail uses, including a Target store, retail/restaurant uses, and a parking structure containing two levels of parking. The proposed project would include a total of approximately 194,749 gross square feet of retail and associated uses in a three-level, 74'-4" tall retail center. Approximately 458 parking spaces were proposed to be located on the ground level and second level of the project. The City of Los Angeles, Department of City Planning is the lead agency for the Certified EIR.

The Project was approved and the EIR was certified in April, 2013. The Project and Certified EIR were subjected to legal challenges, which resulted in some of the Project approvals being overturned. In response, the applicant and City are proposing to amend the Vermont/Western Transit Oriented District Specific Plan (also referred to as the Station Neighborhood Area Plan – "SNAP"), and, solely to address roadway standards, the Hollywood Community Plan and the Citywide General Plan Transportation Element, within which the Project is located. The Addendum was prepared pursuant to CEQA Guidelines § 15164(a) which allows a lead agency to prepare an addendum to a previously certified EIR if some changes or additions to the previously certified EIR are necessary but none of the conditions described in CEQA Guidelines § 15162 requiring preparation of a subsequent EIR are present. CEQA Guidelines § 15162 provides that preparation of a subsequent EIR is required when one of the following occurs:

- Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

- Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

- New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:

    - The project will have one or more significant effects not discussed in the previous EIR;

    - Significant effects previously examined will be substantially more severe than shown in the previous EIR;

    - Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative;

    - Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but project proponents decline to adopt the mitigation measure or alternative.

Public Resources Code ("PRC") § 21166 provides that unless one or more of the conditions set forth are met, no subsequent or supplemental environmental impact report is required.

This Addendum describes the proposed modifications to the Target at Sunset and Western project and provides a comparison of the potential environmental effects which could be associated with those modifications to the impacts of the project as approved for each of the environmental issue areas evaluated in the Certified EIR. The analysis demonstrates that the proposed modifications evaluated in the Addendum would not result in conditions meeting the criteria set forth in CEQA Guidelines § 15162. Therefore, pursuant to PRC § 21166 and CEQA Guidelines § 15162, preparation of a subsequent EIR is not required.

ORIGINAL PROJECT DESCRIPTION

As shown in Figure 1, Regional Map, the project site is a rectangular shaped property that is approximately 168,869 square feet in size, and is bounded by Sunset Boulevard to the north, Western Avenue to the east, De Longpre Avenue to the south, and St. Andrews Place to the west. The Hollywood Freeway (US-101), located less than one half mile west of the project site, provides regional access to the project area. Additional nearby arterials contributing to site access include Hollywood Boulevard to the north, Western Avenue to the east, Santa Monica Boulevard to the south, and Vine Street to the west.

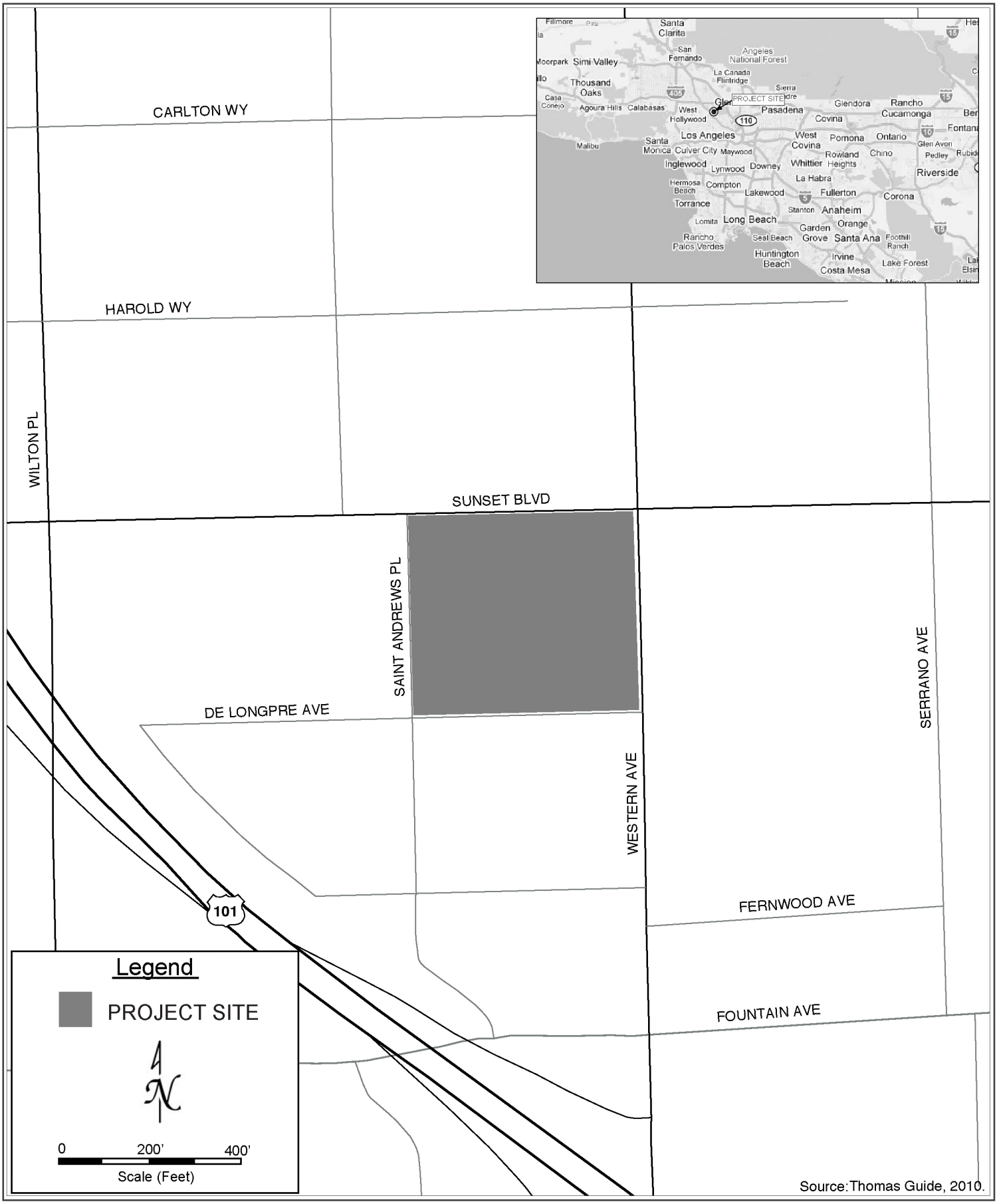

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Figure 1
Regional & Project Vicinity Map

The project site was previously occupied by a Department of Water and Power (DWP) electrical substation, a surface parking lot, and approximately 59,561 square feet of one-story commercial buildings that previously housed various businesses including a CVS/Pharmacy, a 3 Hermanos department store, a Farm Fresh Ranch Market, and a Carl's Jr. Restaurant. The previous shopping center on the project site was of a suburban, highway-oriented configuration. Additionally, a vacant part of the southwestern corner of the site previously included a recycling center operation. The existing buildings were located on the southern approximately one-half of the lot with a surface parking area located on the northern approximately one-half of the lot. The existing buildings were constructed in the mid 1970s. The topography of the project site is relatively flat, with a gradual slope from the north to the south.

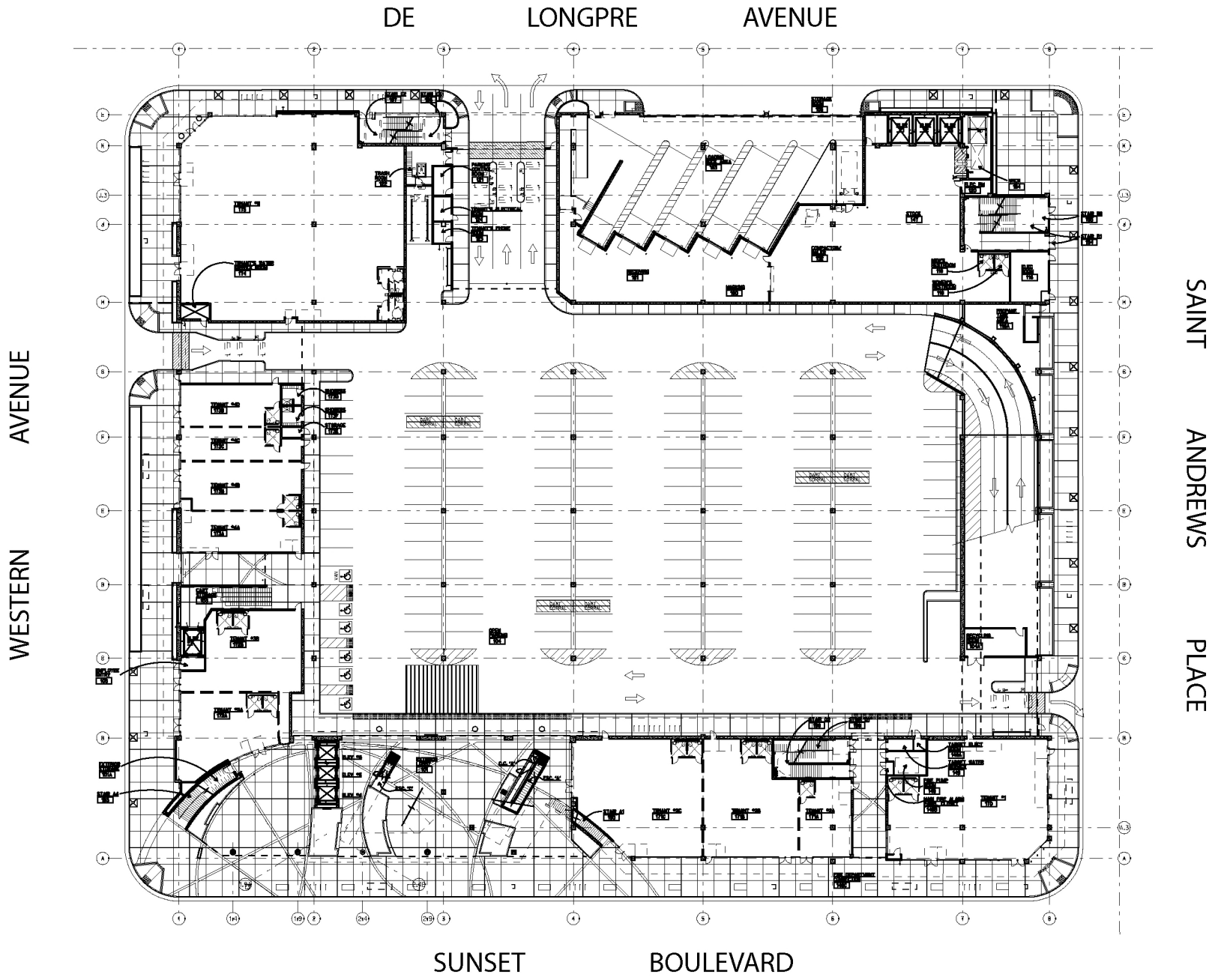
The City Council approved the Target at Sunset and Western project (the "Original Project") on April 3, 2013. The Original Project included the demolition of the existing 59,561 square feet of single-story buildings, electrical substation and parking lot and development of commercial retail uses, including a Target store, retail/restaurant uses, and a parking structure containing two levels of parking. The Original Project included a total of approximately 194,749 gross square feet of retail and associated uses, including a 163,862 square foot Target store, along with 30,887 square feet of other smaller retail and food uses fronting Sunset Boulevard and Western Avenue, in a three level retail center (Figures 2 through 4). Approximately 458 parking spaces would be located on the ground level and second level of the Original Project, which would also contain exterior balconies, a roof terrace on the second level, open areas and landscaping, at an FAR of approximately 1.15:1. The retail center building would extend to a maximum height of 74'-4" to the main roofline along De Longpre Avenue.

Project approvals for the Original Project included numerous Specific Plan Exceptions to the SNAP that were required to accommodate the project design, most notably the proposed building height. Under SNAP, building height for commercial projects is limited to 35 feet, plus 10 feet for roof structures, and a maximum floor area ratio of 1.5. Under SNAP, the building height for mixed residential and commercial use projects is 75 feet.

DESCRIPTION OF THE PROPOSED MODIFICATIONS TO THE PROJECT

Changes in Circumstances Under Which the Project is Undertaken

After the City approved the Original Project, the Project Applicant initiated construction of the project pursuant to valid building grading and permits issued by the City of Los Angeles Department of Building and Safety. The Project approvals were subsequently subjected to a legal challenge, which resulted in some of the Project approvals being overturned. As a result of the court's ruling, construction that had been completed pursuant to the then-valid permits was halted, after the building was framed and the roof installed, but prior to completion of the project's construction. Accordingly, with the previously valid building permits rendered potentially invalid by a court, no construction is presently taking place on the project site, and the project site is currently closed and fenced.



Source: Development Resource Consultants.

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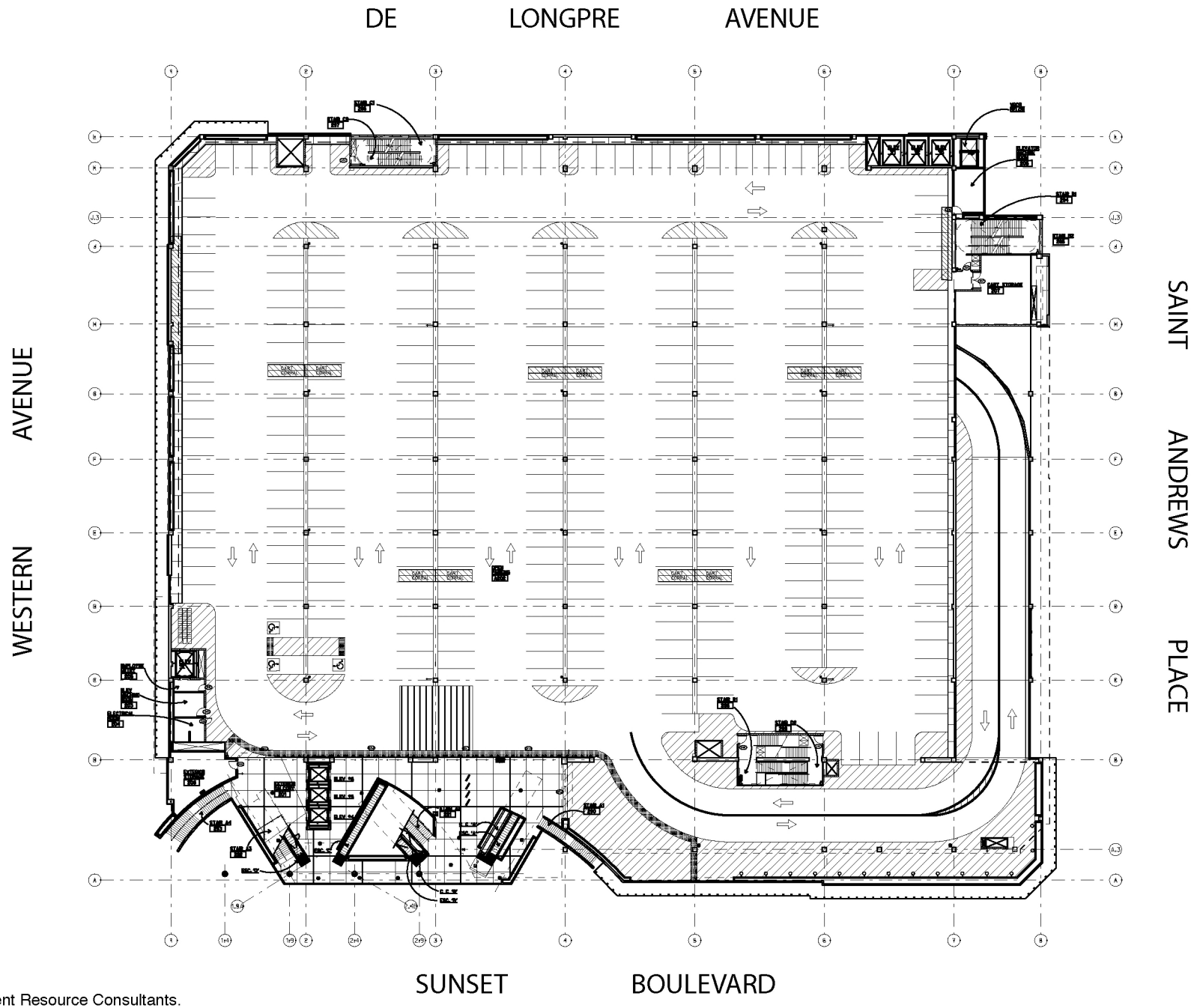
Figure 2
Original Project Site Plan



Source: Development Resource Consultants.

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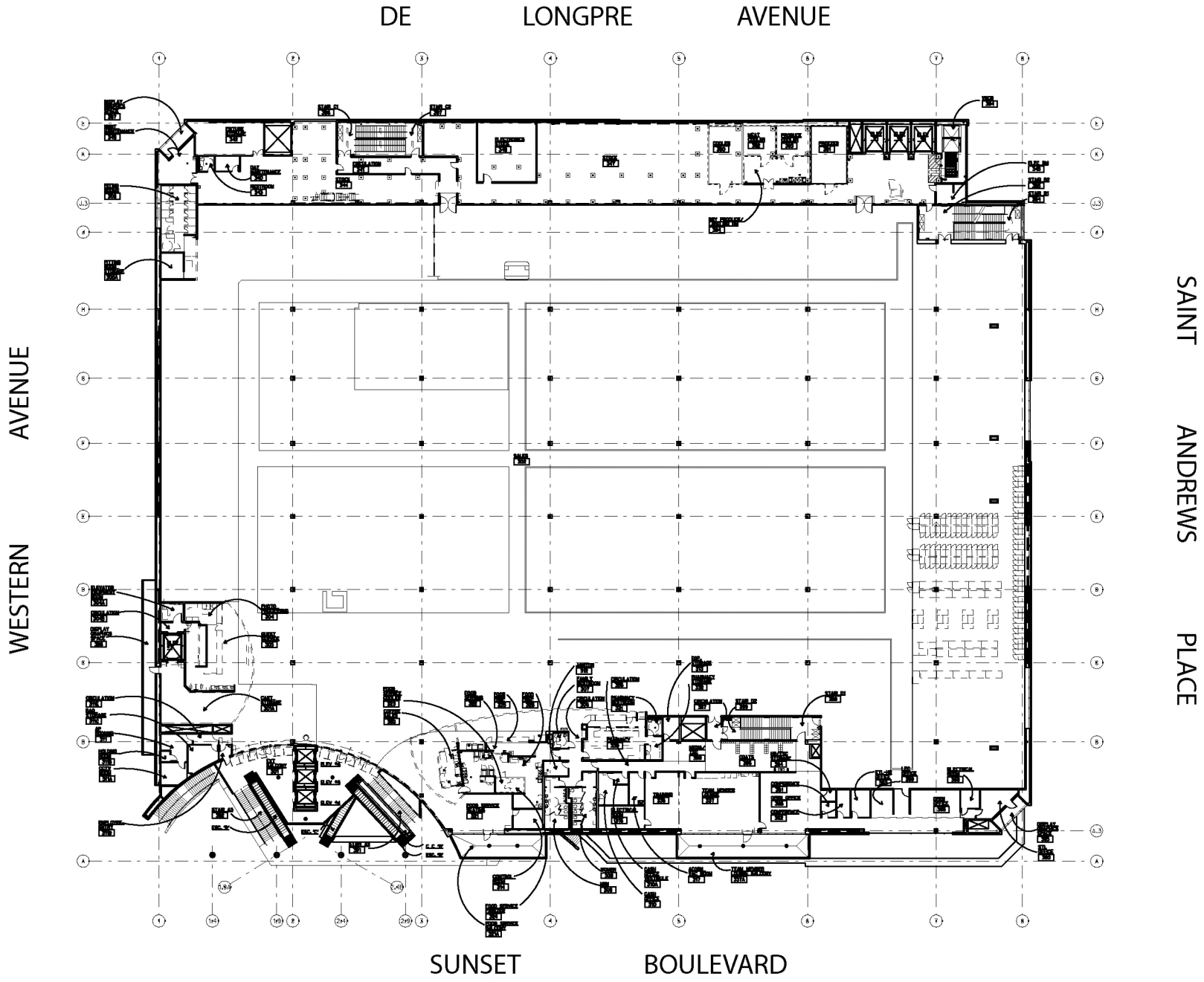
Figure 3
Original Site Plan, Level 2



Source: Development Resource Consultants.

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Figure 4
Original Site Plan, Level 3

Since the original approvals, background conditions within the area in which the Project Site is located, most notably the levels of background traffic, have changed. The land uses immediately surrounding the Project Site have not changed. However, other development projects have been proposed in the area since the Project was approved.

Proposed Project Modifications (the "Revised Project")

The Project Applicant has submitted an application for new project approvals consisting of an amendment to the SNAP (the "proposed Specific Plan amendment") that would change development standards and certain requirements for projects proposed for development within the SNAP area, and an amendment to the adopted Hollywood Community Plan, and the Transportation Element of the City's General Plan (the "proposed General Plan Amendment"). If approved, these amendments would permit the development of the Project in accordance with the Original Project description. The proposed Specific Plan amendment, proposed General Plan Amendment, and the subsequent actions needed to complete construction of the Original Project comprise the Revised Project.

The full text of the proposed Specific Plan amendment is provided in Appendix A to this Addendum. The relevant components of the proposed Specific Plan amendment include the following:

- The proposed Specific Plan amendment establishes a new Subarea F – Large Scale Highway Oriented Commercial (see Figure 5, Revised Specific Plan Area Map), which includes, among others, the following requirements:

    - Commercial Only Projects. Projects comprised exclusively of commercial uses over 100,000 sf on existing sites of over 3.5 acres, and within a quarter-mile of a transit station, and within a quarter-mile of freeway on and off ramps, shall not exceed a maximum building height of 75 feet and a maximum FAR of 1.5, provided, however that roofs and roof structures for the purposes specified in Section 12.21.1 B 3 of the Code, may be erected up to ten feet above the prescribed height limit established in this section, provided that the structures and features are set back a minimum of ten feet from the roof perimeter and screened from view at street level by a parapet or sloping a roof.

    - Commercial. Notwithstanding the contrary provisions of Section 12.21 A 4 of the Code and regardless of the underlying zone, the following parking standards shall apply to Projects with commercial uses: (i) projects comprised of large commercial uses with nationally recognized commercial tenants over 100,000 sf shall provide a minimum of two parking spaces for each 1,000 square feet of combined floor area of commercial use; (ii) the maximum number of off-street parking spaces which may be provided for all other commercial uses shall be limited to two parking spaces for each 1,000 square feet of combined floor area of commercial uses contained within all buildings on a lot; (iii) a

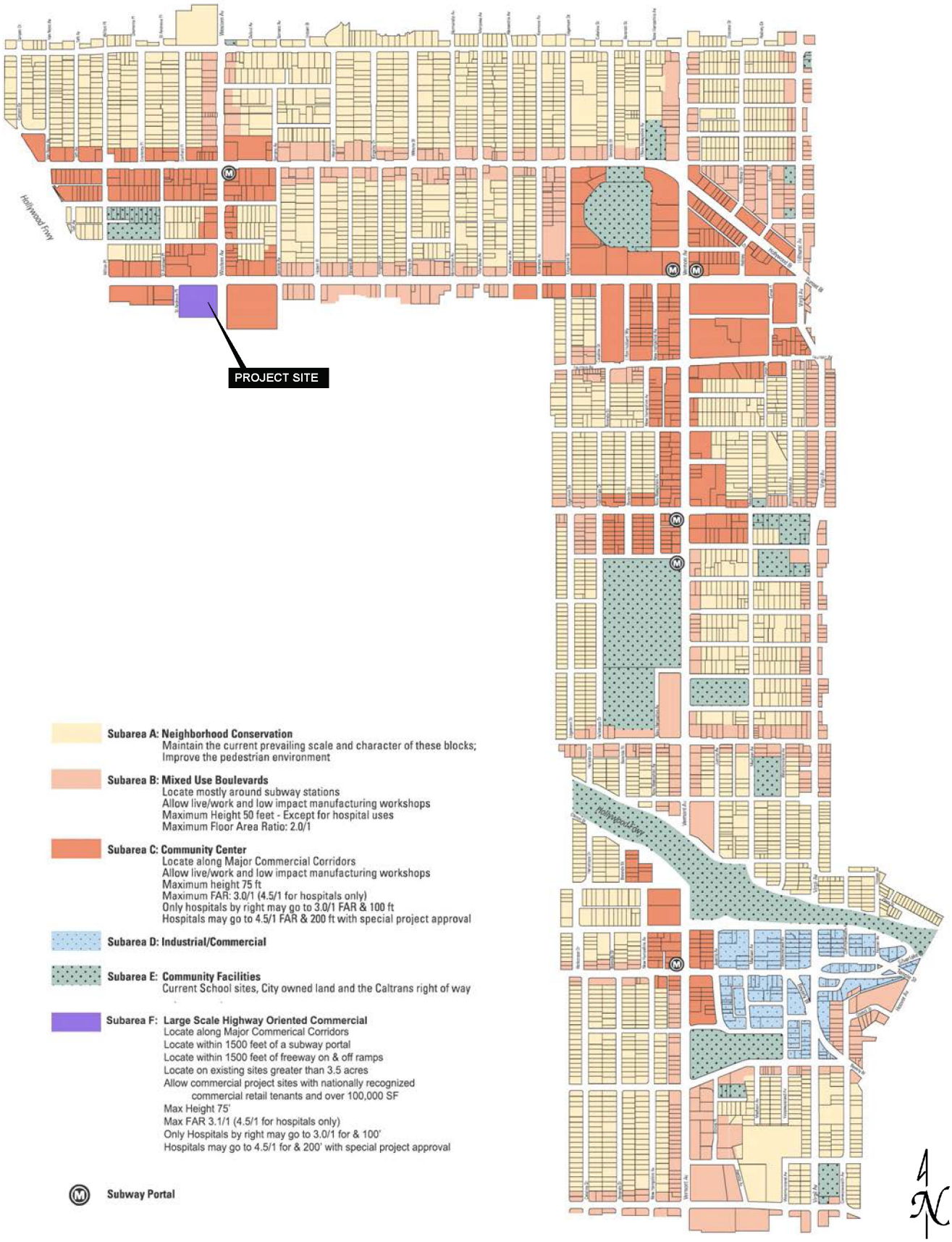

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Figure 5
Revised Specific Plan Area Map

- maximum of 50% of the required non-residential parking spaces may be provided off-site, but within 1,500 feet of the lot for which they are provided.

- The proposed Specific Plan amendment would modify the requirement that an Applicant for any project containing 40,000 square feet or more of retail commercial floor area provide free delivery of purchases made at the site by residents living within the Specific Plan Area by removing this requirement for projects located within Subarea F.

- The proposed Specific Plan Amendment would establish requirements for transitional height between uses as follows:

  Height Limits. Notwithstanding any provisions of Sections 12.21.1 A 10 of the Code to the contrary, portions of buildings on a lot located within the Subarea shall not exceed the transitional height limits set forth below when located within the distances specified therein from a lot within the Subarea A.

Distance	Height
0 to 49 feet	25 feet
50 to 99 feet	33 feet
100 to 200 feet	61 feet

  Calculating Distances. Transitional Height limits as set forth above in Section 12 C of this Specific Plan shall only apply to lots adjoining or abutting a lot in Subarea A and shall not apply to lots separated by a public street.

- The proposed Specific Plan Amendment would establish development standards and design guidelines for projects located within Subarea F. The development standards establish specified requirements with respect to: landscaping, usable open space, streetscape elements, pedestrian/vehicle circulation, utilities, building design, rooftop appurtenances, trash and recycling areas, pavement, freestanding walls, parking structures, parking lots, on-site lighting, security devices, privacy control, noise control, and required ground floor uses. The design guidelines establish specified requirements with respect to: urban form, building form, architectural features, building color, signs, and plant materials on facades.

In addition to the proposed Specific Plan amendment, the Revised Project would encompass an amendment to the adopted Hollywood Community Plan and the Transportation Element of the City's General Plan to modify roadway standards in the vicinity of the project site. Specific components of the proposed General Plan Amendment include:

- Redesignation of Sunset Boulevard along the frontage of the project site (from St. Andrews Place to Western Avenue) in the Transportation Element of the General Plan from the current designation of Major Highway – Class II, which requires a 40-foot half-width roadway on a 52-

foot half-width right-of-way, to Modified Major Highway – Class II, which will provide a 40-foot half-width roadway within a 55-foot half width right-of-way.

- Redesignation of Western Avenue along the frontage of the project site (from Sunset Boulevard to DeLongpre Avenue) in the Transportation Element of the General Plan from the current designation of Major Highway Class II, which requires a 40-foot half-width roadway on a 52-foot half-width right-of-way, to Modified Major Highway – Class II along the Western Avenue property frontage which will provide a 37-foot half width roadway within a 52-foot half width right-of-way.

In addition to the proposed Specific Plan amendment and proposed General Plan amendment, both of which would restore the standards applied to the original approvals, the Revised Project would encompass all construction activities needed to complete the existing structure and the operation of the proposed commercial uses in substantial conformance with the parameters set forth in the Original Project. Such activities may include, but are not limited to, completion of the building frame, walls and roof; construction of interior and exterior electrical, mechanical, plumbing and drainage systems; installation of interior finishes, equipment, and appliances; and installation of landscaping and signage. The Revised Project does not include demolition of previous uses, as this activity was completed prior to the suspension of construction of the proposed project. The Revised Project also does not include substantial excavation, grading, or site preparation earthwork, as this activity was substantially completed prior to the suspension of construction of the proposed project. The Revised Project could include additional minor earth movement in conjunction with the activities described above.

The design and appearance of the Revised Project would substantially conform with the design and appearance of the Original Project, particularly with respect to building height and mass, signage, parking supply and location, open space and public plazas, and circulation. The Revised Project would comply with the child care facility requirement of the SNAP (Section 6.G) through a cash payment in lieu of floor area and play area (Section 6.G.4). The Revised Project has been designed to be consistent with the requirements set forth in the proposed Specific Plan amendment (including development standards and design guidelines) and proposed General Plan amendment, and thus no Specific Plan Exceptions would be required to implement the Revised Project.

Except where expressly indicated, the Revised Project includes the mitigation measures contained in the Certified EIR. This Addendum incorporates the Certified EIR's analyses and mitigation measures, except as expressly changed.

Discretionary Actions

Approval of some or all of the discretionary actions listed below would be required to permit construction of the Revised Project:

- Specific Plan Amendment to the Vermont/Western Transit Oriented District Specific Plan (Station Neighborhood Area Plan, SNAP).
- Request to re-classify the project site from SNAP Subarea C to SNAP Subarea F.
- Conditional Use Permit ("CUB") to allow the sale of beer, wine and spirits for off-site consumption.
- Site Plan Review.
- General Plan Amendment to amend the adopted Hollywood Community Plan and the Transportation Element of the City's General Plan.
- Finding of attractiveness of substantial conformance to the SNAP Development Standards and Design Guidelines, or the City's Citywide Design Guidelines.
- Other permits, ministerial or discretionary, may be necessary in order to execute and implement the project. Such approvals may include, but are not limited to: demolition, grading, excavation, and building permits; exterior approvals; permits for driveway curb cuts; storm water discharge permits; and installation and hookup approvals for public utilities and related permits.

ENVIRONMENTAL ANALYSIS

The analysis which follows addresses each of the environmental issues addressed in the Certified EIR. For each issue, the analysis summarizes the conclusions of the Certified EIR with respect to the impacts of the Original Project. The impacts of the Original Project provide the point of comparison with the impacts of the Revised Project. The analysis then compares the level of impacts of the Revised Project to the impacts of the Original Project as evaluated in the Certified EIR. The analysis then concludes whether the impacts of the Revised Project are the same, higher or lower than the Original Project. From this conclusion, the analysis determines whether the Revised Project would result in any effects that would meet the criteria set forth in CEQA Guidelines § 15162. The analysis presented in the following sections demonstrates that the Revised Project would not result in new significant impacts or substantial increase in the severity of previously identified impacts.

Aesthetics

Original Project

Visual Quality/Views

The Certified EIR found that the proposed project would substantially increase the visibility of the project site from a distance, as compared to existing conditions. The resulting building would likely be visually prominent from the surrounding area, at least in the short term. This increased visibility would

occur on area roadways and their adjoining sidewalks, including Sunset Boulevard, Western Avenue, and St. Andrews Place. Additionally, the greater height and mass that would result on the project site would increase the visibility of the project site from nearby residential and commercial properties. Even with this increased prominence, however, the Certified EIR found that the proposed project would be visually integrated with the existing character of the area, which is a major intersection characterized by commercial development. Moreover, the proposed project would replace the existing automobile-oriented, suburban style shopping center that was located on the project site with an urban-scale project that would be reflective of the expected visual character of the area as it develops in accordance with adopted land use plans, including the Hollywood Community Plan, Hollywood Redevelopment Plan, and Vermont/Western SNAP, which envision further concentration of commercial development in the area in the future.

The Certified EIR found that, although the project was seeking an exception from the Vermont/Western Specific Plan's height limit of 35 feet for commercial-only projects, the project's overall height of 74'-4" was not outside the range of what is allowed for mixed-use projects under the Vermont/Western SNAP. Since the visual integration of the proposed project into the surrounding area would be primarily determined by the building's height and mass, the requested Specific Plan Exceptions that would address these inconsistencies would not result in impacts to the visual environment. Taking all factors into account, even with increased height, mass and visual prominence of the project site that would result from the project, the Certified EIR found that potential aesthetic impacts of the proposed project to the general visual character of the project area would be less than significant.

The Certified EIR found that the proposed building would obstruct some of the intermittent public views of the Hollywood Hills and the HOLLYWOOD sign that are presently available to cars and pedestrians traveling northbound on Western Avenue and that public views from the sidewalk in front of the Covenant House building looking north across the existing parking lot towards the Hollywood Hills and the HOLLYWOOD sign would be obstructed as a result of the proposed project. The Certified EIR found that the intermittent reduction in visual access to the Hollywood Hills and HOLLYWOOD sign from limited locations along Western Avenue would be significant. The Certified EIR found that, since construction activities would have the same effect as the proposed project, project construction impacts relative to viewsheds would be significant.

Light and Glare

The Certified EIR found that construction lighting could include floodlights focused on the work area that would be shielded to focus the light on-site and preclude light trespass onto nearby properties. Therefore, impacts related to construction lighting would be less than significant.

The Certified EIR found that, although additional lighting sources associated with the proposed project could incrementally add to the ambient glow of the project site and immediately surrounding uses, this area is already characterized by high ambient light levels and impacts related to project interior and exterior light sources would be less than significant.

The Certified EIR found that tenant signage would be associated with specific commercial uses and as such would be perceived as part of the use and not as separate visual resource and that light impacts resulting from project signage would be less than significant.

The Certified EIR found that project impacts related to daytime glare would be less than significant because existing sources of daytime glare on the project site (i.e., façade windows, light-colored cars, car mirrors, and windshields) would be replaced with less reflective surfaces of building facades and windows, the building, parking structure, and signage within the project site would be prohibited from using highly reflective building materials such as mirrored glass in exterior façades, and surrounding low- to mid-rise buildings would largely block direct views of the project site.

Shade/Shadow

The Certified EIR found that shadows from the proposed project building would not shade residential buildings or other sensitive uses for time periods in excess of the thresholds established in the *L.A. CEQA Thresholds Guide,* and would be less than significant for the summer, winter and spring/fall equinox time frames.

Project Design Features and/or Mitigation Measures

The Certified EIR included the following project design features and/or mitigation measures.

To reduce the effect of massing, the Certified EIR identified the following project design features:

- Architectural features, such as planters, storefront, balconies, outdoor plazas, and other articulated elements to the exterior façade.
- Varying façade building materials such as concrete, steel, plaster, glazing, and metal panels.
- Bold horizontal and vertical surfaces using simple forms through a variety of materials in order to create visual interest.
- Open areas, glazed elements and display windows on the upper levels of the proposed project.
- Setback of the upper floor exterior building wall a minimum of 15 feet from the front property line along Sunset Boulevard.
- Projecting canopies at the retail frontage along Western.
- Varying horizontal and vertical planes such as entrance and signage features to break up roof lines.
- Small retail and/or restaurant uses along Sunset and Western to provide a street frontage for pedestrians. These uses would incorporate storefronts, canopies, and pedestrian level signage to add pedestrian scale and promote walkability.
- A large public plaza at the corner of Sunset Boulevard and Western Avenue, including decorative specialty lighting, new street furniture, bike racks and amenities and enhanced decorative paving to the street.
- Raised parapet walls to screen roof top mechanical equipment, including satellite dishes, from adjacent street levels.

The Certified EIR found that, other than reducing the height of the proposed building on the project site, no mitigation measures were available to address impacts of the proposed project related to view blockage. The Certified EIR found that, because the proposed project is considered to result in less-than-significant impacts to visual quality/character, no mitigation measures were required. Nonetheless, Mitigation Measures IV.B-1 through IV.B-9 were included in the Certified EIR to further reduce impacts, and reflect good planning and design practices currently promoted by the City.

IV.B-1. All open areas not used for buildings, driveways, pedestrian amenities or walks shall be attractively landscaped and maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect to the satisfaction of the decision maker.

IV.B-2. Every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from graffiti, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to Municipal Code Section 91.8104.

IV.B-3. The exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a public street or alley, pursuant to Municipal Code Section 91,8104.15.

IV.B-4. On-site signs shall be limited to the maximum allowable under City Code.

IV.B-5. Multiple temporary signs in the store windows and along the building walls are not permitted.

IV.B-6. A landscape plan shall be prepared by a licensed landscape architect to the satisfaction of the decision maker.

IV.B-7. The Applicant shall ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways, and that such temporary barriers and walkways are maintained in a visually attractive manner throughout the construction period.

IV.B-8. The Applicant shall prepare a street tree plan to be reviewed and approved by the City's Department of Public Works, Street Tree Division. All plantings in the public right-of-way shall be installed in accordance with the approved street tree plan.

IV.B-9. All new sidewalks along the project's street frontages shall be paved with pervious (permeable) concrete or interlocking pavers to create a distinctive pedestrian environment and to increase the opportunity for stormwater infiltration on the site.

IV.B-10. All lighting related to construction activities shall be shielded or directed to restrict any direct illumination onto property located outside of the project site boundaries that is improved with light-sensitive uses.

IV.B-11. Construction hours shall generally be 7:00 AM to 9:00 PM Monday through Friday and 8:00 AM to 6:00 PM Saturday.

IV.B-12. Exterior lighting included within the proposed project shall incorporate fixtures and light sources that focus light on-site to minimize light trespass.

IV.B-13. Proposed project lighting shall comply with LAMC Section 93.0117. As such, proposed project lighting shall not cause more than two footcandles of lighting intensity or direct glare from the light source at any residential property.

IV.B-14. All buildings, parking structures, and signage within the project site shall be prohibited from the using highly reflective building materials such as mirrored glass in exterior façades. Examples of commonly used non-reflective building materials include cement, plaster,

concrete, metal, and non-mirrored glass, and would likely include additional materials as technology advances in the future.

IV.B-15. All buildings, parking structures, and signage within the project site shall be prohibited from using highly reflective building materials such as mirrored glass in exterior facades.

IV.B-16. The proposed project building shall not include large areas of reflective surfaces that could reflect light from signage into surrounding areas. On-site buildings, signage, or thematic elements shall not incorporate reflective building materials or provide a source of auto headlight-related glare in proximity to glare sensitive uses.

Revised Project & Changed Circumstances

The Revised Project proposes the same land uses and building heights as are included in the Original Project. The Revised Project would provide a similar appearance on the project site as would occur under the Original Project. Construction activities associated with the Revised Project would be similar to the Original Project, and, therefore, impacts of the Revised Project would be similar to the Original Project. The Revised Project would include new development standards and design guidelines for Subarea F that are consistent with established planning and urban design principles, and consistent with the urban uses that exist or are contemplated for this area of the City in compliance with the Hollywood Community Plan. The proposed development standards and design guidelines would provide for aesthetically pleasing and appropriately designed projects within Subarea F. The Revised Project would be consistent with the requirements established by these development standards and design guidelines. The Revised Project building would block views to the Hollywood Hills and HOLLYWOOD sign to the same extent as the Original Project. The Revised Project would include the same nighttime lighting sources as the Original Project. Impacts of the Revised Project with respect to aesthetics, views and light and glare would be the same as the Original Project. The project design features and mitigation measures identified in the Certified EIR with respect to aesthetics, views, light and glare, were observed, and would continue to be observed as applicable to the Revised Project. Consequently, the Revised Project would not represent a new significant impact or substantial increase in the severity of previously identified impacts with respect to aesthetics, views, or light and glare.

Agricultural Resources

Original Project

The Certified EIR found that, because the project site is located in an urbanized area of the City of Los Angeles within the Hollywood Community Plan area, currently zoned C2-1 (commercial), and developed with commercial uses, no impact on farmland or agricultural resources would occur, and no mitigation measures would be required.

Revised Project & Changed Circumstances

The Revised Project would be developed on the same project site as evaluated in the Certified EIR. Accordingly, the Revised Project would not impact agricultural resources and, consequently, would not

represent a new significant impact or substantial increase in the severity of previously identified impacts with respect to agricultural resources.

Air Quality

Original Project

The Certified EIR found that mass daily construction emissions would not exceed South Coast Air Quality Management District (SCAQMD) thresholds of significance, with the exception of NO_x during the grading/site preparation phase. Therefore, project impacts due to construction emissions would be significant during the site preparation/grading phase and less than significant for the remainder of the project construction period. The Certified EIR found that on-site emissions generated by the proposed project during the different phases of construction would not exceed the established SCAQMD localized thresholds for NO_x (in the form of NO_2), CO, PM_{10}, and $PM_{2.5}$. Therefore, the localized air quality impacts resulting from construction emissions associated with the proposed project would be less than significant.

The Certified EIR found that the net increase in regional operational emissions associated with the proposed project would not exceed the SCAQMD's recommended thresholds during either the summertime (smog season) or the wintertime (non-smog season). Therefore, regional impacts associated with operational emissions from the proposed project would be less than significant. An alternate analysis was also conducted that did not apply traffic credits from the prior CVS/Pharmacy use. The Certified EIR found that the proposed project would not exceed the SCAQMD thresholds during either the summertime or wintertime seasons under this scenario. The Certified EIR found that on-site operational emissions generated by the proposed project would not exceed the established SCAQMD localized thresholds for NO_x (in the form of NO_2), CO, PM_{10}, and $PM_{2.5}$ and would be less than significant.

A health risk assessment (HRA) was conducted to evaluate the impacts of annual average diesel exhaust emissions from vehicular sources (specifically heavy-duty, diesel delivery trucks) associated with the proposed project. The Certified EIR found that the cancer and non-cancer risks at the maximum exposed receptor would be below the SCAQMD CEQA significance thresholds, and would be less than significant.

Project Design Features and/or Mitigation Measures

The Certified EIR included the following project design features and/or mitigation measures.

The Certified EIR found that the construction air quality impacts of the proposed project would be significant for NO_x emissions during the grading phase. By definition, these emissions would also be cumulatively considerable and significant. In addition, although compliance with SCAQMD Rule 403 is required by law and is reflected in the analysis of construction PM_{10} and $PM_{2.5}$ emissions, this measure could also be considered a mitigation measure to minimize these emissions during the construction

phase. The Certified EIR identified that the proposed project would include the following mitigation measures:

IV.I-1. The Project Developer(s) shall implement fugitive dust control measures in accordance with SCAQMD Rule 403. The Project Developer(s) shall include in construction contracts the control measures required and recommended by the SCAQMD at the time of development. Examples of the types of measures currently required and recommended include the following:

- Use watering to control dust generation during demolition of structures or break-up of pavement.
- Water active grading/excavation sites and unpaved surfaces at least three times daily.
- Cover stockpiles with tarps or apply non-toxic chemical soil binders.
- Limit vehicle speed on unpaved roads to 15 miles per hour.
- Sweep daily (with water sweepers) all paved construction parking areas and staging areas.
- Provide daily clean-up of mud and dirt carried onto paved streets from the site.
- Install wheel washers for all exiting trucks, or wash off the tires or tracks of all trucks and equipment leaving the site.
- Suspend excavation and grading/excavation activity when winds (instantaneous gusts) exceed 15 miles per hour over a 30-minute period or more.
- An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive fugitive dust generation. Any reasonable complaints shall be rectified within 24 hours of their receipt.

IV.I-2. The Project Developer(s) shall implement measures to reduce the emissions of pollutants generated by heavy-duty diesel-powered equipment operating at the Project Site throughout the Project construction phases. The Project developer(s) shall include in construction contracts the control measures required and recommended by the SCAQMD at the time of development. Examples of the types of measures currently required and recommended include the following:

- Keep all construction equipment in proper tune in accordance with manufacturer's specifications.
- Use late model heavy-duty diesel-powered equipment at the Project Site to the extent that it is readily available in the South Coast Air Basin (meaning that it does not have to be imported from another air basin and that the procurement of the equipment would not cause a delay in construction activities of more than two weeks).
- Limit truck and equipment idling time to five minutes or less.
- Rely on the electricity infrastructure surrounding the construction sites rather than electrical generators powered by internal combustion engines to the extent feasible.

Revised Project & Changed Circumstances

To address the potential air quality impacts associated with the Revised Project, and changed circumstances associated with the Revised Project, an updated air quality analysis was prepared by Cadence Environmental Consultants, which is included as Appendix B to this Addendum. The updated analysis reflects the partial completion of project construction, as well as updated background traffic information for the project vicinity (see ***Transportation and Traffic,*** below).

Construction Emissions

Construction of the Revised Project would involve the completion of the commercial structure located at the project site. Impacts associated with demolition of the previous commercial uses at the site, site grading and excavation, and initial building construction have already occurred as envisioned, and were evaluated under the Certified EIR. The mitigation measures identified in the Certified EIR were observed during this activity.

The analysis of mass daily construction emissions was prepared utilizing the California Emissions Estimator Model (CalEEMod v. 2013.2.2) recommended by the SCAQMD. The mass daily construction-related emissions are shown in Table 1. These emissions assume a peak scenario in which the full set of construction equipment would be used each day throughout the entire construction phase. In reality, each piece of equipment would only be used for a portion of each day and there would be days when very little equipment is used. Coupled with the construction activity that has already taken place, the mitigation measures contained in the Certified EIR were observed, and would continue to be observed as applicable to the Revised Project.

Table 1
Estimated Mass Daily Construction Emissions

Emissions Source	Emissions in Pounds per Day					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Building Construction Phase						
On-Site Emissions	3.4	28.5	18.5	<0.1	2.0	1.8
Off-Site Emissions	0.5	3.1	7.2	<0.1	0.9	0.3
Total Building Construction Emissions	3.9	31.6	25.7	<0.1	2.9	2.1
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Building Construction Phase with Architectural Coatings						
On-Site Emissions	26.3	30.8	21.8	<0.1	2.1	2.0
Off-Site Emissions	0.5	2.9	7.3	<0.1	1.0	0.3
Total Building Construction Emissions	26.8	33.7	29.1	<0.1	3.1	2.3
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No

Notes: Emissions of PM_{10} and $PM_{2.5}$ assume the implementation of fugitive dust control measures as required by SCAQMD Rule 403.
Source: Cadence Environmental Consultants, 2015. Calculation sheets are provided in Appendix B.

As shown in Table 1, the mass daily construction-related emissions generated during the Revised Project construction phase would not exceed the thresholds of significance recommended by the SCAQMD. Therefore, impacts of the Revised Project with respect to regional mass emissions during construction would be less than significant. Coupled with the construction activity that has already taken place, impacts of the Revised Project would be significant and unavoidable for NOx during grading and site preparation, and less than significant for all other criteria pollutants. This impact would be the same as the Original Project.

Table 2 identifies the maximum daily emissions that are estimated to occur at the project site during the remaining construction phases of the proposed project. As shown, emissions during the remaining construction phases would not exceed the SCAQMD's Localized Significance Thresholds (LST) for the specified pollutants. Therefore, impacts of the Revised Project related to localized pollutant concentrations during construction would be less than significant. Coupled with the construction activity that has already taken place, impacts of the Revised Project would be less than significant with respect to localized pollutant concentrations during construction. This impact would be the same as the Original Project.

Table 2

Localized Estimated Peak Daily Construction Emissions

Emissions Source	Total On-site Emissions (Pounds per Day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Building Construction Phase				
On-Site Emissions	28.51	18.51	1.97	1.85
SCAQMD Localized Thresholds	141.21	1,557.48	13.01	6.88
Significant Impact?	No	No	No	No
Building Construction Phase with Architectural Coatings				
On-Site Emissions	30.78	21.87	2.13	2.02
SCAQMD Localized Thresholds	141.21	1,557.48	13.01	6.88
Significant Impact?	No	No	No	No

The localized thresholds for construction emissions at a receptor distance of 82 feet for a 3.88-acre site in SRA 1.
Source: Cadence Environmental Consultants, 2015. Calculation sheets are provided in Appendix B.

Operational Emissions

Operational emissions generated by area sources, energy sources, and mobile sources would result from the normal day-to-day activities at the project site after occupation. The increase in daily operational emissions has been calculated utilizing CalEEMod. The results of these calculations are presented in Table 3. As shown, the Revised Project would generate an increase of mass daily emissions that does not approach the thresholds of significance recommended by the SCAQMD. As such, the impact of the project would be less than significant.

The average daily operational emissions that would be generated at the Revised Project site are shown in Table 4 along with the applicable operational LSTs for SRA 1. As shown on-site operational emissions generated by the new office building would not approach the established SCAQMD localized thresholds. Therefore, this impact would be less than significant.

Table 3
Estimated Mass Daily Project Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Area Sources	4.2	<0.1	<0.1	0.0	<0.1	<0.1
Energy Sources	<0.1	0.1	0.1	<0.1	<0.1	<0.1
Mobile Sources	23.3	44.3	193.5	0.4	27.3	7.7
Total Emissions	27.5	44.4	193.6	0.4	27.3	7.7
SCAQMD Thresholds	55.0	55.0	550.0	150.0	150.0	55.0
Significant Impact?	No	No	No	No	No	No
Wintertime (Non-Smog Season) Emissions						
Area Sources	4.2	<0.1	<0.1	0.0	<0.1	<0.1
Energy Sources	<0.1	0.1	0.1	<0.1	<0.1	<0.1
Mobile Sources	24.4	46.3	201.7	0.4	27.3	7.7
Total Emissions	28.6	46.4	201.8	0.4	27.3	7.7
SCAQMD Thresholds	55.0	55.0	550.0	150.0	150.0	55.0
Significant Impact?	No	No	No	No	No	No

Source: Cadence Environmental Consultants, 2015. Calculation sheets are provided in Appendix A.

Table 4
Estimated Daily Localized Operational Emissions

Emissions Source	Emissions in Pounds per Day			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Area Sources	0.00	0.00	0.00	0.00
Energy Sources	0.75	0.63	0.06	0.06
Total Emissions	0.75	0.63	0.06	0.06
SCAQMD Thresholds of Significance	74.00	280.00	3.00	1.00
Significant Impact?	No	No	No	No

Localized thresholds for construction emissions calculated for a 3.88-acre site at a receptor distance of 25 meters, as established by the SCAQMD for sites in SRA 1.
Source: Cadence Environmental Consultants, 2015. Calculation sheets are provided in Appendix A.

Because the area of the Basin is currently in nonattainment for ozone, NO_2, PM_{10}, and $PM_{2.5}$, other new projects in the region could cause an exceedance of an air quality standard or contribute substantially to an existing or projected air quality exceedance. With regard to determining the significance of the Revised Project's contribution, the SCAQMD considers any construction-related and/or operational emissions from individual projects that exceed the project-specific thresholds of significance identified above to be considered cumulatively considerable. As discussed previously in this report, the maximum mass daily and localized construction-related and operational emissions associated with the proposed project would not exceed the thresholds of significance recommended by the SCAQMD, except for NOx emissions during construction. Therefore, the Revised Project would contribute a cumulatively considerable increase in NOx emissions during construction, and would not contribute a cumulatively considerable increase in emissions for the remaining pollutants for which the Basin is in nonattainment. The cumulative air quality impacts associated with the Revised Project would be significant and

unavoidable for NOx emissions during construction, and less than significant for all other emissions during construction and operation. This impact is the same as the Original Project.

The level of truck activity for the Revised Project would be the same as the Original Project since both projects would include the same land uses and square footage. Accordingly, the cancer and non-cancer risks at the maximum exposed receptor under the Revised Project would be the same as the Original Project, and would be less than significant.

Based upon all of the analyses presented above, the Revised Project would not represent a new significant impact or substantial increase in the severity of previously identified impacts with respect to air quality.

Biological Resources

Original Project

The Certified EIR found that migratory birds are the only sensitive species identified that would have the potential to occur on the site, although the potential is considered to be low. The Certified EIR found that this potential impact would be reduced to less than significant through implementation of mitigation measures. The Certified EIR found that development of the proposed project would have no impact on riparian habitat or other sensitive natural communities, wetlands, or wildlife corridors because the project site is located in a highly urbanized area that has been previously developed.

The Certified EIR found that impacts to protected and non-protected trees on the project site would be less than significant because removal of these trees would occur in compliance with the City's Protected Tree Ordinance and policy regarding mature non-protected trees. The Certified EIR found the project site and the surrounding area are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, and the project would have no impact to any draft or adopted habitat conservation plans.

Project Design Features and/or Mitigation Measures

The Certified EIR included the following project design features and/or mitigation measures.

The Certified EIR found that the following mitigation measure would avoid adverse effects to nesting birds.

Mitigation Measure

IV.A -1. Conduct tree removal activities associated with project development during the non-breeding season (in general, September 1st through January 31st); OR

Conduct pre-construction surveys for nesting birds if tree removal activities are to take place during the nesting season (in general, February 1st through August 31st). Pre-construction

surveys shall be conducted by a qualified biologist no more than three days prior to the initiation of tree removal activities to confirm presence or absence of active nests. If tree removal activities are delayed, then additional pre-construction surveys shall be conducted such that no more than three days will have lapsed between the survey and tree removal activities. If no active nests are encountered, no further mitigation would be required following submittal of a survey results letter to the City of Los Angeles. However, if active nests are encountered, species-specific measures shall be prepared by a qualified biologist in coordination with the CDFG and other appropriate agencies, and implemented to prevent the direct loss or abandonment of the active nest.

Revised Project & Changed Circumstances

The Revised Project would be developed on the same project site as evaluated in the Certified EIR. In conjunction with construction activities that have already taken place, all trees were removed from the project site. Coupled with the construction activity that has already taken place, impacts of the Revised Project would be less than significant with respect to trees and/or nesting birds. This impact would be the same as the Original Project. The mitigation measure identified in the Certified EIR related to nesting birds was observed, and would continue to be observed as applicable to the Revised Project. Similar to the Original Project, the Revised Project would not impact any other biological resources and, consequently, would not represent a new significant impact or substantial increase in the severity of previously identified impacts with respect to biological resources.

Cultural Resources

Original Project

The Certified EIR found that no buildings on the project site were historic resources subject to CEQA. The Certified EIR found that no potential or listed historic resources were identified adjacent to the project site, and that, although potential historic resources in the area were located within the vicinity of the project site, no potential for the proposed project to impact any of these resources would exist, and impacts would be less than significant.

The Certified EIR found that the project site and immediately surrounding areas do not contain any known archaeological sites or archaeological survey areas. The Certified EIR found that, while uncovering of notable archaeological resources was not anticipated, with implementation of City-standard measures for handling any resources that might be discovered during grading, proposed project impacts on any previously undiscovered archaeological resources would be less than significant.

The Certified EIR found that the project site and immediate surrounding areas do not contain any known vertebrate paleontological resources. The Certified EIR found that, while the uncovering of notable resources was not anticipated, to be conservative, with implementation of City-standard measures for handling any resources that might be discovered during grading, project impacts to any previously undiscovered paleontological resources would be less than significant.

The Certified EIR found that, although no human remains are known to have been found on the project site, it is possible that unknown resources could be encountered during project construction. However, through compliance with established procedures, project impacts to unknown human remains would be less than significant.

Project Design Features and/or Mitigation Measures

The Certified EIR included the following project design features and/or mitigation measures.

IV.A -2. If unknown archaeological materials are discovered during any grading or construction activity, work in the affected area shall stop and the contractor shall immediately notify the Applicant and the City of Los Angeles. An archaeologist shall be consulted to determine the significance of the discovered artifact(s) and, if necessary, formulate a mitigation plan. Work can resume in the affected area, only with the approval of the archaeologist.

IV.A -3. If paleontological materials are discovered during any grading or construction activity, work in the affected area shall stop and the contractor shall immediately notify the Applicant and the City of Los Angeles. A paleontologist shall be consulted to determine the significance of the discovered fossil materials and, if necessary, formulate a mitigation plan. Work can resume in the affected area, only with the approval of the paleontologist.

Revised Project & Changed Circumstances

The Revised Project would be developed on the same project site as evaluated in the Certified EIR. Accordingly, the Revised Project would not impact historic resources. Coupled with the construction activity that has already taken place, impacts of the Revised Project would be the same as the Original Project with respect to underground archaeological and paleontological resources. The mitigation measures previously identified in the Certified EIR with respect to potential underground cultural resources were observed, and, to the extent that the construction activities required to complete the Revised Project fall within the mitigation measures included in the Certified EIR, these mitigation measures would continue to be observed as applicable to the Revised Project.

The Revised Project would, consequently, not represent a new significant impact or substantial increase in the severity of previously identified impacts with respect to cultural resources.

Geology and Soils

Original Project

The Certified EIR found that the potential for surface rupture at the project site due to fault plane displacement propagating to the ground surface during the operation of the proposed project would be low, and impacts related to seismic fault rupture would be less than significant. The Certified EIR found that, although future users on the project site would be exposed to seismic groundshaking, proposed construction would be consistent with all applicable provisions of the City of Los Angeles Building Code

and the recommendations of the Geotechnical Study, and risks from seismic groundshaking would be less than significant.

The Certified EIR found that, due to the temporary nature of the soil exposure during the grading and excavation processes, substantial erosion would not occur. The Certified EIR found that the proposed project would develop the project site with pervious and impervious surfaces including structures, paved areas, and landscaping, and, as such, the proposed project would not leave soils exposed at the project site or substantially increase the rate and amount of erosion occurring at the project site. Therefore, operational impacts related to erosion and the loss of topsoil would be less than significant.

The Certified EIR found that subsurface soils encountered were not subject to liquefaction below the groundwater elevation, and that risks associated with liquefaction/lateral spreading during operation of the proposed project would not occur. Additionally, the Certified EIR found that seismic settlement can occur in saturated and unsaturated, loose, and unconsolidated materials, but that the proposed project would implement all of the site-specific requirements identified in the Geotechnical Study, and seismic settlement impacts would be less than significant.

The Certified EIR found that impacts related to tsunami, earthquake-induced dam failures or seiches, and impacts related to 100-year or 500-year flood plains would be less than significant due to the location of the project site. The Certified EIR found that groundwater and petroleum are not currently being extracted from the project site and would not be extracted as part of the proposed project, and impacts associated with subsidence would be less than significant.

The Certified EIR found that, with compliance with the Los Angeles Building Code and implementation of all site-specific requirements identified in the Geotechnical Study, impacts associated with expansive soils would be less than significant.

Project Design Features and/or Mitigation Measures

The Certified EIR included the following project design features and/or mitigation measures.

IV.D-1. The proposed project shall be designed and constructed in accordance with the recommendations provided in a full Geotechnical Study, which shall be approved by the Department of Building and Safety prior to issuance of building and grading permits.

Revised Project & Changed Circumstances

The Revised Project would be developed on the same project site as evaluated in the Certified EIR. Coupled with the construction activity that has already taken place, impacts of the Revised Project would be the same as the Original Project with respect to geology and soils. The mitigation measure identified in the Certified EIR with respect to potential excavation and soil movement was observed, and would continue to be observed as applicable to the Revised Project.

The Revised Project would, consequently, not represent a new significant impact or substantial increase in the severity of previously identified impacts with respect to geology and soils.

Greenhouse Gas Emissions

Original Project

The Certified EIR found that the net increase in greenhouse gas (GHG) emissions generated by the proposed project would be approximately 0.00253 percent of the 2004 statewide emission level, and that the proposed project would be consistent with all feasible and applicable recommended measures of Air Resource Board (ARB) Scoping Plan to reduce greenhouse gas emissions in California. Therefore, the impact of the proposed project would be less than significant with regard to greenhouse gas emissions.

Project Design Features and/or Mitigation Measures

The Certified EIR included the following project design features and/or mitigation measures.

The proposed project would meet LEED certification compliance standards. Specific design features to be incorporated into the project include:

- Recycling of concrete and cardboard waste generated during construction;
- Installation of a "cool white roof" that reflects the sun's heat and reduces urban heat island effect;
- Use of recycled construction materials, including recycled steel framing, crushed-concrete sub-base in parking lots, fly ash-based concrete and recycled content in joists and joist girders;
- Use of locally (within 500 miles) manufactured construction materials, where possible;
- Use of wood certified by the Forest Stewardship Council for construction purposes;
- Central tracking of waste compactor loads, ensuring that compactors are full thereby reducing trips to landfills;
- Implementation of active management to reuse and recycle plastic garment hangers;
- Implementation of a store-based cardboard recycling program, managed in coordination with distribution centers;
- Recycle electronic waste generated through returned products and replacement of company-owned electronics;
- Refurbish and reuse broken shopping carts through centralized program;
- Implementation of merchandise salvage program, partner stores with charities or national vendors to liquidate unsold products;
- Implementation of vendor return program for overstock, substandard quality or damaged merchandise;
- Partner with America's Second Harvest to redistribute unsold food items;
- Implementation of a centrally managed program to redeploy, donate or resell used corporate assets such as food service equipment, store fixtures, forklifts, semi-trailers, technology equipment and security equipment;

- Use of energy efficient lighting including the use of T8 fluorescent lamps and electronic ballasts, motion-sensor lighting in stockrooms, and light-emitting diodes (LED) for exterior signage;
- Implementation of store-based integrated energy-management system controlling lighting, refrigeration, heating and cool equipment and exhaust fans;
- Use of low-impact development measures using innovative design to filter and infiltrate stormwater runoff and reduce water sent to sewer systems.

Revised Project & Changed Circumstances

To address the potential GHG emission impacts associated with the Revised Project, and changed circumstances associated with the Revised Project, an updated GHG analysis was prepared by Cadence Environmental Consultants, which is included as Appendix C to this Addendum. The updated analysis reflects the partial completion of project construction, as well as updated background traffic information for the project vicinity (see ***Transportation and Traffic,*** below). The updated analysis also reflects the advancement in GHG models and protocols, and thresholds of significance that have been proposed by cognizant regulatory agencies, since the Certified EIR was prepared.

The City of Los Angeles relies upon the expert guidance of the SCAQMD regarding the methodology and thresholds of significance for the evaluation of air quality impacts within the South Coast Air Basin. GHG emissions are air pollutants that are subject to local control by the SCAQMD. As such, the City looks to the SCAQMD for guidance in the evaluation of GHG impacts.

The SCAQMD has been evaluating GHG significance thresholds since April 2008. In December 2008, the SCAQMD adopted an interim screening level threshold of 10,000 metric tons of carbon dioxide equivalents ($MTCO_2e$) per year for stationary source/industrial projects for which the SCAQMD is the lead agency. The SCAQMD has continued to consider adoption of significance thresholds for residential and general development projects. The most recent proposal issued by SCAQMD in September 2010 uses the following tiered approach to evaluate potential GHG impacts from various uses:

Tier 1 Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.

Tier 2 Consider whether or not the proposed project is consistent with a locally adopted GHG reduction plan that has gone through public hearings and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.

Tier 3 Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 $MTCO_2e$/year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 $MTCO_2e$/year), commercial projects (1,400 $MTCO_2e$/year), and mixed-use projects (3,000 $MTCO_2e$/year). Under option 2, a single numerical screening threshold of 3,000 $MTCO_2e$/year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.

Tier 4 Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 $MTCO_2e$ per service population for project level analyses and 6.6 $MTCO_2e$ per service population for plan level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.

Tier 5 Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

The thresholds identified above have not been officially adopted by the SCAQMD, or distributed for widespread public review and comment, and the working group tasked with developing the thresholds has not met since September 2010. The future schedule and likelihood of threshold adoption is uncertain.

However, for the purpose of evaluating the GHG impacts associated with the Revised Project, this analysis utilizes the SCAQMD's draft tiered thresholds. The SCAQMD's draft thresholds have also been utilized for other projects in the City of Los Angeles.

Tier 1

The Revised Project is subject to CEQA, but no categorical exemptions are applicable to the project. Therefore, the analysis moves to Tier 2.

Tier 2

The Revised Project has been designed to meet the LEED Green Building Rating System standards to reduce energy consumption. It would also be required to comply with the Green Building Program Ordinance, which would reduce the GHG emissions that would be associated with operation of the Revised Project. However, neither the SCAQMD nor the City of Los Angeles have adopted a GHG reduction plan that has gone through public hearings and CEQA review, that has an approved inventory, includes monitoring, etc. Therefore, the analysis moves to Tier 3.

Tier 3

The estimated annual construction-related and operational GHG emissions associated with the Revised Project have been calculated utilizing the California Emissions Estimator Model (CalEEMod v. 2013.2.2) recommended by the SCAQMD. These emissions are shown in Table 5. As shown, the annual emissions would exceed the draft 3,000 $MTCO_2e$ threshold for non-industrial projects. Therefore, the analysis moves to Tier 4.

Table 5
Estimated Project Annual GHG Emissions

Emissions Source	CO_2e in Metric Tons per Year
Construction[1]	21.3
Operation	
Area Sources	<0.1
Energy Sources	1,174.9
Mobile Sources	5,556.1
Waste Disposal	32.4
Water and Wastewater	70.4
Total Emissions	6,855.1
SCAQMD Draft Tier 3 Threshold	3,000.0
Exceeds Threshold?	Yes

[1] Construction emissions are amortized over 30 years in accordance with SCAQMD guidance (640.10 $MTCO_2e$/30 years).
Source: Cadence Environmental Consultants, 2015. Calculation result sheets are provided in Appendix C.

Tier 4

SCAQMD's draft thresholds define the service population as the total residents and employees associated with a project. This may be appropriate for regional or community-wide analyses in which most people are either residents or employees and the two cross over (residents of the community are also employees in the community). In the case of a general development projects, the service population consists of residents, employees, customers, vendors, students, etc. In the case of a commercial project, employees may be only about two percent of the number of people that visit a site. The vast majority of people visiting a commercial project are customers with a smaller number of vendors (delivery and sales). It does not make sense to consider only the employees as the service population for a project such as this. The employees are at a site to serve the needs of their customers. Therefore, this analysis assumes that the service population is everyone that would be served by the proposed use, including employees, customers, and vendors.

The Revised Project is expected to employ approximately 250 full and part-time employees, primarily from the local community. However, the total service population can be roughly estimated by dividing the number of potential daily vehicle trips generated by the proposed project by two. The vehicle trip numbers are divided by two since each service population member would make one trip to the site and one trip from the site (one person, two trips). This is a very conservative assumption since each vehicle is assumed to accommodate only one person, whereas, many of the vehicles would accommodate more than one person.

The Revised Project is expected to generate approximately 9,635 average daily vehicle trips per weekday based upon the trip generation rate identified in the Traffic Impact Study prepared for the proposed

project.[1] This number is the total trips that would be generated by the proposed land use prior to any credit for public transit and pass-by trips. This is appropriate since it identifies a trip generation estimate for the entire service population whether they arrive via private vehicles or transit. Dividing this number by two identifies a conservative project service population of approximately 4,818 employees, customers, and vendors.

Dividing the 6,855.1 $MTCO_2e$ annual GHG emissions by the 4,818 service population yields an efficiency of 1.42 $MTCO_2e$ of GHGs per service population member. If one considers that the daily service population for the project would likely be greater if more than one person per vehicle were to travel to the site, the actual emissions per service population would be even lower. However, the analysis demonstrates that the GHG emissions per service population would be substantially less than the SCAQMD's draft threshold of 4.8 $MTCO_2e$ per service population. Therefore, the GHG emissions associated with the Revised Project would be below the SCAQMD threshold of significance and less than significant.

In addition, the operational and design characteristics of the Revised Project would be the same as the Original Project. Therefore the Revised Project would be consistent with the recommended measures of ARB Scoping Plan to reduce greenhouse gas emissions in California to the same extent as the Original Project.

Accordingly, the Revised Project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Hydrology and Water Quality

Original Project

The Certified EIR found that the existing municipal storm drain system will be able to accommodate the storm water flows generated under the proposed project, and impacts to existing storm drain system capacity resulting from the proposed project would be less than significant. The Certified EIR found that, because the proposed project would not increase the amount of impervious surfaces at the site, the amount of runoff from the site would not increase under the proposed project, and development of the project site would not result in significant impacts related to surface water runoff.

The Certified EIR found that the project site would not be susceptible to tsunamis or seiches due to its location, and that the project site is not located within a 100-year or 500-year flood hazard area. Therefore, the future development of the project site would not result in or expose people or structures to flooding. The Certified EIR found that excavation activities would terminate above the likely groundwater table, and would not result in the alteration of groundwater flows beneath the project site.

[1] *Overland Traffic Consultants, Inc., 2015 (see Appendix E).*

The Certified EIR found that the proposed project would result in less than significant impacts related to the availability of groundwater, and would not result in the alteration of groundwater flows.

The Certified EIR found that, during project construction, a temporary alteration of the existing on-site drainage pattern and increased erosion may occur, but that, with implementation of the required BMPs and the mitigation measures, short-term impacts on water quality from construction would be less than significant.

The Certified EIR found that, in compliance with the Standard Urban Stormwater Management Plan (SUSMP) requirements, the proposed development would provide for the treatment/filtration of on-site stormwater runoff before it enters the public stormwater conveyance system, and, with compliance with the SUSMP requirements, the proposed project's operational impacts on stormwater quality would be less than significant.

Project Design Features and/or Mitigation Measures

The Certified EIR included the following project design features and/or mitigation measures.

Impacts related to surface water runoff and water quality would be less than significant with compliance of regulatory requirements. The following measures shall be included as Conditions of Approval to ensure long-term compliance with these requirements.

IV.F-1. The proposed project shall be designed and constructed in accordance with the recommendations provided in the geotechnical report (Appendix IV.D-1, which may be modified, if necessary as part of final project design). The geotechnical study shall be approved by the Department of Building and Safety prior to issuance of building and grading permits.

IV.F-2. The applicant shall maintain all structural or treatment control BMPs for the life of the project.

IV.F-3. All earthwork on the project site shall be performed in accordance with the requirements of the City of Los Angeles Building and Safety, the City of Los Angeles Civil Engineer of Record, and the Storm Water Pollution Prevention Program.

IV.F-4. The proposed project shall implement all SWPPP BMPs listed in Section 3.B.III.1.a of the Hydrology and Water Quality chapter of this EIR.

IV.F-5. All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, wood, and vegetation. Non-recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes shall be discarded at a licensed regulated disposal site.

IV.F-6. Leaks, drips, and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.

IV.F-7. Shall not hose down pavement at material spills. Dry cleanup methods shall be used whenever possible.

IV.F-8. Dumpsters shall be covered and maintained. Place uncovered dumpsters under a roof or cover with tarps or plastic sheeting.

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

IV.F-10. All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills.

IV.F-11. Project applicant(s) are required to implement stormwater BMPs to retain or treat the runoff from a storm event producing ¾ inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required.

IV.F-12. Post development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rates for developments where increased peak stormwater discharge rate will result in increased potential for downstream erosion.

IV.F-13. Provide trees and other vegetation at the project site in accordance with SNAP requirements.

IV.F-14. Any connection to the sanitary sewer must have authorization from the Bureau of Sanitation.

IV.F-15. Any toxic wastes must be discarded at a licensed regulated disposal site. Store trash dumpsters either under cover and with drains routed to the sanitary sewer or use non-leaking and water tight dumpsters with lids. Use drip pans or absorbent materials whenever grease containers are emptied. Wash containers in an area with properly connected sanitary sewer.

IV.F-16. Reduce and recycle wastes, including: paper, glass, aluminum, oil, and grease.

IV.F-17. Reduce the use of hazardous materials and waste by: using detergent-based or water-based cleaning systems; and avoid chlorinated compounds, petroleum distillates, phenols, and formaldehyde.

IV.F-18. Utilize natural drainage systems to the maximum extent practicable.

IV.F-19. Control or reduce or eliminate flow to natural drainage systems to the maximum extent practicable.

IV.F-20. Protect slopes and channels and reduce run-off velocities by complying with Chapter IX, Division 70 of the Los Angeles Municipal Code and utilizing vegetation (grass, shrubs, vines, ground covers, and trees) to provide long-term stabilization of soil.

IV.F-21. All storm drains inlets and catch basins within the project area must be stenciled with prohibitive language (such as "NO DUMPING – DRAINS TO OCEAN") and/or graphical icons to discourage illegal dumping.

IV.F-22. Signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, must be posted at public access points along channels and creeks with the project area.

IV.F-23. Legibility of stencils and signs must be maintained.

IV.F-24. Materials with the potential to contaminate stormwater must be: (1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or (2) protected by secondary containment structures such as berms, dikes, or curbs.

IV.F-25. The storage area must be paved and sufficiently impervious to contain leaks and spills.

IV.F-26. The storage area must have a roof or awning to minimize collection of stormwater within the secondary containment area.

IV.F-27. The owner(s) of the properties will prepare and execute covenant and agreement (Planning Department General form CP-6770) satisfactory to the Planning Department binding the owners to post construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and/or per manufacturer's instructions.

IV.F-28. Store trash dumpsters both under cover and with drains routed to the sanitary sewer or use non-leaking and water tight dumpsters with lids. Wash containers in an area with properly connected sanitary sewer.

IV.F-29. Incorporate appropriate erosion control and drainage devices, such as interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code. Protect outlets of culverts, conduits, or channels from erosion by discharge velocities by installing a rock outlet protection. Rock outlet protection is a physical device composed of rock, grouted riprap, or a concrete rubble placed at the outlet of a pipe. Install sediment traps below the pipe-outlet. Inspect, repair, and maintain the outlet protection after each significant rain.

Revised Project & Changed Circumstances

Construction

The Revised Project would be developed on the same project site as evaluated in the Certified EIR. Coupled with the construction activity that has already taken place, impacts of the Revised Project would be the same as the Original Project with respect to water quality during construction. The mitigation measures identified in the Certified EIR with respect to potential erosion and runoff during construction were observed, and would continue to be observed as applicable to the Revised Project.

In addition, in a change in the regulatory environment since the Certified EIR, construction associated with the Revised Project would be subject to the requirements of the Los Angeles Regional Water Quality Control Board Order No. R4-2012-0175, NPDES No. CAS00400, effective December 28, 2012, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County (the "Los Angeles County MS4 Permit"), which controls the quality of runoff entering municipal storm drains in the County. Section VI.D.8, of this Permit, Development Construction Program, requires Permittees (which include the City of Los Angeles) to enforce implementation of Best Management Practices (BMPs), including, without limitation, approval of an Erosion and Sediment Control Plan (ESCP) for all construction activities within their jurisdiction. Accordingly, the construction contractor for the Revised Project development would be required to implement BMPs that would meet or exceed local, State, and Federal mandated guidelines for storm water treatment to control erosion and to protect the quality of surface water runoff during the construction period. BMPs utilized could include, without limitation, disposing of waste in accordance with all applicable laws and regulations; cleaning up leaks, drips, and spills immediately; conducting street sweeping during construction activities; limiting the amount of soil exposed at any given time;

covering trucks; keeping construction equipment in good working order; and installing sediment filters during construction activities.

As discussed in the Certified EIR, under existing regulations, as the construction site for the Revised Project is over one acre in size, the contractor would file a Notice of Intent (NOI) with the State Water Resources Control Board and prepare a Surface Water Pollution Prevention Plan (SWPPP) before the start of any construction activity. Implementation of the BMPs in the Project SWPPP and compliance with the City's discharge requirements (ESMC §§ 5-4-1, et seq.) would ensure that Revised Project construction would meet the requirements of the Los Angeles County MS4 Permit and thus would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Because of the more stringent regulations that are presently applicable to storm water runoff quality during construction, which would be applicable to the Revised Project, , impacts of the Revised Project related to water quality during construction would not increase compared to the Original Project.

Operations

With respect to runoff water quality during operation of the Revised Project, Los Angeles County and all cities within LA County (except for the City of Long Beach) are permittees under the Los Angeles County MS4 Permit. Section VI.D.7 of this Permit, Planning and Land Development Program, is applicable to, among others, development projects equal to one acre or greater of disturbed area and adding more than 10,000 square feet of impervious surface area and would thus apply to the Revised Project. This Program requires, among other things, that projects retain on site the runoff volume from: (a) the .75 inch, 24-hour rain event; or (b) the 85th percentile, 24-hour rain event, as determined from the Los Angeles County 85th percentile precipitation isohyetal map, whichever is greater. The Revised Project would also be subject to the BMP requirements of the SUSMP adopted by the Regional Water Quality Control Board for the Los Angeles Region. As a permittee, the City of Los Angeles is responsible for implementing the requirements of the County-wide SUSMP within the City. A Project-specific SUSMP would be implemented during the operation of the Revised Project. In compliance with the MS4 Permit and SUSMP requirements, the Revised Project development would be required to retain storm flows and allow percolation on-site before flows enter the storm drain system. The system incorporated into the Revised Project must follow specific design requirements set forth in the MS4 permit and must be approved by the City.

In addition, the Revised Project would be subject to the provisions of the City's Low Impact Development (LID) Ordinance effective May 12, 2012, which is designed to mitigate the impacts of increases in runoff and stormwater pollution as close to the source as possible. LID comprises a set of site design approaches and Best Management Practices (BMPs) that promote the use of natural systems for infiltration, evapotranspiration and stormwater. The LID Ordinance will require the project to incorporate LID standards and practices to encourage the beneficial use of rain water and urban runoff, reduce stormwater runoff, promote rainwater harvesting, and provide increased groundwater recharge.

In this regard, the City has established review procedures to be implemented by the Department of City Planning, Department of Building and Safety, and Department of Public Works that parallel the review of the SUSMP and MS4 permit requirements. Incorporation of these features would minimize the increase in stormwater runoff from the site. The mitigation measures in the Certified EIR that address the quantity and quality of storm water runoff from the project site would continue to be applicable to the Revised Project.

Because of the more stringent regulations that are presently applicable to storm water runoff quality during operation, impacts of the Revised Project related to water quality during operations would not increase compared to the Original Project. Consequently, the Revised Project would not represent a new significant impact or substantial increase in the severity of previously identified impacts with respect to hydrology and water quality.

Hazards and Hazardous Materials

Original Project

The Certified EIR found that the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, State, and federal regulations governing such activities, and impacts would be less than significant. The Certified EIR found that potentially hazardous materials transported, stored, offered for sale, or used on site for daily upkeep would be contained, stored, and used in accordance with manufacturers' instructions, and handled in compliance with applicable standards and regulations, and project impacts related to hazardous materials during operations would be less than significant.

The Certified EIR found that recognized environmental conditions on the project site would be addressed by mitigation measures to ensure that conditions of contamination on the project site would not expose workers and visitors to the site to adverse conditions related to potential site contamination. The Certified EIR found that no UST's are located directly on site and impacts associated with risk of upset of USTs and Aboveground Storage Tanks (ASTs) would be less than significant.

The Certified EIR found that existing structures and facilities on-site may contain Asbestos-Containing Materials (ACMs) and Lead Based Paint (LBP), and that implementation of mitigation measures prior to the demolition of structures and facilities would reduce potentially significant impacts associated with an exposure to ACMs and LBP during construction to less than significant.

The Certified EIR found that the Assistance League of Southern California's Learning Center for Young Children and Children's Club is located within 0.25 miles of the project site. As the proposed project will comply with all standards, regulations, good housekeeping practices, and mitigation measures, it is not anticipated to emit any hazardous emissions during construction or operation and impacts would be less than significant.

The Certified EIR found that the project site is not located within the boundaries of an airport land use plan and would not result in a safety hazard for people residing or working in the project area. The Certified EIR found that, according to the Safety Element of the City of Los Angeles General Plan, Sunset Boulevard and Western Avenue in the project vicinity are designated disaster routes. The Certified EIR found that, neither the construction nor the operation of the proposed project would require or result in modifications to either roadway that would impact emergency traffic, or would impair implementation of, or physically interfere with, any adopted or on-site emergency response or evacuation plans or a local, state, or federal agency's emergency evacuation plan, and the project would have a less than significant impact.

The Certified EIR found that the project site is located in a highly urbanized area of the City of Los Angeles and is not subject to wildland fires. Therefore, no impact from wildland fires would occur.

Project Design Features and Mitigation Measures

The Certified EIR included the following project design features and/or mitigation measures.

IV.E-1. In the event that excavation or grading activity on the project site reveals discolored soil or the equipment operator detects odors or fumes emanating from the soil, earth disturbance activity shall cease and an assessment of the soil shall be conducted at the site to evaluate the potential presence of subsurface contamination as a result of historical on-site uses and proximal off-site facilities that may have impacted the soil, soil vapor, and/or groundwater beneath the site. If environmental conditions exceeding regulatory requirements are identified, remediation shall be accomplished to the satisfaction of the appropriate regulatory agency(ies) shall be completed before earth-disturbing activities may resume.

IV.E-2. The Applicant shall conduct ACM and LBP surveys on all buildings and associated infrastructure scheduled for demolition. If asbestos and/or lead-based paint are detected, they shall be abated and removed in accordance with all applicable federal, state, and local regulations and in accordance with SCAQMD regulations.

Revised Project & Changed Circumstances

The Revised Project would be developed on the same project site as evaluated in the Certified EIR. Coupled with the construction activity that has already taken place, impacts of the Revised Project would be the same as the Original Project with respect to hazardous materials on the project site. The mitigation measures in the Certified EIR, were observed, and would continue to be observed as applicable to the Revised Project.

Impacts associated with hazardous materials use during operation of the Revised Project would be the same as the Original Project, as the same land uses included in the Original Project would be included in the Revised Project. The Revised Project would, consequently, not represent a new significant impact or substantial increase in the severity of previously identified impacts with respect to hazardous materials.

Land Use

Original Project

The Certified EIR found that the project would not physically divide an established community because it is being built on a site that has already been developed with commercial and public utility uses within an established community. The Certified EIR found that the proposed project would include similar uses to those of the surrounding area and be consistent with the design of surrounding development, and impacts with regard to land use functional compatibility would be less than significant.

The Certified EIR found that the proposed project would be consistent with SB 375, the SCAG Regional Comprehensive Plan, the SCAG Compass Growth Vision, the Regional Transportation Plan, the City of Los Angeles General Plan Framework, Hollywood Community Plan, REVISED Hollywood Community Plan policies, Hollywood Redevelopment Plan, Los Angeles State Enterprise Zone, the City of Los Angeles Planning and Zoning Code and the City's Walkability Guidelines.

The Certified EIR found that the proposed project would be consistent with allowed land use for the project site per the Vermont/Western SNAP. The Certified EIR found that the proposed project complied with the development standards and design guidelines of the Vermont/Western Specific Plan to the greatest extent possible and necessitated a Specific Plan Exception for minor deviations from some requirements. The requested exceptions with respect to deliveries and parking supply reflect a balance between orientation to the automobile and transit- and pedestrian-oriented characteristics of the proposed project. This characteristic would render the project less consistent with the objectives of the SNAP to promote transit-oriented development. However, the proposed project would provide landscaping, sidewalks, pedestrian plazas and other pedestrian oriented features that would promote pedestrian and transit-user access to the site, in addition to automobile access. Under the proposed project, the project site would be less automobile-oriented than under its current configuration. Overall, while certain exceptions to the SNAP would be associated with the proposed project that would be automobile-oriented, those exceptions would not be at the expense of other pedestrian and transit-oriented improvements at the project site and the proposed project would therefore not be substantially inconsistent with the policies of the SNAP that promote transit and pedestrian access to the project site.

The other requested exceptions from the design and development standards of the SNAP are that the proposed project would exceed the 35-foot height limit for a commercial project established in the SNAP. However, the SNAP anticipates that this area of the City in general and the project site specifically could include buildings of height up to 75 feet, in a mixed use project. If the project included housing, it would not require an exception from the SNAP building height limit. As such, even though the project would not provide housing in return for additional building height, it would not be substantially inconsistent with the objectives of the SNAP with respect to housing.

The remaining exceptions to the SNAP that are requested by the proposed project are related to design features (upper floor setback, roof line, transparent building elements) and operating hours. The reduction in transparent building elements would occur on the building's St. Andrews Place frontage, which faces Home Depot, and would not detract from the pedestrian orientation of the building on Sunset Boulevard and Western Avenue. Further, the operation of loading facilities beyond the hours set forth in the SNAP would not result in significant impacts to adjacent uses. Overall, the granting of the requested exceptions to the SNAP would not substantially conflict with the principles, intent, and goals of the SNAP.

Revised Project & Changed Circumstances

The Revised Project includes the same land uses and square footage as the Original Project. Accordingly, the Revised Project would be consistent with the land use designations set forth for the project site in the General Plan Framework, Hollywood Community Plan, Hollywood Redevelopment Plan, and the City of Los Angeles Planning and Zoning Code. Since the location of the Revised Project would not change, the Revised Project would be consistent with the regional growth policies of SB375 and the SCAG Regional Comprehensive Plan to concentrate future development in transit station areas. Since the Revised Project would reflect the same overall design as the Original Project, it would implement the City's Walkability Guidelines to a similar degree as the Original Project.

The Revised Project would be consistent with allowed land use for the project site per the Vermont/Western SNAP. The Revised Project would include the proposed Specific Plan amendment. Accordingly, since the Revised Project has been designed to be compliant with the requirements contained in the proposed Specific Plan amendment, no exceptions to the Vermont/Western SNAP would be required to implement the Revised Project.

The proposed Specific Plan amendment would modify the requirement that an Applicant for any project containing 40,000 square feet or more of retail commercial floor area provide free delivery of purchases made at the site by residents living within the Specific Plan Area, by eliminating this requirement for projects in Subarea F. By definition, retail projects in Subarea F would consist of over 100,000 square feet on existing sites over 3.5 acres in size, which would limit such project to major national retailers. For these users, the existing requirement is potentially redundant, since such large uses are likely to offer some form of free delivery through their websites. Accordingly, the proposed Specific Plan amendment would not be inconsistent with the intent of the SNAP to promote neighborhood integration. By coordinating such deliveries within existing extensive delivery networks, such as Fedex, UPS and USPS, the removal of this requirement could actually reduce potential environmental impacts by eliminating the overlapping delivery services that could occur if each qualifying user were to maintain its own delivery service. This provision would not result in new environmental impacts.

When the original Project was approved, the City had not yet decided what in-lieu childcare fee to levy. Although timing cannot be guaranteed, it is likely that the Board of Commissioners of the City's

Department of Recreation and Parks will decide on an appropriate fee before the City Council approves the Revised Project.

The proposed Specific Plan amendment would establish transitional height requirements between uses located adjacent to Subarea A of the SNAP. As shown in Figure 5 above, the proposed boundaries of Subarea F would not be adjacent to any part of SNAP Subarea A. Thus, this requirement would not apply to the Revised Project.

The Revised Project would be consistent with the development standards and design guidelines that would be established for Subarea F under the proposed Plan Amendment. No variations from these requirements are being requested.

The proposed General Plan amendment is necessary to establish the street standards for the Revised Project. The proposed General Plan amendment would accommodate the Revised Project's main entry plaza, which converges at the corner of Sunset Boulevard and Western Avenue, and is oriented towards a transit station. The plaza would incorporate enhanced architectural, landscape and hardscape elements to provide an urban streetscape and a vibrant place for pedestrians to gather. The proposed General Plan Amendment is required to accommodate new dedications and easements that would accommodate 15 foot wide sidewalks along Sunset Boulevard and Western Avenue. The project would provide new street trees, benches and other amenities, thereby enhancing the pedestrian experience to the transit station and bus stops located near the project. In the main entry plaza, the proposed project will provide a kiosk for transportation information that will include current routes and schedules, maps, and other information for the Metro Red Line subway and for the Metro and DOT bus lines operating in the project area.

The City had already approved the modified road standards in the Hollywood Community Plan Update (HPCU), and the court's rejection of the HCPU was unrelated to these modified road standards. The proposed update to the Citywide General Plan Transportation Element (called "Mobility Plan 2035") was approved by the City Planning Commission on May 28, 2015, and was adopted by the City Council on August 11, 2015. Mobility Plan 2035 changed the designation of Sunset Boulevard and Western Avenue from "Major Highway – Class II" to "Avenue I". The Avenue I designation requires a 35-foot half-width roadway on a 50-foot half-width right-of-way. The proposed redesignation that would occur under the Revised Project would preserve the 15 foot sidewalks adjacent to the project site and would thus not conflict with the proposed modifications to the Mobility Element.

Consequently, the Revised Project would not represent a new significant impact or substantial increase in the severity of previously identified impacts with respect to land use.

Mineral Resources

Original Project

The Certified EIR found that the project site and surrounding area do not contain valued mineral resources, and that the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state, or a locally-important mineral resource, and no impacts would occur.

Revised Project & Changed Circumstances

The Revised Project would be developed on the same project site as evaluated in the Certified EIR. Impacts of the Revised Project would be the same as the Original Project. The Revised Project would, consequently, not represent a new significant impact or substantial increase in the severity of previously identified impacts with respect to mineral resources.

Noise

Original Project

The Certified EIR found that construction noise levels at the Learning Center for Young Children[2] facility would exceed the City's significance threshold and would be significant. Construction noise levels at other sensitive receptors would not exceed the City's significance threshold and would be less than significant. The Certified EIR found that roadway noise levels generated by haul/delivery vehicles during construction would be less than significant.

The Certified EIR found that vibration levels during construction at the Learning Center for Children would be significant during the site demolition and grading phases, which would be the most vibration-intensive phases of project construction.

The Certified EIR found that the maximum increase in 24-hour average roadway noise levels would not exceed the threshold established by the *L.A. CEQA Thresholds Guide*, and traffic noise impacts would be less than significant.

Project Design Features and Mitigation Measures

The Certified EIR included the following project design features and mitigation measures.

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[2] *The Learning Center for Young Children has been subsequently replaced with a facility, Learning Unleashed, that provides a similar function (child care and after-school teaching programs) as was provided by the Learning Center for Young Children.*

IV.H-1. The project shall comply with the City of Los Angeles Noise Ordinance No. 41.40 which restricts construction and demolition activities to the hours of 7:00 AM to 9:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday.

IV.H-2. Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

IV.H-3. The use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized to the extent feasible. Examples include the use of drills and jackhammers.

IV.H-4. Construction activities whose specific location at the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.

IV.H-5. Equipment warm-up areas, water tanks, and equipment storage areas shall be located as far as possible from the surrounding residential uses and the Children's Learning Center.

IV.H-6. The project contractor shall use power construction equipment with state-of-the-are noise shielding and muffling devices.

IV.H-7. The project developer shall install temporary sound curtains capable of reducing noise by at least 15 dBA on the far side of the project site, of sufficient height to block the lines-of-sight of the construction activities at the project site from the Learning Center for Young Children facility. The sound curtains shall be in place from the commencement of construction activities on the project site until the exterior of the building is constructed and doors are installed and place until the exterior of the building is constructed and doors are installed.

IV.H-8. Two weeks prior to the commencement of construction at the project site, notification must be provided to the Learning Center for Children facility disclosing the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period.

IV.H-9. The project developer shall provide a liaison to coordinate construction activities with the Learning Center for Children facility such that the loudest construction activities would occur during times when children are not napping or outside. In addition, a phone number and contact name shall be provided to the Learning Center for Children for school faculty to call for noise complaints.

IV.H-10. Existing structure demolition and grading using large bulldozers shall not be permitted within 150 feet of the Learning Center for Young Children except after 4 pm Monday through Friday or anytime on Saturday.

Revised Project & Changed Circumstances

To address the potential noise impacts associated with the Revised Project, and changed circumstances associated with the Revised Project, an updated noise analysis was prepared by Cadence Environmental Consultants, which is included as Appendix D to this Addendum. The updated analysis reflects the partial completion of project construction, as well as updated background traffic information for the

project vicinity (see ***Transportation and Traffic,*** below) and updated noise measurements that are indicative of existing community noise levels.

Existing daytime noise levels were measured at seven locations on February 18, 2015 along the nearby roadways that would be most affected by noise levels generated at the project site and by traffic generated by the Revised Project. The measurement locations are illustrated in Figure 6 and described as follows:

- Location 1 - Northern side of Sunset Boulevard west of St. Andrews Place. Noise levels were measured adjacent to the public right-of-way within the parking lot of a commercial center. The primary sources of noise at this location were traffic on Sunset Boulevard and people talking.

- Location 2 - Northern side of Sunset Boulevard west of Western Avenue across from the proposed project site. Noise levels were measured adjacent to the public right-of-way within the parking lot of a WSS store. The primary sources of noise at this location were traffic on Sunset Boulevard and people talking.

- Location 3 - Eastern side of Western Avenue north of Sunset Boulevard. Noise levels were measured within the public right-of-way adjacent to the View@270 apartment building. The primary sources of noise at this location were traffic on Western Avenue and people talking.

- Location 4 - Northern side of Sunset Boulevard east of Western Avenue. Noise levels were measured within the public right-of-way adjacent to the View@270 apartment building. The primary sources of noise at this location were traffic on Sunset Boulevard and people talking.

- Location 5 - Western side of Western Avenue south of De Longpre Avenue. Noise levels were measured near the public right-of-way within the parking lot of the King Buffet restaurant. The primary sources of noise at this location were traffic on Western Avenue, shielded construction (excavation) activities at the property to the east of Western Avenue, and people talking.

- Location 6 - Southern side of De Longpre Avenue west of Western Avenue across from the proposed project site. Noise levels were measured adjacent to the public right-of-way within the parking lot of a commercial center. The primary sources of noise at this location were traffic on Western Avenue and De Longpre Avenue, and people talking.

- Location 7 - Western side of St. Andrews Place north of Fountain Avenue. Noise levels were measured within the public right-of-way adjacent to the multi-family apartment building along this roadway segment. This measurement location is also representative of the existing noise environment at the Learning Unleashed facility. The primary sources of noise at this location were traffic on the Hollywood Freeway (US-101) and Fountain Avenue.

Source: Cadence Environmental Consultants, 2015

EcoTierra consulting

Figure 6
Noise Monitoring Locations

The daytime noise levels measured at each of the locations are identified in Table 6. The estimated 24-hour noise level along the residential roadway segment of St. Andrews Place is presented in Table 7.

Table 6
Existing Daytime Noise Levels at Off-site Locations

Noise Measurement Location	Primary Noise Sources	Noise Level Statistics		
		L_{eq}	L_{min}	L_{max}
1. Northern side of Sunset Boulevard west of St. Andrews Place within commercial center parking lot.	Traffic on Sunset Boulevard, people talking.	67.8	86.0	65.4
2. Northern side of Sunset Boulevard west of Western Avenue across from project site.	Traffic on Sunset Boulevard, people talking.	68.3	86.6	57.4
3. Eastern side of Western Avenue north of Sunset Boulevard adjacent to View@270 apartment building.	Traffic on Western Avenue, people talking.	70.3	84.6	59.0
4. Northern side of Sunset Boulevard east of Western Avenue adjacent to View@270 apartment building.	Traffic on Sunset Boulevard, people talking.	69.4	81.8	59.2
5. Western side of Western Avenue south of De Longpre Avenue within King Buffet restaurant parking lot.	Traffic on Western Avenue, shielded construction (excavation) activities, and people talking.	68.6	84.8	58.8
6. Southern side of De Longpre Avenue west of Western Avenue across from project site.	Traffic on Western Avenue and De Longpre Avenue, people talking.	59.7	77.4	52.2
7. Western side of St. Andrews Place north of Fountain Avenue adjacent to apartment building.	Traffic on Hollywood Freeway (US-101) and Fountain Avenue.	66.8	87.1	60.3
Source: Cadence Environmental Consultants, 2015. Noise measurement data are provided in Appendix D.				

Table 7
Existing 24-Hour Roadway Noise Levels at Locations Off Site

Roadway	Roadway Segment	Existing Land Uses	dBA CNEL [a]
St Andrews Place	North of Fountain Avenue	Residential	68.7
Source: Cadence Environmental Consultants, 2015. Calculation data and results are provided in Appendix D.			

Construction

Construction of the Revised Project would involve the completion of the commercial structure located at the project site. Noise from forklifts, power tools, generators, and other sources of noise would be associated with construction of the proposed project. During each stage of development, there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of the activity.

For the purpose of evaluating construction noise impacts, the L.A. CEQA Thresholds Guide defines sensitive uses as residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. As such, the sensitive receptors in the vicinity of the project site that would be affected by construction activities would be the Learning Unleashed classroom space (formerly the Learning Center for Young Children) located approximately

100 feet to the southwest of the project site and the existing residences located approximately 250 to 300 feet to the north and northeast of the project site.

Temporary construction noise levels could periodically reach 80 dBA L_{eq} at the Learning Unleashed classroom facility. In addition, noise levels could also periodically reach 71.3 dBA L_{eq} at the residential uses to the northeast of the project site. The construction noise levels at the residential uses to the north of the site would be approximately 66.0 dBA L_{eq} due to the barrier attenuation that is provided by the commercial buildings along Sunset Boulevard.

Existing daytime noise levels along St. Andrews Place (Monitoring Location 7) were measured to be approximately 67 dBA L_{eq}. This measured level would also be representative of the Learning Unleashed classroom facility. Table 6 shows that existing daytime noise levels at the residential uses to the northeast of the site average around 69 dBA L_{eq}. Construction noise levels of up to 80 dBA L_{eq} at the Learning Unleashed classroom facility would increase daytime noise levels at this location by more than five dBA L_{eq} for 10 days in a three month period. This would be a significant impact throughout the remaining construction phases of project development, the same as under the Original Project. However, construction noise levels of up to 72 dBA L_{eq} at the residential uses to the northeast of the project site and up to 67 dBA L_{eq} at the residential uses to the north of the project site would increase daytime noise levels at these sensitive receptors by less than five dBA L_{eq}. This would also be a less than significant impact at the nearest residential locations, the same as under the Original Project.

Roadway noise levels would also be generated by haul/delivery vehicles during the remaining construction phases of development. An average of 50 construction workers would be on-site with a peak of up to 125 workers. In order for a five dBA increase in roadway noise levels to occur, the roadway traffic volumes would have to increase by more than 200 percent. This would not occur on the streets that the trucks would travel to and from the project site and a less than significant impact would occur. Impacts would be the same as under the Original Project.

Construction activities associated with the Revised Project would only occur during the permitted hours designated in Section 41.40 of the LAMC and would not occur during recognized sleep hours. In addition, pursuant to the provisions of LAMC Section 112.05, implementation of technically feasible noise limitation measures, including the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment, would be required for the project. Coupled with the construction activity that has already taken place, impacts of the Revised Project would be the same as the Original Project with respect to construction noise. The mitigation measures identified in the Certified EIR were observed, and would be observed as applicable to the Revised Project, and would reduce noise levels associated with remaining construction of the Revised Project to less than significant.

Construction activities that would occur at the project site have the potential to generate low levels of ground-borne vibration. The buildings adjacent to the project consist of newer residential structures and commercial buildings of more modern steel and concrete construction. Based on the significance

criteria from the Certified EIR, a significant structural ground-borne vibration impact could occur if the nearest residential buildings are exposed to vibration levels of 0.3 inches per second PPV, or if the nearest commercial buildings are exposed to vibration levels of 0.5 inches per second PPV. The potential for nearby residents and commercial workers and students to be annoyed by ground-borne vibration would be significant if vibration levels reach 0.10 inches per second PPV. Vibration levels associated with the Revised Project could reach as high as approximately 0.076 inches per second PPV within 25 feet of an operating loaded truck. The maximum vibration level of 0.076 inches per second PPV would be below the thresholds of significance for both potential building damage and human annoyance. Therefore, the potential impacts associated with construction vibration would be less than significant.

Operations

Locations in the vicinity of the project site would experience a slight increase in noise resulting from the additional traffic generated by the proposed project and the increased activity at the project site. According to the updated Traffic impact Study, the proposed project would generate an increase of approximately 5,509 vehicle trips per day. Based on this level of traffic increase, the increase in 24-hour roadway noise levels along the residential segment of St. Andrews Place north of Fountain Avenue is shown in Table 8. As shown, the Revised Project would increase noise levels along St. Andrews Place by approximately 0.3 dBA CNEL, which would be imperceptible to most people and would not exceed the applicable thresholds of significance for the affected existing land uses.

Table 8
Project 24-Hour Roadway Noise Impacts

Roadway	Roadway Segment	Noise Levels in dBA CNEL				
		Existing Traffic Volumes	Existing Plus Project	Increase	Significance Threshold[a]	Significant?
St Andrews Place	North of Fountain Avenue	68.7	69.0	0.3	5.0	No
Source: Cadence Environmental Consultants, 2015. Calculation data and results are provided in Appendix D.						

Other operational noise sources associated with the Revised Project, including equipment, parking structure, and loading dock, would be the same as the Original Project, and would result in less than significant impacts.

Consequently, the Revised Project would not represent a new significant impact or substantial increase in the severity of previously identified impacts with respect to noise.

Population, Housing, and Employment

Original Project

The Certified EIR found that the proposed project would not introduce permanent residents to the Hollywood CPA, and would have no impact on population growth. The Certified EIR found that construction of the proposed project would create temporary construction-related jobs. However, due to the nature of such jobs, the Certified EIR found that no permanent residents would be generated as a result of the construction of the proposed project.

The Certified EIR found that the commercial component of the proposed project would generate approximately 250 full- and part-time jobs, but this growth would be insubstantial in the context of the growth forecasted for the City of Los Angeles and the Hollywood CPA, and impacts on population growth would be less than significant.

The Certified EIR found that the proposed project does not include a residential component and no existing residential uses would be demolished or displaced as part of the project; therefore, the proposed project would not exceed any housing projections for the region, city, or CPA and no impact would occur.

Revised Project & Changed Circumstances

Employment growth associated with the Revised Project would be the same as the Original Project because the Revised Project would include the same land uses and same square footage as the Original Project. Impacts of the Revised Project related to population, housing and employment would be the same as the Original Project. Consequently, the Revised Project would not represent a new significant impact or substantial increase in the severity of previously identified impacts with respect to population, housing and employment.

Public Services

Original Project

Police Protection

The Certified EIR found that, while there is the potential for the construction of the proposed project to increase the demand for police protection services, the proposed project would provide security to the site during the construction process, and construction impacts would be less than significant. The Certified EIR found that emergency access would be maintained to the project site during construction, and the proposed project would implement construction project design features, and that traffic construction impacts to police services would be less than significant.

The Certified EIR found that the proposed project would implement crime prevention features, such as nighttime security lighting, secure parking facilities, and provision of security patrol if necessary, and would result in a less than significant operational impact on police protection services. The Certified EIR found that the addition of 250 employees would not create the demand for additional police officers. The Certified EIR found that Inclusion of preventative and proactive security measures would decrease the amount of service calls the LAPD would receive, and LAPD would review the proposed project design and provide guidance on design features that would minimize the opportunity for crime, which would minimize demand police protection services. The Certified EIR found that operational impacts on police services would be less than significant.

The Certified EIR found that project impacts related to response times would be less than significant as traffic impacts will be mitigated to the maximum extent possible based on established LADOT methodologies and thresholds, and police units would have multiple routes to access the project site. The Certified EIR found that, while the proposed project would result in a significant impact related to access based on the projected operational condition of the Sunset Boulevard/Western Avenue intersection under cumulative plus project traffic conditions, and, under the conservative alternate analysis, project traffic would significantly impact two intersections, a police unit accessing the project site from the surrounding area may or may not pass through the Sunset Boulevard/Western Avenue intersection or one or both of the two impacted study intersections under the conservative analysis, and impacts would be less than significant.

Project Design Features and/or Mitigation Measures

The Certified EIR included the following project design features and/or mitigation measures.

IV.J-1. The proposed project shall implement a Construction Management Plan that would outline provisions for on-site security during construction, which could include, but are not limited to, temporary security fencing, lighting, and providing security personnel to patrol the site. Additionally, the Construction Management Plan shall ensure emergency access to the project site is maintained at all times during construction through well-marked entrances.

IV.J-2. The proposed project shall comply with the design guidelines outlined in the LAPD Design Out Crime Guidelines, which recommend using natural surveillance to maximize visibility, natural access control that restricts or encourages appropriate site and building access, and territorial reinforcement to define ownership and separate public and private space. Specifically, the proposed project shall:

- Provide on-site security whose duties would include but would not be limited to the following:
  - Monitoring entrances and exits;
  - Managing and monitoring fire/life/safety systems; and
  - Controlling and monitoring activities in the parking facilities.
- Install security industry standard security lighting at recommended locations including parking structures, pathway options, and curbside queuing areas;

- Install closed-circuit television at select locations including (but not limited to) entry and exit points, loading docks, public plazas and parking areas;
- Provide adequate lighting of parking structures, elevators, and lobbies to reduce areas of concealment;
- Provide lighting of building entries, pedestrian walkways, and public open spaces to provide pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings;
- Design public spaces to be easily patrolled and accessed by safety personnel;
- Design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites; and
- Limit visually obstructed and infrequently accessed "dead zones."
- Prior to the issuance of a certificate of occupancy for each construction phase and on-going during operations, the Applicant or its successor shall develop an Emergency Procedures Plan to address emergency concerns and practices. The plan shall be subject to review by LAPD.

Fire Protection

The Certified EIR found that construction on the project site would increase the potential for accidental on-site fires from such sources as the operation of mechanical equipment and use of flammable construction materials. However, impacts would be less than significant because emergency access would be maintained to the project site during construction; construction impacts are temporary in nature; emergency vehicle drivers have a variety of options for avoiding traffic; and the proposed project would implement a construction traffic management plan.

The Certified EIR found that the project applicant would be required to submit a plot plan to the LAFD for approval during the City plan check process, which would ensure the requisite fire flow for the project site. The Certified EIR found that the project site is located beyond the LAMC maximum response distance of an engine company for commercial land uses. Therefore, since the proposed project would be equipped with a sprinkler system, and would conform with applicable Fire Code and LAFD building requirements would provide adequate on-site fire protection, impacts would be less than significant.

The Certified EIR found that, while the proposed project is anticipated to affect vehicle/capacity ratios and the level of service of roadways in the project vicinity, the implementation of project-specific intersection and roadway improvements would mitigate significant impacts to the maximum extent possible based on LADOT's established methodology and significance thresholds. The Certified EIR found that, while the project would result in a significant impact related to access based on the projected operational condition of the Sunset Boulevard/Western Avenue intersection under cumulative plus project traffic conditions, and, under the conservative analysis, traffic conditions would not be mitigated to less than significant levels for two intersections, impacts would be less than significant since emergency response times would not be substantially affected given that there would be significant

traffic impacts at limited locations (and only under very conservative assumptions), and given the availability of alternative routes within the street pattern in the area surrounding the project site.

Project Design Features and/or Mitigation Measures

The Certified EIR included the following project design features and/or mitigation measures.

No significant impacts related to fire protection services have been identified; however, the City requires implementation of the following Standard Mitigation Measures:

IV.J-4. The proposed project shall implement a Construction Management Plan that shall outline provisions for on-site security during construction, which could include, but are not limited to, temporary security fencing, lighting, and providing security personnel to patrol the site. Additionally, the Construction Management Plan shall ensure emergency access to the project site is maintained at all times during construction through well-marked entrances.

IV.J-5. The proposed project shall comply with all State and local building codes relative to fire protection, safety, and suppression. Specifically, the project design shall incorporate the standards and requirements as set forth by: Title 24, the City of Los Angeles Safety Element, the LAMC Fire Code, and any additional code requirements established by the LAFD relative to fire prevention, safety, suppression, and emergency access and response.

IV.J-6. The project applicant shall submit a plot plan for approval of access and hydrants by the LAFD prior to the issuance of a building permit by the City. The plot plan shall include fire prevention and access features to the satisfaction of the LAFD, including the following standard requirements:

- Access for Fire Department apparatus and personnel to and into all structures shall be required.
- Any required Fire Annunciator panel or Fire Control Room shall be located within 50 feet visual line of site of the main entrance stairwell or to the satisfaction of the LAFD.
- Any required fire hydrants to be installed shall be fully operational and accepted by the LAFD prior to any building occupation.
- All water systems and roadways are to be improved to the satisfaction of the LAFD prior to any building occupation.
- All structures shall be fully sprinklered pursuant to LAMC Section 57.09.07(A).
- No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
- No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along the path of travel.

Revised Project & Changed Circumstances

Demand for police and fire services associated with the Revised Project would be the same as the Original Project because the Revised Project includes the same land uses and square footage, and would have the same employee and visitor populations as the Original Project. The same mitigation measures

contained in the Certified EIR would continue to be applicable to the Revised Project. Consequently, the Revised Project would not represent a new significant impact or substantial increase in the severity of previously identified impacts with respect to public services.

Recreation

Original Project

The Certified EIR found that the Original Project could generate increased demand for park and recreation services that would be less than significant.

Revised Project & Changed Circumstances

Demand for recreation facilities and services associated with the Revised Project would be the same as the Original Project because the Revised Project includes the same land uses and square footage, and would have the same employee and visitor populations as the Original Project. Consequently, the Revised Project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

Transportation and Traffic

Original Project

The Certified EIR found that, traffic from construction workers is not expected to create a significant impact on the street system. The Certified EIR found that the level of traffic from truck hauling would not result in a significant traffic impact on the street system.

The Certified EIR found that five study intersections would be significantly impacted by the proposed project:

- Intersection No. 4: Hollywood Boulevard and Western Avenue
- Intersection No. 6: Sunset Boulevard and Western Avenue
- Intersection No. 9: Western Avenue and De Longpre Avenue
- Intersection No. 11: Western Avenue and Fountain Avenue
- Intersection No. 12: Western Avenue and Santa Monica Boulevard

The Certified EIR found that seven study intersections would be significantly impacted by the proposed project if traffic credits from the prior use were not factored into project's traffic generation. Under this scenario, two additional intersections (#19, Sunset Boulevard and Van Ness Avenue and #24, Wilton Place and Hollywood Boulevard) would be significantly impacted during the afternoon peak hour. In addition, Intersection #6, Sunset Boulevard and Western Avenue, would be significantly impacted during the morning peak hour under this scenario. Impacts would be mitigated to less than significant at five of the seven impacted intersections. Impacts at the other two intersections (#11, Western Avenue and

Fountain Avenue; and #12, Western Avenue and Santa Monica Boulevard) would be significant and unavoidable.

The Certified EIR found that six of the study intersections would be impacted by the project traffic volume using the significant impact criteria established by LADOT. In addition, a traffic signal was determined necessary for the intersection of Western Avenue and De Longpre Avenue. Therefore, this intersection was also considered as significantly impacted. Compared to the impacts of the existing plus project traffic scenario, one intersection that would be significantly impacted under the existing plus project traffic scenario (#10, Western Avenue & Fountain Avenue) would not be impacted under the future cumulative with project traffic scenario. However, three additional intersections would be significantly impacted under the future cumulative with project traffic scenario (#19, Sunset Boulevard and Van Ness Avenue; #22, Sunset Boulevard and St. Andrews Place (east); and #24, Wilton Place and Hollywood Boulevard).

The Certified EIR found that a significant neighborhood street impact would occur on St. Andrews Place N/O Fountain Avenue under the existing conditions plus project with no traffic credits as a result of traffic generated by the proposed project. Under this scenario, the proposed traffic mitigation would be to implement a neighborhood calming program to install speed humps along St. Andrews Place between Fountain Avenue and De Longpre Avenue.

The Certified EIR found project trips assigned to the Hollywood Freeway would create a minimal impact with less than the two percent increase required for a significant freeway traffic impact. The Certified EIR found that sufficient capacity would be available to accommodate new project-related person trips estimated to use transit during the evening peak hour.

The Certified EIR found that the intersection of Sunset Boulevard and Western Avenue is projected to operate at LOS F during the morning and afternoon peak hours, after implementation of mitigation measures. With the installation of a traffic signal, the intersection of Western Avenue and De Longpre Avenue is projected to operate at LOS A and B during the morning and afternoon peak hours, respectively. The intersection of Sunset Boulevard and St. Andrews Place is projected to operate at LOS B during the morning and afternoon peak hours. Therefore, proposed project impacts related to access for the intersection of Sunset Boulevard and Western Avenue would exceed the LADOT site access significance threshold and would be significant.

The Certified EIR found that the implementation of project-specific intersection and roadway improvements would mitigate all potentially significant impacts based on LADOT's established methodology and significance thresholds. However, under the conservative analysis traffic conditions would not be mitigated to less than significant levels for two intersections. These effects could potentially affect response times in the area during project operation. This impact is not considered significant since emergency response times would not be substantially affected given that there would be significant traffic impacts at limited locations (and only under very conservative assumptions), and given the availability of alternative routes within the street pattern in the area surrounding the project

site. Based on the project's proposed circulation plan and the above considerations, it is anticipated that the Los Angeles Fire Department (LAFD) would be able to respond to on-site areas within the established response time. Therefore, impacts related to emergency access would be less than significant.

The Certified EIR found that, with implementation of safety measures (such as easy pedestrian flow and caution signage for bicyclists, pedestrians and drivers installed near driveways and access points), potential bicycle, pedestrian, and vehicular conflicts would be minimized, and impacts would be less than significant.

The Certified EIR found that proposed project parking supply of 458 parking stalls would exceed the LAMC requirement by 72 parking spaces. The Certified EIR found that the Vermont/Western Specific Plan would limit the proposed project to 386 parking spaces and the proposed project would require a Specific Plan Exception to allow for the additional 72 parking spaces.

Project Design Features and/or Mitigation Measures

The Certified EIR included the following project design features and/or mitigation measures.

IV.C-1. Prior to the issuance of construction permits the developer shall prepare Work Area Traffic Control Plans that at a minimum should include:

- Identification of a designated haul route to be used by construction trucks;
- Provide an estimate of the number to trucks trips and anticipated trips;
- Identification of traffic control procedures, emergency access provisions, and construction alternative crew parking locations;
- Identification of the on-site location of vehicle and equipment staging;
- Provide a schedule of construction activities;
- Limitations on any potential lane closures to off-peak travel periods;
- Scheduling the delivery of construction materials during non-peak travel periods, to the extent possible;
- Coordinating deliveries to reduce the potential of trucks waiting to unload building materials; and
- Prohibiting parking by construction workers on neighborhood streets as determined in conjunction with city Staff.

IV.C-2. Hollywood Boulevard and Western Avenue:

a. Restripe Western Avenue to increase the southbound curb lane from 18 feet to 20 feet in width to facilitate the southbound right-turning traffic on Western Avenue at Hollywood Boulevard (i.e., functional right-turn lane).
b. Upgrade the traffic signal controller to a Type 2070 controller at the intersection of Western Avenue and Russell Avenue.
c. Install additional system detector loops along both approaches of Hollywood Boulevard and Harvard Boulevard.

IV.C-3. Sunset Boulevard and Western Avenue:

a. Widen the west side of Western Avenue north of Sunset Boulevard by five feet from north of Sunset Boulevard to approximately 160 feet to allow for the installation of a southbound right-run lane on Western Avenue. The ultimate design of this improvement shall maintain a minimum sidewalk/parkway width of 15 feet along the west side of Western Avenue north of Sunset Boulevard, and shall provide one left-turn lane, two through lanes, and one right-turn lane in the southbound direction. This is in addition to the intersection improvements required to satisfy the City street standards.

b. Install a closed circuit television (CCTV) camera at this intersection.

IV.C-4. Western Avenue and De Longpre Avenue:

a. Install a new traffic signal with a northbound left-turn pocket at the intersection of Western Avenue and De Longpre Avenue.

b. Restripe De Longpre Avenue to include an eastbound left-turn lane and a right-turn lane at its intersection with Western Avenue.

IV.C-5. Sunset Boulevard and Van Ness Avenue:

a. Install a CCTV camera and the necessary infrastructure (including fiber optic and interconnect).

IV.C-6. Sunset Boulevard and St. Andrews Place:

a. Restripe St. Andrews Place on the northbound approach to Sunset Boulevard to accommodate a left-turn lane and a left-thru-right turn lane.

b. Upgrade the traffic signal controller at this intersection to a Type 2070 with additional system detector loops along both approaches to Sunset Boulevard and St. Andrews Place.

IV.C-7. Wilton Place and Hollywood Boulevard:

a. Install left-turn-only lanes on the northbound and southbound approaches of Wilton Place at Hollywood Boulevard. This would accommodate a left-turn lane and a shared through/right-turn lane on the northbound and southbound approaches. Remove two parking spaces on the west side of Wilton Place north of Hollywood Boulevard.

The Certified EIR identified the following mitigation measure to address the significant neighborhood impact that would occur on St. Andrews Place north of Fountain Avenue under the existing conditions plus project with no traffic credits scenario:

IV.C-8. Implement a neighborhood traffic calming program to install speed humps along St. Andrews Place between Fountain Avenue and De Longpre Avenue, subject to the approval procedures of LADOT.

Revised Project & Changed Circumstances

To address the potential traffic impacts associated with the Revised Project, and changed circumstances associated with the Revised Project, an updated traffic analysis was prepared by Overland Traffic Consultants, which is included as Appendix E to this Addendum. The updated analysis reflects the partial completion of project construction, as well as updated background traffic information for the project vicinity.

The updated traffic analysis utilized the same LADOT methodologies and protocols for traffic evaluation in the City of Los Angeles as were used in the Original Project traffic analysis. The traffic conditions analysis was conducted using the Critical Movement Analysis (CMA) method for the study intersections. New peak hour traffic counts were analyzed along with intersection geometrics and traffic controls to determine the intersection's typical weekday peak hour operating condition. For the un-signalized intersections, a delay based analysis has been conducted using procedures based on the Highway Capacity Manual, (HCM). This procedure calculates the control delay as the total elapsed time from the time a vehicle stops at the end of the queue to the time the vehicle depart from the intersection.

Project traffic generation was calculated using the most current information contained in the Institute of Transportation Engineers (ITE) publication Trip Generation. This publication of traffic generation data is the industry standard for estimating traffic generation for different commercial land uses. On the basis of the LADOT approved trip generation rates, estimates of the project's traffic volume were calculated. The Revised Project is estimated to generate 5,509 daily trips, 193 AM peak hour trips, and 473 PM peak hour trips. This level of trip generation would be lower than the Original Project's daily and PM peak hour trip generation (6,143 trips and 538 trips, respectively), and higher than the Original Project's AM peak hour trip generation (117 trips). These estimated trips do not include any credits for previous uses.

The future cumulative traffic analysis includes other "related" development projects located within the study area that are either under construction or planned. As part of this cumulative analysis, up-to-date development lists were obtained from the City of Los Angeles Department of Transportation, Department of City Planning, and the Hollywood Economic Development Update report. The list identifies 120 related projects that could produce additional traffic at the study intersections by the future study year 2017. The updated related projects list includes the Hollywood Cap Park Project, which was specifically mentioned in comments submitted during the review and certification process for the Certified EIR.

Traffic volume projections were developed to analyze the existing traffic conditions after completion of the proposed project. Under the existing plus project traffic condition, one study intersection (Sunset Boulevard/Western Avenue would be significantly impacted by the project. This impact would occur during the PM peak hour.

Pursuant to the LADOT Traffic Study Policies and Procedures August 2014, only signalized intersections should be selected for the project traffic impact analysis. "Unsignalized intersections should be evaluated solely to determine the need for the installation of a traffic signal or other traffic control device, but will not be included in the impact analysis." Therefore, traffic signal warrants were reviewed for the five unsignalized study intersections, as listed below.

1. Western Avenue and De Longpre Avenue;
2. Western Avenue and Hollywood Freeway Northbound On-Ramp;
3. Sunset Boulevard and Hollywood Freeway Southbound On-Ramp;
4. Wilton Place and Hollywood Freeway Northbound Off-Ramp/Taft Way; and

5. Hollywood Freeway Southbound Off-Ramp/Van Ness and Harold Way.

Of the five unsignalized intersections, LADOT is requiring installation of a traffic signal at the intersection of Western Avenue and De Longpre Avenue, as a project design feature. A new traffic signal with a northbound left-turn pocket will be added to this intersection. Currently, the intersection is marked with an uncontrolled crosswalk and no left-turn storage lane. The traffic signal will facilitate the safe and efficient movement of pedestrians and vehicles at this intersection.

For the remaining 23 study intersections, the impact of the project's traffic volumes was calculated by adding the project volume to the "without project" traffic estimates. Comparing the changes in traffic conditions between the "without project" and "with project" traffic volume provides the data to determine if the project traffic volume creates a significant traffic impact, which would require traffic mitigation at any of the study intersections.

The updated traffic analysis found that five study intersections would be impacted by the project traffic volumes using the significant impact criteria established by LADOT. It should be noted that the impact analysis does not consider any changes or improvements to the intersections as may be required of other development projects. The significantly impacted intersections are:

- Intersection No. 4, Hollywood Boulevard and Western Avenue;
- Intersection No. 6, Sunset Boulevard and Western Avenue;
- Intersection No. 12, Western Avenue and Santa Monica Boulevard;
- Intersection No. 19, Sunset Boulevard and Van Ness Avenue; and
- Intersection No. 24, Wilton Place and Hollywood Boulevard.

These intersections are the same intersections that were identified as significantly impacted in the Certified EIR under the scenario where no credit was taken for existing uses (i.e., the same scenario that was evaluated in the updated traffic analysis). One intersection that was identified as significantly impacted in the Certified EIR (Intersection No. 10, Western Avenue and Fountain Avenue) would not be significantly impacted by the Revised Project because of reduced PM peak hour traffic generation by the Revised Project. No new intersection impacts would result from the Revised Project.

The updated traffic analysis and LADOT Assessment letter[3] identified revised mitigation measures based upon most current information to address the significant impacts of the Revised Project.

IV.C-2. Hollywood Boulevard and Western Avenue:

a. Restripe Western Avenue to increase the southbound curb lane from 18 feet to 20 feet in width to facilitate the southbound right-turning at the intersection traffic on Western Avenue at Hollywood Boulevard; this would allow the southbound approach to

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[3] *Department of Transportation, Interdepartmental Correspondence, Memorandum from Tomas Carranza, Senior Transportation Engineer, October 1, 2015 (see Appendix F to this Addendum).*

accommodate one left-turn lane, one through lane, and one shared through/right-turn lane.

b. Upgrade the traffic signal controller to a Type 2070 controller at the intersection of Western Avenue and Russell Avenue.

c. Install additional system detector loops along both approaches of Hollywood Boulevard at Harvard Boulevard.

IV.C-3. Sunset Boulevard and Western Avenue:

a. Consistent with the adopted street standards for Western Avenue, reconfigure the west side of Western Avenue north of Sunset Boulevard to allow for the installation of a southbound right-run lane on Western Avenue. The ultimate design of this improvement should maintain a minimum sidewalk/parkway width of 15-feet along the west side of Western Avenue north of Sunset Boulevard, and should provide one left-turn lane, two through lanes, and one right-turn lane in the southbound direction.

b. Install a closed circuit television (CCTV) camera and the necessary infrastructure (including fiber optic and interconnect) at Sunset Boulevard and Western Avenue.

IV.C-4. Sunset Boulevard and Van Ness Avenue:

a. Install a CCTV camera and the necessary infrastructure (including fiber optic and interconnect) at Sunset Boulevard and Western Avenue.

IV.C-5. System-Wide Traffic Signal Upgrades:

a. Upgrade the traffic signal controller to a Type 2070 at the following intersections: Sunset Boulevard and St. Andrews Place; Franklin Avenue and Wilton Place; and Franklin Avenue and Garfield Place;

b. Install additional system detector loops along the approaches at Sunset Boulevard and St. Andrews Place;

c. Install a CCTV camera and the necessary infrastructure (including fiber optic and interconnect) at Western Avenue and Santa Monica Boulevard.

With the implementation of the proposed mitigation measures, 4 of the 5 significant traffic impacts will be reduced to a level of less than significant. No mitigation measures are available to address the significant impact at Western Avenue and Santa Monica Boulevard. Impacts at this intersection would be significant and unavoidable, same as under the Original Project.

Traffic generated by the Revised Project has the potential to cause motorists to bypass congested arterial streets and use nearby neighborhood streets. The updated traffic study analyzed those local residential streets that may be impacted based on an increase in the streets daily traffic volume. Recent 24-hour traffic counts were conducted to determine the volume of existing traffic currently on the streets selected for this analysis. The existing daily traffic volume on each of the residential streets was factored up by three percent per year based on recent traffic counts to the year 2017 to account for potential traffic growth. The segment of St. Andrews Place north of Fountain Avenue is expected to exceed the 8 percent threshold for a significant impact by 0.6% as a result of traffic generated by the Revised Project. This is the same impact as was identified for the Original Project. No significant neighborhood impacts are expected at the other streets analyzed. The same mitigation measure identified for the Original Project (Mitigation Measure IV.C-8) would reduce the impact on St. Andrews

Place to less than significant if concurred in by the adjoining neighborhood. If the adjoining neighborhood does not concur, the impact would be significant and unavoidable, same as the Original Project.

The updated traffic analysis found that the Revised Project would not significantly impact CMP intersections or freeway segments, or transit service, same as the Original Project.

The parking supply provided by the Revised Project would be in compliance with the requirements set forth for commercial uses in the proposed Specific Plan amendment. Parking impacts of the Revised Project would be less than significant.

The proposed General Plan amendment would not change the existing configuration of streets serving the project site. Accordingly, the proposed General Plan amendment would not change the analysis and conclusions presented in the updated traffic analysis prepared for the Revised Project.

Consequently, the Revised Project would not represent a new significant impact or substantial increase in the severity of previously identified impacts with respect to transportation and traffic.

Utilities

Original Project

Sewer

The Certified EIR found that the Hyperion Treatment Plant (HTP) would have sufficient treatment capacity to accommodate the proposed project's average daily wastewater generation and impacts to wastewater treatment capacity would be less than significant. The Certified EIR found that the existing wastewater conveyance system would have available capacity to accommodate the increased wastewater generated by the proposed project and wastewater impacts would be less than significant.

Project Design Features and/or Mitigation Measures

The Certified EIR included the following project design features and/or mitigation measures.

No significant impacts related to sewer service have been identified; however, the City requires implementation of the following Standard Mitigation Measures:

IV.K-1. As part of the normal construction/building permit process, the Applicant or its successor shall confirm with the City that the capacity of the local and trunk lines are sufficient to accommodate the proposed project's sewer flows during the construction and operation phases.

IV.K-2. The proposed project shall implement any upgrades to the sewer system serving the proposed project that could be needed to accommodate the Project's sewer generation.

Water

The Certified EIR found that the proposed project would be within the growth projections of the LADWP and it is anticipated that the LADWP would be able to meet the proposed project's water demand. The Certified EIR found that the fire flow requirement and associated infrastructure requirements would conform to the City's Fire Code and be implemented in consultation with the LAFD, and impacts related to water infrastructure and fire flow would be less than significant.

Project Design Features and/or Mitigation Measures

The Certified EIR included the following project design features and/or mitigation measures.

The proposed project shall implement the following project design features to reduce water consumption:

- The Applicant or its successor shall install new water meters as required.
- The proposed project shall include water conservation features in accordance with Title 24 of the CCR. Further, the proposed project design shall incorporate energy efficient appliances in compliance with proposed amendments to the California Energy Code previously described in this Subsection.
- The Applicant or its successor shall install plumbing and plumbing fixtures that shall meet the following requirements:
    - Toilets. All toilets installed shall be high efficiency fixtures. The maximum flush volume for high efficiency toilets shall not exceed 1.28 gpf (effective).
    - Urinals. All urinals installed shall be, at a minimum, high efficiency fixtures. The maximum flush volume of high efficiency urinals shall not exceed 0.125 gpf. Waterless urinals shall be utilized wherever possible.
    - Faucets. All faucets in public restrooms must be self-closing. The flow rate for all indoor faucets shall be 2.2 gpm except as follows:
        - The maximum flow rate for private or private use lavatory faucets shall be 1.5 gpm (5.6 liter per minute);
        - The maximum flow rate for public use lavatory faucets, shall be 0.5 gpm. Exception: Metering faucets shall deliver not more than 0.25 gallon (1.0 liter) of water per cycle; and
        - The maximum flow rate for a pre-rinse spray valve installed in a commercial kitchen to remove food waste from cookware and dishes prior to cleaning shall be 1.6 gpm (6.0 liter per minute).
- The Applicant shall not use single pass cooling systems. Single-pass cooling systems are strictly prohibited for use in devices, processes, or equipment installed in commercial, industrial, or multi-family residential buildings. This prohibition shall not apply to devices, processes, or equipment installed for health or safety purposes that cannot operate safely otherwise.
- The Applicant or its successor shall use rotating sprinkler nozzles landscape irrigation – 0.5 gpm;
- The Applicant or its successor shall use drought tolerant and native plants for 25 percent of total landscaping;

- The Applicant or its successor shall use drip/subsurface irrigation (Micro-Irrigation), weather-based irrigation controller, micro-spray and zoned irrigation; and
- The Applicant or its successor shall use landscaping contouring to minimize precipitation runoff.

Solid Waste

The Certified EIR found that project-generated demolition and construction-related waste would represent a very small percentage of the inert waste disposal capacity in the region, and impacts would be less than significant. The Certified EIR found that sufficient landfill capacity exists to accommodate the daily operational waste generated by the proposed project, and a less than significant impact would occur.

Project Design Features and/or Mitigation Measures

The Certified EIR included the following project design features and/or mitigation measures.

The proposed project shall implement the following project design features to ensure implementation of LEED certification:

- The Applicant or its successor shall implement a demolition and construction debris recycling plan for all buildings constructed as part of the proposed project, with the explicit intent of requiring recycling during all phases of site preparation and building construction. Off-site recycling centers, such as asphalt or concrete crushers, would be utilized to provide crushed materials for roadbed base. In addition, trees unsuitable for relocation would be recycled and used for landscape mulch;
- All structures constructed or uses established within any part of the proposed project shall be designed to be permanently equipped with clearly marked, durable, source sorted recycling bins at all times to facilitate the separation and deposit of recyclable materials;
- Primary collection bins shall be designed to facilitate mechanized collection of such recyclable wastes for transport to on- or off-site recycling facilities;
- The Applicant or its successor shall continuously maintain in good order clearly marked, durable, and separate recycling bins on the same lot or parcel to facilitate the deposit of recyclable or commingled waste metal, cardboard, paper, glass, and plastic therein; maintain accessibility to such bins at all times for the collection of such wastes for transport to on- or off-site recycling plants; and require waste haulers to utilize local or regional material recovery facilities as feasible and appropriate; and
- During occupancy and operations, the proposed project shall have a solid waste diversion rate target of 65 percent of non-hazardous materials.

Electricity

The Certified EIR found that the proposed project's demand for electricity could be served via existing infrastructure, and no improvements or additions to LADWP's off-site distribution system would be needed, and impacts would be less than significant.

Project Design Features and/or Mitigation Measures

The Certified EIR included the following project design features and/or mitigation measures.

The proposed project shall design the building envelope, heating, ventilation, and air-conditioning (HVAC), lighting, other systems such as electric motor equipment, to maximize energy performance. Additionally, as part of the proposed project and to reduce its overall demand for electricity, the following electrical systems could be employed to meet the current 2008 Title 24 requirements or exceed the 2005 Title 24 requirements by 15 percent:

- Automatic and day-lighting controls and zoning;
- Cool roofs or high reflectance and high emittance roof surfaces in all low-slope applications;
- Building commissioning for electrical and mechanical equipment;
- Energy efficient heating and cooling systems, transformers, and indoor and outdoor lighting; and
- Other building envelope components such as glazing, insulation, and energy efficient windows.

Natural Gas

The Certified EIR found that the proposed project's natural gas supply needs would be accommodated within natural gas supply projections for the region, that the proposed project's demand for natural gas could be served via current infrastructure, and impacts would be less than significant.

Project Design Features and/or Mitigation Measures

The Certified EIR included the following project design features and/or mitigation measures.

The proposed project shall include all gas service lines required for the new gas meters. The following measures shall be incorporated as part of the project design:

- The Applicant or its successor shall comply with State Energy Conservation Standards for New Residential and Non-Residential Buildings (Title 24, Part 6, Article 2, California Administrative Code, 2008) and exceed Title 24, Part 6, Article 2, California Administrative Code, 2005 by 15 percent.
- The Applicant or its successor shall install energy efficient heating and cooling systems, appliances (e.g., Energy Star®), equipment, and control systems.
- The Applicant or its successor shall specify low-flow water-usage fixtures, reducing water consumption and water heating fuel (natural gas).
- The Applicant or its successor shall use energy-efficient pumps and motors for, waste and storm water conveyance, fire water, and domestic water.
- The Applicant or its successor shall commit to LEED certification. Several potential energy conservation technologies and methods may include Enhanced Commissioning, Measurement & Verification, solar power, gas absorption chillers, and on-site generation systems.

Revised Project & Changed Circumstances

Subsequent to the Certified EIR, the Los Angeles Department of Water and Power prepared an updated Urban Water Management Plan[4] which documents adequate and reliable water supplies for the service area of LADWP through 2035 under normal, single dry-year, and mulotiple dry-year scenarios. Utility demand associated with the Revised Project would be the same as the Original Project because the Revised Project would include the same land uses and square footage as the Original Project. The same project design features and/or mitigation measures included in the Certified EIR would continue to be applicable to the Revised Project. Consequently, the Revised Project would not represent a new significant impact or substantial increase in the severity of previously identified impacts.

CONCLUSION

Based on the above analysis, which compared the potential effects of the Revised Project with the potential impacts of the Original Project as discussed in the Certified EIR and is summarized in Table 9 below, the City concludes that the Revised Project would not require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects (CEQA Guidelines § 15162(a)(1)). In addition, no substantial changes have occurred with respect to the circumstances under which the project would be undertaken which would require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects (CEQA Guidelines § 15162(a)(2)). Finally, no new information of substantial importance has been presented which would show that the Revised Project would have one or more significant effects not discussed in the previous EIR; that significant effects previously examined will be substantially more severe than shown in the previous EIR; that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents declined to adopt the mitigation measure or alternative; or that mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents declined to adopt the mitigation measure of alternative (CEQA Guidelines § 15162(a)(3)). Therefore, none of these conditions described in CEQA Guidelines § 15162 requiring preparation of a subsequent EIR are present. Substantial evidence supporting the conclusions presented above is provided in the proceedings of this Addendum (CEQA Guidelines § 15164(e)).

As indicated above, the Certified EIR finds that the Original Project would result in significant traffic impacts, operational air quality impacts, view blockage impacts, and construction noise impacts that could not be mitigated to a less than significant level. In such cases, CEQA requires that the project cannot be approved unless findings of overriding considerations can be made by the City Council. Accordingly, a Statement of Overriding Considerations was required to be adopted by the City Council,

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[4] *Los Angeles Department of Water and Power, Urban Water Management Plan, 2010, adopted May 3, 2011.*

which set forth the specific reasons why the project's benefits outweigh its significant environmental impacts. The City Council adopted a Statement of Overriding Considerations on April 3, 2013 for the Original Project. The Revised Project would have similar significant traffic impacts, operational air quality impacts, construction noise impacts, and view blockage impacts that cannot be mitigated to a less than significant level as the Original Project. As determined in this Addendum, these impacts would not represent new impacts or substantial increase in the severity of previously-identified impacts. As required by CEQA, the Statement of Overriding Considerations must be re-adopted in order to approve the Revised Project.

Table 9

Summary of the Revised Project Compared to the Original Project

Impact Category	Original Project Impacts	Revised Project Impacts
Aesthetics – Visual Quality	Less Than Significant	Same
Aesthetics – View Blockage	Significant and Unavoidable	Same
Aesthetics – Light and Glare	Less Than Significant	Same
Aesthetics – Shade/Shadow	Less Than Significant	Same
Agricultural Resources	No Impact	Same
Air Quality - Construction	Significant and Unavoidable	Same
Air Quality - Operation	Less Than Significant	Same
Biological Resources	Less Than Significant with Mitigation	Same
Cultural Resources	Less Than Significant with Mitigation	Same
Geology and Soils	Less Than Significant with Mitigation	Same
Hydrology and Water Quality	Less Than Significant with Mitigation	Same
Hazards and Hazardous Materials	Less Than Significant with Mitigation	Same
Land Use	Less Than Significant	Same
Mineral Resources	No Impact	Same
Noise-Construction	Significant and Unavoidable	Same
Noise-Operation	Less Than Significant	Same
Population, Housing, and Employment	Less Than Significant	Same
Public Services-Fire	Less Than Significant with Mitigation	Same
Public Services – Police	Less Than Significant with Mitigation	Same
Recreation	Less Than Significant	Same
Transportation and Traffic	Significant and Unavoidable	Same
Utilities-Sewer	Less Than Significant with Mitigation	Same
Utilities-Water	Less Than Significant with Mitigation	Same
Utilities-Solid Waste	Less Than Significant	Same
Utilities-Natural Gas	Less Than Significant	Same
Utilities-Electricity	Less Than Significant	Same

APPENDIX A

PROPOSED AMENDMENT TO THE VERMONT/WESTERN TRANSIT ORIENTED DISTICT SPECIFIC PLAN – STATION NEIGHBORHOOD AREA PLAN (SNAP)

APPENDIX B

AIR QUALITY REPORT

APPENDIX C

GHG EMISSIONS REPORT

APPENDIX D

NOISE REPORT

APPENDIX E

UPDATED TRAFFIC REPORT

APPENDIX F

LADOT ASSESSMENT LETTER