



INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

Hollywood Community Plan Area

1717 Wilcox Project

Case Number: ENV-2016-2264-MND

Project Location: 1717 N. Wilcox Avenue, Los Angeles, CA 90028

Council District: 13—Mitch O'Farrell

Project Description: The Project includes the development of a 134-room hotel and approximately 3,580 square feet of restaurant uses on an approximately 0.47-acre site located at 1717 Wilcox Avenue (Project Site) in the Hollywood Community Plan Area of the City of Los Angeles (City). The Project would replace an existing asphalt-paved surface parking lot and an approximately 593-square-foot restaurant with an approximately 60,693-square-foot hotel and restaurant within one building that would range in height up to six stories with a building height of approximately 89 feet. The proposed uses would be supported by 104 parking spaces that would be located within a two-level subterranean parking garage and in a partial above-grade parking level. Overall, the Project would remove approximately 593 square feet of existing floor area and construct approximately 60,693 square feet of new floor area, resulting in a net increase of 60,100 square feet of floor area on the Project Site.

APPLICANT:
Adolfo Suaya

PREPARED BY:
Eyestone Environmental

ON BEHALF OF:
The City of Los Angeles
Department of City Planning

October 2016

V. Cultural Resources

Mitigation Measure V-1

- A qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. If paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.

XII. Noise

Mitigation Measure XII-1

The Project shall include the following measures during construction period:

- The project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.
- Construction and demolition shall be restricted to the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday.
- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
- Temporary noise barriers shall be used along the northern, eastern and western property boundaries to block the line-of-sight between the construction equipment and the adjacent residences. The noise barrier shall provide minimum 5 dBA noise reduction to the residences to the west (receptor R1) and northeast (receptor R3) and 15 dBA noise reduction to the residence to the north (receptor R1).

Mitigation Measure XII-2

The Applicant shall retain the services of a qualified acoustical engineer with expertise in the design of building sound insulation, who shall submit a signed report to the City during a plan check for review and approval, indicating that the proposed building design sound insulation achieves an interior sound environment of maximum 45 dBA CNEL, per the City of Los Angeles Building Code (LAMC Section 91.1207).

Mitigation Measure XII-3

Retain the services of a qualified vibration consultant to monitor ground-borne vibration at the exterior of the adjacent buildings to the north, south and west of the Project Site during site grading/excavation (when the use of heavy construction equipment, such as a large bulldozer, drill rig, or loaded truck occurs) within 15 feet of the off-site building structures adjacent to the Project Site. If the measured ground-borne vibration levels exceed 0.2 inch/second (PPV) at the adjacent off-site structures, the project contractor shall evaluate and employ alternative construction methods, so that the ground-borne vibration levels would be below 0.2 inch/second (PPV) at the adjacent off-site structures to the north, south and west.

XVI. Transportation/Traffic

Mitigation Measure XVI-1

Plan construction and construction staging as to maintain adequate and safe pedestrian access on adjacent sidewalks throughout construction.

Mitigation Measure XVI-2

Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.

Mitigation Measure XVI-3

Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

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CITY OF LOS ANGELES

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

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY AND CHECKLIST

(Article IV B City CEQA Guidelines)

LEAD CITY AGENCY	COUNCIL DISTRICT	DATE
City of Los Angeles Department of City Planning	13	October 27, 2016

RESPONSIBLE AGENCIES

To be determined
PROJECT TITLE/NO.

CASE NO.

1717 Wilcox

ENV-2016-2264-MND

PREVIOUS ACTIONS CASE NO.

DOES have significant changes from previous actions.

DOES NOT have significant changes from previous actions.

PROJECT DESCRIPTION:

The project involves the construction of a 134-room hotel and approximately 3,580 square feet of restaurant uses (Project) on an approximately 0.47-acre site located at 1717 Wilcox Avenue (Project Site) in the Hollywood Community Plan Area of the City of Los Angeles (City). The Project would replace an existing asphalt-paved surface parking lot and approximately 593-square-foot restaurant with approximately 60,693 square feet of hotel and restaurant uses within one building that would range in height up to six stories with a maximum building height of approximately 89 feet. The proposed uses would be supported by 104 parking spaces that would be located within a two-level subterranean garage and in a partial above grade parking level. Overall, the Project would remove approximately 593 square feet of existing floor area and construct approximately 60,693 square feet of new floor area, resulting in a net increase of 60,100 square feet of floor area within the Project Site.

ENVIRONMENTAL SETTING:

The Project Site is located in the Hollywood Community Plan Area of the City of Los Angeles. The Project Site is generally bounded by multi-family residential uses to the north, Wilcox Avenue to the east, commercial uses to the south, and Hudson Avenue to the west. Primary regional access is provided by the Hollywood Freeway (US-101), which runs north-south approximately 0.5 mile east of the Project Site. Major arterials providing regional and sub-regional access to the Project Site vicinity include Sunset Boulevard, Highland Avenue, Santa Monica Boulevard, Hollywood Boulevard, and Western Avenue. In addition, several transit lines operated by the Los Angeles County Metropolitan Transportation Authority and the City of Los Angeles Department of Transportation (DASH) provide public transit access in the vicinity of the Project Site.

PROJECT LOCATION

1717 N. Wilcox Avenue, Los Angeles, CA 90028

PLANNING DISTRICT

Hollywood

STATUS:

PRELIMINARY

PROPOSED

ADOPTED 1998

EXISTING ZONING

C4-2D-SN, [Q]R5-2

MAX. DENSITY ZONING

MAX. DENSITY PLAN

PLANNED LAND USE & ZONE

Regional Center Commercial/High Density Residential; C2-2D-SN/[Q]R5-2

C2-2D: 3:1

DOES CONFORM TO PLAN

DOES NOT CONFORM TO PLAN

SURROUNDING LAND USES

PROJECT DENSITY

NO DISTRICT PLAN

Commercial, retail, and multi-family residential



DETERMINATION (To be completed by Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

A handwritten signature in black ink, appearing to read "Nicholas..."

SIGNATURE

Senior City Planner

TITLE

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of a mitigation measure has reduced an effect from “Potentially Significant Impact” to “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, “Earlier Analysis,” cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significance.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

- | | | |
|---|--|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agricultural and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology/Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology/Water Quality |
| <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation/Traffic | <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Mandatory Findings of Significance | | |

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

 **BACKGROUND**

PROPONENT NAME

Adolfo Suaya

PHONE NUMBER

(323) 468-0200

PROPONENT ADDRESS

6541 Hollywood Boulevard, Suite 111, Los Angeles, CA 90028

AGENCY REQUIRING CHECKLIST

City of Los Angeles, Department of City Planning

DATE SUBMITTED

October 27, 2016

PROPOSAL NAME (If Applicable)

1717 Wilcox

 ENVIRONMENTAL IMPACTS

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
II. AGRICULTURE AND FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

IV. BIOLOGICAL RESOURCES. Would the project:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
or ordinance?				
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

V. CULTURAL RESOURCES: Would the project:

a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of dedicated cemeteries (see Public Resources Code, Ch. 1.75, §5097.98, and Health and Safety Code §7050.5(b))?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

VI. GEOLOGY AND SOILS. Would the project:

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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VII. GREENHOUSE GAS EMISSIONS. Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

IX. HYDROLOGY AND WATER QUALITY. Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Violate any water quality standards or waste discharge requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
X. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XI. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XII. NOISE. Would the project result in:

a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XIII. POPULATION AND HOUSING. Would the project:

a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XIV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

XV. RECREATION.

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XVI. TRANSPORTATION/TRAFFIC. Would the project:

a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XVII. TRIBAL CULTURAL RESOURCES.

- a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
- i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
 - ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

XVIII. UTILITIES AND SERVICE SYSTEMS. Would the project:

- a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
- b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?
- e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
- f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
- g. Comply with federal, state, and local statutes and regulations related to solid waste?
- h. Other utilities and service systems?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XIX. MANDATORY FINDINGS OF SIGNIFICANCE.

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



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

PREPARED BY	TITLE	TELEPHONE #	DATE
Stephanie Eyestone-Jones Eyestone Environmental 6701 Center Drive West, Suite 900 Los Angeles, CA 90045	President	(424) 207-5333	October 27, 2016

A. Project Description

Attachment A: Project Description

A. Introduction

The project involves the construction of a 134-room hotel and approximately 3,580 square feet of restaurant uses (Project) on an approximately 0.47-acre site located at 1717 Wilcox Avenue (Project Site) in the Hollywood Community Plan Area of the City of Los Angeles (City). The Project would replace an existing asphalt-paved surface parking lot and approximately 593-square-foot restaurant¹ with approximately 60,693 square feet of hotel and restaurant uses within one building that would range in height up to six stories with a maximum building height of approximately 89 feet. The proposed uses would be supported by 104 parking spaces that would be located within a two-level subterranean parking garage and in a partial above-grade parking level. Overall, the Project would remove approximately 593 square feet of existing floor area and construct approximately 60,693 square feet of new floor area, resulting in a net increase of 60,100 square feet of floor area within the Project Site.

B. Project Location and Surrounding Uses

The approximately 20,622-square-foot Project Site is located in the Hollywood Community Plan Area (Community Plan) of the City of Los Angeles, and has a primary address of 1717 Wilcox Avenue. The Project Site is generally bounded by multi-family residential uses to the north, Wilcox Avenue to the east, commercial uses to the south, and commercial uses and Hudson Avenue to the west. Primary regional access is provided by the Hollywood Freeway (US-101), which runs north-south approximately 0.5 mile east of the Project Site. Major arterials providing regional and sub-regional access to the Project Site vicinity include Sunset Boulevard, Highland Avenue, Santa Monica Boulevard, Hollywood Boulevard, and Western Avenue. In addition, several transit lines operated by the Los Angeles County Metropolitan Transportation Authority and the City of Los Angeles Department of Transportation (DASH) provide public transit access in the vicinity of the Project Site. A map of the Project Site and the surrounding area is provided in Figure A-1 on page A-2.

¹ *City of Los Angeles, ZIMAS Parcel Profile Report for 1717 Wilcox Avenue.*

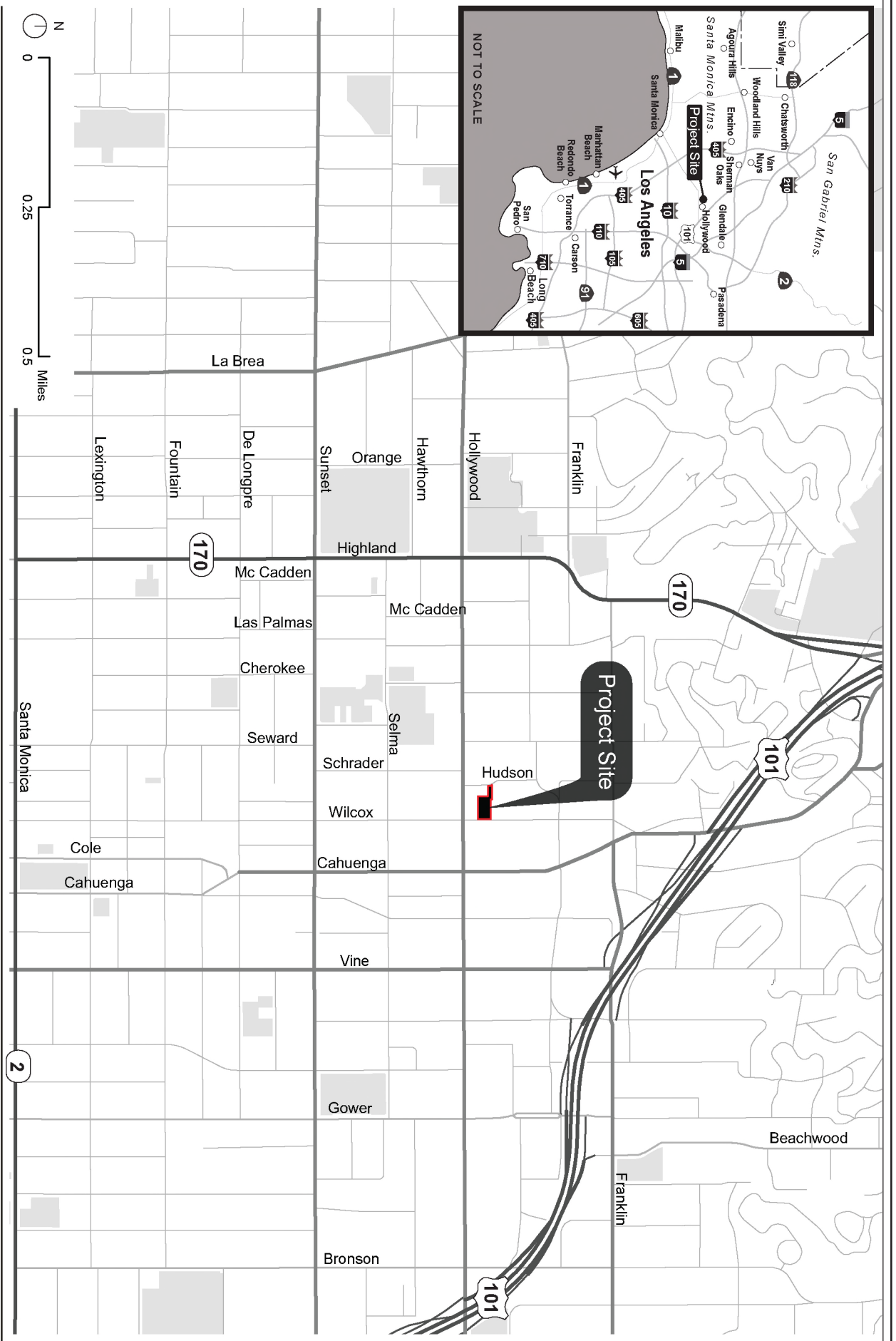


Figure A-1
Project Location Map

As shown in the aerial photograph provided in Figure A-2 on page A-4, the Project Site is located in a highly urbanized area that includes a mixture of low- and mid-rise buildings occupied primarily by multi-family residential and commercial uses, including retail stores and restaurants. Specifically, directly north of the Project Site are two-story multi-family residential buildings and a four-story multi-family residential building located north of these uses. Directly east of the Project Site, across Wilcox Avenue, is the one- to four-story vacant Pacific Theatre building. Directly south of the Project Site is a one- to two-story commercial building consisting of a cafe, restaurants, and several specialty stores. Additional commercial uses are located along Hollywood Boulevard, across from the one- to two-story commercial building bounding the Project Site. Directly west and south of portions of the Project Site is a one-story commercial building. West of the Project Site, across Hudson Avenue, is a four-story multi-family residential building and a surface parking lot for the tenants of the building.

C. Existing Project Site Conditions

As shown in Figure A-3 on page A-5, the Project Site is currently primarily developed as an asphalt-paved surface parking lot that provides parking for 78 vehicles. A portion of the Project Site, along the northeast boundary, includes a restaurant that comprises approximately 593 square feet. Ingress to the Project Site is available via driveways along Wilcox Avenue and Hudson Avenue. Egress is only provided at the driveway along Hudson Avenue. Landscaping within and surrounding the Project Site is very limited. With the exception of a few on-site ornamental shrubs, the Project Site is paved. Existing pole lights are also located on the Project Site.

D. Land Use and Zoning

1. Hollywood Community Plan Area

The Project Site is located within the planning boundary of the Hollywood Community Plan (Community Plan), which was adopted in December 1988. As shown in Figure A-4 on page A-6, the Project Site comprises two adjacent parcels. As illustrated in Figure A-4, one of the two parcels is designated for Regional Center Commercial land uses by the Community Plan. The other parcel is designated for High Density Residential land uses by the Community Plan.



Figure A-2
Aerial Photograph of the Project Site and Vicinity

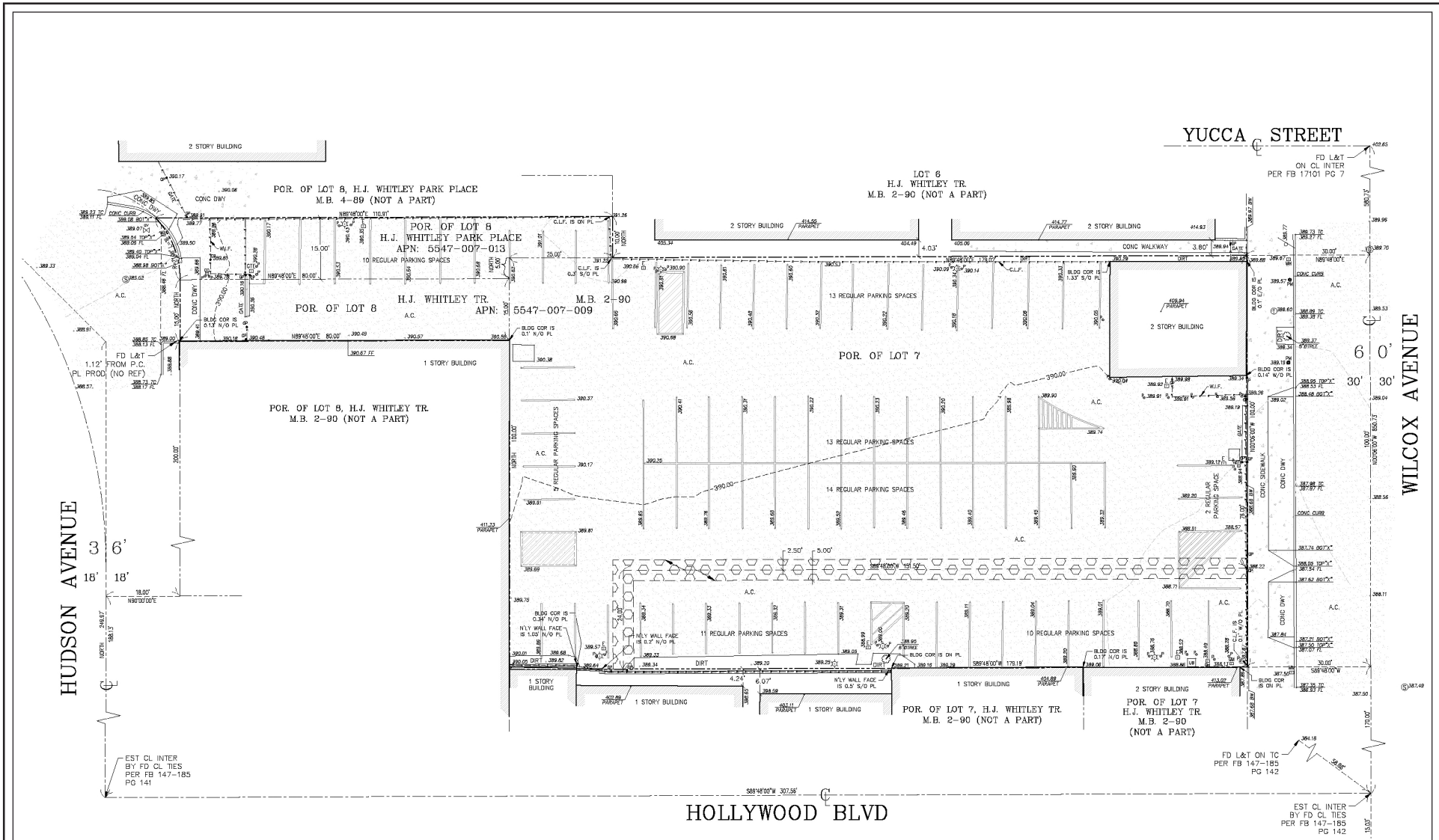
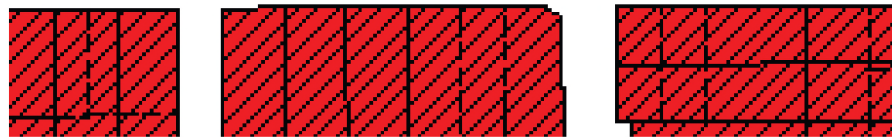
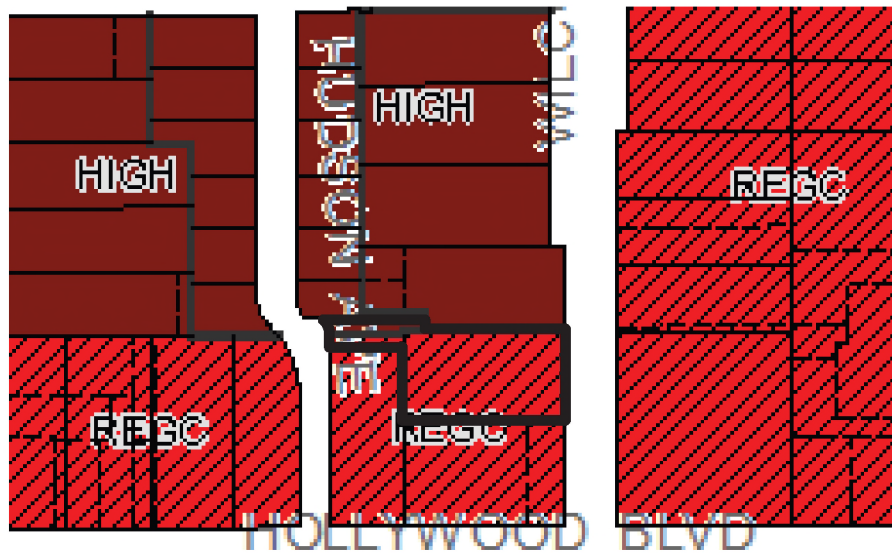


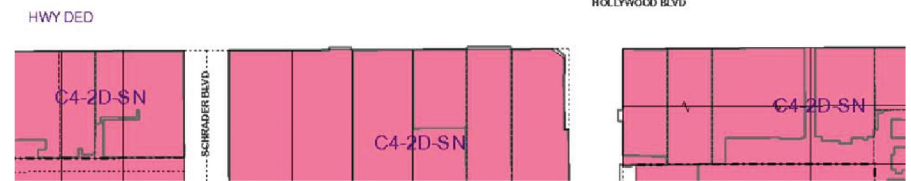
Figure A-3
Existing Site Plan



GENERAL PLAN LAND USE

- High Density Residential
- Regional Center Commercial

Project Site



GENERALIZED ZONING

- R2, RD, RMP, RW2, R3, RAS, R4, R5
- CR, C1, C1.5, C2, C4, C5, CW, ADP, LASED, CEC, USC, PVSP

Figure A-4
Existing Land Use and Zoning

2. Los Angeles Municipal Code

As shown in Figure A-4 on page A-6, the Project Site is predominantly zoned C4-2D-SN (Commercial, Height District 2D, Signage Supplemental Use District) with a small portion of the Project Site zoned [Q]R5-2 (Qualified Multiple Dwelling Residential, Height District 2).

Subject to some limitations, the Los Angeles Municipal Code (LAMC) provides that all uses permitted in the C1, C1.5, and C2 zone are also permitted in the C4 zone. Those uses include retail stores, offices, hotels, schools, parks, and theaters. The C4 zone also permits any land use permitted in the R4 (Multiple Dwelling) zone, which includes one-family dwellings, two-family dwellings, apartment houses, multiple dwellings, and home occupations at a maximum density of one dwelling unit per 400 square feet of lot area).

Height District 2 within the C4 zone normally imposes a maximum Floor Area Ratio (FAR) of 6:1 with no height limit. The D limitation attached to the Project Site's C4 zoning restricts building height to 45 feet above grade. In addition, total floor area of a structure is limited to two times the buildable area of the lot (2:1 FAR). The SN in the zoning prefix indicates that the C4 zoned portion of the Project Site is located in the Hollywood Signage Supplemental Use District.

The R5 Multiple Dwelling zone permits any use permitted in the more restrictive R1, R2, R3, and R4 residential zones, as well as hotels, motels, and apartment hotels, including accessory business uses.

Pursuant to Ordinance No. 165659, the Q Condition attached to the R5 zone covering a small portion of the Project Site limits the types of development that would otherwise be allowed in the R5 zone under the LAMC. Uses permitted by right pursuant to the Q condition include residential uses permitted in the R4 zone, and hotels, motels, and apartment hotels. Subject to the Zoning Administrator's approval, the Q Condition also permits parking buildings that are accessory to the main use of the lot or accessory to the main use of another lot located within the Hollywood Redevelopment Project area, any use permitted in the C1 zone within buildings which were in existence on the lot upon the effective date of Ordinance 165659 (March 28, 1990), and any other use permitted in the C1 zone provided that such use does not exceed a FAR of 1:1 and provided that such commercial use is combined with a multiple unit residential use with a minimum FAR of 2:1 and with at least 12 dwelling units.

As discussed above, the Project Site comprises two adjacent parcels. One of the two parcels is designated for Regional Center Commercial land uses while the other parcel is designated for High Density Residential land uses. The portion of the Project Site

designated Regional Center Commercial is subject to LAMC Section 12.22-A.18, which provides exceptions from certain LAMC requirements for projects within either the Central City Community Plan Area or portions of other community plan areas designated as Regional Centers or Regional Commercial. The exception provided by LAMC Section 12.22-A.18 applies to the requirement set forth in LAMC Sections 12.13-A(1.5) and 12.16-A(2) that hotels within the C4 zone (such as the Project) be situated more than 500 feet from any R zone, absent a Conditional Use Permit. Thus, the Project's location within 500 feet of the [Q]R5 zone would not require a Conditional Use Permit. Notwithstanding the exceptions set forth in LAMC Section 12.22-A.18, the Project would require a Conditional Use Permit in order to allow a commercial use in the R5 zone pursuant to LAMC Section 12.24 W.15.

3. Other Applicable Land Use Regulations

In addition to the Hollywood Community Plan area, the Project Site is within the boundaries of the Hollywood Signage Supplemental Use District, Hollywood Redevelopment Project, Adaptive Reuse Incentive Area, Transit Priority Area, and Los Angeles Promise Zone. The Project Site is also subject to Historic Preservation Review.

E. Description of Proposed Project

1. Project Overview

The Applicant proposes to develop a 134-room hotel and approximately 3,580 square feet of restaurant uses. The Project would replace an existing asphalt-paved surface parking lot and approximately 593-square-foot restaurant with approximately 60,693 square feet of hotel and restaurant uses. The proposed uses would be provided within one hotel building that would range in height up to six stories with a maximum building height of approximately 89 feet. The proposed uses would be supported by 104 parking spaces that would be located within a two-level subterranean parking garage and in a partial above-grade parking level. Overall, the Project would remove approximately 593 square feet of existing floor area and construct approximately 60,693 square feet of new floor area, resulting in a net increase of 60,100 square feet of floor area within the Project Site. A conceptual illustration of the Project is shown in Figure A-5 on page A-9.

2. Project Design

The proposed hotel would be designed in a contemporary architectural style. As shown in Figure A-6 through Figure A-9 on pages A-10 through page A-13, the proposed hotel would comprise three to six levels above a podium level and would feature openings

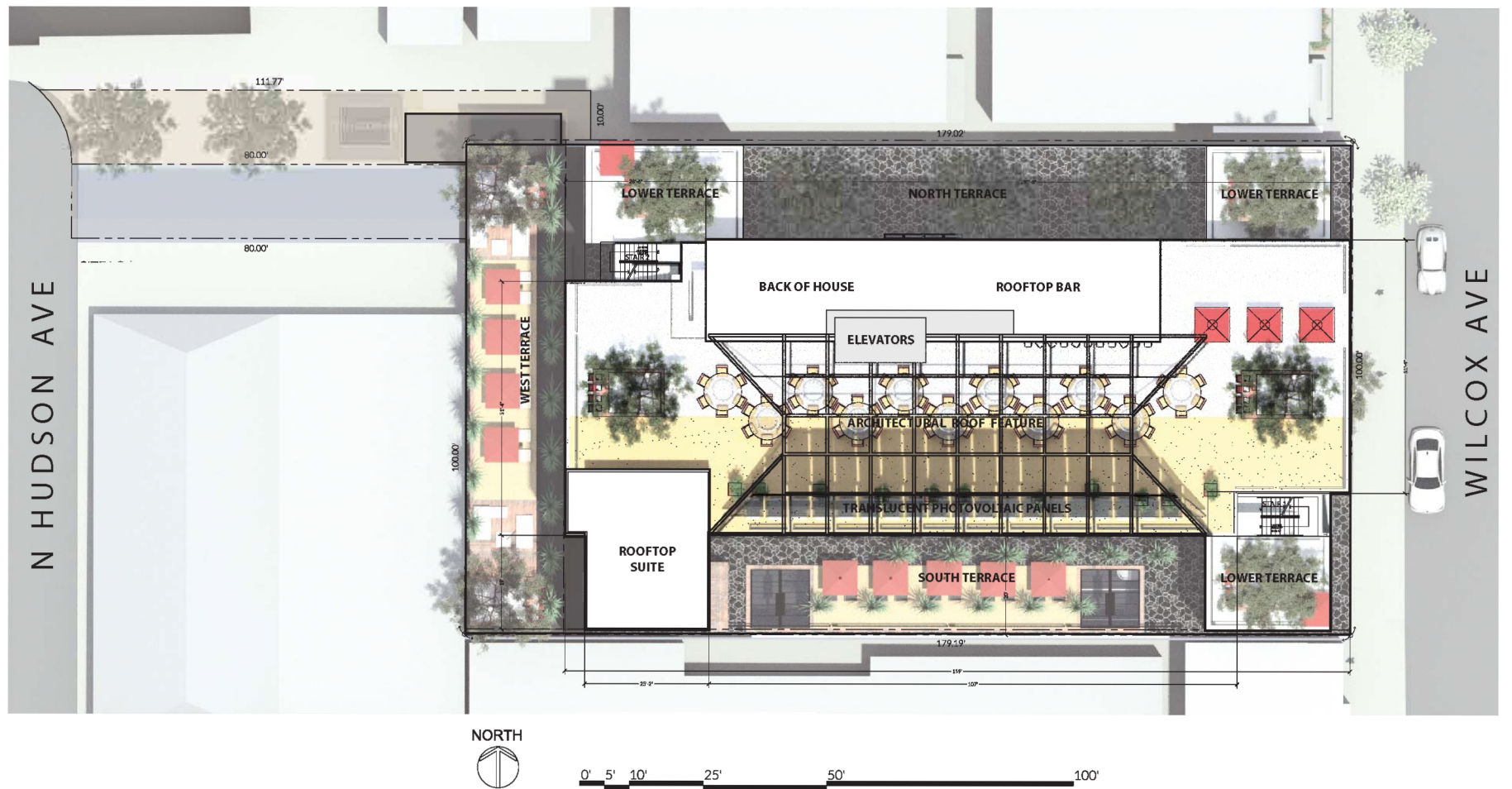


Figure A-5
Conceptual Site Plan



east elevation

Figure A-6
Conceptual Elevation - East Elevation

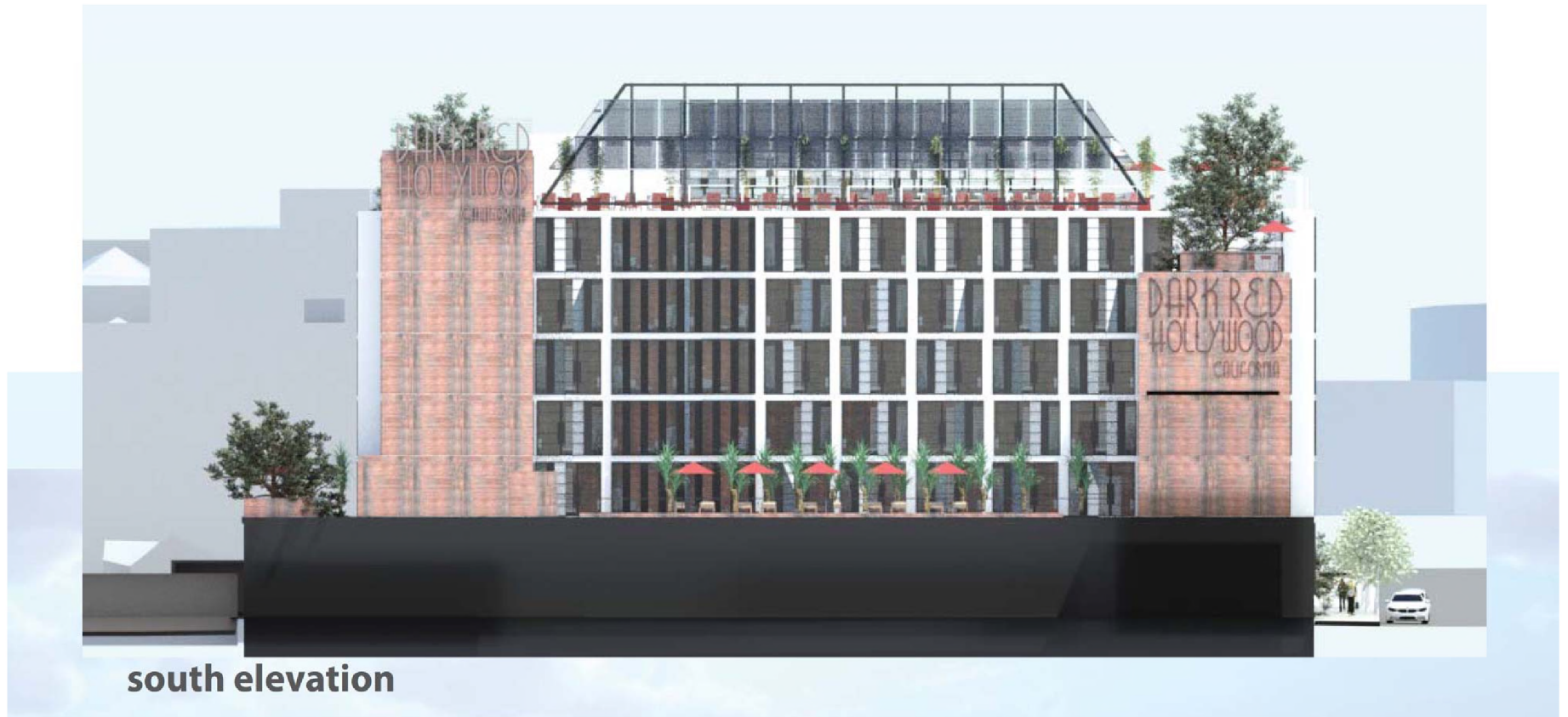


Figure A-7
Conceptual Elevation - South Elevation



Figure A-8
Conceptual Elevation - West Elevation



Figure A-9
Conceptual Elevation - North Elevation

throughout the building for terraces that would include seating and landscaping. The roof of the proposed hotel would also include terraces with seating and landscaping as well as a rooftop bar and a rooftop suite. A transparent architectural roof feature that would include translucent photovoltaic panels would extend above portions of the seating areas provided at the rooftop level. As specifically shown in Figure A-6 on page A-10, the primary structure of the proposed hotel would be designed as a five-story structure above the podium level located within the central portion of the Project Site. That primary structure would be flanked by four three- to six-story structures connected to the primary five-story structure. Two structures would flank the primary structure along the northern boundary of the Project Site, adjacent to the multi-family-residential uses to the north, including a three-story structure on the northeast corner of the building and a four-story structure on the northwest corner of the building. As shown in Figure A-5 on page A-9, along the northern boundary and in between the two structures that would flank the primary structure, the building would feature a setback that would include a terrace area with seating and landscaping to buffer the proposed hotel from the adjacent multi-family residential uses to the north. Along the southern boundary of the Project Site, toward Hollywood Boulevard and adjacent to the neighboring one- to two-story commercial building, the primary structure would be flanked by a four-story structure on the southeast corner of the primary building and a six-story structure on the southwest corner of the primary building. The southern boundary of the primary building would feature a setback similar to that along the northern boundary that would include a terrace area with seating and landscaping. An additional terrace with landscaping and seating would also be provided along the western boundary of the Project Site.

The primary five-story structure above the podium level would reach a height of approximately 67 feet. The six-story structure, which would include the roof suite, would reach a height of approximately 78 feet. Including the rooftop bar and the architectural roof feature, the proposed hotel would feature a maximum height of approximately 89 feet. The hotel would include building fenestration, a variety of surface materials and colors, and a stepped back design along all the façades of the building to create horizontal and vertical articulation, provide visual interest, and minimize the mass of the building. Building materials would include precast concrete, terra cotta, plaster, aluminum, glass, tile, metal, and prefinished metal. Glass used in building façades would be non-reflective or treated with a non-reflective coating in order to minimize glare. Additionally, all major utilities would be placed underground.

The ground floor level would feature the hotel lobby and a restaurant. As previously discussed, the proposed uses would be supported by 104 parking spaces that would be located within a two-level subterranean parking garage and in a partial above grade parking level. The subterranean parking garage would extend to a depth of approximately 25 feet below the existing ground surface.

3. Access and Parking

Vehicular access to the Project Site would primarily be provided via a driveway from Wilcox Avenue. Secondary access would be provided through a driveway from Hudson Avenue for deliveries and hotel loading. Pedestrian access to the Project Site would be provided along Wilcox Avenue.

The Project would provide 104 parking spaces that would be located within a two-level subterranean parking garage and in a partial above grade parking level. Specifically, approximately 45 parking spaces would be located within the first subterranean level, 51 parking spaces would be located within the second subterranean level, and eight parking spaces would be provided in a partial above-grade parking level. The proposed parking supply would meet the parking requirements of the LAMC. In addition, in accordance with the LAMC, the Project would provide 29 on-site bicycle parking spaces, including 13 short-term bicycle parking spaces located on the ground level and 16 long-term bicycle parking spaces located on the lower parking level in.

4. Lighting and Signage

Project lighting would include low-level exterior lights adjacent to the building and along pathways for aesthetic, security, and wayfinding purposes. Lighting would comply with current energy standards and codes while providing appropriate light levels for accent signage, architectural features, and landscaping elements. Light sources would be shielded and/or directed toward areas to be illuminated thereby minimizing spill-over onto nearby areas.

The Project's signage would be designed to be aesthetically compatible with the proposed architecture of the Project Site and to contextualize lighting designs with other signage in the surrounding neighborhood. Proposed signage would include general street level tenant/site identification, visitor directional signage, and temporary construction signage, as permitted per the LAMC. The Project could also include neon signage. No off-site or billboard advertising is proposed as part of the Project.

5. Landscaping and Open Space

The Project would provide landscaped terrace areas with seating throughout the building and would include openings throughout the building for the placement of planter boxes. As shown in Figure A-5 on page A-9, the Project would include a north terrace, a south terrace, and a west terrace, as well as additional smaller terraces located above some of the structures flanking the central portion of the building. Specifically, the north terrace would be located between the two structures on the northeast and northwest

corners of the primary building and would be landscaped and include seating. Smaller terraces would also be located above the two northern structures flanking the primary structure that would include landscaping and seating. The south terrace would be located between the two structures on the southeast and southwest corners of the primary building and would be landscaped and include seating. A smaller terrace would also be provided above the southeast structure flanking the primary structure and would include landscaping and seating. The west terrace would be located along the western boundary of the Project Site and would similarly include landscaping and seating. Landscaping and additional amenities such as lounge chairs, tables, and umbrellas would also be provided at the roof level. In addition, a small landscaped area would be located between the entryways to the hotel lobby and the restaurant on the ground floor of the building and would include space for bicycle parking.

6. Sustainability Features

The Project would be designed to comply with the City of Los Angeles Green Building Code. Specifically, the Project would include the installation of translucent photovoltaic panels that would serve to reduce energy use. Overall energy efficiency would be maximized with Energy Star-rated appliances, advanced lighting, dual glazed windows with low-e coating, and an energy efficient thermal building envelope. In addition, the Project would include low-flow bathroom and plumbing fixtures in accordance with the City's Green Building Code. Further, 20 percent of the total code-required parking spaces would include infrastructure for future electric vehicle charging stations. The Project would also reduce water use by selecting plant material with low water requirements.

F. Project Construction and Scheduling

Project construction is anticipated to occur over approximately 24 months beginning in 2017 and completed in 2019. Construction of the Project would commence with demolition of the existing surface parking area and restaurant, followed by grading and excavation for the subterranean parking garage. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. It is estimated that approximately 20,000 cubic yards of export material (e.g., concrete and asphalt debris) and soil would be hauled from the Project Site during the demolition and excavation phase. The haul route from the Project Site is anticipated to be via Hollywood Boulevard to the Hollywood Freeway.

G. Necessary Approvals

The City of Los Angeles has the principal responsibility for approving the Project and is the Lead Agency for environmental review. Approvals required for development of the Project may include, but are not limited to, the following:

- Vesting Zone and Height District Change, pursuant to LAMC Sections 12.32 F and Q, to change the existing zoning of the portion of the Project Site zoned C4-2D-SN to C2-2D-SN and to remove the existing D Limitation and impose a new D Limitation permitting a maximum FAR of 3:1;
- Zoning Administrator's Adjustment, pursuant to LAMC Section 12.28, to permit zero-foot setbacks at the northerly and southerly side yards (above the ground floor) in lieu of the otherwise required yards;
- Conditional Use Permit, pursuant to LAMC Section 12.24-W.15, to allow a commercial use in the R5 Zone;
- Conditional Use Permit, pursuant to LAMC Section 12.24-W.1, to permit the on-site sale and consumption of a full line of alcoholic beverages;
- Site Plan Review, pursuant to LAMC Section 16.05, for a development creating 50 guest rooms and over 50,000 square feet of floor area.
- Haul Route Approval

B. Explanation of Checklist Determinations

Attachment B: Explanation of Checklist Determinations

The following discussion provides responses to each of the questions set forth in the City of Los Angeles Initial Study Checklist. As demonstrated by the responses herein, with the implementation of mitigation measures, the Project would not result in any potentially significant environmental impacts.

With regard to the Project's potential impacts on aesthetics and parking, it is noted that in September 2013, the State of California enacted Senate Bill 743, which instituted changes to the California Environmental Quality Act (CEQA) when evaluating environmental impacts to projects located in areas served by transit. Specifically, Senate Bill 743 added Public Resources Code Section 21099, which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment."¹ This state law supersedes the aesthetic impact threshold in the *L.A. CEQA Thresholds Guide*.

The Project is an infill development within a site that is zoned for commercial uses with a floor area ratio greater than 0.75 and that is within a transit priority area, as designated by the City. Therefore, the Project satisfies SB 743's definition of an "employment center project." Therefore, the Project's aesthetic and parking impacts shall not be considered significant impacts on the environment pursuant to Public Resources

¹ *Public Resources Code Section 21099 defines an employment center project as a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. Public Resources Code Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way, from parcels that are developed with qualified urban uses. Public Resources Code Section 21099 defines a "transit priority area" as an area within one-half mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." Public Resources Code Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods."*

Code Section 21099. Nonetheless, the following aesthetics analysis is provided for informational purposes.

I. Aesthetics

Would the project:

a. Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. Pursuant to the Conservation Element of the City of Los Angeles General Plan, scenic vistas are views of valued visual resources such as natural features, striking or unusual terrain, or unique urban or historic features that are available from public parklands, private and publicly owned sites, and public rights-of-way.²

As described in Attachment A, Project Description, of this Initial Study, the Project Site is currently developed primarily as a surface parking lot and includes a small restaurant. No valued visual resources are located on the Project Site. Thus, the visual resources identified include off-site resources that may be viewed within the same viewshed as the Project Site from nearby or distant vantage points. The visual resources identified for this analysis include the Hollywood Hills to the north and the Warner Theatre/Pacific Building, which is a historic resource and a portion of which is located across Wilcox Avenue from the Project Site. Scenic vistas of these visual resources from public rights-of-way are limited due to the predominantly flat terrain of the vicinity and the dense, intervening development that blocks long-range, expansive views. Visual resources that can be seen in combination with the Project Site are primarily limited to those located adjacent to the Project Site due to the densely developed nature of the Project Site area. Intermittent views of the Hollywood Hills can also be seen in conjunction with the Project Site.

Views of the Hollywood Hills in the vicinity of the Project Site are primarily available along Wilcox Avenue at Hollywood Boulevard, with a very limited portion of the Hollywood Hills visible at Hudson Avenue and Hollywood Boulevard. The proposed design of the Project featuring setbacks would not obstruct existing views of the Hollywood Hills from either Wilcox Avenue or Hudson Avenue. Views of the Hollywood Hills would also continue to be available on an intermittent basis along adjacent roadway segments.

Views of the Warner Theatre/Pacific Building in the vicinity of the Project Site are primarily available along Wilcox Avenue and Hollywood Boulevard. The upper portions of

² *City of Los Angeles General Plan, Conservation Element.*

the building are visible along Hudson Avenue, including across the Project Site. The Project has been designed to respect the existing mid-size scale and character of the surrounding area, including the Warner Theatre/Pacific Building, by introducing a mid-size building that includes stepbacks throughout the façades of the building to minimize massing. While the Project would partially block existing views of the Warner Theatre/Pacific Building available along Hudson Avenue, the more holistic views of the building along Wilcox Avenue and Hollywood Boulevard would remain.

Panoramic views that include the Project Site are available from a variety of vantage points in the Hollywood Hills to the north. As is the case under existing conditions, future views with implementation of the Project would continue to depict the highly urbanized area stretching from Hollywood to downtown Los Angeles and beyond. Despite the increase in building height and density that would result from the Project, the Project Site would remain difficult to discern within the greater fabric of urban development. In terms of long-range views, the Project would not interfere with current views of the downtown skyline and distant horizon line that are available from public rights-of-way in the vicinity of the Project Site.

Based on the analysis above, the Project would not have a substantial adverse effect on a scenic vista. In accordance with Senate Bill 743, impacts would not be considered significant.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The Project Site is not located along or in proximity to a state or City-designated scenic highway.³ In addition, the Project Site does not include any scenic resources. With the exception of a few ornamental trees and landscaping, the Project Site is paved with asphalt surface. One ornamental street tree flanks the Project Site on Wilcox Avenue. The on-site trees and off-site street tree are not considered scenic resources. Furthermore, there are no unique geologic or topographic features located on the Project Site, such as hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands. The Project Site also does not include any buildings on-site that are historic resources. Thus, construction and operation of the Project would not result in impacts to scenic resources within a state- or City-designated scenic highway.

³ Los Angeles Department of City Planning, *Mobility Plan 2035: An Element of the General Plan, Map A4—Central, Midcity Subarea, 2015*, <http://planning.lacity.org/documents/policy/mobilityplnmemo.pdf>, accessed April 13, 2016.

c. Substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact. The Project Site, located between Hudson Avenue and Wilcox Avenue, north of Hollywood Boulevard, within the Hollywood Community Plan area of the City of Los Angeles, is currently developed with a paved surface parking lot and a small restaurant. The Project Site is situated in an area of the City of Los Angeles that primarily comprises dense residential and commercial uses. The Project Site is generally bounded by multi-family residential uses to the north, the Warner Theatre/Pacific Building to the east across Wilcox Avenue, and commercial uses to the south and west. Additional commercial uses are located along Hollywood Boulevard, across from commercial uses bounding the south side of the Project Site. Across Hudson Avenue, west of the Project Site, is a residential building and a surface parking lot for the tenants of the building. Located in a highly urbanized area, the Project Site vicinity includes a mixture of low- and mid-rise buildings occupied primarily by multi-family residential and commercial uses, including retail stores and restaurants. The existing structure on the Project Site was built in 1936 and possesses no distinctive architectural characteristics. There is no natural open space on the Project Site and minimal discontinuous landscaping, primarily in the form of ornamental trees and shrubs. Similar to most of the properties in the Project area, the Project Site exhibits little topographic relief with no slopes or hillsides. The Project Site does not contain any notable aesthetic resources. The buildings surrounding the Project Site vary considerably in design, including both historic and modern architecture, consistent with the varied visual character that comprises the Hollywood community. The following discussion addresses the Project's potential to degrade the existing visual character or quality of the Project Site and its surroundings during construction and operation.

Construction

Construction activities generally cause a temporary contrast to, and disruption in, the general order and aesthetic character of an area. Although temporary in nature, construction activities may cause a visually unappealing quality in a community. During construction activities for the Project, the visual appearance of the Project Site would be altered due to the removal of the existing surface lot and restaurant. Other construction activities including site preparation, grading, and excavation; the staging of construction equipment and materials; and the construction of the building foundation and proposed structure. Some of the activity would be visible from roadways adjacent to the Project Site, as well as to viewers within nearby buildings. Temporary construction fencing would be placed along the periphery of the Project Site to screen much of the construction activity from view at the street level, and graffiti would be removed, as needed, from all temporary walkways and construction fencing throughout the Project construction period.

The Project would also require the removal of the existing street tree adjacent to the Project Site on Wilcox Avenue. This tree is an ornamental species. The removal of this street tree would temporarily reduce the visual quality of the street during the construction phase of the Project, but not to a substantial degree. Furthermore, the removed street tree would be replaced in accordance with the requirements of the City's Urban Forestry Division. Given that the loss of the individual street tree would be temporary, that the removed tree does not contribute substantially to the visual quality of the area, and that the Project would replace the streetscape along the Project perimeter, the removal of street trees during construction activities would not substantially alter or degrade the existing visual character of the Project area.

Overall, while affecting the visual character of the Project area on a short-term basis, Project construction activities would not substantially alter or degrade the existing visual character or quality of the Project Site and surrounding area, for the following reasons: (1) views of construction activity would be limited in duration and location; (2) the Project Site appearance would be typical of construction sites in urban areas; (3) construction would occur within an urban setting with a high level of human activity and development; and (4) construction fencing would be placed along the periphery of the Project Site to screen much of the construction activity from view at the street level. In accordance with Senate Bill 743, impacts would not be considered significant.

Operation

The Project would replace an existing surface parking lot and a small one-story restaurant with a hotel that would range in height from three to six stories, thereby altering the visual character of the Project Site. Specifically, the Project would replace a an underutilized site that does not contribute to local scenic resources with a new building that incorporates appropriate design elements for the area and enhances the pedestrian experience adjacent to the Project Site. The Project would also be compatible with and would complement existing and future development in the Project area, including other proposed hotel developments.

The Project would further increase the amount and quality of landscape and streetscape on and adjacent to the Project Site, and would provide new street trees and landscaping along Wilcox Avenue, which currently features very limited landscaping. Overall, development of the proposed hotel and associated landscaping would visually "fill in" the existing underutilized Project Site and would represent an extension and reflection of the surrounding urban environment, thus creating a complementary visual connection between the Project Site and the Project vicinity.

Relative to surrounding development, an inconsistent visual character is evident throughout the Project vicinity due to the eclectic nature and varying age of existing

buildings and their associated variations in architecture, building heights, massing, and materials. There is a wide range of aesthetic characteristics and contrasts within the City of Los Angeles due to the intermingled suburban neighborhoods, dense urban areas, hillside residential areas, and accompanying urban fabric and infrastructure.⁴ This urban mosaic is also evident in the vicinity of the Project Site. In the surrounding community and region, the aesthetic environment reflects a multitude of interspersed low-, mid-, and high-rise structures with commercial and residential uses and associated infrastructure with no discernible theme. The Project would become part of this urban fabric and the Project massing, height, and aesthetic character would be consistent with many of the existing and proposed commercial and residential structures in the vicinity of the Project Site. Further, the Project area continues to transform, with new and ongoing development incorporating mixed uses with mid- and high-rise buildings of contemporary design. The Project would not be in substantial conflict with the surrounding visual environment in terms of building height, design, massing, and scale.

The Project has been appropriately designed to be consistent and compatible with the uses found in the Hollywood Community Plan area, which is highly urbanized and characterized by a wide array of building heights ranging from low-rise to high-rise. In particular, the proposed maximum height of up to six stories and approximately 89 feet at one area of the building would be consistent with other building heights in the vicinity, including the four-story multi-family residential buildings to the north of the Project Site and the up to four-story vacant Pacific Theatre building to the east of the Project Site. As discussed in Attachment A, Project Description, of this Initial Study, the building has been designed primarily as a five-story structure above the podium level that would be flanked by four three- to six-story structures extending from the primary five-story structure. In comparison to the uses immediately north, south, and west of the Project Site, the Project would appear taller than most of the structures. These lower-rise residential and commercial structures are one element of the varied visual character of the area that also includes several modern mid-rise and high-rise buildings. In addition, the Project includes project design features and incorporates design elements that would visually moderate the differences in height between lower-rise structures in the immediate vicinity and the proposed building.

The proposed hotel would include building fenestration, a variety of surface materials and colors, and a stepped back design to create horizontal and vertical articulation, provide visual interest, and reduce the building scale. In particular, with regard to the residential uses to the north, commercial uses to the south, and residential and commercial uses to the west of the Project Site, the Project would include landscaped

⁴ *L.A. CEQA Guide, Section A.1, page A.1-2, 2006.*

terraces that would be set back from these uses and provide relief from the primary five-story portion of the proposed hotel and the three- to six-story extensions of the hotel. These elements would serve to reduce the perceived height and massing of the proposed structure when viewed from any direction, and provide substantial visual relief and variety when viewed from uses to the north. Overall, the proposed design elements would ensure that the Project would be a visually compatible structure to other similar buildings in the vicinity of the Project Site. Additionally, proposed parking on-site would be designed to maximize efficiency and minimize visual impacts. The parking to be provided on-site would be located primarily within a one-level subterranean parking garage with a partial level above grade and would be largely screened by the proposed building from off-site public views along surrounding streets.

Project signage would be designed to be aesthetically compatible with the existing and proposed architecture and other signage in the area. Proposed signage would include building identity signage and general ground level and wayfinding pedestrian signage, in accordance with the Los Angeles Municipal Code (LAMC) and Hollywood Signage Supplemental Use District requirements. The building identity sign would consist of a horizontal building-mounted sign presenting the Project name and/or address (see Figure A-6, Figure A-7, and Figure A-9 in Attachment A, Project Description, of this Initial Study). Parking signs would be located at parking entrances. Signs would also be used to identify lobby entrances at a pedestrian scale. Wayfinding signs would be located at parking garage entrances and elevator lobbies. All Project signs would feature colors that are complementary to the architectural design of the proposed building. In addition, low-level accent lighting to highlight the Project's signage would be incorporated. The Project would not include any of the types of signs that are prohibited in the Hollywood Signage Supplemental Use District pursuant to Ordinance No. 181,340, either within the Project Site or off-site. Therefore, the types and arrangement of signs would be appropriately designed and scaled within the context of the Project and the Project area.

In summary, the visual simulations of the Project and images of the existing aesthetic character in the vicinity illustrate that the Project would change the visual character of the Project Site. In contrast with the existing surface parking lot and small restaurant, the Project would introduce a new multi-story, mixed-use building that would be interspersed with commercial and residential uses among the surrounding urban fabric and infrastructure. Overall, the building height, design, massing, and scale would be compatible with the existing urban uses that set the aesthetic character of the vicinity. Based on the analysis above, the Project would not substantially degrade the existing visual character or quality of the Project Site or surrounding vicinity. In accordance with Senate Bill 743, impacts would not be considered significant.

Shading

As provided in the *L.A. CEQA Thresholds Guide*, the visual character or quality of a site and its surroundings can also be affected by shading cast upon adjacent areas by proposed structures. Shadows may provide positive effects, such as cooling effects during warm weather, or negative effects, such as the loss of natural light necessary for solar energy purposes, or the loss of warming influences during cool weather. Shadow effects depend on several factors, including the local topography, height and bulk of a project's structural elements, sensitivity of adjacent land uses, existing conditions on adjacent land uses, season, and duration of shadow projection. According to the *L.A. CEQA Thresholds Guide*, facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional land uses (e.g., schools, convalescent homes); commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor dining areas; nurseries; and existing solar collectors.

As previously discussed, land uses surrounding the Project Site include multi-family residences to the north, the vacant Pacific Theatre building to the east, and commercial uses to the south and west. The multi-family residential buildings to the north do not contain routinely useable outdoor spaces immediately adjacent to the Project Site that would be considered sensitive to shading from the Project. In addition, while there is a courtyard area associated with the multi-family residential building to the north (along Wilcox Avenue), the courtyard area is situated between two existing buildings and is currently shaded by the existing buildings. Therefore, the Project would not generate new shadows that would shade existing routinely useable outdoor spaces associated with the multi-family residential developments to the north. As such, the shadows to be generated by the proposed hotel would not substantially degrade the existing visual character or quality of the Project Site and its surroundings. In accordance with Senate Bill 743, impacts would not be considered significant.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The Project Site currently generates low to moderate levels of artificial light and glare typical of urbanized areas. Light sources include low-level security lighting fixtures that illuminate the surface parking lot, vehicle headlights, and exterior and interior lighting emanating from the on-site restaurant. Nighttime light is common throughout the City of Los Angeles and urbanized areas in general. Artificial light may be directly generated from sources or indirect sources of reflected light. The Project vicinity is highly urbanized and includes a varied mix of residential and commercial uses. There are no natural open spaces or biologically sensitive areas in the Project vicinity. Rather, the surrounding ambient nighttime lighting environment is typical of a developed, urban environment. To the south of the Project Site, the numerous theaters, restaurants,

and nightclubs that line Hollywood Boulevard create an active night life characterized by high levels of ambient nighttime lighting. Medium ambient nighttime lighting levels characterize the areas to the north, west, and east of the Project Site, which primarily contain multi-family residential uses interspersed with a mix of commercial uses. The primary nighttime lighting sources in the Project Site vicinity include interior light spillage from buildings, vehicle headlights along roadways and in parking areas, signage, street lamps, and security/parking lighting. In the immediate Project vicinity, the nearest off-site receptors with views of the Project Site that are considered sensitive relative to nighttime light are limited to the multi-family residential uses to the north and west of the Project Site. Daytime glare is generally associated with reflected sunlight from buildings with reflective surfaces such as glass, shiny surfaces, metal, or other reflective materials. Glare sources within the Project Site are generally limited to vehicular windows and windows on the restaurant. These glare sources are not considerable in the context of the urban environment. In the immediate Project vicinity, the nearest off-site receptors that are considered sensitive relative to daytime glare and have views of the Project Site include the multi-family residential uses to the north and west of the Project Site and motorists along adjacent roadways including Wilcox Avenue, Hudson Avenue, and Hollywood Boulevard.

Construction

Lighting needed during Project construction has the potential to generate temporary light spillover to off-site sensitive land uses in the Project vicinity, including the residential uses directly north and west of the Project Site. However, construction activities would occur in accordance with the provisions of LAMC Section 41.40, which limits the hours of construction to between 7:00 A.M. and 9:00 P.M. on weekdays and between 8:00 A.M. and 6:00 P.M. on Saturdays and national holidays, with no construction permitted on Sundays. Therefore, construction would occur primarily during daylight hours, and construction lighting would only be used for the duration needed if construction were to occur in the evening hours during the winter season when daylight is no longer sufficient. Furthermore, construction-related illumination would be used for safety and security purposes only, and would be shielded and/or aimed so that no direct beam illumination is provided outside of the Project Site boundary. Therefore, light resulting from construction activities would not result in a new source of substantial light which would adversely affect day or nighttime views in the area. In accordance with Senate Bill 743, impacts would not be considered significant.

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

activities. Furthermore, as noted above, construction would primarily occur during the daytime hours in accordance with the LAMC. Therefore, there would be a negligible potential for nighttime glare associated with construction activities to occur. In accordance with Senate Bill 743, impacts would not be considered significant.

Operation

The Project would replace the existing surface parking lot and restaurant on the Project Site with a new structure and would increase the number of vehicle trips to and from the Project Site. However, the Project would eliminate sources of glare associated with the existing surface parking lot. New sources of artificial lighting that would be introduced by the Project would include: low-level interior lighting visible through the windows of the hotel rooms and the ground-floor lobby; signage lighting; architectural lighting on the building, including lighting associated with rooftop uses and activities; low-level security and wayfinding lighting; landscape lighting; and automobile headlights. The Project could also include neon signage. New sources of glare would include building surfaces and Project-related vehicles.

The proposed lighting sources would be similar to other lighting sources in the Project vicinity and would not generate artificial light levels that are out of character with the surrounding area, which is densely developed and characterized by a high degree of human activity during the day and night. All exterior lights, including lights on the terraces and rooftop, would be directed towards the interior of the Project Site to avoid light spillover onto adjacent sensitive uses. The stepped back design would further ensure that lighting on the upper levels and the rooftop is concentrated in the central portion of the building, and would provide space along the building edges to serve as a buffer for rooftop light spillover. Project lighting would also meet all applicable LAMC lighting standards. As required by LAMC Sec. 93.0117(b), exterior light sources and building materials would not cause more than two (2) foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors on any property containing residential units; an elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas, or any other property containing a residential unit or units.

As discussed above, Project signage would include building identity signage and directional/wayfinding signs. In general, new signage would be architecturally integrated into the design of the building and would establish appropriate identification for the hotel and restaurant uses. Project signage would be illuminated by means of low-level external lighting, internal halo lighting, or ambient light and may include neon signs. Exterior lights would be directed onto signs to avoid creating off-site glare, in accordance with the Hollywood Signage Supplemental Use District. In accordance with the LAMC, illumination used for Project signage would be limited to a light intensity of 3 foot-candles

above ambient lighting, as measured at the property line of the nearest residentially zoned property.

With regard to glare, the Project would be designed in a contemporary architectural style and would feature various surface materials. Building materials could include concrete, stucco, aluminum, and glass. The Project would use non-reflective glass or glass that has been treated with a non-reflective coating in all exterior windows and building surfaces to reduce potential glare from reflected sunlight. Metal building surfaces would be used as accent materials and would not cover expansive spaces. Therefore, these materials would not have the potential to produce a substantial degree of glare. In addition, the proposed parking garage would be subterranean, which would eliminate the reflection potential from parked cars as viewed from surrounding areas and roadways during the day and night, and would substantially reduce lighting levels from vehicle headlights during the night. While headlights from vehicles entering and exiting the Project's driveways would be visible from the residential receptors immediately north and west of the Project Site during the evening hours, such lighting sources would be typical for the Project area and would not be anticipated to result in a substantial adverse impact.

Based on the above, lighting and glare associated with Project operation would not result in a new source of substantial light or glare which would adversely affect day or nighttime views in the area. In accordance with Senate Bill 743, impacts would not be considered significant.

II. Agriculture and Forest Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

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

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles and is currently improved with a surface parking lot and a small restaurant. The Project Site does not include any agricultural uses and no agricultural operations occur within the Project Site or in the vicinity of the Project Site. In addition, the Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation. Therefore, development of the Project would not result in the conversion of farmland to a non-agricultural use. No impacts would occur, and no mitigation measures are required.

b. Conflict with the existing zoning for agricultural use, or a Williamson Act contract?

No Impact. As discussed in Attachment A, Project Description, of this Initial Study, the Project Site is predominantly zoned C4-2D-SN (Commercial Zone, Height District 2D) with a small portion of the Project Site zoned [Q]R5-2 (Multiple Dwelling Zone, Height District 2). The Project Site is not zoned for agricultural use under the LAMC. In addition, no agricultural zoning is present in the surrounding area. Furthermore, the Project Site and surrounding area are also not enrolled under a Williamson Act Contract.⁵ Therefore, development of the Project would not conflict with existing zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no mitigation measures are required.

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles and does not include any forest land or timberland as defined by the Public Resources Code. In addition, the Project Site is currently zoned for commercial and high-density residential uses, is not zoned for forest land or timberland, and is not used as forest land or timberland. Therefore the Project would not conflict with existing zoning for, or cause rezoning of forest land or timberland as defined in the applicable sections of the Public Resources Code. No impacts would occur, and no mitigation measures are required.

⁵ *City of Los Angeles Department of City Planning, Zone Information and Map Access System, Parcel Profile Report, <http://zimas.lacity.org/>, accessed April 15, 2016.*

d. Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As discussed above, the Project Site is located in an urbanized area, is not zoned for forest land, and does not include any forest or timberland. Therefore, development of the Project would not result in the loss or conversion of forest land. No impacts would occur, and no mitigation measures are required.

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

No Impact. As noted above, the Project Site is located in an urbanized area of the City of Los Angeles and is currently improved with a surface parking lot and a small restaurant. The Project Site does not contain any agricultural or forest uses. In addition, no agricultural or forest uses are located in the vicinity of the Project Site. Thus, development of the Project would not result in the conversion of farmland to non-agricultural use or conversion of forest land to non-forest use. No impacts would occur, and no mitigation measures are required.

III. Air Quality

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a. Conflict with or obstruct implementation of the applicable air quality Plan?

Less Than Significant Impact. The Project Site is located within the 6,745-square-mile South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone and PM_{2.5}). The Project would be subject to the SCAQMD's Air Quality Management Plan (AQMP). The AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG).

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties and addresses regional issues relating to

transportation, the economy, community development and the environment.⁶ With regard to future growth, SCAG has prepared the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS) which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2016–2040 RTP/SCS are based in part on projections originating under County and City General Plans. These growth projections were utilized in the preparation of the air quality forecasts and consistency analysis included in the Draft 2016 AQMP. However, as the Draft 2016 AQMP is not yet adopted, this analysis relies on the 2012 AQMP, which utilized the growth projections in the 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (2012–2035 RTP/SCS). The 2016–2040 RTP/SCS contains similar declining growth projections as the 2012–2035 RTP/SCS, and it is expected to support similar conclusions.

As discussed in Response to Checklist Question X.b, Land Use, below, because the Project is consistent with the land use designations in the General Plan of the City of Los Angeles, the Project is also considered consistent with the region's AQMP. In addition, as discussed below, Project implementation would not exceed any ambient air quality standards or thresholds. Therefore, the Project would not conflict with or obstruct implementation of the SCAQMD's AQMP.

The Congestion Management Program (CMP) was enacted by the Metropolitan Transportation Authority (Metro) to address traffic congestion issues that could impact quality of life and economic vitality. The intent of the program is to provide an analytical basis for transportation decisions throughout the state. An analysis is required at all CMP monitoring intersections for which a project is projected to add 50 or more trips during any peak hour. In addition, analysis is required for all freeway segments for which a project is projected to add 150 or more hourly trips, in each direction, during the peak hours analyzed.

As described in further detail below in Response to Checklist Question XVI.b Transportation/Circulation, the Project is not expected to generate additional trips which would result in an increase of 50 or more trips during any peak hour at the nearest CMP intersection. As a result, the Project would not exceed any CMP thresholds, and no impact to the CMP network would occur. Thus, the Project would not conflict with or obstruct implementation of the CMP.

⁶ SCAG serves as the federally designated metropolitan planning organization (MPO) for the southern California region.

Based on the above, implementation of the Project would result in less than significant impacts associated with consistency with the AQMP and CMP, and no mitigation measures are required.

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact. As previously discussed in Response to Checklist Question No. III.a, the Project Site is located within the South Coast Air Basin, which is characterized by relatively poor air quality. State and federal air quality standards are often exceeded in many parts of the Basin, including those monitoring stations nearest to the Project Site, which exceed the most stringent ambient air quality standard for ozone and particulate matter (PM). The Project would contribute to local and regional air pollutant emissions during construction (short-term) and Project occupancy (long-term). However, as demonstrated by the following analysis, construction and operation of the Project would result in less-than-significant impacts relative to the daily significance thresholds for criteria air pollutant emissions established by the SCAQMD. Worksheets detailing this air quality analysis are included in Appendix A of this MND.

Construction

Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. Construction of the Project has the potential to create regional air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition, site preparation, and construction activities. Mobile source emissions, primarily nitrogen oxides (NO_x) and particulate matter (PM), would result from the use of construction equipment such as loaders, cranes, and haul trucks. During the finishing phase, the application of architectural coatings (i.e., paints) and other building materials would release volatile organic compounds (VOCs).

Regional Impacts

Regional construction-related emissions associated with heavy construction equipment were calculated using the SCAQMD's California Emissions Estimator Model (CalEEMod). Model results are provided in Appendix A of this MND. The calculations reflect the types and quantities of construction equipment that would be used to renovate the Project Site. A summary of unmitigated maximum daily regional emissions by construction year is presented in Table B-1 on page B-16, along with the regional significance thresholds for each air pollutant. As shown therein, maximum regional construction emissions would not exceed the thresholds for VOC of 75 lbs/day, NO_x of

Table B-1
Regional and Localized Unmitigated Construction Emissions^a
(pounds per day)

Emission Source	VOC	NO _x	CO	SO _{2.5}	PM ₁₀ ^b	PM _{2.5} ^b
Regional Emissions						
2017	3.3	37.9	29.5	0.1	3.3	1.6
2018	43.1	19.7	21.0	0.1	2.3	1.3
Maximum Peak Daily^c	43	38	30	<1	3	2
SCAQMD Significance Threshold ^d	75	100	550	150	150	55
Over/(Under)	(32)	(62)	(520)	(150)	(147)	(53)
Significant?	No	No	No	No	No	No
Localized Emissions						
2017	2.0	21.1	12.2	<0.1	2.6	1.2
2018	42.6	17.7	13.4	<0.1	1.0	1.0
Maximum Peak Daily^c	43	21	13	<1	3	1
SCAQMD Significance Threshold ^{e,f}	NA	41	680	NA	5	3
Over/(Under)	NA	(20)	(667)	NA	(2)	(2)
Significant?	NA	No	No	NA	No	No

^a Compiled using the CalEEMod emissions inventory model. Results from the CalEEMod model output are rounded to the nearest tenth.

^b PM₁₀ and PM_{2.5} emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.

^c Maximum Peak Daily emissions are rounded to the nearest whole number.

^d SCAQMD significance thresholds are available at www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2.

^e SCAQMD LSTs based on SRA 1, 1-acre active site area, and 25-meter receptor distance (the smallest acreage and closest receptor distance on the mass rate LST look-up tables). Consistent with SCAQMD LST methodology, the 25-meter receptor distance should be used for receptors closer than 25 meters and would be representative of adjacent sensitive receptors (Page 3-3 of the LST Methodology). The SCAQMD localized threshold for NO_x was revised to account for the recently adopted 1 hour NO₂ National Ambient Air Quality Standard of 188 µg/m³.

^f SCAQMD does not provide an LST for SO₂ since land use development projects typically result in negligible construction and long-term operation emissions. Since VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. Due to the role VOCs play in ozone formation, it is classified as a precursor pollutant and only a regional emissions threshold has been established.

Source: Eyestone Environmental, 2016.

100 lbs/day, carbon monoxide (CO) of 550 lbs/day, sulfur dioxide (SO_x) of 150 lbs/day, PM₁₀ of 150 lbs/day, or PM_{2.5} of 55 lbs/day. Thus, potential impacts associated with regional construction emissions would be less than significant, and no mitigation measures are required.

Localized Impacts

The localized effects of daily construction emissions generated on-site were evaluated for sensitive receptor locations potentially impacted by the Project according to the SCAQMD's localized significance threshold (LST) methodology, which utilizes on-site mass emissions rate look-up tables and project-specific modeling, where appropriate. LSTs are only applicable to the following criteria pollutants: NO_x , CO, PM_{10} , and $\text{PM}_{2.5}$. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and distance to the nearest sensitive receptor. The Project Site is located in SRA 1, which encompasses the downtown Los Angeles area. The mass rate look-up tables were developed for each SRA and can be used to determine whether or not a project may generate significant adverse localized air quality impacts. The LST mass rate look-up tables apply to projects that have active construction areas that are less than or equal to 5 acres in size.

The nearest sensitive receptors are multi-family residences located directly adjacent to the Project Site, to the north. To evaluate the potential localized air quality impacts at these sensitive receptors, a conservative estimate of maximum local (on-site) daily emissions for NO_x , PM_{10} , $\text{PM}_{2.5}$, and CO for each phase of construction was used.

Localized construction emissions thresholds, based on the construction site acreage and distance to the closest off-site sensitive receptor, were obtained from the LST look-up tables and are summarized in Table B-1 on page B-16. As presented in Table B-1, construction-related daily maximum localized emissions would not exceed the SCAQMD daily significance thresholds of 41 lbs/day for NO_x , 680 lbs/day for CO, 5 lbs/day for PM_{10} , and 3 lbs/day for $\text{PM}_{2.5}$. Therefore, localized emissions associated with construction of the Project would not result in a significant short-term impact, and no mitigation measures are required.

Recognizing the correlation between potential impacts on local air quality and human health, the SCAQMD developed the LSTs discussed above, which are based on compliance with the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). The NAAQS and CAAQS are established at concentration levels to provide public health protection, including protecting the health of "sensitive" populations such as asthmatics, children, and the elderly. As shown in Table B-1, the Project would not exceed any of the SCAQMD's LSTs at near-by residential uses.

Operational

The SCAQMD has also established separate significance thresholds to evaluate potential impacts associated with the incremental increase in criteria air pollutants associated with long-term Project operations. Project operations could result in mobile source emissions, as well as emissions generated by area sources (e.g., natural gas combustion, landscape fuel combustion, consumer products, and architectural coatings). Operational emissions related to the Project were evaluated using the SCAQMD recommended CalEEMod model.

Regional Impacts

The Project would result in an increase in emissions from vehicular exhaust and from the consumption of fossil fuels for comfort heating and the generation of electricity for cooling, lighting, and power needs. The results of the detailed emissions calculations are provided in Table B-2 on page B-19, and CalEEMod output files are contained in Appendix A of this MND. As indicated therein, the Project would result in an increase of criteria pollutant emissions. However, the increase in emissions would be well below the SCAQMD daily significance thresholds of 55 lbs/day for VOC, 55 lbs/day for NO_x, 550 lbs/day for carbon monoxide (CO), 150 lbs/day for sulfur dioxide (SO_x), 150 lbs/day for PM₁₀, or 55 lbs/day for PM_{2.5}. Therefore, impacts associated with regional operational emissions would be less than significant, and no mitigation measures are required.

Localized Impacts

Operation of the Project would not introduce any major new sources of air pollution within the Project Site. Emissions estimates for criteria air pollutants from on-site sources are presented in Table B-2. The SCAQMD LST mass rate look-up tables, which apply to projects that have active areas that are less than or equal to 5 acres in size, were used to evaluate potential localized impacts. As shown in Table B-2, on-site operational emissions would not exceed any of the LSTs. Therefore, localized impacts from on-site emission sources would be less than significant.

The SCAQMD recommends a hot-spot evaluation of potential localized CO impacts when vehicle-to-capacity (V/C) ratios are increased by two percent or more at intersections with a level of service (LOS) of D or worse. As discussed further in Response to Checklist Question No. XVI.b, and in the Traffic Study included in Appendix F, of this MND, the Project would generate a maximum of 20 trips during any peak-hour period at the intersections with a LOS of D or worse. Thus, none of the signalized intersections analyzed in the Traffic Study included in Appendix F of this MND meet these requirements and thus, no additional analysis of this issue was necessary. As such, the Project would not cause any new or exacerbate any existing CO hotspots. As a result, impacts related to

Table B-2
Maximum Increase in Project-Related Operational Emissions^a
(pounds per day)

Emission Source	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
On-Site						
Area	6.0	<0.1	<0.1	<0.1	<0.1	<0.1
Energy	0.1	1.2	1.0	<0.1	0.1	0.1
<i>Subtotal</i>	<i>6.1</i>	<i>1.2</i>	<i>1.0</i>	<i><0.1</i>	<i>0.1</i>	<i>0.1</i>
Off-Site						
Mobile	4.5	8.5	37.3	0.1	5.4	1.5
Total	10.6	9.5	37.6	0.1	5.4	1.6
Comparison to SCAQMD Thresholds (Regional)						
Project Emissions ^b	11	10	39	<1	5	2
SCAQMD Significance Threshold ^c	55	55	550	150	150	55
Over/(Under)	(44)	(45)	(511)	(150)	(145)	(53)
Significant?	No	No	No	No	No	No
Comparison to SCAQMD Thresholds (Localized)						
Project Emissions ^b	<1	1	1	<1	0.1	0.1
SCAQMD Significance Threshold ^{d,e}	----	41	680	----	2	1
Over/(Under)	----	(40)	(679)	----	(1.9)	(0.9)
Significant?	----	No	No	----	No	No

^a Compiled using the CalEEMod emissions inventory model. Results from the CalEEMod model output are rounded to the nearest tenth.

^b Project emissions are rounded to the nearest whole number.

^c SCAQMD significance thresholds are available at www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2.

^d SCAQMD LSTs based on SRA 1, 1-acre active site area, and 25-meter receptor distance (the smallest acreage and closest receptor distance on the mass rate LST look-up tables). Consistent with SCAQMD LST methodology, the 25-meter receptor distance should be used for receptors closer than 25 meters and would be representative of adjacent sensitive receptors (Page 3-3 of the LST Methodology). The SCAQMD localized threshold for NO_x was revised to account for the recently adopted 1 hour NO₂ NAAQS of 188 µg/m³.

^e SCAQMD does not provide an LST for SO₂ since land use development projects typically result in negligible construction and long-term operation emissions. Since VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. Due to the role VOCs play in ozone formation, it is classified as a precursor pollutant and only a regional emissions threshold has been established.

Source: Eyestone Environmental, 2016.

localized mobile-source CO emissions would be less than significant, and no mitigation measures are required.

- c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including**

releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less Than Significant Impact. As the Project is not part of an ongoing regulatory program, the SCAQMD recommends that project-specific air quality impacts be used to determine the potential cumulative impacts to air quality. As discussed above, peak daily emissions of operation-related pollutants associated with the Project would not exceed SCAQMD regional or localized significance thresholds. By applying SCAQMD's cumulative air quality impact methodology, implementation of the Project would not result in an addition of criteria pollutants such that cumulative impacts, in conjunction with related projects in the region, would occur. Therefore, the emissions of non-attainment pollutants and precursors generated by Project operation would be less than significant, and no mitigation measures are required.

d. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Certain population groups are especially sensitive to air pollution and should be given special consideration when evaluating potential air quality impacts. These population groups include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes or others who engage in frequent exercise. As defined in the SCAQMD *CEQA Air Quality Handbook*, a sensitive receptor to air quality is defined as any of the following land use categories: (1) long-term health care facilities; (2) rehabilitation centers; (3) convalescent centers; (4) retirement homes; (5) residences; (6) schools (i.e. elementary, middle school, high schools); (7) parks and playgrounds; (8) child care centers; and (9) athletic fields. The nearest sensitive receptors are multi-family residences located directly adjacent to the Project Site, to the north.

As discussed above in Response to Checklist Question No. III.b, construction and operation of the Project would result in a less than significant impact for both regional and localized air pollution emissions. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations. In addition, Project construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust and other specified dust control measures. As such, impacts to off-site sensitive receptors would be less than significant, and no mitigation measures are required.

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit toxic air contaminants (TACs). The California Air Resources Board (CARB) has published and adopted the "Air Quality and Land Use Handbook: *A Community Health Perspective (2005)*," which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities).

The SCAQMD adopted similar recommendations in their “*Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning (2005)*.” Together the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources, and the addition of new TAC sources in proximity to existing sensitive land uses.

Although the Project would result in limited amounts of TAC emissions primarily from mobile source emissions, the Project would be consistent with CARB and SCAQMD guidance documents discussed above and would not include any substantial TAC sources as defined in the guidance documents. Therefore, TAC impacts would be less than significant, and no mitigation measures are required.

e. Create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would use conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people given the surrounding primarily single-family residential and commercial uses that characterize the vicinity of the Project Site.

According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses. In addition, on-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantial adverse odor impacts. Therefore, potential odor impacts during construction and operation of the Project would be less than significant, and no mitigation measures are required.

IV. Biological Resources

Would the project:

- a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

No Impact. The Project Site is located in an urbanized area and is currently primarily developed as a surface parking lot with a small restaurant. Small ornamental trees and shrubs exist on portions of the Project Site. Due to the improved nature of the Project Site and the highly urbanized surrounding areas, as well as lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed urban settings. As such, the Project would not have a substantial adverse effect, either directly or indirectly through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. No impacts would occur, and no mitigation measures are required.

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

No Impact. The Project Site is located in an urbanized area and is currently primarily developed as a surface parking lot with a small restaurant. The Project Site and vicinity do not contain riparian habitats or any other sensitive natural communities. As such, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impacts would occur, and no mitigation measures are required.

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

No Impact. The Project Site is located in an urbanized area and is currently primarily developed as a surface parking lot with a small restaurant. No water bodies or federally protected wetlands, as defined by Section 404 of the Clean Water Act, are present on, or in the vicinity of the Project Site. As such, the Project would not have an adverse effect on federally protected wetlands. No impacts would occur, and no mitigation measures are required.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less than Significant Impact. The Project Site is located in an urbanized area and is currently primarily developed as a paved surface parking lot with a small restaurant. In

addition, the areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within and surrounding the Project Site which provide linkages to natural open spaces areas and which may serve as wildlife corridors. Accordingly, development of the Project would not interfere substantially with any established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Furthermore, no water bodies that could serve as habitat for fish exist on the Project Site or in the vicinity of the Project Site. In addition, on-site vegetation is limited to small ornamental, non-native trees and shrubs, and a few small non-native trees are present adjacent to the Project Site on Wilcox Avenue. Although unlikely, these trees could potentially provide nesting sites for migratory birds. Thus, in the event these trees are removed during Project development, the Project would comply with the Migratory Bird Treaty Act (MBTA), which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. In accordance with the Migratory Bird Treaty Act, tree removal activities would take place outside of the nesting season (February 15–September 15), if and to the extent feasible. To the extent that vegetation removal activities must occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a 300-foot buffer (500 feet for raptors) would be established until the fledglings have left the nest. With compliance with the Migratory Bird Treaty Act, impacts would be less than significant, and no mitigation measures are required.

e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?

No Impact. The City of Los Angeles Protected Tree Regulations included in Section 17.05.R of the LAMC (Tree Regulations) regulates the relocation or removal of specified protected trees, including all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least 4 inches in diameter at breast height. These tree species are defined as “protected” by the City of Los Angeles. As previously discussed, the Project Site includes a few small ornamental trees and shrubs, which would be removed with implementation of the Project. None of the trees found within the Project Site and adjacent to the Project Site are considered protected trees per the City’s Tree Regulations. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. No impacts would occur, and no mitigation measures are required.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Project Site is located in an urbanized area and is currently developed as a paved surface parking lot with a small restaurant. As previously described,

ornamental trees and limited ornamental landscaping exist on portions of the Project Site. In addition, the Project Site and areas surrounding the Project Site are fully developed and do not include large expanses of open space. The Project Site does not support any habitat or natural community. Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. No impacts would occur, and no mitigation measures are required.

V. Cultural Resources

Would the project:

a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Less Than Significant Impact. Section 15064.5 of the CEQA Guidelines generally defines a historic resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code). Additionally, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register, which are based on the National Register criteria. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register.

A Historic Resources Assessment and Impacts Report for 1717 North Wilcox Avenue (Historic Resources Assessment) was prepared for the Project by Leslie Heumann, Historic Resources Consultant, and is included as Appendix B to this MND. The Historic Resources Assessment considers the historic significance of the Project Site in terms of eligibility for inclusion in the National Register and California Register; for designation as a City of Los Angeles Historic-Cultural Monument (HCM); and as a contributing resource to an identified or potential City of Los Angeles Historic Preservation Overlay Zone (HPOZ).

As part of the Historic Resources Assessment, the findings of previous historic resources surveys of Hollywood were reviewed, including SurveyLA (November 2015), the City of Los Angeles Community Redevelopment Agency survey (February 2010), the National Register nomination form for the Hollywood Boulevard Commercial and Entertainment District, the Historic Property Data File (2011) maintained by the State Office of Historic Preservation, and the Los Angeles ZIMAS database. In addition, a site visit was performed on August 7, 2016 to gather information on the existing conditions within and surrounding the Project Site. Digital photographs of the exterior of the Project Site and its vicinity, as well as specific research of the Project Site were also reviewed.

As detailed in the Historic Resources Assessment, the Project Site, including the existing structure within the Project Site, has not been individually listed in or formally determined to be eligible for listing in the National Register or the California Register. In addition, the Project Site has not been designated, or taken under consideration for designation, as a Historic-Cultural Monument. Furthermore, the survey of the Hollywood Community Plan area for SurveyLA concluded that the Project Site does not satisfy any of the criteria as a historical resource. The 2010 Survey of the Hollywood Redevelopment Project area also indicated that the Project Site was found ineligible for National Register, California Register, or local designation. Moreover, the Project Site is not located within an existing Historic Preservation Overlay Zone. Therefore, as no historic resources are located within the Project Site, removal of the existing uses within the Project Site would not create a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the CEQA Guidelines.

With regard to the surrounding uses, the Project Site is located at the northern edge of and, according to the City, within the boundaries of the Hollywood Boulevard Commercial and Entertainment District, which is listed in the National Register. However, as discussed in the Historic Resources Assessment, the Project Site does not contribute to the significance of the Hollywood Boulevard Commercial and Entertainment District. Notwithstanding, the Project would not result in the physical demolition, destruction, relocation, or alteration of any nearby historical resource, including resources within the Hollywood Boulevard Commercial and Entertainment District, such that the significance of a historical resource would be materially impaired. In addition, given the Project Site's location relative to the Warner Theatre/Pacific Building, a historic resource, the Project would not impinge on noteworthy views of the building from Hollywood Boulevard or Wilcox Avenue. The upper stories and roof of the Project may be visible from some vantage points on Hollywood Boulevard, but this new addition to the skyline would not block nor significantly impinge upon views of the Warner Theatre/Pacific Building or of the Hollywood Boulevard Commercial and Entertainment District from any potential vantage points to the east, west, or south. Furthermore, the Project would comply with required setbacks and would not result in any demolition or alteration to the Holly Cinema, which is a contributor to the Hollywood Boulevard Commercial and Entertainment District and a significant historical

resource located at 6523 Hollywood Boulevard, adjacent to the Project Site. Overall, the characteristics of the Project are compatible with its location north of the Hollywood Boulevard Commercial and Entertainment District. No parcels will be assembled for the Project, thus preserving the existing rhythm and scale of the neighborhood. The height of the Project is compatible with nearby buildings, including Hollywood Boulevard Commercial and Entertainment District contributors, such as the Security Trust Building (6381 Hollywood Boulevard, seven stories), Guaranty Building (6331 Hollywood Boulevard, 12 stories), and the Equitable Building (6253 Hollywood Boulevard, 12 stories). To the extent applicable, the Project would also conform to the Secretary of the Interior's Standards for Rehabilitation.

In summary, development of the Project would not cause an adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5. Impacts would be less than significant, and no mitigation measures are required.

b. Cause a substantial adverse change in significance of an archaeological resource pursuant to §15064.5?

Less Than Significant Impact. Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important to prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community.

The Project Site is located within an urbanized area and has been subject to ground disturbance in the past. Thus, surface archaeological resources that may have existed at one time have likely been previously disturbed. In addition, although, the Project proposes additional grading, excavation and other construction activities, the potential to encounter archaeological resources is anticipated to be low due to the developed nature of the Project Site and previous grading activities. Furthermore, the records search conducted for the Project Site by the SCCIC (see Appendix B to this MND) indicates that there are no known archaeological resources on the Project Site or within a 0.5-mile radius of the Project Site. While this does not preclude the potential for an archaeological site to be identified during construction activities associated with the Project, it is unlikely since disturbance of the ground surface has previously occurred onsite. However, given the maximum depth of excavation for Project development would be approximately 25 feet below the existing ground surface, if an archaeological resource were to be discovered during construction of the Project, then work in the area would cease, and deposits would be treated in accordance with federal and state regulatory requirements, including those set forth in California Public Resources Code Section 21083.2 with respect to any unique archaeological resource. With compliance with applicable regulatory requirements, any

potential impacts related to archaeological resources would be less than significant, and mitigation measures are not required.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant With Mitigation Incorporated. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this area are extinct. Section 5097.5 of the Public Resources Code specifies that any unauthorized removal of paleontological remains is a misdemeanor. Further, the California Penal Code Section 622.5 sets the penalties for damage or removal of paleontological resources.

Based on the records search conducted by the Natural History Museum and included as part of Appendix B to this MND, there are no fossil localities that lie directly within the boundaries of the Project Site. The records search indicates that within the greater vicinity of the Project Site, there are fossil localities at depth in similar sediments as those underlying the Project Site. The closest identified localities in proximity to the Project Site are LACM 6297-6300, which are located approximately 1.5 miles east of the Project Site, between Western Avenue and the Hollywood Freeway along Hollywood Boulevard. These localities produced a fossil specimen of a horse (*Equus*), bison (*Bison*), camel (*Camelops*), and mastodon (*Mammut americanum*) at depths between 47 to 80 feet below grade. The next closest identified locality is LACM 3371, which is located approximately 3.0 miles southwest of the Project Site, near the intersection of Sierra Bonita Avenue and Oakwood Avenue. This locality produced fossil specimens of bison (*Bison antiquus*) at a depth of 12 feet below the surface. In addition, locality LACM 3250 near the intersection of Madison Avenue and Middlebury Street, approximately 3.2 miles southeast of the Project Site produced a fossil specimen of mammoth (*Mammuthus*), at a depth of about 8 feet below street level. Approximately 3.6 miles southeast of the Project Site, near the intersection of Western Avenue and Council Street locality LACM 5845 produced specimens of mastodon (*Mammut americanum*) at a depth of 5 to 6 feet below the surface.

While the Project Site has been subject to grading and development in the past, grading for the two-level subterranean parking garage would require excavation at depths of approximately 25 feet below the existing ground surface. Thus, there is a possibility that paleontological artifacts that were not recovered during prior construction or other human activity may be present. As set forth in Mitigation Measure V-1, a qualified paleontologist would be retained to perform periodic inspections of excavation and grading activities of the Project Site. In the event paleontological materials are encountered, the paleontologist would be allowed to temporarily divert or redirect grading and excavation activities in the

area of the exposed material to facilitate evaluation and, if necessary, salvage. Therefore implementation of Mitigation Measure V-1 would ensure that any potential impacts related to paleontological resources would be less than significant.

The Project Site does not include any known unique geologic features and no unique geologic features are anticipated to be encountered during project construction. Therefore, the Project would not directly or indirectly destroy a unique geologic feature. The impact associated with unique geologic features would be less than significant, and no mitigation measures are required.

Mitigation Measure V-1: A qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. If paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.

d. Disturb any human remains, including those interred outside of dedicated cemeteries (see Public Resources Code, Ch. 1.75, §5097.98, and Health and Safety Code §7050.5(b))?

Less Than Significant Impact. Although no human remains are known to have been found on the Project Site, there is the possibility that unknown resources could be encountered during Project construction, particularly during ground-disturbing activities such as excavation and grading. If human remains were discovered during construction of the Project, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with Public Resources Code Section 5097.91 and 5097.98, as amended. Therefore, with compliance with applicable regulatory requirements, any potential impacts related to human remains would be less than significant, and mitigation measures are not required.

VI. Geology and Soils

The following analysis is based, in part, on the *Preliminary Geotechnical Investigation and Fault-Rupture Study Report for the Proposed Wilcox Hotel* (Geotechnical Report), prepared by GeoRox Engineering, dated February 16, 2016. The Geotechnical Report is included as Appendix C of this MND.

Would the project:

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

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

Less Than Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement more recent than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The CGS establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. Additionally, the City of Los Angeles designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

The State of California released the official Earthquake Zones of Required Investigation Map for the Hollywood Quadrangle on November 6, 2014 (Earthquake Fault Zones Map). This map is State of California's CGS official earthquake fault zone map

for the Hollywood area. It is the most current and accurate map available to delineate the boundaries of earthquake fault zones in the Hollywood area. As discussed in the Geotechnical Report, the Project Site is located within an Alquist-Priolo Earthquake Fault Zone according to the Earthquake Zones of Required Investigation Map for the Hollywood Quadrangle.

As stated in the Geotechnical Report, field explorations revealed no evidence of faulting within the Project Site. In addition, review of aerial photographs did not indicate any geomorphic evidence of faulting within the Project Site or the immediate surrounding area. Although the geotechnical investigation noted the truncated ridge between Whitley Avenue and Wilcox Avenue, which defines the southern strand of the Hollywood fault, in a number of aerial photos, the surface trace of the southern strand of the Hollywood fault was mapped approximately 350 feet north of the Project Site. Based on the lack of faulting observed, the Geotechnical Report concluded that there are no active faults present beneath the Project Site. Thus, the potential for surface rupture due to faulting to occur on the Project Site is considered low. In addition, the Geotechnical Report concluded that the surface trace of the southern strand of the Hollywood fault is a sufficient distance to the north of the Project Site and therefore, the Project would meet potential setback requirements. Furthermore, the Project would comply with the current seismic design provisions of the 2013 California Building Code (CBC). The CBC incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program (NEHRP) to mitigate losses from an earthquake and provide for the latest in earthquake safety. Additionally, construction of the Project would be required to adhere to the seismic safety requirements contained in the Los Angeles Building Code, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-related hazards. Thus, with adherence to regulatory requirements and geotechnical recommendations, impacts related to the rupture of a known earthquake fault would be less than significant, and no mitigation measures are required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. As previously stated, the closest active fault to the Project Site is the Hollywood Fault.

As with any new development in the State of California, building design and construction for the Project would be required to conform to the current seismic design provisions of the CBC. As indicated above, the 2013 CBC incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the NEHRP to mitigate losses from an earthquake and provide for the latest in earthquake safety.

Additionally, construction of the Project would be required to adhere to the seismic safety requirements contained in the Los Angeles Building Code, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-related hazards. With compliance with regulatory requirements, impacts associated with seismic ground shaking would be less than significant, and no mitigation measures are required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their shear strength due to excess water pressure that builds up during repeated seismic shaking. A shallow groundwater table, the presence of loose to medium dense sand and silty sand, and a long duration and high acceleration of seismic shaking are factors that contribute to the potential for liquefaction. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials.

As discussed in the Geotechnical Report, based on the State of California Seismic Hazards Map, Hollywood Quadrangle, the Project Site is not mapped within a potential liquefaction zone. Similarly, the Project Site is also not mapped as an area susceptible to liquefaction by the City of Los Angeles.⁷ In addition, as described in the Geotechnical Report, the Project Site is underlain by predominantly very stiff clayey soils and medium dense to dense sandy soils within the upper 50 feet. Furthermore, groundwater was not encountered within borings at depths ranging from 50 to 71.5 feet below the ground surface of the Project Site and Cone Penetration Test soundings to depths of 50 to 86 feet. Therefore, the Geotechnical Report determined that the potential for liquefaction on the Project Site is very low. As such, impacts associated with seismic-related liquefaction would be less than significant, and no mitigation measures are required.

iv. Landslides?

Less Than Significant Impact. The Project Site is not located within a City-designated Hillside Grading Area and is not subject to the City's Hillside Ordinance. Additionally, the Project Site is generally flat and there is a general lack of elevation difference in the vicinity of the Project Site. Further, the Project Site is not in close proximity to any mountains or steep slopes. As such, there is no potential for landslides to occur on or near the Project Site. Therefore, the Project would not expose people or

⁷ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed February 18, 2016.

structures to substantial adverse effects involving landslides and impacts would be less than significant. Thus, no mitigation measures are required.

b. Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Development of the Project would require grading and excavation and other construction activities that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. Although Project development has the potential to result in the erosion of soils, this potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities. Specifically, all grading activities would require grading permits from the City's Department of Building and Safety, which would include requirements and standards designed to limit potential impacts associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavations, and fills. Regarding soil erosion during Project operations, the potential is relatively low since the Project Site would be paved over and/or landscaped. Therefore, with compliance with applicable regulatory requirements, impacts regarding soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. Potential impacts with respect to liquefaction and landslides were determined to be less than significant based on the analysis presented in Checklist Questions VI(a)(iii) and (iv), above.

Lateral spreading is a term referring to landslides that commonly form on gentle slopes and that have rapid fluid-like flow movement. As previously discussed in Response to Checklist Question No. VI.a(iv), the Project Site is generally flat and there is a general lack of elevation difference in the vicinity of the Project Site. Further, the Project Site is not in close proximity to any mountains or steep slopes. Therefore, as discussed in Response to Checklist Question No. VI.a(iv), potential impacts with respect to landslides would be less than significant, and no mitigation measures are required.

Subsidence occurs when subsurface fluids (e.g., petroleum, groundwater, natural gas) are withdrawn from the ground. Based on the Geotechnical Report, seeps, springs, or groundwater were not encountered during site exploration. Therefore, no groundwater would be expected to be encountered during Project construction. Thus, impacts with

respect to subsidence would be less than significant, and no mitigation measures are required.

Additionally, with respect to lateral spreading, subsidence, or collapse, all Project construction would comply with the CBC as supplemented by additional requirements in the LAMC. These regulations are designed to assure safe construction and include building foundation requirements appropriate to the conditions present at the Project Site. As part of these requirements a grading plan would be reviewed and approved by the consulting geologist and soils engineer followed by review by the Department of Building and Safety. In addition, in accordance with regulatory requirements, grading activities would be conducted under the direction and supervision of a licensed engineering geologist and/or soils engineer.

Overall, with compliance with standard City requirements, impacts associated with landslides, lateral spreading, subsidence, liquefaction, or collapse would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. As set forth in the Geotechnical Report, existing native soils at depths of 18 to 19 feet below the Project Site were identified as clayey silty soils and considered to have low expansion potential. Notwithstanding, construction of the Project would be required to comply with the CBC and supplemental requirements of the LAMC, as enforced by the City of Los Angeles. These requirements would include building foundation and other requirements appropriate to site-specific conditions that would be provided in accordance with the design level geotechnical investigation required by the City. Thus, with implementation of existing regulatory requirements, impacts with respect to expansive soils would be less than significant, and no mitigation measures are required.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. Wastewater generated by the Project would be accommodated by the existing City sewer infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Thus, the Project would not result in impacts related to the ability of soils to support septic tanks or alternative wastewater disposal systems. As no impact would result, no mitigation measures are required.

VII. Greenhouse Gas Emissions

Would the project:

- a. **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**
- b. **Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

Less Than Significant Impact (a and b). Until the passage of AB 32, CEQA documents generally did not evaluate greenhouse gas (GHG) emissions or impacts of projects on global climate change. Rather, the primary focus of air pollutant analysis in CEQA documents was the emission of criteria pollutants, or those identified in the California and federal Clean Air Acts as being of most concern to the public and government agencies (e.g., toxic air contaminants). With the passage of AB 32 and SB 97, CEQA documents must now contain a more detailed analysis of GHG emissions. However, the analysis of GHGs is different from the analysis of criteria pollutants. Since the half-life of CO₂ is approximately 100 years, GHGs affect the global climate over a relatively long timeframe. Conversely, for criteria pollutants, significance thresholds/impacts are based on daily emissions; and the determination of attainment or non-attainment are based on the daily exceedance of applicable ambient air quality standards (e.g., 1-hour and 8-hour exposures). Also, the scope of criteria pollutant impacts is local and regional, while the scope of GHG impacts is global.

OPR's recommended amendments to the CEQA Guidelines for analysis of GHGs were adopted by the California Natural Resources Agency on December 30, 2009. Analysis of GHG emissions in a CEQA document presents unique challenges to lead agencies. However, such analysis must be consistent with existing CEQA principles and, therefore, the amendments comprise relatively modest changes to various portions of the existing CEQA Guidelines. The amendments add no additional substantive requirements; rather, the Guidelines merely assist lead agencies in complying with CEQA's existing requirements. Modifications address those issues where analysis of GHG emissions may differ in some respects from more traditional CEQA analysis. Other modifications clarify existing law that may apply both to an analysis of GHG emissions, as well as more traditional CEQA analyses.

As set forth above, the following two questions relating to the effects of GHGs were added to the CEQA Guidelines, Appendix G (Environmental Checklist).

- Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

- Would the project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs?

Section 15064.4 of the CEQA Guidelines was adopted to assist lead agencies in determining the significance of the impacts of GHGs. Consistent with developing practice, this section urges lead agencies to quantify GHG emissions of projects where possible and includes language necessary to avoid an implication that a “life-cycle” analysis is required. In addition to quantification, this section recommends consideration of several other qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs).

Section 15064.4 does not establish a threshold of significance. Lead agencies are called on to establish significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines amendments also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA’s requirements for cumulative impact analysis (see CEQA Guidelines Section 15130(f)).⁸

Although GHG emissions can be quantified, the California Air Resources Board (CARB), South Coast Air Quality Management District (SCAQMD), and the City of Los Angeles, have yet to adopt project-level significance thresholds for GHG emissions that would be applicable to the Project.⁹

As indicated above, in response to Senate Bill 97, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant. Per CEQA Guidelines Section 15064(h)(3), a project’s incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the

⁸ See generally Section 15130(f); see also Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources (April 13, 2009).

⁹ The South Coast Air Quality Management District has formed a GHG Significance Threshold Working Group. More information on this Working Group is available at www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds/page/2, accessed March 2, 2016.

geographic area of the project.¹⁰ To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.¹¹ Thus, in the absence of any adopted, quantitative threshold, the Project would not have a significant effect on the environment if it is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions including the emission reduction measures discussed within the AB 32 Climate Change Scoping Plan, SCAG's Sustainable Communities Strategy, and the City of Los Angeles Green Building Code. The Project would result in direct and indirect GHG emissions generated by different types of emissions sources, including:

- Construction: emissions associated with demolition of existing parking lot for construction of the proposed hotel and restaurant uses, site preparation, excavation, grading, and construction-related equipment and vehicular activity;
- Area sources: emissions associated with consumer products, and landscape equipment;
- Building operations: emissions associated with space heating and cooling, water heating, and lighting;
- Mobile: emissions associated with vehicular exhaust from trips to and from the Project site;
- Solid waste: emissions associated with waste streams (embodied energy of materials); and
- Water: emissions associated with energy used to pump, convey, deliver, and treat water.

The Project would generate an incremental contribution to and cumulative increase in sources of GHGs. However, it should be noted that even a very large individual project would not generate enough GHG emissions on its own to significantly influence global climate change.

GHG emissions during construction and operation of the Project were calculated using the SCAQMD recommended California Emissions Estimator Model. As shown in Table B-3 on page B-37, construction of the Project is estimated to generate a total of 878 metric tons of carbon dioxide equivalent (CO₂e). As recommended by the SCAQMD,

¹⁰ 14 CCR Section 15064(h)(3).

¹¹ *Id.*

Table B-3
Construction and Operational Greenhouse Gas Emissions

Emission Source	CO ₂ e (metric tons)
Construction Emissions	
2017	542
2018	399
Total	941
Emissions Amortized over 30 years	31
Project Emissions	
Area	<1
Energy	866
Mobile	989
Waste	22
Water	24
Construction	31
Total	1,932
 <i>Source: Eyestone Environmental, 2016.</i>	

the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory. As presented in Table B-3, the Project's operational emissions, combined with the Project's amortized construction emissions, would result in an annual total of 31 metric tons of CO₂e.

As discussed above, CARB, SCAQMD and the City of Los Angeles, have yet to adopt project-level significance thresholds for GHG emissions that would be applicable to the Project. In September 2010, the SCAQMD CEQA Significance Thresholds GHG Working Group staff proposal recommended use of a 3,000 metric-ton (MT) CO₂e screening threshold for all land use projects.¹² While this screening value is not considered a significance threshold, it does represent the level of GHG emissions that the SCAQMD considered not to require further analysis. As shown in Table B-3, project-related GHG emissions would be well below the screening value considered by the SCAQMD.

¹² SCAQMD, *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15, September 28, 2010*, [www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf?sfvrsn=2).

The following discussion describes the extent the Project is consistent with the applicable regulatory plans and policies to reduce GHG emissions.

AB 32 Climate Change Scoping Plan

The goal to reduce GHG emissions to 1990 levels by 2020 (Executive Order S-3-05) was codified by the Legislature as the 2006 Global Warming Solutions Act (Assembly Bill 32). In 2008, CARB approved a Climate Change Scoping Plan as required by AB 32.¹³ The AB 32 Climate Change Scoping Plan proposes a “comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health.”¹⁴ The AB 32 Climate Change Scoping Plan has a range of GHG reduction actions which include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 implementation fee to fund the program. The following discussion focuses on pertinent reduction actions that have the greatest potential to reduce Project-related GHG emissions.

As shown in Table B-3 on page B-37, Project operation would result in 1,901 MTCO₂e. The breakdown of emissions by source category show approximately 46 percent from energy consumption, 52 percent from mobile sources, one percent from solid waste generation, and one percent from water supply, treatment and distribution. Provided below is an evaluation of applicable reduction actions/strategies by emissions source category to determine the extent the Project’s design features comply with or exceed the reduction actions/strategies outlined in the AB 32 Climate Change Scoping Plan.

Applicable GHG reduction actions and strategies from the emission reduction measures discussed within the AB 32 Climate Change Scoping Plan that would serve to reduce GHG emissions from the Project are included in the following tables by source type: Table B-4, Energy, on page B-39; Table B-5, Mobile, on page B-41; Table B-6, Solid Waste Diversion, on page B-43; and Table B-7, Water, on page B-44. These GHG reduction actions and strategies would serve to reduce GHG emissions from the Project. As shown in the tables below, the Project would be consistent with these reduction actions and strategies. These GHG reduction actions and strategies would primarily be implemented at the state and federal level, but would reduce GHG emissions from the Project. As shown in the tables, the Project would be consistent with these reduction actions and strategies.

¹³ *Climate Change Proposed Scoping Plan was approved by CARB on December 11, 2008.*

¹⁴ *Climate Change Scoping Plan, CARB, December 2008, www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm, accessed March 7, 2016.*

Table B-4
AB 32 Climate Change Scoping Plan Reduction Measures—Energy

Actions and Strategies	Project Consistency Analysis
<p>California Renewables Portfolio Standard (RPS) program: Senate Bill 2X modified California's RPS program to require that both public and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. California Senate Bill 2X also requires regulated sellers of electricity to meet an interim milestone of procuring 25 percent of their energy supply from certified renewable resources by 2016.</p>	<p>Consistent. These levels of reduction are consistent with Los Angeles Department of Water and Power (LADWP)'s commitment to achieve 35 percent renewables by 2020. In 2011, LADWP indicated that 20 percent of its electricity came from renewable resources in Year 2010.^a As LADWP would provide electricity service to the Project Site, the Project would use electricity consistent with this performance based standard. Electricity GHG emissions provided in Table B-3 on page B-37 reflect consistency with this regulation.</p>
<p>Senate Bill 350 (SB 350): The Clean Energy and Pollution Reduction Act of 2015 increases the standards of the California RPS program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by 2030 and also requires the State Energy Resources Conservation and Development Commission to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.^b</p>	<p>Consistent. LADWP would be required to meet this performance based standard. As LADWP would provide electricity service to the Project Site, the Project would use electricity consistent with this performance based standard. Table B-3 on page B-37 presents projected GHG emissions for 2019 and would not include the additional reductions in GHG emissions from implementation of this regulation. Electricity GHG emissions presented in Table B-3 would be further reduced by 17 percent.</p> <p>Doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under the California Code of Regulations Title 24, Part 6 (consistency with this regulation is discussed below) and utility-sponsored programs such as rebates for high-efficiency appliances, heating ventilation and air-conditioning (HVAC) systems and insulation. The Project would support this action/strategy through compliance with specific requirements of the Los Angeles Green Building Code (consistency with this regulation is discussed below).</p>
<p>California Code of Regulations (CCR), Title 20: The 2012 Appliance Efficiency Regulations, adopted by the California Energy Commission (CEC), include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California.</p>	<p>Consistent. This performance standard applies to new appliances and lighting that are sold or offered for sale in California. As such, appliances and lighting used by the Project would comply with this performance based standard.</p>
<p>CCR, Title 24, Building Standards Code: The 2013 Building Energy Efficiency Standards contained in Title 24, Part 6 (also known as the California Energy Code), requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.</p> <p>The California Green Building Standards Code (Part 11, Title 24) established mandatory and</p>	<p>Consistent. The Project would comply with applicable provisions of the 2013 Los Angeles Green Building Code which in turn requires compliance with mandatory requirements included in the California Green Building Standards. The 2013 Building Energy Efficiency Standards are 25 percent more efficient than the 2008 standards for residential construction and 30 percent better for nonresidential construction.^c The 2013 Standards are approximately 40 to 45 percent more efficient than the 2020 Projected Emissions under Business-as-Usual in the AB 32 Climate Action Scoping Plan. The standards offer builders better windows, insulation, lighting, ventilation systems and</p>

Table B-4 (Continued)
AB 32 Climate Change Scoping Plan Reduction Measures—Energy

Actions and Strategies	Project Consistency Analysis
voluntary standards on planning and design for sustainable site development, energy efficiency (extensive update of the California Energy Code), water conservation, material conservation, and internal air contaminants.	other features that reduce energy consumption in homes and businesses.
Energy Independence and Security Act of 2007 (EISA): EISA requires manufacturing for sale within the Untitled States to phase out incandescent light bulbs between 2012 and 2014 resulting in approximately 25 percent greater efficiency for light bulbs and requires approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020.	Consistent. This performance based standard would serve to reduce the use of incandescent light bulbs for the Project. Electricity GHG emissions provided in Table B-3 on page B-37 conservatively account for a 25 percent reduction in lighting electricity consumption with implementation of this regulation.
Assembly Bill 1109 (AB 1109): The Lighting Efficiency and Toxic Reduction Act prohibits a person from manufacturing for sale in the state requires the establishment of minimum energy efficiency standards for all general purpose lights. The standards are structured to reduce average statewide electrical energy consumption by not less than 50 percent from the 2007 levels for indoor residential lighting and not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018. ^d	Consistent. As with the Energy Independence and Security Act of 2007 discussed above, the Project would meet this performance based standard.
The Cap-and-Trade Program: This program is designed to reduce GHG emissions from major sources, such as refineries and power plants, (deemed “covered entities”) by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve AB 32’s emission-reduction mandate of returning to 1990 levels of emissions by 2020.	Consistent. The Cap-and-Trade Program provides a firm cap, ensuring that the 2020 statewide emission limit will not be exceeded. In sum, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects’ electricity usage are covered by the Cap-and-Trade Program. The analysis of GHG emissions provided above in Table B-3 on page B-37 conservatively did not account for reductions in electricity usage covered by the Cap-and-Trade Program.

^a Website www.ladwpnews.com/go/doc/1475/987799/, accessed March 7, 2016.

^b Senate Bill 350 (2015–2016 Reg. Session) Stats 2015, Ch. 547.

^c California Building Standards Commission, Energy Commission Approves More Efficient Buildings for California’s Future, News Release, May 31, 2012, www.energy.ca.gov/releases/2012_releases/2012-05-31_energy_commission_approves_more_efficient_buildings_nr.html, accessed March 7, 2016.

^d 2007b. Assembly Bill 1109 (2007–2008 Reg. Session) Stats. 2007, Ch. 534.

Source: Eyestone Environmental, 2016.

Table B-5
AB 32 Climate Change Scoping Plan Reduction Measures—Mobile

Actions and Strategies	Consistency Analysis
<p>Assembly Bill 1493 (AB 1493) “Pavley Standards”: AB 1493 requires the development and adoption of regulations to achieve “the maximum feasible reduction of greenhouse gases” emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the State. In compliance with AB 1493, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles and light duty trucks of model year 2009 through 2016. Model years 2017 through 2025 are addressed by California’s Advanced Clean Cars program (discussed below).</p>	<p>Consistent. GHG emissions related to vehicular travel by the Project would benefit from this regulation and mobile source emissions generated by the Project would be reduced with implementation of AB 1493 consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions provided in Table B-3 on page B-37 reflect consistency with this regulation.</p>
<p>Executive Order S-01-07: The Low Carbon Fuel Standard (LCFS) requires a 10-percent or greater reduction by 2020 in the average fuel carbon intensity for transportation fuels in California regulated by CARB. CARB identified the LCFS as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009 (CARB 2009).^{a,b}</p>	<p>Consistent. GHG emissions related to vehicular travel by the Project would benefit from this regulation and mobile source emissions generated by the Project would be reduced with implementation of the Low Carbon Fuel Standard consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions provided in Table B-3 on page B-37 reflect consistency with this regulation.</p>
<p>Advanced Clean Cars Program: In 2012, CARB approved the Advanced Clean Cars Program, a new emissions-control program for model year 2017 through 2025. The program combines the control of smog, soot, and GHGs with requirements for greater numbers of zero-emission vehicles. By 2025, when the rules will be fully implemented, the new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions.</p>	<p>Consistent. These standards will apply to all passenger and light duty trucks used by customers, employees, and deliveries to the Project. GHG emissions related to vehicular travel by the Project would benefit from this regulation and mobile source emissions generated by the Project would be reduced with implementation of this performance based standard consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions provided in Table B-3 on page B-37 conservatively do not include this additional 34-percent reduction in mobile source emissions as the CalEEMod model does not yet account for this regulation. The Project would further support this regulation since the Project Applicant would provide at least 20 percent of the total code-required parking spaces for the Project to be capable of supporting future electric vehicle supply equipment.</p>
<p>Senate Bill (SB) 375: SB 375 requires integration of planning processes for transportation, land-use and housing. Under SB 375, each Metropolitan Planning Organization (MPO) would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet a target, created by CARB, for reducing GHG emissions.</p>	<p>Consistent. SB 375 requires SCAG to direct the development of the SCS for the region. The Project would be consistent with SCAG’s RTP/SCS by locating the Project within a HQTAs and by reducing Project-related transportation emissions by 29 percent (See Appendix A of this MND). The RP/SCS targets a nine percent reduction in VMT by 2020 and a 16 percent reduction by 2035. Thus, the Project would be consistent with SB 375.</p>

Table B-5 (Continued)
AB 32 Climate Change Scoping Plan Reduction Measures—Mobile

Actions and Strategies	Consistency Analysis
<p>^a <i>California Air Resources Board, Initial Statement of Reason for Proposed Regulation for The Management of High Global Warming Potential Refrigerant for Stationary Sources, October 23, 2009, www.arb.ca.gov/regact/2009/gwprmp09/isorref.pdf, accessed March 7, 2016.</i></p> <p>^b <i>Carbon intensity is a measure of the GHG emissions associated with the various production, distribution, and use steps in the “lifecycle” of a transportation fuel.</i></p> <p><i>Source: Eyestone Environmental, 2016.</i></p>	

SCAG’s Sustainable Communities Strategy

As described in Table B-5 on page B-41, SB 375 requires each Metropolitan Planning Organization to prepare a Sustainable Communities Strategy (SCS) in its regional transportation plan (RTP). SCAG’s SCS is included in the SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS). The goals and policies of the 2016–2040 RTP/SCS that focus on reducing vehicle miles traveled (VMT) feature transportation and land use planning that include building infill projects, locating residents closer to where they work and play and designing communities so there is access to high quality transit service. The 2016–2040 RTP/SCS is expected to reduce per capita transportation emissions by eight percent by 2020 and 18 percent by 2035.

This level of reduction would meet and exceed the region’s GHG targets set by CARB of eight percent per capita by 2020 and 13 percent per capita by 2035.¹⁵ Furthermore, although there are no per capita GHG emission reduction targets for passenger vehicles set by CARB for 2040, the 2016–2040 RTP/SCS’s GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2040.¹⁶ The 2016–2040 RTP/SCS would result in an estimated 21-percent decrease in per capita GHG emissions by 2040. By meeting and exceeding the SB 375 targets for 2020 and 2035, as well as achieving an approximately 21-percent decrease in per capita GHG emissions by 2040 (an additional 3-percent reduction in the five years between 2035 [18 percent] and 2040 [21 percent]), the 2016–2040 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the state’s GHG emission reduction goals.

¹⁵ *Southern California Association of Governments, Final 2016–2040, RTP/SCS, Executive Summary, p. 8, April 2016.*

¹⁶ *Southern California Association of Governments, Final 2016–2040, RTP/SCS, April 2016, p. 153.*

Table B-6
AB 32 Climate Change Scoping Plan Reduction Measures—Solid Waste Diversion

Actions and Strategies	Consistency Analysis
<p>California Integrated Waste Management Act of 1989 and Assembly Bill 341: The California Integrated Waste Management Act of 1989 requires each jurisdiction’s source reduction and recycling element to include an implementation schedule that shows (1) diversion of 25 percent of all solid waste by January 1, 1995, through source reduction, recycling, and composting activities; and (2) diversion of 50 percent of all solid waste on and after January 1, 2000, through source reduction, recycling, and composting facilities.^a</p> <p>AB 341 (2011) amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter.^b</p>	<p>Consistent. GHG emissions related to solid waste generation from the Project would benefit from this regulation and solid waste disposal emissions generated by the Project would be reduced with implementation of this performance based standard consistent with reduction of GHG emissions under AB 32. Project-related GHG emissions from solid waste generation provided in Table B-3 on page B-37 conservatively do not include this 50- to 75-percent reduction in solid waste generation source emissions.</p>
<p>^a Cal. Pub. Res. Code Section 41780(a). ^b Cal. Pub. Res. Code Section 41780.01(a). Source: Eyestone Environmental, 2016.</p>	

The 2016–2040 RTP/SCS states that the SCAG region is home to about 18.3 million people in 2012 and currently includes approximately 5.9 million homes and 7.4 million jobs. By 2040, the integrated growth forecast projects that these figures will increase by 3.8 million people, with nearly 1.5 million more homes and 2.4 million more jobs. High Quality Transit Areas (HQTAs) will account for three percent of regional total land, but are projected to accommodate 46 percent and 50 percent of future household and employment growth respectively between 2012 and 2040. The overall land use pattern in the 2016–2040 RTP/SCS reinforces the trend of focusing new housing and employment in the region’s HQTAs. HQTAs are a cornerstone of land use planning best practices in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

Consistent with the SCAG’s RTP/SCS alignment of transportation, land use, and housing strategies, the Project would provide visitors and employees with convenient access to public transit, which would facilitate a reduction in VMT and corresponding vehicular GHG emissions. In particular, the Metro Red Line subway, which operates in the vicinity of the Project Site, runs between North Hollywood and downtown Los Angeles,

**Table B-7
AB 32 Climate Change Scoping Plan Reduction Measures—Water**

Actions and Strategies	Consistency Analysis
<p>CCR, Title 24, Building Standards Code: The California Green Building Standards Code (Part 11, Title 24) includes water efficiency requirements for new residential and non-residential uses, in which buildings shall demonstrate a 20-percent overall water use reduction.</p>	<p>Consistent. The Project would comply with applicable provisions of the 2013 Los Angeles Green Building Code which in turn requires compliance with mandatory standards included in the California Green Building Standards (20 percent overall water use reduction).</p>
<p>Senate Bill X7-7: The Water Conservation Act of 2009 sets an overall goal of reducing per-capita urban water use by 20 percent by December 31, 2020. The state is required to make incremental progress toward this goal by reducing per-capita water use by at least 10 percent by December 31, 2015. This is an implementing measure of the Water Sector of the AB 32 Scoping Plan. Reduction in water consumption directly reduces the energy necessary and the associated emissions to convey, treat, and distribute the water; it also reduces emissions from wastewater treatment.</p>	<p>Consistent. As discussed above under Title 24, the Project would meet this performance based standard.</p>
<p>Source: <i>Eyestone Environmental, 2016.</i></p>	

connecting with the Metro Orange Line in North Hollywood, the Metro Purple Line at Wilshire Boulevard, the Metro Blue Line and Metro Expo Line in downtown Los Angeles, and the Metro Gold Line at Union Station. In the Project vicinity, the Metro Red Line has stations at Hollywood Boulevard & Highland Avenue, approximately 0.5 mile west of the Project Site, and Hollywood Boulevard & Vine Street, approximately 0.33 mile east of the Project Site. Public bus transit service in the vicinity of the Project Site is provided by Metro and the City of Los Angeles Department of Transportation (LADOT) with nine bus lines serving the Project area. As shown in Appendix A of this MND, the close proximity of transit would reduce the number of vehicular trips and related VMT by approximately 29 percent. The Project’s estimated VMT reductions would be consistent with regional strategies to reduce transportation-related GHG emissions and would be consistent with and support the goals and benefits of the 2016–2040 RTP/SCS, which seeks improved “mobility and access by placing destinations closer together and decreasing the time and cost of traveling between them. The Project would also be consistent with SCAG’s GHG reduction strategy to concentrate job growth within HQTAs. The Project represents a development within an existing urbanized area that would concentrate new commercial uses within a HQTA, which is defined by the 2016–2040 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit

corridor with 15-minute or less service frequency during peak commute hours.¹⁷ The convenient access to public transportation and other measures would further promote a reduction in vehicle miles traveled and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2016–2040 RTP/SCS.

Los Angeles Green Building Code

With regard to the Los Angeles Green Building Code, Ordinance No. 182,849 requires that all Projects for which applications were filed on or after January 1, 2014, must comply with the Los Angeles Green Building Code as amended to comply with various provisions of the 2013 CALGreen Code. The Project will satisfy provisions of the 2013 CALGreen Code, which is anticipated to be 30 percent more efficient for nonresidential construction compared to the 2008 CALGreen Code. Therefore, the Project is consistent with the Los Angeles Green Building Code.

Summary

The Project is consistent with the emission reduction measures discussed within CARB's AB 32 Climate Change Scoping Plan, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB's AB 32 Climate Change Scoping Plan, the Project would use "green building" features consistent with the Los Angeles Green Building Code.

As part of SCAG's 2016–2040 RTP/SCS, a reduction in VMT within the region is a key component to achieve the 2020 and 2035 GHG emission reduction targets established by CARB. As discussed above, the Project results in a VMT reduction of approximately 29 percent as a result of the close proximity to transit and would be consistent with SCAG's 2016–2040 RTP/SCS.

VIII. Hazards and Hazardous Materials

The following analysis is based, in part, on the *Phase I Environmental Site Assessment Report* (Phase I Environmental Site Assessment) prepared for the Project by Aaron & Wright Assessment, LLC, dated September 9, 2015. The Phase I Environmental Site Assessment is included as Appendix D of this MND.

¹⁷ Metro, *High Quality Transit Areas, Southwest Quadrant*, http://media.metro.net/projects_studies/call_projects/images/Southwest%20Quad%20Map.pdf, accessed February 24, 2016.

Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of hotel and restaurant developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed hotel and restaurant uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. However, all potentially hazardous materials to be used during construction and operation of the Project would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations. Impacts would be less than significant, and no mitigation measures are required.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. The Phase I Environmental Site Assessment included a review of environmental records for the Project Site and a site reconnaissance to identify potential on-site hazards. As discussed in the Phase I Environmental Site Assessment, the Project Site currently consists of one single-story restaurant building, one commercial dumpster enclosure, and associated asphalt parking and driveways. According to the Phase I Environmental Site Assessment, the Project Site has been developed with the existing surface parking lot since the 1920s, the restaurant building since 1936, and the commercial dumpster enclosure structure since 1978. Prior to the current development, the Project Site was developed as a portion of a residence in the early 1900s and was developed with duplexes in the 1910s to the 1920s. Based on the prior uses at the Project Site, the Phase I Environmental Site Assessment determined that no prior uses of the Project Site or adjoining properties would be considered a recognized environmental condition (REC).

With regard to the existing uses on the Project Site, potential environmental concerns at the Project Site noted in the Phase I Environmental Site Assessment include asbestos-containing materials (ACM), polychlorinated biphenyls (PCBs) and vapor encroachment conditions. The Phase I Environmental Site Assessment noted suspect ACM in the form of vinyl flooring and mastic, roofing materials and drywall/joint compound located in the restaurant building of the Project Site. However, since the suspect ACM was observed to be in good condition, the Phase I Environmental Site Assessment determined that these

materials can be effectively managed as part of an asbestos Operations and Maintenance Program until such time as renovation or demolition activities necessitate their removal. In addition, in accordance with SCAQMD Rule 1403, Asbestos Emissions from Demolition/Renovation Activities, prior to demolition activities associated with the Project, the Applicant would conduct surveys of all buildings to verify the presence or absence of any ACMs and conduct remediation or abatement before any disturbance occurs. Any ACMs would be removed by a licensed abatement contractor in accordance with all federal, State and local regulations prior to renovation or demolition. Mandatory compliance with applicable federal and State standards and procedures would reduce risks associated with ACM to less than significant levels.

The Phase I Environmental Site Assessment found no indication of potential PCB-containing electrical or hydraulic equipment such as elevators, lifts or transformers that would imply a significant potential for a REC related to PCBs on the Project Site. As further described in the Phase I Environmental Site Assessment, based on topography, groundwater flow direction, soil and the furthest known extents of the contamination, none of the properties surrounding the Project Site were suspected of having petroleum or chemical contaminant plumes that would be identified as a vapor encroachment condition within the Project Site.

With regard to lead-based paint (LBP), given the age of the restaurant building to be removed, there is the potential for LBP to be present within the structure. However, the painted surfaces were noted to be in good condition and, given the nonresidential usage of the property, LBP was not considered a significant concern. Nevertheless, in accordance with SCAQMD Rule 1403, Asbestos Emissions from Demolition/Renovation Activities, prior to demolition activities associated with the Project, the Applicant would conduct surveys of all buildings to verify the presence or absence of any LBPs and conduct remediation or abatement before any disturbance occurs. Any LBPs would be removed by a licensed abatement contractor in accordance with all federal, state and local regulations prior to renovation or demolition. Mandatory compliance with applicable federal and State standards and procedures would reduce risks associated with LBP to acceptable levels.

As described in the Phase I Environmental Site Assessment, reconnaissance of the Project Site revealed no evidence of past or current presence of underground storage tanks or above-ground storage tanks on the Project Site.

As noted in the Phase I, local water supplies are not known to have elevated levels of radon or radium. Further, based on low regional averages, the non-residential usage of the property and presence of commercial-grade HVAC systems, radon was not considered a significant concern at the Project Site.

The Project Site is not within a Methane Zone or Methane Buffer Zone identified by the City.¹⁸ Therefore, there is a negligible risk of subsurface methane release.

Based on the above, with compliance with regulatory requirements, the Project would not result in a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment. Impacts would be less than significant, and no mitigation measures are required.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. Selma Avenue Elementary School and Larchmont Charter School, located at 6611 Selma Avenue, are approximately 0.25 mile southwest of the Project Site. As discussed above, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of hotel and restaurant developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed hotel and restaurant uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used in the vicinity of the Project Site. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Furthermore, all materials during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. In addition, as described in Attachment A, Project Description, of this MND, truck haul routes during construction of the Project would likely be along Hollywood Boulevard to and from the Hollywood Freeway and trucks would not travel adjacent to the two schools identified above. As such, the use of such materials would not create a significant hazard to nearby schools. Impacts would be less than significant, and no mitigation measures are required.

¹⁸ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed February 18, 2016.

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

Less Than Significant Impact. Based on the Phase I Environmental Site Assessment, the Project Site is not listed on any of the federal, State and local databases that track hazards, including the use and storage of hazardous materials. Further, as discussed in the Phase I Environmental Site Assessment and summarized in the Response to Checklist Question VIII.(b), above, with compliance with regulatory requirements, the Project would not result in a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment. Impacts would be less than significant, and no mitigation measures are required.

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

No Impact. The Project Site is not located within an airport land use plan or within 2 miles of a public airport. Therefore, the Project would not result in a safety hazard associated with an airport. No impact would occur, and no mitigation measures are required.

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

No Impact. There are no private airstrips in the vicinity of the Project Site and the Site is not located within a designated airport hazard area. Therefore, the Project would not result in airport-related safety hazards. No impact would occur, and no mitigation measures are required.

- g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

Less Than Significant Impact. The City of Los Angeles' General Plan Safety Element addresses public protection from unreasonable risks associated with natural disasters (e.g., fires, floods, earthquakes) and sets forth guidance for emergency response. Specifically, the Safety Element includes Exhibit H, Critical Facilities and Lifeline Systems, which identifies emergency evacuation routes, along with the location of selected emergency facilities. According to the Safety Element of the City of Los Angeles General

Plan, the Project Site is not located along a designated disaster route.¹⁹ The closest disaster routes include Highland Avenue located approximately 0.5 mile west of the Project Site, the Hollywood Freeway (US-101) located approximately 0.5 mile northeast of the Project Site, and Beverly Boulevard located approximately 2 miles south of the Project Site.

While it is expected that the majority of construction activities for the Project would be confined to the Project Site, temporary and limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially affect emergency access adjacent to the Project Site. However, access to the Project Site and surrounding area during construction of the Project would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Therefore, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan, and impacts during construction would be less than significant level.

With regard to operation, the Project does not propose the permanent closure of any local public streets and access to the Project Site would continue to be provided from Wilcox Avenue and Hudson Avenue. In addition, the Project would not install barriers that would impede emergency response within and in the vicinity of the Project Site. Furthermore, according to the Traffic Study prepared for the Project, operation of the Project would not result in any significant traffic impacts pursuant to the significance thresholds of the Los Angeles Department of Transportation (LADOT). The Project also would not have a significant impact on the regional arterial system. The Project would also be expected to provide adequate emergency access and comply with Los Angeles Fire Department access requirements during operation. Therefore, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan during operation of the Project. Impacts during operation would be less than significant, and no mitigation measures are required.

h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Less Than Significant Impact. The Project Site is located within an urbanized area and is currently developed with a restaurant and paved surface parking areas. Furthermore, the Project Site is not located within a City-designated Very High Fire Hazard

¹⁹ *City of Los Angeles Department of Planning General Plan Safety Element—Critical Facilities and Lifeline Systems, Exhibit H (November 26, 1996).*

Severity Zone (VHFHSZ).²⁰ However, the Project Site is located within Fire District No. 1, which consists of areas identified by the City that are required to meet additional developmental regulations to mitigate fire hazard-related risks. Notwithstanding, there are no wildlands located adjacent to the Project Site. In addition, the Project Site is located in an urbanized area and would be developed with new structures that would comply with LAFD requirements. Therefore, the Project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. Impacts would be less than significant, and no mitigation measures are required.

IX. Hydrology and Water Quality

Would the project:

a. Violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. During Project construction, particularly during the grading and excavation phases, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. Thus, Project-related construction activities could have the potential to result in adverse effects on water quality. However, this potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities. Specifically, all grading activities would require grading permits from the City's Department of Building and Safety, which would include requirements and standards designed to limit potential impacts associated with erosion to acceptable levels. Additionally, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. With compliance with applicable regulatory requirements, impacts to water quality during construction would be less than significant.

During operation, the Project would introduce sources of potential stormwater pollution that are typical of hotel and restaurant uses (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with parking and circulation areas).

²⁰ *City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed February 18, 2016. The VHFHSZ was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.*

Stormwater runoff from precipitation events could potentially carry urban pollutants into municipal storm drains. However, in accordance with the City's Low Impact Development (LID) Ordinance (Ordinance No. 181,899), Best Management Practices (BMPs) would be implemented on-site to address City and State water quality requirements.

With compliance with applicable regulatory requirements, including implementation of best management practices and LID standards as described above, the Project would not violate any water quality standards or waste discharge requirements. Impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. As discussed above in Response to Checklist Question VI.a.iii, groundwater was not encountered within borings at depths ranging from 50 to 71.5 feet below the ground surface of the Project Site and Cone Penetration Test soundings to depths of 50 to 86 feet. In addition, as discussed in the Phase I Environmental Site Assessment, the historic high groundwater level beneath the Project Site is estimated to be between 25 to 35 feet below the existing ground surface. As previously discussed, grading for the Project would require excavations of approximately 25 feet below the existing ground surface for development of the proposed subterranean parking level. Therefore, based on the groundwater levels observed within the Project Site and depth of excavation, the Project would not be anticipated to encounter groundwater during construction. As such, construction activities associated with the Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Thus, impacts on groundwater levels during construction would be less than significant, and no mitigation measures are required.

Operation of the Project would not interfere with groundwater recharge. The majority of the Project Site is currently primarily developed with a paved surface parking area and a small restaurant. Therefore, the degree to which surface water infiltration and groundwater recharge currently occurs on-site is negligible. The Project is an infill development and would replace the existing surface parking area and restaurant with a hotel building and restaurant uses. Therefore, with implementation of the Project, existing impervious surfaces would remain. In addition, the Project would not install any groundwater wells and would not otherwise directly withdraw any groundwater. As such, operation of the Project would not substantially affect groundwater levels beneath the

Project Site, including depleting groundwater supplies or resulting in a substantial net deficit in the aquifer volume or lowering of the local groundwater table. Therefore, impacts on groundwater during operation of the Project would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. As previously described, the Project Site is primarily developed with a paved surface parking area and includes a small restaurant. Landscaping on-site is very limited. The Project Site is not crossed by any water courses or rivers. Based on the existing uses of the Project Site and the limited landscaping, the Project Site is primarily comprised of impervious surface areas. Therefore, given the mostly impervious area of the Project Site, any stormwater that falls on the Project Site is likely directed to storm drains adjacent to the Project Site on Wilcox Avenue and Hudson Avenue and not infiltrated or captured on-site. As described above, the Project is an infill development and would replace the existing surface parking area and restaurant with a hotel building that would include restaurant uses. Since the Project would be constructed within the extent of the Project Site, with implementation of the Project, the Project Site would remain mostly impervious surface area. In addition, the Project would include several planter boxes throughout the building that would serve to capture some of the stormwater from the Project Site. Any stormwater not captured by the proposed planter boxes would continue to flow to the storm drains adjacent to the Project Site along Wilcox Avenue and Hudson Avenue. Furthermore, as discussed above, the Project would comply with the City's LID requirements, which would address erosion control and would minimize the discharge of pollutants. Therefore, the Project would not substantially alter existing drainage patterns, including through the alteration of a stream or river, which could result in an increase in substantial erosion or siltation on- or off-site. Impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. There are no streams or rivers within the Project Site or in the vicinity of the Project Site. In addition, as described above in Response to Checklist Question IX.c, the Project would not alter drainage patterns or result in an increase in surface runoff. Therefore, the Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site. Impacts would be less than significant, and no mitigation measures are required.

e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. As discussed in Response to Checklist Questions IX.a through IX.c, above, the Project would maintain the impervious surfaces within the Project Site and would not alter drainage patterns or result in an increase in runoff. Thus, the existing public stormwater system would have sufficient capacity to accommodate the Project. In addition, with compliance with the City's LID requirements, the Project would not result in additional sources of polluted runoff. Therefore, impacts would be less than significant, and no mitigation measures are required.

f. Otherwise substantially degrade water quality?

Less Than Significant Impact. As discussed in Response to Checklist Question IX.a, above, with implementation of regulatory requirements, water quality impacts associated with construction and operation of the Project would be less than significant, and no mitigation measures are required.

g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles.^{21,22} Further, the Project does not propose housing within the Project Site. Thus, the Project would not place housing within a 100-year flood hazard area. No impacts would occur, and no mitigation would be required.

h. Place within a 100-year flood hazard area, structures which would impede or redirect flood flows?

No Impact. As discussed above, the Project Site is not located within a designated 100-year flood hazard area. Thus, the Project would not place structures that would impede or redirect flood flows within a 100-year flood hazard area. No impacts would occur, and no mitigation measures are required.

²¹ Federal Emergency Management Agency, *Flood Insurance Rate Map, Panel Number 06037C1605F, effective September 26, 2008*, <https://msc.fema.gov/portal/search#searchresultsancho>, accessed February 19, 2016.

²² *Safety Element of the Los Angeles City General Plan, Exhibit F, City of Los Angeles, November 26, 1996.*

i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Less Than Significant Impact. As stated above, the Project Site is not located within a designated 100-year flood plain. In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within a flood control basin.²³ However, the Project Site is located within a potential inundation area associated with the Hollywood Reservoir, which is held by the Mulholland Dam. The Mulholland Dam is a Los Angeles Department of Water and Power dam located in the Hollywood Hills. The Mulholland Dam was built in 1924 and designed to hold 2.5 billion gallons of water. This dam, as well as other dams in California are continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum considered earthquake for the site. Pursuant to these regulations, the Mulholland Dam and other dams in California are regularly inspected to ensure compliance with current safety regulations. In addition, the Department of Water and Power has emergency response plans to address any potential impacts to its dams. Given the oversight by the Division of Safety of Dams, including regular inspections, and the Department of Water and Power's emergency response program, the potential for substantial adverse impacts related to inundation at the Project Site as a result of dam failure would be less than significant, and no mitigation measures are required.

j. Inundation by seiche, tsunami, or mudflow?

Less Than Significant Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement associated with large, shallow earthquakes. Mudflows result from the downslope movement of soil and/or rock under the influence of gravity.

As discussed above in Response to Checklist Question No. IX.i, the Project Site is located within a potential inundation area associated with the Hollywood Reservoir. However, given the distance of the Project Site to the Hollywood Reservoir, a seiche within the Hollywood Reservoir would not affect the Project Site. In addition, the Project Site is approximately 13 miles east of the Pacific Ocean and is not mapped by the City as being

²³ *Safety Element of the Los Angeles City General Plan, Exhibit G, City of Los Angeles, November 26, 1996.*

located within an area potentially affected by a tsunami.²⁴ The Project Site is also not in close proximity to any mountains or steep slopes which could be affected by a potential mudflow. Therefore, no seiche, tsunami, or mudflow events are expected to impact the Project Site. Impacts would be less than significant, and no mitigation measures are required.

X. Land Use and Planning

Would the project:

a. Physically divide an established community?

Less Than Significant Impact. As shown in the aerial photograph provided in Figure A-2 included in Attachment A, Project Description, of this Initial Study the Project Site is located in a highly urbanized area that includes a mixture of low- and mid-rise buildings occupied primarily by multi-family residential and commercial uses, including retail stores and restaurants. Specifically, directly north of the Project Site are two-story multi-family residential buildings, with a four-story multi-family residential building located further north. Directly east of the Project Site, across Wilcox Avenue, is the one- to four-story vacant Pacific Theatre building. Directly south of the Project Site is a one- to two-story commercial building consisting of a cafe, restaurants, and several specialty stores. Additional commercial uses are located along Hollywood Boulevard, across from the one- to two-story commercial building bounding the Project Site to the south. Directly west and south of the Project Site is a one-story building consisting of commercial uses. Further west of the Project Site, across Hudson Avenue, is a four-story multi-family residential building and a surface parking lot for the tenants of the building.

The Project Site is currently primarily developed as an asphalt-paved surface parking lot that provides parking for 78 vehicles. A portion of the Project Site, along the northeast boundary, includes a restaurant that comprises approximately 593 square feet. The Project includes the development of a 134-room hotel and approximately 3,580 square feet of restaurant uses. The proposed development would replace the existing asphalt-paved surface parking lot and restaurant within the Project Site. The proposed uses would be provided within one building that would range in height up to six stories with a maximum height of approximately 89 feet. All proposed development would occur within the boundaries of the Project Site as it currently exists. The Project would not require the permanent closure of any adjacent roadways that connect existing uses. Furthermore, there are no existing residential uses on the Project Site that would require relocation and have the potential to physically divide an established community. Moreover, the proposed

²⁴ *Ibid.*

uses would be compatible with the variety of existing land uses and low- to mid-rise buildings in the surrounding area. Therefore, implementation of the Project would not physically divide an established community. Impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. Several land use plans and regulatory documents guide development of the Project Site. At the local level, several plans and regulatory documents guide development within the Project Site. The Hollywood Community Plan (Community Plan) constitutes the local land use policy standard of the City of Los Angeles General Plan, and the City of Los Angeles Municipal Code governs land use through specific land use restrictions, design standards, and building and safety codes. The Project Site is also located within the Community Redevelopment Agency of Los Angeles (CRA/LA)'s Hollywood Redevelopment Project area, the City's Adaptive Reuse Incentive Area, the Los Angeles State Enterprise Zone, the Hollywood Signage Supplemental Use District, and the Los Angeles Promise Zone.

Regional plans that are applicable to the Project Site include the Southern California Association of Governments' (SCAG) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which addresses long-term regional transportation needs throughout its jurisdiction; SCAG's Compass Growth Vision Report, which addresses issues such as congestion and housing availability that affect the region's livability;²⁵ and the Los Angeles County Congestion Management Program (CMP), administered by the Los Angeles County Metropolitan Transportation Authority (Metro), which regulates regional traffic issues. In addition, the South Coast Air Quality Management District (SCAQMD) administers the Air Quality Management Plan (AQMP), which addresses attainment of State and federal ambient air quality standards throughout the South Coast Air Basin. Refer to Checklist Question No. III, Air Quality, above, and

²⁵ SCAG prepared and issued an updated *Regional Comprehensive Plan (RCP)* in 2008 in response to SCAG's Regional Council directive in SCAG's 2002 *Strategic Plan* to define solutions to interrelated housing, traffic, water, air quality, and other regional challenges. The RCP is an advisory document that describes future conditions if current trends continue, defines a vision for a healthier region, and recommends an Action Plan with a target year of 2035. The RCP may be voluntarily used by local jurisdictions in developing local plans and addressing local issues of regional significance. However, as indicated by SCAG, because of its advisory nature, the RCP is not used in SCAG's Intergovernmental Review process. Rather, SCAG reviews new major regional projects based on consistency with the 2016–2040 RTP/SCS and Compass Growth Vision.

Checklist Question No. XVI, Transportation/Circulation, below for an analysis of the Project's consistency with the AQMP and the CMP.

Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (General Plan Framework), adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire City of Los Angeles and defines citywide policies regarding land use. The General Plan Framework defines citywide policies that influence the Community Plans and most of the City's General Plan Elements. The policies are organized by chapters that address land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, and infrastructure and public services. As discussed in the Transportation Chapter, the goals, objectives, policies, and related implementation programs of the Transportation Chapter are set forth in the Transportation Element of the General Plan adopted by the City in September 1999. As an update to the Transportation Element, the City Council initially adopted Mobility Plan 2035 in August 2015. The City Council readopted Mobility Plan 2035 in January 2016 and may consider additional amendments.²⁶ With the updated Transportation Element, the Transportation Chapter of the Framework Element is now implemented through Mobility Plan 2035. The Project's consistency with applicable goals, objectives, and policies in the General Plan Framework is analyzed in Table B-8 on page B-59 and the corresponding discussion below. The Project's consistency with applicable policies in Mobility Plan 2035 is analyzed in Table B-9 on page B-65.

As described in Table B-8, the Project would be consistent with the applicable objectives and policies that support the goals set forth in the General Plan Framework's Land Use Chapter. Specifically, the Project would accommodate a diversity of uses by replacing an existing surface parking lot and restaurant with a new hotel building that would include restaurant uses and would serve the needs of the surrounding community, provide job opportunities, and support visitors and tourism. The Project would also be consistent with the type and density of development that is envisioned for the Regional Center in the General Plan Framework. In addition, the Project would focus new development in proximity to Hollywood Boulevard, which is a major thoroughfare and transit corridor, and provide bicycle facilities. The Project's location and proximity to transit and provision of bicycle facilities would facilitate a reduction in vehicle trips and emphasize pedestrian/bicycle access. Furthermore, the Project would be designed to maintain and enhance the prevailing scale and character of the surrounding area by constructing a mid-rise building that would be compatible with other mid-rise buildings adjacent to the

²⁶ LA2B, *City Planning Commission Hearing on Additional Amendments*, <https://la2b.org/2016/01/28/city-planning-commission-hearing-on-additional-amendments/>, accessed May 11, 2016.

Table B-8
Project Consistency with Applicable Objectives and Policies of the General Plan Framework

Objective/Policy	Analysis of Project Consistency
Land Use Chapter	
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	Consistent. The Project would replace an existing surface parking lot and restaurant with a new hotel building and restaurant uses.
Policy 3.1.1: Identify areas on the Long-Range Land Use Diagram and in the community plans sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural/institutional, educational, health, services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.	Consistent. The Long-Range Land Use Diagram designates the Project Site as being within a Regional Center. The Project would replace an existing surface parking lot with a new hotel building and restaurant uses that would serve the needs of the surrounding community, provide job opportunities, and support visitors and tourism.
Policy 3.1.2: Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long-Range Land Use Diagram.	Consistent. As discussed below in Checklist Question No. XIV, Public Services, and in Checklist Question No. XVIII, Utilities, the agencies that provide services and utilities to the Project Site would have capacity to serve the Project. The Project would also be consistent with the primary land use designation for the Project Site.
Policy 3.1.4: Accommodate new development in accordance with land use and density provisions of the General Plan Framework Long-Range Land Use Diagram (Figures 3-1 to 3-4) and Table 3-1.	Consistent. The Long-Range Land Use Diagram designates the Project Site as being within a Regional Center. The Long Range Land Use Diagram and Table 3-1 in the General Plan Framework describe a Regional Center as a focal point of regional commerce, identity, and activity containing a diversity of uses such as corporate and professional offices, residential, retail commercial malls, government buildings, major health facilities, major entertainment, cultural facilities, and supporting services. Generally, different types of Regional Centers fall within the range of floor area ratios (FARs) from 1.5:1 to 6.0:1. Some are only commercially oriented; others contain a mix of residential and commercial uses. Also, Regional Centers are generally characterized by 6- to 20-story buildings (or higher). Regional Centers are usually major transportation hubs and may also include small parks and other community-oriented facilities, as well as gasoline/automotive services with accessory uses such as retail, food stores, restaurants, and/or take-out. The Project proposes an up to six-story hotel building and restaurant uses. The Project would have a total FAR of approximately 2.95:1. Furthermore, the Project Site is located in proximity to Hollywood Boulevard, which is a major thoroughfare and transit corridor. As such, the Project would be consistent with the type of development that is envisioned for the Regional Center in the General Plan Framework.

Table B-8 (Continued)
Project Consistency with Applicable Objectives and Policies of the General Plan Framework

Objective/Policy	Analysis of Project Consistency
<p>Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.</p>	<p>Consistent. The Project would focus new development in proximity to Hollywood Boulevard, which is a major thoroughfare and transit corridor. In addition, the Project would provide approximately 18 bicycle parking spaces, including nine long-term spaces and nine publicly accessible spaces for short-term bicycle parking. Therefore, the Project would provide convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle miles traveled.</p>
<p>Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.</p>	<p>Consistent. Refer to the consistency analysis for Objective 3.2.</p>
<p>Policy 3.2.4: Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhances the character of commercial and industrial districts.</p>	<p>Consistent. The Project would replace a surface parking lot with a new hotel building that is similar to and compatible with other surrounding uses in the immediate vicinity of the Project Site, including mid-rise multi-family residential uses to the north. The Project also would focus new development in proximity to Hollywood Boulevard, a commercial corridor that is characterized by a high degree of pedestrian activity, and within a Regional Center. There are no industrial districts in the vicinity of the Project Site.</p>
<p>Objective 3.3: Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.</p>	<p>Consistent. The Project does not include the development of housing and would not generate a new residential population. With regard to employment, the Project's 3,580-square foot restaurant uses would generate approximately 75 employees,²⁷ which would represent a negligible portion of SCAG's employment forecast. Therefore, the Project's employment growth would be well within SCAG's projections for the Subregion, which serve as the basis for the General Plan Framework's demographic projections and planned provisions of transportation and utility infrastructure and public services. In addition, as discussed below in Checklist Question No. XIV, Public Services, and in Checklist Question No. XVIII, Utilities, the agencies that provide services and utilities to the Project Site would have capacity to serve the Project.</p>

²⁷ Los Angeles Unified School District, 2012 Developer Fee Justification Study, February 9, 2012, Table 11. Based on the employee generation rate for "Lodging," which is 0.00113 employees per average square foot for the hotel portion of the Project and "Neighborhood Shopping Center," which is 0.00271 employees per average square foot for the restaurant portion of the Project.

Table B-8 (Continued)
Project Consistency with Applicable Objectives and Policies of the General Plan Framework

Objective/Policy	Analysis of Project Consistency
<p>Objective 3.4: Encourage new multi-family residential, retail, commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers, as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.</p>	<p>Consistent. The Project would develop a new hotel and restaurant uses in a Regional Center in proximity to Hollywood Boulevard, which is a major thoroughfare and transit corridor. Also refer to the consistency analysis for Policy 3.2.4.</p>
<p>Policy 3.4.1: Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.</p>	<p>Consistent. Refer to the consistency analysis for Policy 3.1.4, Policy 3.2.4, and Objective 3.4.</p>
<p>Objective 3.7: Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved.</p>	<p>Consistent. Refer to the consistency analysis for Policy 3.1.2 and Policy 3.2.4.</p>
<p>Objective 3.10: Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.</p>	<p>Consistent. Refer to the consistency analysis for Policy 3.1.4 and Policy 3.2.4.</p>
<p>Policy 3.10.1: Accommodate land uses that serve a regional market in areas designated as "Regional Center" in accordance with Tables 3-1 and 3-6. Retail uses and services that support and are integrated with the primary uses shall be permitted. The range and densities/intensities of uses permitted in any area shall be identified in the community plans.</p>	<p>Consistent. Refer to the consistency analysis for Policy 3.1.4.</p>
<p>Policy 3.10.3: Promote the development of high-activity areas in appropriate locations that are designed to induce pedestrian activity, in accordance with Pedestrian-Oriented District Policies 3.16.1 through 3.16.3, and provide adequate transitions with adjacent residential</p>	<p>Consistent. The Project would focus new development in proximity to Hollywood Boulevard, a commercial corridor that is characterized by a high degree of pedestrian activity. As discussed above under Policy 3.2.4, the Project would be similar to and compatible with other nearby uses. The Project also incorporates design</p>

Table B-8 (Continued)
Project Consistency with Applicable Objectives and Policies of the General Plan Framework

Objective/Policy	Analysis of Project Consistency
uses at the edges of the centers.	elements, such as tiered building heights, to reduce the perceived height and massing of the building.
Policy 3.10.4: Provide for the development of public streetscape improvements, where appropriate.	Consistent. The Project would install new street trees and perimeter landscaping along the Project Site's Wilcox Avenue frontage, improving the streetscape environment and creating a more inviting pedestrian realm along these streets.
Policy 3.10.6: Require that Regional Centers be lighted to standards appropriate for nighttime access and use.	Consistent. The Project would include proper lighting of parking levels, elevators, and lobbies to reduce areas of concealment. Building entries and sidewalks would be adequately lit to provide for pedestrian orientation and to clearly identify entry and exit points.
Objective 3.16: Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.	Consistent. Refer to the consistency analysis for Objective 3.2 and Policy 3.10.4.
Policy 3.16.2: Locate parking in pedestrian districts to the rear, above, or below the street-fronting uses.	Consistent. The Project would provide parking in a subterranean level and in a partial above grade level that would be integrated into the ground level of the building.
Objective 3.17: Maintain significant historic and architectural districts while allowing for the development of economically viable uses.	Consistent. As discussed above in Response to Checklist Question No. V.a, the Project Site is located at the northern edge of and, according to the City, within the boundaries of the Hollywood Boulevard Commercial and Entertainment District, which is listed in the National Register. However, the Project Site does not contribute to the significance of the Hollywood Boulevard Commercial and Entertainment District. Notwithstanding, the Project would not result in the physical demolition, destruction, relocation, or alteration of any nearby historical resource, including resources within the Hollywood Boulevard Commercial and Entertainment District, such that the significance of a historical resource would be materially impaired.
Objective 3.18: Provide for the stability and enhancement of multi-family residential, mixed-use, and/or commercial areas of the City and direct growth to areas where sufficient public infrastructure and services exist.	Consistent. Refer to the consistency analysis for Policy 3.1.2 and Policy 3.2.4.
<i>Urban Form and Neighborhood Design Chapter</i>	
Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community or the region.	Consistent. Refer to the consistency analysis for Policy 3.1.4.

Table B-8 (Continued)
Project Consistency with Applicable Objectives and Policies of the General Plan Framework

Objective/Policy	Analysis of Project Consistency
Policy 5.6.1: Promote the undergrounding of utilities throughout the City's neighborhoods, districts, and centers.	Consistent. The Long-Range Land Use Diagram designates the Project Site as being within a Regional Center. As part of the Project, the Applicant would evaluate the feasibility of undergrounding utilities.
Policy 5.7.1: Establish standards for transitions in building height and for on-site landscape buffers.	Consistent. The Project design reflects a transition in building height with regard to the surrounding neighborhood's character. Although the Project would be noticeably taller than some of the structures that are adjacent to the Project Site, the Project would include building fenestration, a variety of surface materials and colors, and varying rooflines to create horizontal and vertical articulation, provide visual interest, and reduce the building scale. In particular, the building would vary in height from three to six stories to provide visual relief and would include landscape buffers within the step backs of the building.
Policy 5.8.4: Encourage that signage be designed to be integrated with the architectural character of the buildings and convey a visually attractive character.	Consistent. Project signage would be designed to be aesthetically compatible with the existing and proposed architecture and to contextualize lighting designs with other signage in the surrounding neighborhood. Proposed signage would include general street level site identification, visitor directional signage, and temporary construction signage, as permitted under the Hollywood Signage Supplemental Use District and the LAMC.
Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	Consistent. The Project would incorporate elements that would promote individual and community safety. Specifically, as provided below in Checklist Question No. XIV, Public Services, the Project would include on-site security; a closed-circuit security camera system; sufficient lighting of building entries and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings; sufficient lighting of parking areas, elevators, and lobbies to reduce areas of concealment; entrances to and exits from buildings, open spaces around buildings, and pedestrian walkways designed to be open and in view of surrounding sites, to the extent practicable.
<i>Economic Development Chapter</i>	
Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.	Consistent. The Project would replace an existing surface parking lot with a new hotel building and restaurant uses that would serve the needs of the surrounding community, provide job opportunities, and support visitors and tourism that would sustain economic growth.

Table B-8 (Continued)
Project Consistency with Applicable Objectives and Policies of the General Plan Framework

Objective/Policy	Analysis of Project Consistency
<p>Policy 7.2.2: Concentrate commercial development entitlements in areas best able to support them, including community and regional centers, transit stations, and mixed-use corridors. This concentration prevents commercial development from encroaching on existing residential neighborhoods.</p>	<p>Consistent. Refer to the consistency analysis for Policy 3.1.4 and Policy 3.2.4.</p>
<p>Policy 7.2.3: Encourage new commercial development in proximity to rail and bus transit corridors and stations.</p>	<p>Consistent. Refer to the consistency analysis for Policy 3.1.4.</p>
<p>Infrastructure and Public Services Chapter</p>	
<p>Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.</p>	<p>Consistent. As evaluated above in Checklist Question No. IX, Hydrology and Water Quality, with implementation of the Project, drainage conveyance from the Project Site would be similar to the existing condition. In addition, existing impervious surfaces on the Project Site would generally remain with implementation of the Project. Therefore, stormwater flows from the Project Site would not increase with implementation of the Project. In addition, the Project would comply with the City's Low Impact Development Ordinance and would implement Best Management Practices to collect, detain, treat, and discharge runoff onsite before discharging into the municipal storm drain system. Implementation of Best Management Practices for the treatment of stormwater runoff would result in an improvement in surface water quality runoff from the Project Site.</p>
<p>Objective 9.10: Ensure that water supply, storage, and delivery systems are adequate to support planned development.</p>	<p>Consistent. As evaluated below in Checklist Question No. XVIII, Utilities, the Project would be within the Los Angeles Department of Water and Power's current and projected available water supplies for normal, single-dry, and multiple-dry years. As such, LADWP would be able to meet the water demand for the Project as well as existing and planned water demands of its future service area.</p>
<p>Source: <i>Eyestone Environmental, 2016.</i></p>	

Project Site and include tiered building heights and landscaped setbacks to reduce the height and massing of the building. Overall, as detailed in Table B-8 on page B-59, the Project would be consistent with the applicable objectives and policies that support the goals of the General Plan Framework's Land Use Chapter.

Table B-9
Project Consistency with Applicable Policies of the Mobility Plan 2035

Policy	Analysis of Project Consistency
<p>Policy 1.6: Design detour facilities to provide safe passage for all modes of travel during times of construction.</p>	<p>Consistent. As discussed below in Checklist Question No. XVI, Transportation/Circulation, a Construction Management Plan would be prepared and be submitted to the Los Angeles Department of Transportation for review and approval. The Construction Management Plan would identify the location of any temporary street parking or sidewalk closures, provide for the posting of signs advising pedestrians of temporary sidewalk closures and provide alternative routes, provide for the installation of other construction-related warning signs, and show access to abutting properties.</p>
<p>Policy 2.3: Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.</p>	<p>Consistent. The Project would focus new development in proximity to Hollywood Boulevard, a commercial corridor that is characterized by a high degree of pedestrian activity. The Project Site is also located in an area well-served by public transit provided by Metro and LADOT, including bus stops along Hollywood Boulevard.</p>
<p>Policy 3.1: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes—including goods movement—as integral components of the City's transportation system.</p>	<p>Consistent. The Project would provide adequate vehicular access, improving pedestrian access, and providing bicycle facilities. In addition, the Project is located in an area well-served by public transit provided by Metro and LADOT, including bus stops along Hollywood Boulevard.</p>
<p>Policy 3.2: Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.</p>	<p>Consistent. The Project is designed to provide accessibility and accommodate the needs of people with disabilities as required by the American with Disabilities Act (ADA) and the City.</p>
<p>Policy 3.3: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.</p>	<p>Consistent. The Project would promote equitable land use decisions that result in fewer vehicle trips by providing a hotel development that would include restaurant uses to serve the community and guests. The Project is also located in an area well-served by public transit provided by Metro and LADOT, including bus stops along Hollywood Boulevard.</p>
<p>Policy 3.4: Provide all residents, workers and visitors with affordable, efficient, convenient, and attractive transit services.</p>	<p>Consistent. The Project is located in an area well-served by public transit provided by Metro and LADOT, including bus stops along Hollywood Boulevard. Thus, employees and visitors of the Project would be well-served by existing transit services.</p>
<p>Policy 3.8: Provide bicyclists with convenient, secure and well maintained bicycle parking facilities.</p>	<p>Consistent. The Project provides approximately 18 bicycle parking spaces in accordance with LAMC requirements.</p>

Table B-9 (Continued)
Project Consistency with Applicable Policies of the Mobility Plan 2035

Policy	Analysis of Project Consistency
Policy 3.9: Discourage the vacation of public rights-of-way	Consistent. The Project would not vacate public rights-of-ways.
Policy 3.10: Discourage the use of cul-de-sacs that do not provide access for active transportation options.	Consistent. The Project does not include the development of a cul-de-sac.
Policy 4.13: Balance on-street and off-street parking supply with other transportation and land use objectives.	Consistent. As discussed in Attachment A, Project Description, of this Initial Study, the Project includes approximately 74 parking spaces within a subterranean parking level and in a partial above grade parking level. The proposed parking supply would meet the parking requirements of the LAMC.
Policy 5.2: Support ways to reduce vehicle miles traveled (VMT) per capita.	Consistent. The Project is a mixed-use development and would be located in proximity to jobs (including those offered onsite), destinations, and other neighborhood services. In addition, the Project would be well-served by public transit provided by Metro and LADOT, including bus stops along Hollywood Boulevard. The Project would also promote pedestrian activity through building design and streetscape amenities and bicycling opportunities.
<i>Source: Eyestone Environmental, 2016.</i>	

As discussed in Table B-8 on page B-59, the Project would be consistent with the relevant objectives and policies that support the goals of the General Plan Framework's Urban Form and Neighborhood Design Chapter, which focus on creating a livable City for existing and future residents that is attractive to future investment, and creating a City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales. In particular, the Project would encourage development in a Regional Center and in proximity to Hollywood Boulevard, which is a major thoroughfare and transit corridor. The Project would also visually moderate height by incorporating tiered building heights, building fenestration, a variety of surface materials and colors, and varying rooflines. In addition, Project signage would be designed to be aesthetically compatible with the existing and proposed architecture and to contextualize lighting designs with other signage in the surrounding neighborhood. Furthermore, the Project would be designed to encourage the effective use of the built environment to help increase personal safety.

The Project would be consistent with the relevant objectives and policies that support the goals of the General Plan Framework's Economic Development Chapter, which promotes continued economic development and investment in targeted districts and centers. As shown in Table B-8 on page B-59, the Project would establish a balance of land uses and concentrate commercial development in areas best able to support such development by providing a new hotel development that would include restaurant uses adjacent to an active commercial corridor. The Project Site's location and pedestrian-friendly characteristics would facilitate the success of the proposed hotel and allow for guests of the hotel to patronize local businesses.

As described in Table B-8, the Project would be consistent with the relevant objectives and policies that support the goals of the General Plan Framework's Infrastructure and Public Services Chapter, which calls for monitoring service demands and forecasting the future need for infrastructure improvements, maintaining an adequate system/service to support the needs of population and employment, and implementing techniques that reduce demands on utility infrastructure or services, where appropriate. Specifically, as discussed below in Checklist Question No. XIV, Public Services, the City's fire protection, police protection, school, library, and parks/recreation services and facilities would be able to adequately serve the Project's demand for these services. In addition, as discussed below in Checklist Question No. XVIII, Utilities, there would be adequate supplies and infrastructure capacity to serve the water, wastewater, electricity, and natural gas demands of the Project. There also would be adequate landfill capacity to accommodate the Project's solid waste generation during construction and operation.

In summary, the Project would be consistent with the relevant objectives and policies that support the goals of the General Plan Framework.

Mobility Plan 2035

The Project would be consistent with the relevant objectives and policies that support the goals of the Mobility Plan 2035, as detailed in Table B-9 on page B-65. The Project supports the City's policy to provide for safe passage of all modes of travel during construction by preparing and implementing a Construction Management Plan that would identify the location of any temporary street parking or sidewalk closures and provide alternative routes. In addition, the Project recognizes all modes of travel by providing adequate vehicular access and providing bicycle facilities. In addition, given the location of the Project Site in close proximity to major transit corridors, the Project would provide employees and visitors convenient access to transit services. Therefore, the Project would be generally consistent with the applicable policies that support the goals and objectives set forth in the Mobility Plan 2035.

Hollywood Community Plan Area

The Project Site is located within the Hollywood Community Plan area. Adopted on December 13, 1988, the specific purpose of the Hollywood Community Plan is to promote an arrangement of land use, circulation, and services that encourages and contributes to the economic, social and physical health, safety, welfare, and convenience of the Hollywood Community within the larger framework of the City. In addition, the Community Plan serves to guide the development, betterment, and change of the community to meet existing and anticipated needs and conditions, as well as to balance growth and stability, reflect economic potentials and limits, land development and other trends, and to protect investment to the extent reasonable and feasible.

As described in Attachment A, Project Description, the Project Site comprises three contiguous parcels. Two of the three parcels are designated for Regional Center Commercial land uses by the Community Plan. The remaining parcel is designated for High Density Residential land uses by the Community Plan. The proposed hotel and restaurant uses would be consistent with the Regional Center Commercial land use designation. In addition, it is noted that while a small portion of the Project Site is designated for High Density Residential land uses, the Project would maintain this portion for vehicular access.

The Project's consistency with the applicable objectives and policies set forth in the Community Plan is analyzed in Table B-10 on page B-69. As discussed therein, overall, the Project would be consistent with the applicable objectives and policies set forth in the Hollywood Community Plan.

Community Redevelopment Agency of Los Angeles Hollywood Redevelopment Project

The Hollywood Redevelopment Plan (Redevelopment Plan) was adopted by the City Council on May 7, 1986, and most recently amended on May 2003.²⁸ The Redevelopment Plan supports the California Community Redevelopment Law and as such, is designed to improve economically and socially disadvantaged areas, redevelop or rehabilitate under or improperly utilized properties, eliminate blight, and improve the public welfare. Although the state legislation and later court decisions dissolved all the redevelopment agencies effective February 1, 2012, it did not dissolve the redevelopment plans. Therefore, the Hollywood Redevelopment Plan and its requirements for development are still in effect.

²⁸ CRA/LA, *A Designated Local Authority, Hollywood Project Area Overview*, www.crala.org/internet-site/Projects/Hollywood/, accessed February 23, 2016.

Table B-10
Project Consistency with Applicable Objectives and Policies of the Hollywood Community Plan

Objective/Policy	Analysis of Project Consistency
<p>1. To coordinate the development of Hollywood with that of other parts of the City of Los Angeles and the metropolitan area.</p> <p>To further the development of Hollywood as a major center of population, employment, retail services, and entertainment; and to perpetuate its image as the international center of the motion picture industry.</p>	<p>Consistent. The Project would construct a new hotel that would include restaurant uses in a pedestrian- and transit-friendly area within the Hollywood Community Plan area. The Project would serve the needs of the surrounding community, provide job opportunities, and support visitors and tourism.</p>
<p>5. To provide a basis for the location and programming of public services and utilities and to coordinate the phasing of public facilities with private development. To encourage open space and parks in both local neighborhoods and in high density areas.</p>	<p>Consistent. As discussed below in Checklist Question No. XIV, Public Services, and in Checklist Question No. XVIII, Utilities, the agencies that provide services and utilities to the Project Site would have capacity to serve the Project. The Project would provide on-site landscape areas and amenities to serve the needs of guests, which would reduce the potential for additional demand to be placed on public parks and open space areas.</p>
<p>6. To make provision for a circulation system coordinated with land uses and densities and adequate to accommodate traffic; and to encourage the expansion and improvement of public transportation service.</p>	<p>Consistent. The Project would concentrate new development in proximity to Hollywood Boulevard, which is a major transit corridor. The Project also would provide approximately 18 bicycle parking spaces, including nine long-term spaces and nine short-term bicycle parking spaces. Finally, as discussed below in Checklist Question No. XVI, Transportation/Circulation, operation of the Project would result in less-than-significant impacts on intersection operations, regional transportation facilities (i.e., freeways), and neighborhood street segments.</p>
<p>7. To encourage the preservation of open space consistent with property rights when privately owned and to promote the preservation of views, natural character and topography of mountainous parts of the Community for the enjoyment of both local residents and persons throughout the Los Angeles region.</p>	<p>Consistent. The Project would replace an existing surface parking lot and restaurant with a new hotel building that would feature landscaped areas and amenities for guests. As discussed in Checklist Question No. I, Aesthetics, the Project would not result in significant impacts related to the blockage of scenic vistas of the Hollywood Hills.</p>
<p>Other Public Facilities Policy 1: It is the City's policy that, where feasible, new power lines be placed underground and that the undergrounding of existing lines be continued and expanded.</p>	<p>Consistent. Project connections to existing power lines would be placed underground.</p>
<p>Source: <i>Eyestone Environmental</i>, 2016.</p>	

Section 502 of the Redevelopment Plan provides that "the land uses permitted in the [Redevelopment] Project Area shall be those permitted by the General Plan, the applicable

Community Plan, and any applicable City zoning ordinance, all as they now exist or are hereafter amended and/or supplemented from time to time.” Section 502 also establishes a mechanism whereby the land use designations of the Redevelopment Plan are automatically updated to conform to any future changes in the Community Plan.

As described in Attachment A, Project Description, the Project Site comprises three contiguous parcels. Two of the three parcels are designated for Regional Center Commercial land uses by the Community Plan. The remaining parcel is designated for High Density Residential land uses by the Community Plan. In accordance with Section 502 of the Redevelopment Plan, the majority of the Project Site is designated for Regional Center Commercial land uses with a small portion designated for High Density Residential land uses.

The Redevelopment Plan calls for the Regional Center Commercial land use designation to generally provide goods and services which are designed in a manner that appeals to a regional market, as well as to local markets, and includes uses such as theaters, restaurants, hotels, offices, and retail or service businesses. Therefore, the types of land uses proposed by the Project would be consistent with the Regional Center Commercial land use designation.

Development in the Regional Center Commercial designation is limited to an FAR of 4.5:1. Under the Project, the proposed FAR would be approximately 2.95:1. Therefore, the Project’s FAR would be consistent with the allowable FAR for the Regional Center Commercial land use designation.

With regard to the portion of the Project Site designated for High Density Residential land use, the Redevelopment Plan calls for areas designated as residential to be maintained, developed, or used for single- or multi-family housing at or below specified housing densities. The Project proposes to maintain that area of the Project Site designated for High Density Residential land uses for access, and would not include any structures within that parcel. Therefore, the Project would be consistent with the types of uses allowed in the High Density Residential land use designation.

The Project Site is also located within the Redevelopment Plan’s Hollywood Boulevard District. The Redevelopment Plan includes the following objectives for the Hollywood Boulevard District:

1. Encourage preservation, restoration and appropriate reuse of historically or architecturally significant structures;

2. Assure that new development is sympathetic to and complements the existing scale of development;
3. Provide pedestrian oriented retail uses along the street level;
4. Encourage entertainment, theater and tourist related uses;
5. Provide adequate parking for new and existing uses; and
6. Reinforce and enhance the existing pedestrian environment.

There are no historically or architecturally significant structures within the Project Site. However, the Project would be designed to complement and be compatible with surrounding existing uses, including historic buildings. Specifically, the Applicant proposes to construct the taller portion of the building in the center of the Project Site and the shorter portions in the northern and southern portions of the Project Site, thereby using varied heights to create a gradual tiered effect to frame the low- to mid-rise buildings adjacent to the Project Site. The northern and southern portions of the building would include setbacks that would be landscaped and provide seating areas. The Project's proximity to Hollywood Boulevard would give Project employees and visitors convenient access to entertainment uses along Hollywood Boulevard and encourage engagement in the surrounding pedestrian-friendly environment. Therefore, the Project would be consistent with the general objectives for the Hollywood Boulevard District.

Based on the analysis above and the analysis of the Project's consistency with the applicable goals of the Hollywood Redevelopment Plan provided in Table B-11 on page B-72, the Project would be consistent with the Hollywood Redevelopment Plan.

City of Los Angeles Adaptive Reuse Incentive Area

The City's Adaptive Reuse Incentive Areas Specific Plan (Adaptive Reuse Plan), established by Ordinance No. 175,038, applies to the entire Hollywood Redevelopment Area, as well as to several other areas of the City. The purpose of the Adaptive Reuse Plan is to facilitate the rehabilitation and reuse of existing underutilized, neglected, or historically significant structures for residential, live/work, or hotel-related uses. Because the Project would not involve the conversion of existing buildings to residential or hotel uses, but rather would construct a new hotel use on the site of an existing surface parking lot and restaurant, the provisions of the Adaptive Reuse Plan do not apply to the Project.

Los Angeles Municipal Code

The Project Site is predominantly designated for Regional Center Commercial uses and zoned C4-2D-SN (Commercial Zone, Height District 2D, Sign District) with a small

Table B-11
Project Consistency with Applicable Goals of the Hollywood Redevelopment Plan

Goal	Analysis of Project Consistency
Goal 3: Promote a balanced community meeting the needs of the residential, commercial, industrial, arts and entertainment sectors.	Consistent. The Project would construct new hotel and restaurant uses in proximity to Hollywood Boulevard. These uses would support tourism and attract additional patrons to Hollywood.
Goal 10: Promote the development of sound residential neighborhoods through mechanisms such as land use, density and design standards, public improvements, property rehabilitation, sensitive in-fill housing, traffic and circulation programming, development of open spaces and other support services necessary to enable residents to live and work in Hollywood.	Consistent. The Project represents an infill development in an area that is characterized by a mix of residential and non-residential uses. New developments, including mixed-use projects, are occurring within the surrounding community and showing growing evidence of transforming the area into a lively, pedestrian-oriented district with a variety of residential and commercial uses, among others. The Project would replace an existing surface parking lot and restaurant with a mixed-use building that would be consistent and compatible with other similar developments in the vicinity.
Goal 12: Support and encourage a circulation system which will improve the quality of life in Hollywood, including pedestrian, automobile, parking and mass transit systems with an emphasis on serving existing facilities and meeting future needs.	Consistent. The Project would concentrate new development in proximity to Hollywood Boulevard, a major thoroughfare and transit corridor, and the Hollywood/Vine Red Line Subway Station. The Project also would provide approximately 18 bicycle parking spaces, including nine long-term spaces and nine short-term bicycle parking spaces. In addition, as discussed below in Checklist Question XVI, Transportation/Circulation, operation of the Project would result in less-than-significant impacts on intersection operations, regional transportation facilities (i.e., freeways), and neighborhood street segments.
<hr/> <p><i>Source: Eyestone Environmental, 2016.</i></p>	

portion of the Project Site designated for High Density Residential uses and zoned [Q]R5-2 (Multiple Dwelling Zone, Height District 2) in the LAMC.

As discussed in Attachment A, Project Description, the Project includes a request to change the portion of the Project Site zoned C4-2D-SN (Commercial Zone, Height District 2D, Sign District) to C2-2D-SN. With some limitations (as identified in the LAMC), the C2 zone permits any land use permitted in the C1.5 Limited Commercial zone. The Commercial zones permit a wide array of land uses, such as retail stores, offices, hotels, schools, parks, and theaters. Height District 2 within the C2 zone normally imposes no height limitation but allows for a maximum Floor Area Ratio (FAR) of 6:1. Pursuant to Ordinance No. 165659, the existing D limitation of the Project Site's zoning restricts the

building or structure height to 45 feet above grade. In addition, the total floor area of a structure is limited to two times the buildable area of the lot. The SN in the zoning prefix indicates that a portion of the Project Site is located in the Hollywood Signage Supplemental Use District.

As described in Attachment A, Project Description, of this MND, the Project would include the development of hotel and restaurant uses within one building that would range in height up to six stories with a maximum building height of approximately 89 feet. The Project comprises a FAR of 2.95:1. Based on the permitted FAR within the C2 zone, the Project would be in compliance with the FAR and density requirements of the LAMC. With regard to height, the proposed building would be above the permitted height of 45 feet. However, approval of the requested D Condition would allow for a maximum height of 89 feet. In addition, the Project includes a request to allow for zero-foot side yards only along certain portions of its northern and southern lot lines to promote an architectural style reminiscent of traditional Hollywood hotels and apartments. Overall, the proposed mid-rise hotel building would be compatible with existing mid-rise buildings in the vicinity of the Project Site, including the mid-rise multi-family residential buildings to the north and west of the Project Site, as well as the vacant Pacific Theatre building. Therefore, the Project would be compatible and consistent with the existing mid-rise buildings in the vicinity of the Project Site.

With regard to the portion of the Project Site zoned R5 Multiple Dwelling, the R5 zone permits any use permitted in the R4 Dwelling zone, including hotels, motels, apartment hotels, retirement hotels, clubs or lodges. Pursuant to Ordinance No. 165659, the Q Condition in a portion of the Project Site's zoning limits development within this area to residential uses permitted in the R4 Multiple Dwelling zone, hotels, motels, and apartment hotels. As described in Attachment A, Project Description, of this MND, the portion of the Project Site zoned R5 would be used for vehicular access and for placement of trash enclosures. Such uses are typical service components of any use and would be permitted in the R5 zone. Nevertheless, the Project would require a Conditional Use Permit in order to allow a commercial use in the R5 zone pursuant to LAMC Section 12.24 W.15.

In summary, with implementation of the requested approvals, land use impacts related to consistency with the LAMC would be less than significant.

Hollywood Signage Supplemental Use District

The Project Site is located within the boundaries of the Hollywood Signage Supplemental Use District (HSSUD). The HSSUD was developed to provide the following: promote appropriate and economically viable signage; limit visual clutter by regulating the number, size, and location of signs; minimize potential traffic hazards and protect public

safety; protect street views and scenic vistas of the Hollywood Sign and the Hollywood Hills; and protect and enhance major commercial corridors and properties. Last amended by Ordinance No. 181,340, the HSSUD promotes signage that uses clear attractive graphics; coordinates with the architectural elements of the building on which the signage is located; reflects a modern vibrant image of Hollywood as the global center of the entertainment industry; and complements and protects the character-defining features of historic buildings. Specifically, permitted signage types include architectural ledge signs, awning signs, electronic message displays, information signs, marquee signs, monument signs, open panel roof signs, pedestrian signs, pillar signs, projecting signs, and/or skyline logos/icons, as well as certain temporary signs. Billboards and pole signs are not permitted, though legally non-conforming signs that pre-date the HSSUD may remain. Maximum permitted sign areas are also specified. The signage within the Project Site would conform to the signage specifications and requirements of the HSSUD.

Los Angeles Promise Zone

The Promise Zones initiative is being implemented by the U.S. Department of Housing and Urban Development, with the goal of revitalizing high-poverty urban, rural and tribal communities through public-private partnerships and collaboration at the local, state and federal levels. The Project Site is located within the boundaries of the federally-designated Los Angeles Promise Zone, which includes the communities of Hollywood, East Hollywood, Koreatown, Pico Union, and Westlake. The Project's general consistency with the applicable goals of the City's Los Angeles Promise Zone is analyzed in Table B-12 on page B-75.

Regional Plans

SCAG's 2016–2040 RTP/SCS presents a long-term transportation vision through the year 2035 for the SCAG region. The 2016–2040 RTP/SCS goals include: (1) maximize mobility and accessibility for all people and goods in the region; (2) ensure travel safety and reliability for all people and goods in the region; (3) preserve and ensure a sustainable regional transportation system; (4) maximize the productivity of our transportation system; (5) encourage land use and growth patterns that facilitate transit and non-motorized transportation; and (6) protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking). The Project would expand existing commercial uses in an area that is already served by public infrastructure and transportation. Specifically, regional access is provided by the Hollywood (US-101) Freeway and the Santa Monica (I-10) Freeway. In addition, the Project area is well served by transit facilities, including the Metro rail, Metro bus, and DASH bus lines. In the vicinity of the Project Site, Metro Red Line stations are located at Hollywood Boulevard and Vine Street, approximately 0.3 mile east of the Project Site, and at Hollywood Boulevard and

Table B-12
Project Consistency with Applicable Goals and Principles of the Los Angeles Promise Zone

Goals and Principles	Analysis of Project Consistency
Goal: Foster Good Jobs and Healthy Businesses	
Promoting good jobs for residents through job training programs that provide high-demand, high wage sectors with a skilled workforce.	Consistent. The Project would create new employment opportunities during construction and operation of the Project.
Goal: Make Our Neighborhoods Safe	
Addressing community perceptions of public safety and quality of life.	Consistent. The Project incorporates elements that would promote individual and community safety. Specifically, as discussed below in Checklist Question No. XIV, Public Services, the Project would include private onsite security and a closed-circuit security camera system; sufficient lighting of building entries and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings; sufficient lighting of parking areas, elevators, and lobbies to reduce areas of concealment; and design project entrances to, and exits from, buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites, to the extent practicable.
<hr/> <p><i>Source: Eyestone Environmental, 2016.</i></p>	

Highland Avenue, approximately 0.5 mile west of the Project Site, respectively. Metro bus lines 210, 212, 217, 222, 312, and 780, as well as DASH lines DASH Hollywood, DASH Beachwood Canyon, and DASH Hollywood/Wilshire, also provide transit service in the Project area.

The Project's development of hotel and restaurant uses in proximity to these existing transportation facilities would increase the productivity of the existing transportation system. The Project would comply with City design standards for access driveways and would not include any hazardous design features that could pose safety issues to travelers. Therefore, the Project would also support the goal to ensure travel safety and reliability for all people and goods in the region. Further, as discussed below in Checklist Question No. XVI, Transportation/Circulation, Project impacts related to the Los Angeles County Congestion Management Program, which serves as the monitoring and analytical basis for regional transportation funding decisions, would be less than significant. The Project would also support the use and productivity of the public transportation system by concentrating new development within an area well-served by a regional transportation system and transit opportunities.

SCAG's Compass Growth Vision Report presents a growth visioning effort to make the SCAG region a better place to live, work, and play for all residents regardless of race, ethnicity, or income. To organize the strategies for improving the quality of life in the SCAG region, the following four principles were established by the Growth Vision Subcommittee: Principle 1—improve mobility for all residents; Principle 2—foster livability in all communities; Principle 3—enable prosperity for all people; and Principle 4—promote sustainability for future generations. The Project would provide a development that includes hotel and restaurant uses that would be in close proximity to an expansive network of regional transportation facilities and transit opportunities. The Project would also provide for a variety of open space areas and amenities to serve the employees and patrons of the Project Site. In addition, the Project would incorporate features to support and promote environmental sustainability. "Green" principles are incorporated throughout the Project to comply with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC) and the sustainability intent of the U.S. Green Building Council's LEED® program. These include energy conservation, water conservation, and waste reduction features. The Project also would provide bicycle parking spaces for long-term and short-term bicycle parking.

Based on the analysis provided above, the Project would not conflict with the applicable goals and principles set forth in the 2016–2040 RTP/SCS and the Compass Growth Vision Report.

Conclusion

Based on the analysis provided above, the Project would be consistent with applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site. As such, impacts related to land use consistency would be less than significant.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. As discussed above in Response to Checklist Question No. IV.f, the Project Site is located within an urbanized area and is currently developed with a paved surface parking area and restaurant. As such, the Project Site does not support any habitat or natural community. Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan. No impacts would occur, and no mitigation measures are required.

XI. Mineral Resources

Would the project:

- a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

No Impact. No mineral extraction operations currently occur on the Project Site. The Project Site is located within an urbanized area and has been previously disturbed by development. As such, the potential for mineral resources to occur on-site is low. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present based on mineral producing area classified by the California Geologic Survey.²⁹ The Project Site is not located within a City-designated oil field or oil drilling area.³⁰ Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impacts would occur, and no mitigation measures are required.

- b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?**

No Impact. See Response to Checklist Question No. XI.a, above.

XII. Noise

Would the project result in:

- a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Less Than Significant Impact with Mitigation Incorporated. The following analysis evaluates the potential noise impacts at noise-sensitive land uses resulting from construction and operation of the Project. The noise worksheets supporting this analysis were prepared by Acoustical Engineering Services and are provided in Appendix E of this MND.

²⁹ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

³⁰ Los Angeles General Plan Safety Element, Exhibit E, Oil Field & Oil Drilling Areas, page 55 (November 1996).

Applicable Noise Regulations

Chapter XI, *Noise Regulation* (hereafter referred to as the Noise Regulation), of the LAMC, establishes regulations regarding allowable increases in noise levels. These regulations address activities associated with operation and construction of the Project.

The Noise Regulation establishes acceptable ambient sound levels to regulate intrusive noises (e.g., stationary mechanical equipment, amplified sound, and vehicles other than those traveling on public streets) within specific land use zones. In accordance with the Noise Regulation, a noise level increase of 5 dBA over the existing ambient noise level at an adjacent property line is considered a noise violation. To account for people's increased tolerance for short-duration noise events, the Noise Regulation provides a 5-dBA allowance (for a total of 10 dBA³¹ above the existing ambient noise level) for noise sources occurring for more than five but less than 15 minutes in any 1-hour period, and an additional 5-dBA allowance (for a total of 15 dBA above the existing ambient noise level) for noise sources occurring for five minutes or less in any 1-hour period.³² This standard applies to all noise sources, with the exception of vehicles traveling on public streets and construction noise.

Ambient noise is defined by the Noise Regulation as the measured noise level averaged over a period of at least 15 minutes. For purposes of determining whether or not a violation of the noise regulation is occurring, the sound level measurements of the additional noise source are averaged over a minimum 15-minute duration and compared with the baseline ambient noise levels (i.e., without the additional noise source). The ambient noise baseline to be used is either the actual measured ambient noise level or the City's presumed ambient noise level, whichever is greater. In cases in which the actual measured ambient noise level is unknown, the City's presumed ambient noise level is used as the baseline. The City's presumed daytime (7:00 A.M. to 10:00 P.M.) and nighttime (10:00 P.M. to 7:00 A.M.) minimum ambient noise levels for residential zones are 50 dBA and 40 dBA, respectively.³³

Noise due to construction is regulated under Section 41.40 of the LAMC, which prohibits construction noise between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, on Saturday before 8:00 A.M. and after 6:00 P.M., and at any time on Sunday or a national holiday.³⁴ The City's Noise Regulation further limits noise from construction

³¹ *A-weighted decibels, abbreviated dBA, are an expression of the relative loudness of sounds in air as perceived by the human ear.*

³² *Los Angeles Municipal Code, Chapter XI, Article I, Section 111.02-(b).*

³³ *Los Angeles Municipal Code, Chapter XI, Article I, Section 111.03.*

³⁴ *Los Angeles Municipal Code, Section 41.40.*

equipment located within 500 feet of a residential zone to 75 dBA (between 7:00 A.M. and 10:00 P.M.), measured at a distance of 50 feet from the source, unless compliance with this limitation is technically infeasible.³⁵

Noise due to vehicle theft alarm systems (car alarms) is regulated under Section 114.06 of the LAMC. The noise regulation states that “it shall be unlawful for any person to install, operate or use any vehicle theft alarm system that emits or causes the emission of an audible sound, which is not, or does not become, automatically and completely silenced within five minutes.”

In addition to the previously described LAMC provisions, the City has established noise guidelines that are used for planning purposes. These guidelines are based in part on the community noise compatibility guidelines established by the California State Governor’s Office of Planning and Research and are intended for use in assessing the compatibility of various land use types with a range of noise levels.³⁶ Table B-13 on page B-80 provides an illustration of land use compatibility for community noise sources.

Noise levels for specific land uses, referred to as Community Noise Equivalent Levels (CNEL), are classified into four categories: (1) “normally acceptable;” (2) “conditionally acceptable;” (3) “normally unacceptable;” and (4) “clearly unacceptable.” A CNEL value of 70 dBA is considered the dividing line between a “conditionally acceptable” and “normally unacceptable” noise environment for noise sensitive land uses, including residences, hotels, parks, schools, and playgrounds.

Changes in noise levels of less than 3 dBA are generally not discernible to most people, while changes greater than 5 dBA are readily noticeable and would be considered a significant increase. Therefore, the significance threshold for mobile source noise is based on human perceptibility to changes in noise levels (increases), with consideration of existing ambient noise conditions and the City’s land use noise compatibility guidelines.

Based on the Noise Regulation and the City’s noise guidelines, the Project would result in a significant noise impact if:

³⁵ *In accordance with the City of Los Angeles Noise Regulations (Los Angeles Municipal Code, Section 112.05), “technically infeasible” means that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment.*

³⁶ *State of California, General Plan Guidelines, Governor’s Office of Planning and Research, 2003.*

Table B-13
Land Use Compatibility for Community Noise Sources

Land Use	Day-Night Average Exterior Sound Level (CNEL dBA)						
	50	55	60	65	70	75	80
Residential Single-Family, Duplex, Mobile Home	A	C	C	C	N	U	U
Residential Multi-Family	A	A	C	C	N	U	U
Transient Lodging, Motel, Hotel	A	A	C	C	N	U	U
School, Library, Church, Hospital, Nursing Home	A	A	C	C	N	U	U
Auditoriums, Concert Hall, Amphitheater	C	C	C	C/N	U	U	U
Sports Arena, Outdoor Spectator Sports	C	C	C	C	C/U	U	U
Playgrounds, Neighborhood Park	A	A	A	A/N	N	N/U	U
Golf Course, Riding Stable, Water Recreation, Cemetery	A	A	A	A	N	A/N	U
Office Buildings, Business, Commercial, Professional	A	A	A	A/C	C	C/N	N
Agriculture, Industrial, Manufacturing, Utilities	A	A	A	A	A/C	C/N	N

A = Normally Acceptable: Specified land use is satisfactory, based upon assumption buildings involved are conventional construction, without any special noise insulation.

C = Conditionally Acceptable: New construction or development only after a detailed analysis of the noise mitigation is made and needed noise insulation features included in project design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

N = Normally Unacceptable: New construction or development generally should be discouraged. A detailed analysis of the noise reduction requirements must be made and noise insulation features included in the design of a project.

U = Clearly Unacceptable: New construction or development generally should not be undertaken.

Source: *City of Los Angeles Noise Element, 1999.*

- Construction-related noise levels exceed 75 dBA (L_{eq})³⁷ at a distance of 50 feet from where the equipment is operating when construction activities are located within 500 feet of a residential area unless technically feasible mitigation measures are incorporated. The City does not have a noise regulation with respect to vehicles traveling on public roads. Therefore, the 75 dBA noise limits for on-site construction equipment is also used for off-site construction equipment (i.e., delivery/haul trucks).

³⁷ L_{eq} is the sound pressure level in dB, equivalent to the total sound energy over a given period of time.

- Project-related on-site stationary noise sources during Project operations increase existing ambient noise levels at adjacent sensitive receptors by 5 dBA; or
- Project-related off-site traffic generated during Project operations increases ambient noise levels along roadway segments with sensitive receptors by 3 dBA (CNEL) or more resulting in a change in the community noise classification or by 5 dBA (CNEL) or more if Project operations do not degrade community noise levels beyond the “conditionally acceptable” category.

Existing Noise Environment

The Project Site is located in a highly urbanized area of the City and is bounded by residential and commercial uses. Ambient noise includes traffic, transit, and trucks, commercial activities, surface parking lot activities, construction noise from developing properties in the area, and other miscellaneous noise sources associated with typical urban activities. Within the Project Site, specific noise sources include vehicle movements associated with the use of existing surface parking lot and operation of a small restaurant.

A total of four (4) noise receptor locations were selected to represent noise sensitive uses (i.e., residential and motel) in the vicinity of the Project Site. The noise-sensitive receptors were selected based on the relative distance from the receptors to the Project Site (i.e., within 500 feet), in accordance with the *L.A. CEQA Thresholds Guide* screening criteria. The noise measurement locations are described in Table B-14 on page B-82 and shown in Appendix E of this MND.

The baseline noise monitoring was conducted on Monday, April 18, 2016 using a Quest Technologies Model 2900 Integrating/Logging Sound Level Meter.³⁸ Measurement instruments were calibrated and operated according to manufacturer written specifications. Two 15-minute measurements were conducted at each of the receptor locations during daytime and nighttime hours. The daytime ambient noise levels were taken between 10:00 A.M. and 12:00 P.M., and the nighttime ambient noise levels were taken between 10:00 P.M. and 12:00 A.M. The ambient noise measurements were taken in accordance

³⁸ *This sound meter meets and exceeds the minimum industry standard performance requirements for “Type 2” standard instruments as defined in the American National Standard Institute (ANSI) S1.4. It also meets the requirement specified in Section 111.01(l) of the LAMC that instruments be “Type S2A” standard instruments or better. The sound meter was calibrated and operated according to the manufacturer’s written specifications.*

**Table B-14
Existing Ambient Noise Levels**

Receptor Location	Noise Receptors Approximate Distance to Project Site ^a	Measured Noise Levels, dBA L _{eq}		CNEL ^b (24-hour)
		Daytime Hours (7:00 A.M.– 10:00 P.M.)	Nighttime Hours (10:00 P.M.– 7:00 A.M.)	
R1 Multi-family residence on Wilcox Avenue, adjacent to the Project Site to the north.	Northern boundary of Project Site	54.6	55.9	60.4
R2 Multi-family residence on Hudson Avenue, adjacent to the Project Site to the west.	50 feet	59.9	56.4	62.0
R3 Multi-family residence on Wilcox Avenue, northeast of the Project Site.	140 feet	63.6	62.6	67.5
R4 Hostel on Schrader Avenue, south of the Project Site.	510 feet	63.1	57.9	64.2

^a Distances are estimated using Google Earth Map.

^b Estimated based on short-term (15-minute) noise measurement based on Federal Transit Administration (FTA) procedures.

Source: AES, 2016. See Appendix E of this MND.

with the City's standards, which require ambient noise to be measured over a period of at least 15 minutes.³⁹

The results of the ambient sound measurement data are summarized in Table B-14. As indicated in Table B-14, the existing daytime ambient noise levels at the receptor locations ranged from 54.6 dBA L_{eq} (at receptor R1) to 63.6 dBA L_{eq} (at receptor R3) while the measured nighttime ambient noise levels ranged from 55.9 dBA L_{eq} (at receptor R1) to 62.6 dBA L_{eq} (at receptor R3). Field observation indicates that the current ambient noise environment at the measurement locations is controlled primarily by auto traffic on nearby roadways including, Hollywood Boulevard, Wilcox Avenue, and Hudson Avenue, and occasional aircraft flyovers. The existing ambient noise environment at all measurement locations, currently exceed the City's presumed daytime and nighttime ambient noise standard of 50 dBA (L_{eq}) and 40 dBA (L_{eq}) for residential use, respectively. Therefore, consistent with LAMC procedures, the measured existing ambient noise levels are used as the baseline conditions for the purposes of determining Project impacts.

³⁹ LAMC Section 111.01.

Short-Term Construction Noise

Project construction is anticipated to occur over approximately 24 months and is anticipated to be completed in 2019. Construction of the Project would commence with demolition of the existing surface parking area and restaurant, followed by grading and excavation for the subterranean parking garage. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. It is estimated that approximately 10,000 cubic yards of export material (e.g., concrete and asphalt surfaces) and soil would be hauled from the Project Site during the demolition and excavation phase. The haul route from the Project Site is anticipated to be via Hollywood Boulevard to the Hollywood Freeway.

Noise from construction activities would be generated by vehicles and equipment during various stages of construction including demolition, site grading and excavation, and building foundation, construction, and landscaping. The noise levels created by construction equipment would vary depending on factors such as the type of equipment, the specific model, operating characteristics, and the condition of the equipment.

Noise levels from construction activities were calculated at the off-site sensitive receptors based on construction equipment noise levels as published in the Federal Highway Administration (FHWA) Road Construction Noise Model.⁴⁰ Construction noise associated with the Project was analyzed using a typical construction equipment inventory consistent with the type of construction planned for the Project. The hourly average (L_{eq}) noise levels associated with Project construction were calculated for the nearest noise-sensitive receptors surrounding the Project Site. These average noise levels are based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage and are typically attributable to multiple pieces of equipment operating simultaneously. The construction noise level at each of the receptor locations was calculated based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance.

Table B-15 on page B-84 provides the estimated construction noise levels at the four representative off-site sensitive receptors located within 500 feet of the Project Site, and a comparison with the noise impact criteria. As indicated in Table B-15, the estimated construction-related noise levels would be below the 75 dBA significance threshold at receptor locations R2 and R4. The estimated noise levels at receptor locations R1 and R3 would exceed the significance threshold by up to 16.6 dBA at receptor R1 and 0.9 dBA at receptor R3, without mitigation measures. Therefore, noise mitigation measures would be

⁴⁰ FHWA, *Roadway Construction Noise Model User's Guide*, 2005.

Table B-15
Construction Noise Impacts—On-Site Equipment

Receptor Location ^a	Nearest Distance to Project Construction Site, (feet)	Estimated Construction Noise Levels by Project Construction Phase, dBA L _{eq}					Significance Threshold ^b dBA L _{eq}
		Demolition	Grading	Foundation	Building Construction	Paving, Landscape	
R1	10	90.0	91.6	90.8	88.4	91.2	75.0
R2	50	74.3	68.9	71.1	67.8	73.4	75.0
R3	140	75.1	73.3	75.9	72.2	71.5	75.0
R4	510	49.4	47.5	50.2	46.5	45.6	75.0

^a Representative noise sensitive receptors within 500 feet of the Project Site.

^b Significance threshold is based on City's maximum allowable noise levels for construction equipment within 500 feet of a residential zone.

Source: AES, 2016. See Appendix E of this MND.

required to reduce the construction related noise levels to a less-than-significant level. Implementation of the mitigation measures provided below, particularly Mitigation Measure XII-1, would reduce the on-site construction-related noise impacts to a less than significant level.

In addition to on-site construction noise sources, materials delivery, concrete mixing, and haul trucks (construction trucks), and construction worker vehicles would require access to the Project Site during the Project construction period. The major noise sources associated with off-site construction trucks would be from delivery/haul trucks. The peak period of construction trucks would be during the site grading phase when there would be up to a maximum of 40 daily delivery/haul trucks (40 incoming and 40 leaving trips). Construction-related trucks would be fewer during other construction phases with up to 20 delivery trucks per day. Therefore, the noise analysis is based on the peak period (site grading phase) with a maximum of 40 trucks (80 truck trips) per day. Based on an 8-hour haul period and a uniform distribution of trips, there would be a maximum of 10 truck trips (five inbound and five outbound) per hour. As described above, haul trucks would generally access the Project Site via Hollywood Boulevard to the Hollywood Freeway.

The off-site construction trucks noise impacts were analyzed using the FHWA's TNM computer noise model. Noise generated by construction trucks along the anticipated haul route, Hollywood Boulevard leading to the Project Site, would be approximately 63.1 dBA (hourly L_{eq}), which would be below the 75 dBA significance threshold. In addition, construction truck traffic would not occur during the noise-sensitive late evening and nighttime hours. As such, significant noise impacts would not be expected from off-site construction traffic, and no mitigation measures are required.

On-Site Operational Noise

Noise sources associated with Project operation would include: (1) on-site stationary noise sources, which consist of outdoor mechanical equipment, parking facilities, loading dock operations, and outdoor uses; and (2) off-site mobile (roadway traffic) noise sources.

Fixed Mechanical Equipment

The operation of mechanical equipment such as air conditioners, fans, and related equipment may generate audible noise levels. However, the Project's mechanical equipment would be located on the building's rooftop or in the interior of the building, shielded from nearby land uses to attenuate noise. In addition, all mechanical equipment would be designed with appropriate noise control devices, such as sound screen/parapet walls, to comply with the noise limitation requirements set forth in Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping and filtering equipment from exceeding the noise level on the premises of other occupied properties by more than 5 dBA. Therefore, operation of new mechanical equipment would not exceed the thresholds of significance identified above. Impacts would be less than significant, and no mitigation measures are required.

Parking

As described in Attachment A, Project Description, of this MND, the Project would provide 104 parking spaces, which would be located within a two-level subterranean parking garage and a partial above grade parking level. Noise generated within the subterranean parking level would be effectively shielded from the off-site sensitive receptors, since the subterranean parking level would be fully enclosed on all sides. The partial above grade parking level would be shielded from the off-site sensitive receptors by the new building and existing buildings to the west and south. In addition, noise generated by motor driven vehicles within the Project Site would be regulated by Section 114.02 of the LAMC, which prohibits the operation of any motor driven vehicles upon any property within the City in a manner that would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than 5 dBA. Therefore, noise impacts associated with parking facilities would be less than significant, and no mitigation measures are required.

Loading Dock

The loading dock and trash compactor for the Project would be provided at the interior of the building on the ground level and would be shielded from off-site sensitive receptors. Delivery trucks and trash collection trucks would access the loading dock and trash compactor from Hudson Avenue. Noise generated from loading activities and trash

compactor would be effectively shielded from off-site sensitive receptors and would not exceed the ambient noise level by more than 5 dBA. Therefore, noise impacts from loading docks and trash compactor operations would be less than significant.

Outdoor Spaces

The Project includes various outdoor spaces, including: an outdoor dining area at the ground level (facing Wilcox Avenue), three landscaped terraces at the podium level, three smaller terraces at the northwest, northeast, and southeast corners of the building (at various elevations), and a bar and terrace at the roof level. Noise associated with the outdoor spaces would include people talking and potential background music (i.e., amplified sound). An amplified sound system would only be used at the outdoor dining (at the ground level) and the roof-level bar and outdoor terrace. For the noise analysis, it was estimated that up to 50 people could be gathered at each of the terraces at the podium level (north, south, and west terraces), up to 20 people at the outdoor dining at the ground level, up to 27 people at the northwest terrace (on the 6th floor), up to 20 people at the northeast terrace (on the 5th floor) and southeast terrace (on the 6th floor), up to 55 people at the bar, and 165 people at the outdoor terrace at the roof level. To evaluate noise from people talking, reference noise levels of 65 dBA and 62 dBA (L_{eq} at a 3.3-foot distance) for a male and female, respectively, speaking in raised voice levels were used for analyzing noise from the use of these areas.⁴¹ In order to analyze a typical noise scenario, it was assumed that up to 50 percent of the people (half of which would be male and the other half female) would be talking at the same time. Another potential noise source associated with the outdoor spaces would be the use of an outdoor amplified sound system. The sound system would be intended to provide sufficient loudness to be heard by people in the immediate vicinity of the outdoor patios. For the noise analysis, the amplified program sound system was assumed to have a maximum noise level of 75 and 90 dBA L_{eq} at a distance of 15 feet from the speaker locations at the ground level outdoor dining and roof-level bar/deck, respectively, ensuring that the amplified program sound would not exceed the significance threshold (i.e., an increase of 5 dBA L_{eq}) at any off-site noise-sensitive receptor.

Table B-16 on page B-87 presents the estimated noise levels associated with use of the outdoor spaces at the off-site sensitive receptors. As indicated in Table B-16, the estimated noise levels at all off-site receptors would be below the significance threshold of 5 dBA (L_{eq}) above ambient noise levels. As such, noise impacts from use of the outdoor spaces would be less than significant, and no mitigation measures are required.

⁴¹ *Handbook of Acoustical Measurements and Noise Control, Table 16.1, Cyril M. Harris, Third Edition, 1991.*

Table B-16
Estimated Noise Levels from Outdoor Uses

Receptor Location	Existing Ambient Noise Levels, dBA L _{eq} (A)	Estimated Noise Levels from Outdoor Uses, dBA L _{eq} (B)	Ambient with Project Outdoor Uses Noise Levels, dBA L _{eq} (C = A+B) ^a	Increase in Ambient Noise due to Project, dBA L _{eq} (C – A)	Significance Threshold ^b	Significant Impact?
R1	54.6	57.5	59.3	4.7	59.6	No
R2	56.4	46.2	56.8	0.4	61.4	No
R3	62.6	51.1	62.9	0.3	67.7	No
R4	57.9	49.7	58.5	0.6	62.9	No

^a Sound levels in decibels are logarithmic values that cannot be combined by normal algebraic addition. Instead, the sound levels in decibels are first converted to energy equivalents, the energy equivalents are added algebraically, and then the total energy equivalent is converted back to its decibel values. For example, $54.6 \text{ dB} + 57.5 \text{ dB} = 10 \cdot \log(10^{(54.6/10)} + 10^{(57.5/10)}) = 59.3 \text{ dB}$.

^b Significance thresholds are equivalent to the lowest measured ambient noise levels (see Table B-14 on page B-82) plus 5 dBA, per the City of Los Angeles Noise Ordinance.

Source: AES, 2016. See Appendix E of this MND.

Off-Site Traffic Noise

The Project is expected to generate a total of 1,244 daily trips, based on the Project's Traffic Study included in Appendix F of this MND.⁴² Project-generated traffic noise impacts were evaluated by comparing the increase in noise levels from the "future without project" condition to the "future with project" condition with the Project's significance threshold. In addition, potential mobile noise impacts were also evaluated by comparing Project-related traffic with the existing baseline traffic noise conditions as a conservative analysis. The cumulative noise impacts due to off-site traffic were analyzed by comparing the projected increase in traffic noise levels from "existing" conditions to "future with project" conditions to the Project's significance criteria. Traffic noise levels at the off-site noise sensitive receptors were calculated using FHWA's Traffic Noise Model and the Project's traffic volume data. The traffic noise impact analysis is based on the 24-hour CNEL noise descriptor.

Table B-17 on page B-88 provides a summary of the off-site traffic noise analysis. As shown in Table B-17, traffic from the Project would result in a negligible increase as compared to the existing conditions; i.e., less than 0.3 dBA. The cumulative traffic volumes would result in a maximum increase of 1.5 dBA CNEL along Hollywood Boulevard (east of Cahuenga Boulevard). Typically, a minimum 3 dBA change in the noise environment

⁴² Traffic Study for the Wilcox Hotel Project, Hollywood, California, Gibson Transportation Consulting, Inc., February 2016.

**Table B-17
Off-Site Traffic Noise Impacts**

Roadway Segment	Adjacent Noise Sensitive Land Use	Calculated Traffic Noise Levels, ^a dBA (CNEL)				Increase in Noise Levels, dBA (CNEL)		
		Existing (A)	Existing + Project (B)	Future No Project (C)	Future + Project (D)	Project (Future) Impacts (D – C)	Project (Existing) Impacts (B – A)	Cumulative Impacts (D – A)
Whitley Street North of Franklin Ave. South of Franklin Ave.	Residential	61.3	61.3	61.4	61.4	0.0	0.0	0.1
	Residential/Hotel	64.7	64.7	64.9	64.9	0.0	0.0	0.2
Wilcox Avenue North of Franklin Ave. Between Franklin Ave. and Yucca St. Between Yucca St. and Hollywood Blvd. South of Hollywood Blvd.	Residential	67.9	67.9	68.5	68.5	0.0	0.0	0.6
	Residential	68.5	68.6	68.6	68.8	0.2	0.1	0.3
	Residential	69.0	69.2	69.1	69.4	0.3	0.2	0.4
	Hotel	69.3	69.3	69.5	69.6	0.1	0.0	0.3
Cahuenga Boulevard North of Franklin Ave. Between Franklin Ave. and Yucca St. Between Yucca St. and Hollywood Blvd. South of Hollywood Blvd.	Residential	72.9	72.9	73.4	73.4	0.0	0.0	0.5
	Residential/Hotel	72.1	72.1	72.6	72.7	0.1	0.0	0.6
	Residential	72.3	72.3	72.9	72.9	0.0	0.0	0.6
	Hotel	72.3	72.3	72.9	72.9	0.0	0.0	0.6
Cherokee Avenue North of Hollywood Blvd.	Residential	64.6	64.6	64.8	64.8	0.0	0.0	0.2

Table B-17 (Continued)
Off-Site Traffic Noise Impacts

Roadway Segment	Adjacent Noise Sensitive Land Use	Calculated Traffic Noise Levels, ^a dBA (CNEL)				Increase in Noise Levels, dBA (CNEL)		
		Existing (A)	Existing + Project (B)	Future No Project (C)	Future + Project (D)	Project (Future) Impacts (D – C)	Project (Existing) Impacts (B – A)	Cumulative Impacts (D – A)
Franklin Avenue								
West of Whitley Ave.	Residential	71.3	71.3	71.8	71.8	0.0	0.0	0.5
Between Whitley Ave. and Wilcox Ave.	Residential	71.5	71.5	71.9	71.9	0.0	0.0	0.4
Between Wilcox Ave. and Cahuenga Blvd.	Residential	71.3	71.3	71.9	71.9	0.0	0.0	0.6
East of Cahuenga Blvd.	Residential	71.4	71.4	72.1	72.1	0.0	0.0	0.7
Yucca Street								
West of Wilcox Ave.	Residential	63.0	63.0	63.6	63.6	0.0	0.0	0.6
Between Wilcox Ave. and Cahuenga Blvd.	Residential	65.5	65.6	66.0	66.1	0.1	0.1	0.6
East of Cahuenga Blvd.	Residential/Hotel	66.4	66.4	67.2	67.2	0.0	0.0	0.8
Hollywood Boulevard								
West of Cherokee Ave.	Commercial	71.2	71.3	72.3	72.3	0.0	0.1	1.1
Between Cherokee Ave. and Wilcox Ave.	Commercial	71.2	71.2	72.2	72.2	0.0	0.0	1.0
Between Wilcox Ave. and Cahuenga Blvd.	Commercial	71.1	71.1	72.3	72.3	0.0	0.0	1.2
East of Cahuenga Blvd.	Hotel	70.9	71.0	72.4	72.4	0.0	0.1	1.5
<p>^a Detailed calculation worksheets are included in Appendix E of this MND. Source: AES, 2016.</p>								

(increase and/or decrease) is considered as a threshold of human perception. The estimated noise increases would be below the more stringent 3 dBA significance threshold (applicable when noise levels fall within the normally unacceptable category) under both Existing Plus Project and Future Plus Project. Therefore, off-site traffic noise impacts associated with the Project would be less than significant, and no mitigation measures are required.

Land Use Compatibility

Based on the measured existing ambient noise levels, the exterior noise levels at the Project Site range from 60.0 dBA CNEL (measured at R1) at the Project's northern property line to 67.5 dBA CNEL (measured at R3) at the Project's eastern property line facing Wilcox Avenue. According to the City of Los Angeles Guidelines for Noise Compatible Land Use⁴³ (Table B-13 on page B-80), the Project Site is considered "conditionally acceptable" for a hotel development (up to 70 dBA CNEL). Therefore, new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is conducted and required noise insulation features are included in the design to ensure that the interior noise environment of the hotel suites achieve an interior noise level of no more than 45 CNEL, as required by the City's Building Code. Therefore, with implementation of Mitigation Measure XII-2 (as described below), the noise impacts to the future hotel uses would be less than significant.

Mitigation Measures

As analyzed above, the Project's on-site construction activities would result in a significant impact without mitigation measures. Therefore, the following noise mitigation measure is included to reduce the Project's construction related noise to the nearby residential uses in the vicinity of the Project Site:

Mitigation Measure XII-1: The Project shall include the following measures during construction period:

- The project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.
- Construction and demolition shall be restricted to the hours of 7:00 A.M. to 6:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday.

⁴³ *City of Los Angeles Noise Element, 1999.*

- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
- Temporary noise barriers shall be used along the northern, eastern and western property boundaries to block the line-of-sight between the construction equipment and the adjacent residences. The noise barrier shall provide minimum 5 dBA noise reduction to the residences to the west (receptor R1) and northeast (receptor R3) and 15 dBA noise reduction to the residence to the north (receptor R1).

In addition, the following noise mitigation measure is included to ensure the Project's operational noise levels are less than significant:

Mitigation Measure XII-2: The Applicant shall retain the services of a qualified acoustical engineer with expertise in the design of building sound insulation, who shall submit a signed report to the City during a plan check for review and approval, indicating that the proposed building design sound insulation achieves an interior sound environment of maximum 45 dBA CNEL, per the City of Los Angeles Building Code (LAMC Section 91.1207).

b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant with Mitigation Incorporated. The City of Los Angeles currently does not address ground vibration impacts either in the LAMC or in the Noise Element of the General Plan. According to the Federal Transit Administration (FTA), ground vibrations from construction activities very rarely reach the level that can damage structures.⁴⁴ A possible exception is the case of old, fragile buildings of historical significance where special care must be taken to avoid damage.

Construction activities that typically generate the most severe vibrations include blasting activities and use of impact pile driving. The Project would be constructed using typical construction techniques and no blasting or impact pile driving will be used. Heavy construction equipment (e.g. a bulldozer and excavator) would generate a limited amount

⁴⁴ U.S. Department of Transportation, Federal Transit Administration, *Transit Noise and Vibration Impact Assessment, 2006*

of ground-borne vibration at short distances away from the source. The use of heavy equipment would most likely be limited to a few hours spread over several days during excavation for the subterranean parking structures and building foundations.

The FTA has published standard vibration velocities for various construction equipment operations. The typical vibration levels (in terms of inch per second peak particle velocity (PPV)) at a reference distance of 25 feet for construction equipment anticipated to be used during Project construction are listed in Table B-18 on page B-93.⁴⁵ As indicated therein, the estimated vibration velocity levels (from all construction equipment) would be well below the building damage significance thresholds at the nearest off-site structure to the east. However, the estimated vibration levels at the nearest structures to the north, south and west would exceed the 0.2 PPV significance threshold. The analysis here applies a conservative threshold of 0.2 PPV for these buildings based on the assumption that these buildings could be non-engineered timber and masonry buildings. Therefore, vibration impacts with respect to potential building damage during construction activities would be significant, without mitigation measures. Implementation of Mitigation Measure XII-3, as provided below, would reduce the construction-related vibration impact to a less than significant level.

Post-construction on-site activities would be limited to typical commercial uses, including building mechanical equipment that would not generate excessive ground-borne noise or vibration. As such, ground-borne vibration and noise levels associated with the Project would be less than significant, and no mitigation measures are required.

Mitigation Measures

As analyzed above, the Project's on-site construction activities would have the potential to result in a significant vibration impacts with respect to building damage at the adjacent buildings immediately north, south, and west of the Project Site. Therefore, the following mitigation measure is included to minimize construction-related vibration impacts:

Mitigation Measure XII-3: Retain the services of a qualified vibration consultant to monitor ground-borne vibration at the exterior of the adjacent buildings to the north, south and west of the Project Site during site grading/excavation (when the use of heavy construction equipment, such as a large bulldozer, drill rig, or loaded truck occurs) within 15 feet of the off-site building structures adjacent to the Project Site. If the measured ground-borne vibration levels exceed 0.2 inch/second (PPV) at the adjacent off-site structures, the project

⁴⁵ FTA, "Transit Noise and Vibration Impact Assessment," May 2006.

**Table B-18
Construction Vibration Impacts**

Equipment	Reference Vibration Velocity Levels at 25 ft. inch/second (PPV)	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from the Project Construction Equipment, inch/second (PPV)			
		Residential Buildings to the North	Commercial Buildings to the South	Commercial Building to the East	Commercial Buildings to the West
Large bulldozer	0.089	0.352	0.352	0.352	0.032
Caisson drilling	0.089	0.352	0.352	0.352	0.032
Loaded trucks	0.076	0.300	0.300	0.300	0.027
Jackhammer	0.035	0.138	0.138	0.138	0.012
Small bulldozer	0.003	0.012	0.012	0.012	0.001
Significance Threshold, inch/second (PPV)		0.2	0.2	0.2	0.2
Significant Impact?		Yes	Yes	Yes	No
<hr/> <i>Source: FTA, 2006, AES, 2015. See Appendix E of this MND.</i>					

contractor shall evaluate and employ alternative construction methods, so that the ground-borne vibration levels would be below 0.2 inch/second (PPV) at the adjacent off-site structures to the north, south and west.

c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact. The existing noise environment in the Project area is dominated by traffic noise along local roadways, as well as surrounding commercial and residential uses. Long-term operation of the Project would not have a significant effect on the existing noise environment in close proximity to the Project Site. Project-related noise sources would include off-site vehicular traffic, on-site parking, loading dock, use of outdoor spaces, and outdoor mounted mechanical equipment. As discussed in Response to Checklist Question No. XII.a, vehicular travel on local roadways attributable to the Project would have a less than significant impact on community noise levels. In addition, noise levels associated with on-site operations (e.g., mechanical equipment, parking, loading dock, and outdoor spaces) would also be less than significant, as discussed in Response to Checklist Question No. XII.a. As such, potential impacts associated with a permanent increase in ambient noise levels would be less than significant, and no mitigation measures are required.

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact with Mitigation Incorporated. Project construction activities would generate noise on a temporary basis and would increase the existing ambient noise in the immediate vicinity of the Project Site. Construction-related noise impacts are discussed above in Response to Checklist Question No. XII.a. As described therein, noise generated by on-site construction activities would temporarily increase the existing ambient noise in close proximity to the Project Site. However, such impacts would be less than significant with implementation of Mitigation Measure XII-1 provided above.

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

No Impact. The Project Site is not located within an airport land use plan or within 2 miles of an airport. The closest airport to the Project Site is the Bob Hope Airport located approximately 6.5 miles north of the Project Site. Therefore, the Project would not expose people residing or working in the Project area to excessive noise levels associated with a public or public use airport. No impacts would occur, and no mitigation measures are required.

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

No Impact. The Project Site is not located within the vicinity of a private airstrip. Therefore, the Project would not expose people to excessive noise levels associated with such operations. No impacts would occur, and no mitigation measures are required.

XIII. Population and Housing

Would the project:

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

Less Than Significant Impact. As provided in the *L.A. CEQA Thresholds Guide*, when evaluating a project's potential impacts to population and housing, the following is considered: would the project include a General Plan amendment, which could result in an increase in population over that projected in the adopted Community Plan or General Plan;

and would the project induce substantial growth on the project site or surrounding area. As discussed in Section II, Project Description, of this MND, the Project does not include a General Plan amendment. Therefore, the Project would not result in an increase in population over that projected in the adopted Community Plan or General Plan as a result of a General Plan amendment.

The Project proposes the development of a 134-room hotel and approximately 3,580 square feet of restaurant uses. The Project does not propose the development of residential uses on the Project Site. As such, the Project would not directly contribute to population growth within the Project Site area. However, the Project could indirectly induce population growth through the creation of temporary construction-related jobs and permanent employment opportunities upon buildout of the Project.

With regard to employment opportunities generated during construction of the Project, it is noted that the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process and are then moved to another construction site where their skills are needed. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project.

During operation of the Project the proposed hotel and restaurant uses would be anticipated to generate approximately 75 employees, based on employee generation rates promulgated by the Los Angeles Unified School District (LAUSD).⁴⁶ Based on the proposed uses of the Project, the employment opportunities offered by the Project would include a range of full-time and part-time positions that would be primarily filled by persons already residing in the vicinity of the workplace, and who generally do not relocate their households due to such employment opportunities. As such, the Project would be unlikely to create an indirect demand for additional housing or households in the area. Should the Project create an indirect demand for additional housing, such demand would be limited given the number of employees expected to be generated by the Project. In addition, such demand, should it occur, would be filled by then-existing vacancies in the housing market, and some from other new units in nearby developments. Therefore, given that the Project would not directly contribute to population growth in the Project area and as some of the employment opportunities generated by the Project would be filled by people already

⁴⁶ *Los Angeles Unified School District, 2012 Developer Fee Justification Study, February 9, 2012, Table 11. Based on the employee generation rate for "Lodging," which is 0.00113 employees per average square foot for the hotel portion of the Project and "Neighborhood Shopping Center," which is 0.00271 employees per average square foot for the restaurant portion of the Project.*

residing in the vicinity of the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. As such, the Project would not result in a notable increase in demand for new housing, and any new demand, should it occur, would be minor in the context of forecasted growth for the City of Los Angeles or the Hollywood Community Plan area. Further, as the Project would be located in a highly developed area with an established network of roads and other urban infrastructure, it would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth.

Based on the above, the Project would not induce substantial population or housing growth. Impacts would be less than significant, and no mitigation measures are required.

b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?

No Impact. The Project Site is currently occupied by a surface parking lot and restaurant. The Project Site does not include any existing housing. Therefore, the Project would not displace any existing housing. No impacts would occur, and no mitigation measures are required.

c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?

No Impact. As no housing currently exists on the Project Site, the development of the Project would not cause the displacement of any persons or require the construction of housing elsewhere. No impacts would occur, and no mitigation measures are required.

XIV. Public Services

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a. Fire protection?

Less Than Significant Impact. Fire protection for the Project Site is provided by the LAFD. The LAFD generally considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. Pursuant to Section 57.507.3.3 of the LAMC, the maximum response distance between commercial land uses and an LAFD station that houses an engine is 1.0 mile and for a truck company

is 1.5 miles. If either of these distances is exceeded, all structures located on a Project Site would require automatic fire sprinklers.

The “first-in” fire station serving the Project Site would be Fire Station No. 27, located at 1327 North Cole Avenue, approximately 0.6 mile south of the Project Site. Fire Station No. 27 consists of two engines, one truck, two ambulances, and urban search and rescue; and houses a total staff of 14 personnel, including captains, engineers, firefighters, paramedics, and apparatus operators.⁴⁷ Under LAMC criteria, the existing fire response distance and equipment provisions would be adequate. Nonetheless, the proposed building would be constructed with a fire sprinkler system to reduce the potential for fire impacts at the Project Site. Furthermore, the Project would comply with LAFD requirements regarding access and fire safety.

Construction activities have the potential to result in accidental onsite fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. Given the nature of construction activities and the work requirements of construction personnel, the Occupational Safety & Health Administration has developed safety and health provisions for implementation during construction, which are set forth in 29 Code of Federal Regulations, Part No. 1926. In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by the Occupational Safety and Health Administration.⁴⁸ Additionally, in accordance with the provisions of the Occupational Safety & Health Administration, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained onsite.⁴⁹ Project construction would also occur in compliance with all applicable federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for project construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

⁴⁷ Telephone communication with LAFD Captain Kevin Rudd, Fire Station 27, April 05, 2016.

⁴⁸ United States Department of Labor. Occupational Safety & Health Administration. Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671, accessed January 19, 2016.

⁴⁹ *Ibid.*

During construction of the Project, construction activities would generate traffic associated with the movement of construction equipment, hauling of demolition and graded materials, and construction worker trips. Additionally, construction activities may involve temporary partial lane closures adjacent to the Project Site for utility improvements, staging, and general construction activities. Other implications of construction-related traffic include increased travel time due to flagging or stopping of traffic to accommodate trucks entering and exiting the Project Site during construction. As such, construction activities could potentially increase response times for emergency vehicles travelling to the Project Site and nearby uses along surrounding streets. However, partial lane closures, should any be required, would be temporary in nature and in the event of partial lane closures, both directions of travel on area roadways and access to the Project Site would be maintained. In addition, during construction of the Project, a Construction Management Plan would be implemented to ensure that adequate and safe access remains available at the Project Site. As part of these plans, provisions for temporary traffic control would be provided during all construction activities along public rights-of-way to improve traffic flow on public roadways (e.g., flaggers). Designated truck queuing, equipment staging, and construction worker parking areas would also be provided. Additionally, emergency access to the Project Site would remain clear and unhindered during construction of the Project pursuant to City requirements. Further, pursuant to Section 21806 of the California Vehicle Code, the drivers of emergency vehicles have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic.

With regards to Project operation, the Project would not include the development of new residential units which would generate a new residential population in the service area of Fire Station No. 27. However, the Project's hotel and restaurant uses would increase the daytime population within the station's service area. Specifically, based on police service population factors provided in the City of Los Angeles CEQA Thresholds Guide, the Project would generate approximately 212 persons on the Project Site.⁵⁰ This daytime population projected to be generated by the Project would increase the demand for LAFD fire protection and emergency medical services. However, the Project would comply with all applicable provisions set forth in the City Building Code and Fire Code regarding structural design, building materials, site access, fire flow, storage and management of

⁵⁰ *The City of Los Angeles CEQA Thresholds Guide provides police service population factors. Based on those factors (1.5 persons/room/day for hotel uses and 3 persons/1,000 square feet for retail uses), full buildout of the Project would generate a net new police service population of approximately 212 persons. Note the Los Angeles Unified School District also sets forth employee generation rates within its Developer Fee Justification Study (February 9, 2012, Table 11). Based on the employee generation rate of 0.00113 employees/square foot for the "Lodging" land use category and 0.00271 employees/square foot for the "Neighborhood Shopping Center" land use category, the Project would generate approximately 75 new employees.*

hazardous materials, alarm and communications systems, etc. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, prior to the issuance of a building permit. In addition, it is noted that since the Project Site would be located within the required response distance from a fire station with an engine or truck company, pursuant to Section 57.507.3.3 of the LAMC, the buildings proposed as part of the Project would not be required to be constructed with automatic fire sprinkler systems. Notwithstanding, to enhance fire safety, the Project would include the installation of a sprinkler system, which would reduce the demand placed on the LAFD. Moreover, the LAFD would be consulted during final building design to ensure adequate compliance with the Building and Fire Codes prior to the issuance of any construction permits. Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment. Therefore, the Project would not result in the need for new or physically altered fire facilities.

With regard to emergency vehicle access during operation, emergency vehicles would continue to have access to the Project Site from Wilcox Avenue and Hudson Avenue. The area surrounding the Project Site includes a mature street system consisting of freeways, primary and secondary arterials, and collector and local streets which provide regional, sub-regional, and local access and circulation in the vicinity of the Project Site. Based on the Project Site's location within a highly urbanized area of the City, the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature. Therefore, the street system surrounding the Project Site is not considered substandard. In addition, the Project's driveways and internal circulation would be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, prior to the issuance of a building permit. The Project does not include any improvements along the streets surrounding the Project Site which could impede emergency vehicle access. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the Project. Therefore, the Project would not significantly impact emergency vehicle access to the Project Site and surrounding uses and the Project is not anticipated to impair the LAFD from responding to emergencies at the Project Site or the surrounding area.

With regard to response times, the Project would introduce new uses to the Project Site which would generate additional traffic in the vicinity of the Project Site. Project-related traffic would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by the additional traffic. As discussed in Checklist Question No. XVI, Transportation/Circulation, below, with the addition of project traffic to the study intersections, none of the study intersections would experience a change to the volume-to-capacity ratio or delay that would exceed the City's significance thresholds. As such, traffic impacts at all study intersections would be less than significant during both the A.M. and P.M. peak periods under Future with Project Conditions. Accordingly, the Project is not anticipated to substantially affect existing response times in the service area of Fire Station No. 27. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic.

Additionally, based on fire flow standards set forth in Section 57.507.3.1 of the LAMC, the Project falls within the Industrial and Commercial category, which has a required fire flow of 6,000 gallons per minute (gpm) from four hydrants to up to 9,000 gpm from six hydrants flowing simultaneously with a residual pressure of 20 pounds per square inch (psi). In accordance with the fire flow standards set forth in the LAMC, the Applicant would coordinate with the City to ensure that adequate water infrastructure is available to meet the required fire flows. Should the City determine that additional water connections and water infrastructure capacity is needed to meet the required fire flows, the Applicant would implement such improvements in consultation with the City.

Based on the above, potential impacts to fire protection services would be reduced through compliance with numerous construction and Building Code and Fire Code standards affecting structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, building sprinkler systems, helicopter access, etc. Therefore, impacts to fire protection would be less than significant, and no mitigation measures are required.

b. Police protection?

Less Than Significant Impact. The Hollywood Community Police Station, which serves the Project area, is located at 1358 Wilcox Avenue, approximately 0.5 mile south of the Project Site. The Hollywood Community Police Station has a service area of approximately 13.34 square miles. The general service boundaries of the Hollywood Community Police Station are Mulholland Drive and the Griffith Park boundary to the north, the City boundary and Melrose Avenue to the south, Normandie Avenue and the Griffith Park boundary to the east, and the City boundary to the west.

Construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. As part of the Project, the Project Applicant would implement temporary security measures including security fencing, lighting, and locked entry to secure the Project Site during construction.

Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Additionally, construction activities may involve temporary partial lane closures adjacent to the Project Site for utility improvements, staging, and general construction activities. Other implications of construction-related traffic include increased travel time due to flagging or stopping of traffic to accommodate trucks entering and exiting the Project Site during construction. Therefore, although construction activities would be short-term and temporary for the area, construction activities could potentially increase response times for police vehicles traveling to the Project Site and nearby uses along surrounding streets. However, partial lane closures, should any be required, would be temporary in nature and in the event of partial lane closures, both directions of travel on area roadways and access to the Project Site would be maintained. In addition, during construction of the Project, a Construction Management Plan would be implemented to ensure that adequate and safe access remains available at the Project Site. As part of these plans, provisions for temporary traffic control would be provided during all construction activities along public rights-of-way to improve traffic flow on public roadways (e.g., flaggers). Designated truck queuing, equipment staging, and construction worker parking areas would also be provided. Additionally, emergency access to the Project Site would remain clear and unhindered during construction of the Project pursuant to City requirements. Further, pursuant to Section 21806 of the California Vehicle Code, the drivers of emergency vehicles have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Therefore, temporary construction activities associated with the Project would not generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site, nor would project construction cause a substantial increase in emergency response times as a result of increased traffic congestion. Therefore, during construction, the Project would not result in the need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services.

With regards to Project operation, the Project would not include the development of new residential units which would generate a new residential population in the service area of the Hollywood Community Police Station. However, the Project's hotel and restaurant uses would increase the daytime population within the station's service area. Specifically, based on police service population factors provided in the City of Los Angeles CEQA

Thresholds Guide, the Project would generate approximately 212 persons on the Project Site.⁵¹ This daytime population projected to be generated by the Project would increase the demand for LAPD police protection services. Notwithstanding, since the Project does not include any residential uses, the Project would not directly affect the existing officer to resident ratio or the crimes per resident ratio citywide of within the Hollywood Community Police Station service area. Nonetheless, to help reduce any on-site increase in demand for police services, the Project would implement comprehensive safety and security features to enhance public safety and reduce the demand for police services, including: 24-hour on-site security personnel; closed-circuit cameras; foot patrols; and access control to the building and parking garage. The Project would also be equipped with an alarm system which would be monitored, and police would be dispatched as needed.

With regard to emergency vehicle access during operation, emergency vehicles would continue to have access to the Project Site from Wilcox Avenue and Hudson Avenue. In addition, the Project's driveways and internal circulation would be designed to incorporate all applicable City Building Code requirements regarding site access, including providing adequate emergency vehicle access. The Project does not include any improvements along the streets surrounding the Project Site which could impede emergency vehicle access. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the Project. Therefore, the Project would not significantly impact emergency vehicle access to the Project Site and surrounding uses and the Project is not anticipated to impair the LAPD from responding to emergencies at the Project Site or the surrounding area.

With regard to response times, the Project would introduce new uses to the Project Site which would generate additional traffic in the vicinity of the Project Site. Project-related traffic would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by the additional traffic. As discussed in Checklist Question No. XVI, Transportation/Circulation, below, with the addition of project traffic to the study intersections, none of the study intersections would experience a change to the volume-to-capacity ratio or delay that would exceed the City's significance thresholds. As such, traffic impacts at all study intersections would be less than significant during both the A.M. and P.M. peak periods under Future with

⁵¹ *The City of Los Angeles CEQA Thresholds Guide provides police service population factors. Based on those factors (1.5 persons/room/day for hotel uses and 3 persons/1,000 square feet for retail uses), full buildout of the Project would generate a net new police service population of approximately 212 persons. Note the Los Angeles Unified School District also sets forth employee generation rates within its Developer Fee Justification Study (February 9, 2012, Table 11). Based on the employee generation rate of 0.00113 employees/square foot for the "Lodging" land use category and 0.00271 employees/square foot for the "Neighborhood Shopping Center" land use category, the Project would generate approximately 75 new employees.*

Project Conditions. Accordingly, the Project is not anticipated to substantially affect existing response times in the service area of the Hollywood Community Police Station. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic.

Based on the above analysis, the Project would not generate a demand for additional police protection services that would substantially exceed the capability of the Hollywood Community Police Station to serve the Project Site. Therefore, the Project would not necessitate the provision of new or physically altered police stations, the construction of which could cause significant impacts, in order to maintain acceptable service ratios or response times. Impacts to police protection service would be less than significant, and no mitigation measures are required.

c. Schools?

Less Than Significant Impact. Public educational services for the Project Site and vicinity are provided by the Los Angeles Unified School District (LAUSD). Residential land uses typically generate school-aged children and a demand for public educational services. The Project includes the development of hotel and restaurant uses. Development of new residential land uses, which directly generate school-aged children and a demand for school services, is not proposed. Thus, implementation of the Project would not result in a direct increase in the number of students within the service area of the LAUSD. In addition, the number of students that may be indirectly generated by employees of the Project would not be anticipated to be substantial as the employment positions offered by the Project would be anticipated to be primarily filled by persons already residing in the vicinity of the Project Site and who already use existing schools in the area. Furthermore, pursuant to Senate Bill 50, the Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees constitutes full and complete mitigation of a project's impacts on school facilities. Therefore, the Project would not result in the need for new or altered school facilities. Impacts on schools would be less than significant, and no mitigation measures are required.

d. Parks?

Less Than Significant Impact. Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. As previously described, the Project involves the development of hotel and restaurant uses. New residential land uses, which typically create the greatest demand for parks and recreational services, are not proposed. Thus, implementation of the Project would not result in on-site residents who would utilize nearby neighborhood and

regional parks or other recreational facilities. In addition, while it is possible that some of the Project's employees may utilize local parks and recreational facilities, this increased demand would be negligible due to the amount of time it would take for employees to access off-site local parks and recreational facilities (the closest of which is the Yucca Street Mini Park located approximately 0.3 mile west of the Project Site). Furthermore, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, while the Project's employment opportunities could have the potential to indirectly increase the population of the Hollywood Community Plan area, new demand for public parks and recreational facilities associated with Project development would be limited. As such, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that a substantial physical deterioration of the facility would occur or be accelerated. Thus, impacts on parks and recreational facilities would be less than significant, and no mitigation measures are required.

e. Other public facilities?

Less Than Significant Impact. Other public facilities available in the vicinity of the Project Site include library services, roads, transit, utility systems such as water and sewer infrastructure, as well as other general public facilities.

The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles through its Central Library, eight regional branch libraries, and 64 neighborhood branch libraries, as well as through Web-based resources.⁵² The Project Site is served by the Frances Howard Goldwyn–Hollywood Regional Branch Library located at 1623 Ivar Avenue, approximately 0.3 mile from the Project Site, and the Will & Ariel Durant Branch Library located at 7140 Sunset Boulevard, approximately 1.2 miles from the Project Site. As discussed above, the Project does not propose residential uses on the Project Site. Therefore, the Project would not result in a direct increase in the number of residents within the service areas of the Frances Howard Goldwyn–Hollywood Regional Branch Library or the Will & Ariel Durant Branch Library. In addition, as Project employees would be more likely to use library facilities near their homes during non-work hours and given that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, Project employees and the potential indirect population generation that could be attributable to those employees would generate minimal demand for library services. As such, any indirect or direct demand for library

⁵² Los Angeles Public Library, *Library Directory*, www.lapl.org/sites/default/files/media/pdf/about/branch_map.pdf, accessed February 19, 2016.

services generated by Project employees would be negligible. Therefore, impacts on library facilities would be less than significant, and no mitigation measures are required.

XV. Recreation

- a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

Less Than Significant Impact. As discussed previously in Response to Checklist Question No. XIV.d, above, the Project involves the development of hotel and restaurant uses. New residential land uses, which typically create the greatest demand for parks and recreational services, are not proposed. Thus, implementation of the Project would not result in on-site residents who would utilize nearby neighborhood and regional parks or other recreational facilities. In addition, while it is possible that some of the Project's employees may utilize local parks and recreational facilities, this increased demand would be negligible due to the amount of time it would take for employees to access off-site local parks and recreational facilities (the closest of which is the Yucca Street Mini Park located approximately 0.3 mile west of the Project Site). Furthermore, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, while the Project's employment opportunities could have the potential to indirectly increase the population of the Hollywood Community Plan area, new demand for public parks and recreational facilities associated with Project development would be limited. As such, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that a substantial physical deterioration of the facility would occur or be accelerated. Thus, impacts on parks and recreational facilities would be less than significant, and no mitigation measures are required.

- b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

No Impact. The Project would not include any on-site public recreational facilities or parks. Therefore, no impacts would occur, and no mitigation measures are required.

XVI. Transportation/Circulation

The following analysis is based, in part, on the *Traffic Study for the Wilcox Hotel Project* (Traffic Study), prepared for the Project by Gibson Transportation Consulting, Inc., March 2016, and included as Appendix F of this MND. The Traffic Study was prepared in

accordance with the Los Angeles Department of Transportation's (LADOT) *Traffic Study Policies and Procedures* (March 2016), which establish the guidelines for determining the appropriate traffic analysis for a project, analysis methodologies, significance thresholds, etc. The scope of analysis for this Traffic Study was developed in consultation with LADOT. The base assumptions and technical methodologies (e.g., trip generation, study locations, analysis methodology, etc.) were identified as part of the Traffic Study approach and were outlined in a Memorandum of Understanding (MOU) dated December 2015, which was reviewed and approved by LADOT. A copy of the MOU is provided in Appendix A of the Traffic Study. LADOT also reviewed and approved the Traffic Study, including the assumptions and methodologies used in the analysis, the results of the analysis, and the mitigation measures recommended to reduce the Project's potentially significant impacts during construction, as discussed below. A copy of LADOT's Assessment Letter of the Traffic Study, dated March 29, 2016, is included in Appendix F of this MND.

Would the project:

- a. **Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**

Less Than Significant with Mitigation Incorporated. The Project would involve the demolition of an existing surface parking lot and restaurant and the construction of a hotel that would include restaurant uses. Construction of the Project has the potential to increase traffic through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site. In addition, the proposed hotel and restaurant uses would have the potential to contribute to an increase in peak-hour traffic in the Project vicinity. An analysis of potential traffic impacts associated with construction and operation of the Project is provided below.

In consultation with LADOT, the following eight signalized intersections and one unsignalized intersection were selected for analysis:

- Intersection 1: Whitley Avenue & Franklin Avenue
- Intersection 2: Wilcox Avenue & Franklin Avenue
- Intersection 3: Cahuenga Boulevard & Franklin Avenue

- Intersection 4: Wilcox Avenue & Yucca Street
- Intersection 5: Cahuenga Boulevard & Yucca Street
- Intersection 6: Cherokee Avenue & Hollywood Boulevard
- Intersection 7: Wilcox Avenue & Hollywood Boulevard
- Intersection 8: Cahuenga Boulevard & Hollywood Boulevard

As required by LADOT's *Traffic Study Policies and Procedures*, the Critical Movement Analysis (CMA) method of intersection capacity analysis was used to determine intersection volume-to-capacity (V/C) ratio and corresponding level of service (LOS) for the turning movements and intersection characteristics at each of the analyzed intersections. Table B-19 on page B-108 defines the ranges of V/C ratios and their corresponding levels of service for signalized intersections.

According to the *City of Los Angeles CEQA Thresholds Guide* (page L.1-3) and LADOT's *Traffic Study Policies and Procedures*, a project would normally have a significant impact on signalized intersection capacity if the project-related increase in the V/C ratio is equal to or exceeds the thresholds presented in Table B-20 on page B-109.

The Traffic Study assessed existing intersection operating conditions and analyzed the potential Project-generated traffic impacts on the street system surrounding the Project Site at Project buildout during the weekday morning (7:00 A.M. to 10:00 A.M.) and afternoon (3:00 P.M. to 6:00 P.M.) commuter peak periods. The Traffic Study evaluated the following traffic scenarios:

- Existing (Year 2015) Conditions;
- Existing (Year 2015) with Project Conditions;
- Future (Year 2019) Base Conditions; and
- Future (Year 2019) with Project Conditions.

The Existing (Year 2015) with Project Conditions, as summarized below, provides an assessment of the operating conditions of the street system under existing conditions with the addition of Project-generated traffic. The Future (Year 2019) with Project Conditions, as also summarized below, provides an assessment of the operating conditions of the street system under future conditions with the addition of Project-generated traffic.

Table B-19
Level of Service Definitions for Signalized Intersections

Level of Service	Description	Volume-to-Capacity Ratio
A	Excellent operation. All approaches to the intersection appear quite open, turning movements are easily made, and nearly all drivers find freedom of operation.	<0.600
B	Very good operation. Many drivers begin to feel somewhat restricted within platoons of vehicles. This represents stable flow. An approach to an intersection may occasionally be fully utilized and traffic queues start to form.	0.601–0.700
C	Good operation. Occasionally drivers may have to wait for more than 60 seconds, and backups may develop behind turning vehicles. Most drivers feel somewhat restricted.	0.701–0.800
D	Fair operation. Cars are sometimes required to wait for more than 60 seconds during short peaks. There is no long-standing traffic queues. This level is typically associated with design practice for peak periods.	0.801–0.900
E	Poor operation. Some long-standing vehicular queues develop on critical approaches to intersections. Delays may be up to several minutes.	0.901–1.000
F	Forced flow. Represents jammed conditions. Backups from locations downstream or on the cross street may restrict or prevent movement of vehicles out of the intersections approach lanes; therefore, volumes carried are not predictable. Potential for stop-and-go type traffic flow.	> 1.000
<p>Source: <i>Highway Capacity Manual, Special Report 209, Transportation Research Board, Washington, D.C., 1985 and Interim Materials on Highway Capacity, MCHRP Circular 212, 1982.</i></p>		

Construction

Construction of the Project is anticipated to begin in 2017 and be completed in 2019. Construction of the Project would involve four primary phases, which may overlap and include grading/demolition, foundation, vertical framing, and finishing. Peak hauling activity is anticipated to occur during the first phase of construction when excavation and grading would occur. In addition to soil hauling trucks, construction of the Project would also involve equipment and delivery trucks during each phase of construction. However, it is anticipated that almost all haul truck activity to and from the Project Site would occur outside of the A.M. and P.M. peak hours. Construction worker trips to and from the Project Site would also occur outside of the A.M. and P.M. peak hours. Therefore, no peak-hour construction traffic impacts are expected during the excavation and grading phase of construction. Haul trucks would travel on approved truck routes designated within the City. Given the Project Site's proximity to US-101, haul truck traffic would take the most direct route to the appropriate freeway ramp. It is anticipated that outbound traffic would travel on Highland Avenue to access US-101 northbound or on Hollywood Boulevard to access US-101 southbound. Inbound traffic would take the reverse route from US-101.

Table B-20
City of Los Angeles Intersection Impact Threshold Criteria

Level of Service	Final V/C	Project Related Increase In V/C
C	> 0.701–0.800	Equal to or greater than 0.040
D	> 0.801–0.900	Equal to or greater than 0.020
E or F	> 0.901	Equal to or greater than 0.010
<i>Source: City of Los Angeles Department of Transportation.</i>		

With regard to access during construction, construction activities are expected to be primarily contained within the Project Site boundaries. However, it is expected that construction fences may encroach into the public right-of-way (e.g., sidewalk and roadways) adjacent to the Project Site, which could temporarily impede pedestrian access. However, with implementation of Mitigation Measures XVI-1 to XVI-3, potential impacts to pedestrian access would be reduced to less than significant.

With regard to vehicular access, temporary traffic controls would be provided to direct traffic around any closures as required in the Construction Management Plan to be implemented as part of the Project. In addition, were construction fences to encroach into the public right-of-way, construction activities could result in the temporary loss of up to one unmetered parking space. However, it is noted that additional on-street parking is available in the vicinity of the Project Site and the temporary loss of up to one parking space would not result in a significant impact to parking during construction.

Additionally, adequate parking for construction workers would be secured in the vicinity of the Project Site. Restrictions against workers parking in the public right-of-way in the vicinity of (or adjacent to) the Project Site would be identified as part of the Construction Management Plan to be implemented as part of the Project.

There are no bus stops adjacent to the Project Site and, therefore, no temporary impacts to transit are expected.

In summary, construction of the Project is not expected to create hazards for roadway travelers, bus riders, or parkers, so long as commonly practiced safety procedures for construction are followed. Such procedures and other measures (e.g., to address temporary traffic control, lane closures, sidewalk closures, etc.) have been incorporated into the Construction Management Plan and Mitigation Measures XVI-1 to XVI-3, as described below. Therefore, construction-related impacts associated with access, parking, and transit are anticipated to be less than significant.

A detailed Construction Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, would be prepared and submitted to the City for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce traffic impacts on the surrounding community. The Construction Management Plan would be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and would include, but not be limited to, the following elements, as appropriate:

- Advance notification of adjacent property owners and occupants, as well as nearby schools, of upcoming construction activities, including durations and daily hours of construction.
- Prohibition of construction worker parking on adjacent residential streets. Temporary pedestrian and vehicular traffic controls during all construction activities adjacent to the Project Site to ensure traffic safety on public right of ways. These controls shall include, but are not limited to, flag people trained in pedestrian and student safety.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Construction-related vehicles shall not park on surrounding public streets.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate, including along all identified LAUSD pedestrian routes to nearby schools.
- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible, and so as to not impede school drop-off and pickup activities and students using LAUSD's identified pedestrian routes to nearby schools.
- Coordination with public transit agencies to provide advanced notifications of stop relocations and durations.
- Provide advanced notification of temporary parking removals and duration of removals.
- Provide detour plans to address temporary road closures during construction.

Mitigation Measures

Mitigation Measure XVI-1: Plan construction and construction staging as to maintain adequate and safe pedestrian access on adjacent sidewalks throughout construction.

Mitigation Measure XVI-2: Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.

Mitigation Measure XVI-3: Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

Operation

Intersections

In accordance with LADOT's methodology, traffic projections for the Project were developed using rates found in *Trip Generation, 9th Edition*. As set forth in the Traffic Study and summarized below in Table B-21 on page B-112, prior to accounting for transit trips, internal capture, and pass-by trips, the Project would generate approximately 1,589 daily trips, including 112 A.M. peak-hour trips and 118 P.M. peak-hour trips on a typical weekday. After accounting for transit trips, internal capture, and pass-by trips the Project would generate 1,244 daily trips, including 86 A.M. peak-hour trips and 92 P.M. peak-hour trips on a typical weekday. Specifically, the transit/walk adjustment applied to the Project's trip generation would reduce the Project's daily trips by 239 trips, the Project's A.M. peak-hour trips by 17 trips, and the Project's P.M. peak-hour trips by 18 trips. In addition, when accounting for internal capture, the Project's trips would be further reduced by 38 daily trips, including 3 A.M. peak-hour trips and 3 P.M. peak-hour trips. Lastly, a pass-by adjustment would reduce the Project's daily trips by 68 trips, including 6 A.M. peak-hour trips and 5 P.M. peak-hour trips.

The operational traffic impacts of the Project during the analyzed A.M. and P.M. peak periods are shown in Table B-22 on page B-113 for Existing with Project Conditions and in Table B-23 on page B-114 for Future with Project Conditions. As shown in Table B-22, with the addition of Project traffic, none of the study intersections would result in a change to the volume-to-capacity ratio that would exceed the significance thresholds set forth above. Therefore, traffic impacts at all study intersections would be less than significant during both the A.M. and P.M. peak periods under Existing with Project Conditions. As shown in Table B-23, with the addition of project traffic, none of the study intersections would result in a change to the volume-to-capacity ratio that would exceed the significance thresholds set forth above. Therefore, traffic impacts at all study intersections would

**Table B-21
Project Trip Generation^a**

Land Use	Size	Daily Trips	A.M. Peak Hour			P.M. Peak Hour		
			In	Out	Total	In	Out	Total
Proposed Project								
Hotel	140 rm	1,144	44	30	74	43	41	84
<i>Transit/Walk Adjustment (15 percent)^b</i>		(172)	(7)	(4)	(11)	(6)	(7)	(13)
<i>Hotel Subtotal</i>		972	37	26	63	37	34	71
Restaurant	3,500 sf	445	21	17	38	20	14	34
<i>Transit/Walk Adjustment (15 percent)^b</i>		(67)	(3)	(3)	(6)	(3)	(2)	(5)
<i>Internal Capture Adjustment (10 percent)^c</i>		(38)	(2)	(1)	(3)	(2)	(1)	(3)
<i>Pass-by Adjustment (20 percent)^d</i>		(68)	(3)	(3)	(6)	(3)	(2)	(5)
<i>Restaurant Subtotal</i>		272	13	10	23	12	9	21
Total Project Trips		1,244	50	36	86	49	43	92
<hr/> <i>rm = rooms</i> <i>sf = square feet</i> ^a <i>ITE Trip Generation, 9th Edition, 2012.</i> ^b <i>The Project Site is located within 0.25 mile of a Metro RapidBus stop (Line 780); therefore, a 15 percent transit adjustment was applied, per Traffic Study Policies and Procedures, LADOT, August 2014.</i> ^c <i>Internal capture adjustments account for person trips made between distinct land uses within a mixed-use development (i.e., between hotel guests and restaurant).</i> ^d <i>Pass-by adjustments account for Project trips made as an intermediate stop on the way from an origin to a primary trip destination without route diversion.</i> <i>Source: Gibson Transportation Consulting, Engineers, 2016.</i>								

be less than significant during both the A.M. and P.M. peak periods under Future with Project Conditions.

Freeways

Congestion Management Program Analysis

The potential impacts of the Project on CMP monitoring stations and freeways were analyzed in accordance with the CMP TIA guidelines. In order to address the potential for regional traffic impacts, the number of net new peak-hour project trips was added to the CMP monitoring locations and freeways in the vicinity of the Project Site to determine whether these volumes exceed the CMP thresholds of 150 vehicles per hour for freeway

Table B-22
Intersection Levels of Service—Existing with Project Conditions

No.	Intersection	Peak Hour	Existing Conditions		Existing with Project		Change in V/C	Signif. Impact?
			V/C	LOS	V/C	LOS		
1.	Whitley Ave. & Franklin Ave.	A.M.	0.630	B	0.633	B	0.003	No
		P.M.	0.595	A	0.597	A	0.002	No
2.	Wilcox Ave. & Franklin Ave.	A.M.	0.781	C	0.787	C	0.006	No
		P.M.	0.574	A	0.590	A	0.016	No
3.	Cahuenga Blvd. & Franklin Ave.	A.M.	0.921	E	0.925	E	0.004	No
		P.M.	0.855	D	0.859	D	0.004	No
4.	Wilcox Ave. & Yucca St.	A.M.	0.347	A	0.362	A	0.015	No
		P.M.	0.360	A	0.373	A	0.013	No
5.	Cahuenga Blvd. & Yucca Street	A.M.	0.495	A	0.499	A	0.004	No
		P.M.	0.585	A	0.588	A	0.003	No
6.	Cherokee Ave. & Hollywood Blvd.	A.M.	0.411	A	0.413	A	0.002	No
		P.M.	0.254	A	0.257	A	0.003	No
7.	Wilcox Ave. & Hollywood Blvd.	A.M.	0.557	A	0.581	A	0.024	No
		P.M.	0.512	A	0.524	A	0.012	No
8.	Cahuenga Blvd. & Hollywood Blvd.	A.M.	0.792	C	0.798	C	0.006	No
		P.M.	0.519	A	0.521	A	0.002	No

Source: Gibson Transportation Consulting Inc., 2016.

segments or 50 vehicle trips per hour for arterial monitoring stations. If the project traffic volumes are not found to exceed the CMP screening thresholds, no further analysis is required.

Two arterial CMP monitoring stations are located within approximately 1.5 miles of the study area: Santa Monica Boulevard and Highland Avenue, located approximately 0.9 mile southwest of the Project Site; and Santa Monica Boulevard and Western Avenue, located approximately 1.5 miles southeast of the Project Site. Morning and afternoon peak-hour traffic for these intersections was calculated based on the number of trips entering and leaving the study area in the direction of the outlying CMP arterial monitoring intersections. Based on this calculation, the number of peak-hour project trips expected at each arterial monitoring intersection is as follows:

- Santa Monica Boulevard and Western Avenue: 5 Project trips during the A.M. peak hour and 6 Project trips during the P.M. peak hour.

Table B-23
Intersection Levels of Service—Future with Project Conditions

No.	Intersection	Peak Hour	Future Conditions		Future with Project		Change in V/C	Signif. Impact?
			V/C	LOS	V/C	LOS		
1.	Whitley Ave. & Franklin Ave.	A.M.	0.681	B	0.684	B	0.003	No
		P.M.	0.667	B	0.670	B	0.003	No
2.	Wilcox Ave. & Franklin Ave.	A.M.	0.876	D	0.882	D	0.006	No
		P.M.	0.674	B	0.680	B	0.006	No
3.	Cahuenga Blvd. & Franklin Ave.	A.M.	1.039	F	1.043	F	0.004	No
		P.M.	0.960	E	0.967	E	0.007	No
4.	Wilcox Ave. & Yucca St.	A.M.	0.370	A	0.385	A	0.015	No
		P.M.	0.386	A	0.399	A	0.013	No
5.	Cahuenga Blvd. & Yucca St.	A.M.	0.569	A	0.573	A	0.004	No
		P.M.	0.677	B	0.681	B	0.004	No
6.	Cherokee Ave. & Hollywood Blvd.	A.M.	0.491	A	0.494	A	0.003	No
		P.M.	0.393	A	0.396	A	0.003	No
7.	Wilcox Ave. & Hollywood Blvd.	A.M.	0.642	B	0.666	B	0.024	No
		P.M.	0.655	B	0.677	B	0.022	No
8.	Cahuenga Blvd. & Hollywood Blvd.	A.M.	0.940	E	0.946	E	0.006	No
		P.M.	0.681	B	0.683	B	0.002	No

Source: Gibson Transportation Consulting Inc., 2016.

- Santa Monica Boulevard and Highland Avenue: 7 Project trips during the A.M. peak hour and 9 Project trips during the P.M. peak hour.

Therefore, the Project would add fewer than 50 peak-hour trips at each of the arterial monitoring intersections nearest the Project study area. As such, Project impacts to a CMP arterial intersection would be less than significant and no further analysis is required.

The closest mainline freeway monitoring location to the Project Site is on US-101 south of Santa Monica Boulevard, approximately 1.75 miles southeast of the Project Site. Based on the Project trip generation and trip distribution pattern at the freeway monitoring location nearest to the Project Site, the Project is projected to add a total of four southbound trips and six northbound trips during the morning peak hour and four southbound trips and four northbound trips during the afternoon peak hour. As such, the Project would not add 150 trips in either direction during either morning or afternoon peak hour. Therefore, project impacts to a CMP mainline freeway monitoring location would be less than significant and no further analysis is required. However, for informational purposes, further analysis was conducted. Table 10 and Table 11 of the Traffic Study

summarize the weekday A.M. and P.M. peak-hour demand to capacity ratio and corresponding LOS for the CMP mainline freeway monitoring location on US-101 south of Santa Monica Boulevard under Existing with Project and Future with Project Conditions, respectively. A significant impact would occur at a CMP mainline freeway segment if project traffic caused an incremental increase in the demand to capacity ratio of 0.02 or greater to a segment projected to operate at LOS F after the addition of project traffic. As shown in Table 10 and Table 11 of the Traffic Study, the changes in the demand to capacity ratio during the A.M. and P.M. peak hours at US-101 south of Santa Monica Boulevard would not exceed the CMP significance threshold of 0.02 under either Existing with Project or Future with Project Conditions. Therefore, impacts would be less than significant.

Caltrans Facilities Analysis

A Caltrans facilities analysis was also conducted to address the Project's potential impact on Caltrans facilities. The Caltrans facilities analysis addresses the Project's potential impacts to freeway mainline segments, Caltrans intersections, off-ramp queuing, and on-ramp capacity. Four freeway mainline segments on US-101 were analyzed using Highway Capacity Manual (HCM) 2010 methodology to determine density, speed, and LOS. Six intersections (including three signalized and three unsignalized intersections) and freeway ramp locations were analyzed using HCM 2010 methodology to identify average vehicle delay and LOS.

Freeway Mainline Segments

As detailed in the Traffic Study, based conservatively on CMP significance criteria, the Project would not significantly impact any of the freeway mainline segments under Existing with Project and Future with Project Conditions. Therefore, impacts to freeway mainline segments would be less than significant, and no mitigation measures are required.

Intersections

As evaluated in the Traffic Study, the six intersections would continue to operate at the same LOS under Existing Conditions and Existing with Project Conditions and under Future Conditions and Future with Project Conditions. Therefore, the Project would not cause the LOS to worsen at any intersection.

Off-Ramp Queues

Under Existing Conditions, two of the seven off-ramps evaluated would have queues exceeding the capacity of the approach lanes during at least one of the analyzed peak hours, with and without Project traffic. However, the queues would not exceed the available storage on the ramps at either location and, therefore, would not extend onto the

freeway mainline. Therefore, the Project would not substantially worsen queuing at any location under Existing Conditions.

Under Future Conditions, three of the seven analyzed off-ramps are forecast to have queues exceeding the capacity of the approach lanes during the morning and/or afternoon peak hours, with and without the addition of Project traffic. However, it is noted that the Project would add no more than five trips to the analyzed freeway off-ramps and increases in the projected queue lengths would be nominal (i.e., less than one car length).

On-Ramp Capacity

As analyzed in the Traffic Study, the Project would not substantially increase the on-ramp volumes at any located under Existing with Project Conditions and Future with Project Conditions.

Pedestrian and Bicycle Paths

Primary pedestrian access to the Project Site would be provided on Wilcox Avenue. The Project access locations would be designed to City standards and would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian and bicyclist safety. All driveways would be designed to intersect roadways at right angles, and street trees and other potential impediments to adequate visibility would be limited. Visitors, patrons, and employees arriving by bicycle would have the same access opportunities as pedestrian visitors. No dedicated bicycle lanes currently exist on Hollywood Boulevard. However, bicycle lanes are proposed in the City's 2010 Bicycle Plan and Mobility Plan. In order to facilitate bicycle use, bicycle parking would be provided on the Project Site consistent with the LAMC.

Transit

The Project Site is well served by rail and numerous bus transit routes. In the vicinity of the Project Site, the Metro Red Line has stations at Hollywood Boulevard and Highland Avenue, approximately less than 0.5 mile west of the Project Site, and at Hollywood Boulevard and Vine Street, approximately 0.33 mile east of the Project Site. Bus lines serving the Project area include Metro lines 210, 212, 217, 222, 312, and 780, as well as DASH lines DASH Hollywood, DASH Beachwood Canyon, and DASH Hollywood/Wilshire.

As detailed in the Traffic Study, based on the Project trip generation estimates and the methodology provided in the CMP, the Project would generate approximately eight transit trips in the A.M. peak hour and nine transit trips in the P.M. peak hour. These trips would be less than one percent of the total residual capacity of the Metro bus lines within

the study area during the A.M. and P.M. peak hours and would be distributed among the different transit lines serving the Project area. Therefore, impacts to the regional transit system would be less than significant.

b. Conflict with an applicable congestion management program including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Less Than Significant Impact. The Los Angeles County Metropolitan Transportation Authority administers the Congestion Management Program, a State-mandated program designed to address the impacts urban congestion has on local communities and the region as a whole. The CMP provides an analytical basis for the transportation decisions contained in the State Transportation Improvement Project. The CMP for Los Angeles County requires an analysis of any Project that could add 50 or more trips to any CMP intersection or more than 150 trips to a CMP mainline freeway location in either direction during either the A.M. or P.M. weekday peak hours. The Project would add a maximum of seven trips during the morning peak hour and nine trips during the afternoon peak hour to the CMP arterial monitoring location at Santa Monica Boulevard and Highland Avenue, approximately 0.9 mile southwest of the Project; and a maximum of five trips during the morning peak hour and six trips during the afternoon peak hour to the CMP arterial monitoring location at Santa Monica Boulevard and Western Avenue, approximately 1.5 miles southeast of the Project. The Project would add a total of four southbound trips and six northbound trips during the morning peak hour and four southbound trips and four northbound trips during the afternoon peak hour to the closest mainline freeway monitoring station located on US-101, approximately 1.75 miles southeast of the Project. Therefore, implementation of the Project would not add more than 50 trips to the identified roadway CMP or more than 150 trips to mainline freeway CMP location in either direction during either the A.M. or P.M. weekday peak hours. Impacts would be less than significant, and no mitigation measures are required. Also refer to Response to Checklist Question No. XVI.a. above.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. The Project Site is not located in the vicinity of any private or public airport or planning boundary of any airport land use plan. Additionally, the Project does not propose any uses that would increase the frequency of air traffic. Thus, no impacts to air traffic patterns would occur, and no mitigation measures are required.

d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. The Project would not alter the existing roadway configuration in the vicinity of the Project Site. In addition, the Project would not include any dangerous design features, including sharp curves or dangerous intersections, on-site or off-site. Furthermore, the Project does not propose any hazardous or incompatible uses. Since the Project would not include any hazardous design features or incompatible uses, no impacts would occur, and no mitigation measures are required.

e. Result in inadequate emergency access?

Less Than Significant Impact. According to the Safety Element of the City of Los Angeles General Plan, the Project Site is not located along a designated disaster route.⁵³ The closest disaster routes include Cahuenga Boulevard located approximately 0.1 mile to the east of the Project Site and Santa Monica Boulevard located approximately 0.8 mile to the south of the Project Site.

During construction of the Project, construction activities would generate traffic associated with the movement of construction equipment, hauling of demolition and graded materials, and construction worker trips. Additionally, construction activities may involve temporary partial lane closures adjacent to the Project Site for utility improvements, staging, and general construction activities. Other implications of construction-related traffic include increased travel time due to flagging or stopping of traffic to accommodate trucks entering and exiting the Project Site during construction. As such, construction activities could potentially increase response times for emergency vehicles traveling to the Project Site and nearby uses along surrounding streets. However, partial lane closures, should any be required, would be temporary in nature and in the event of partial lane closures, both directions of travel on area roadways and access to the Project Site would be maintained. In addition, during construction of the Project, a Construction Management Plan would be implemented to ensure that adequate and safe access remains available at the Project Site. As part of these plans, provisions for temporary traffic control would be provided during all construction activities along public rights-of-way to improve traffic flow on public roadways (e.g., flaggers). Designated truck queuing, equipment staging, and construction worker parking areas would also be provided. Additionally, emergency access to the Project Site would remain clear and unhindered during construction of the Project pursuant to City requirements.

⁵³ *City of Los Angeles Department of Planning General Plan Safety Element—Critical Facilities and Lifeline Systems, Exhibit H (November 26, 1996).*

With regard to emergency vehicle access during operation, emergency vehicles would continue to have access to the Project Site from Wilcox Avenue and Hudson Avenue. The area surrounding the Project Site includes a mature street system consisting of freeways, primary and secondary arterials, and collector and local streets which provide regional, sub-regional, and local access and circulation in the vicinity of the Project Site. Based on the Project Site's location within a highly urbanized area of the City, the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature. Therefore, the street system surrounding the Project Site is not considered substandard. In addition, the Project's driveways and internal circulation would be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. The Project does not include any improvements along the streets surrounding the Project Site which could impede emergency vehicle access. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the Project. Therefore, the Project would not significantly impact emergency vehicle access to the Project Site and surrounding uses.

f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less Than Significant Impact. As described in Response to Checklist Question No. XVI.a, above, the development of the Project would have no adverse significant impacts to either existing or planned public transit, bicycle, or pedestrian facilities in the vicinity of the Project Site. In addition, the Project would comply with LAMC requirements with regard to bicycle parking and pedestrian access. Therefore, the Project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

XVII. Tribal Cultural Resources

Would the project:

- a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to the California Native American tribe, and that is:**
- i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or**

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact. On September 25, 2014, Governor Brown signed into law Assembly Bill 52, which amended Public Resources Code Section 5097.94 and added Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3 to establish that an analysis of a project's impact on cultural resources include whether the project would impact "tribal cultural resources." As set forth in Public Resources Code Section 21074, tribal cultural resources are any of the following:

- (1) *Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:*
 - (A) *Included or determined to be eligible for inclusion in the California Register of Historical Resources.*
 - (B) *Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.⁵⁴*
- (2) *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1.⁵⁵ In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.*
 - (a) *A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.*

⁵⁴ Per subdivision (k) of Public Resources Code Section 5020.1, "local register of historical resources" means a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution.

⁵⁵ Subdivision (c) of Public Resources Code Section 5024.1 provides the National Register of Historic Places criteria for listing of historical resources in the California Register.

- (b) *A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2,⁵⁶ or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2⁵⁷ may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).*

As set forth in Public Resources Code Section 21080.3.1, prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report, the lead agency is required to consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of a proposed project, if: (1) the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area; and (2) the tribe requests consultation, prior to the release of a negative declaration, mitigated negative declaration or environmental impact report for a project.

The City of Los Angeles Department of City Planning, as lead agency for the Project, solicited consultation with California Native American tribes on June 13, 2016. As of October 27, 2016, the City has not received any communication from the tribes consulted requesting consultation.

XVIII. Utilities and Service Systems

Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact. Wastewater collection and treatment services within the Project vicinity are provided by the City of Los Angeles Department of Public Works. Wastewater generated during operation of the Project would be collected and discharged into the existing sewer mains and then conveyed to the Hyperion Water

⁵⁶ *Per subdivision (g) of Public Resources Code Section 21083.2, a unique archaeological resource means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: (1) contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; or (2) has a special and particular quality such as being the oldest of its type or the best available example of its type; or (3) is directly associated with a scientifically recognized important prehistoric or historic event or person.*

⁵⁷ *Per subdivision (h) of Public Resources Code Section 21083.2, a nonunique archaeological resource means an archaeological artifact, object, or site which does not meet the criteria in subdivision (g). A nonunique archaeological resource need be given no further consideration, other than the simple recording of its existence by the lead agency if it so elects.*

Reclamation Plant (HWRP) located in the City of El Segundo. The HWRP is part of the Hyperion Service Area, which also includes the Donald C. Tillman Water Reclamation Plant (TWRP) and the Los Angeles–Glendale Water Reclamation Plant (LAGWRP).⁵⁸ The HWRP is designed to treat 450 million gallons per day (mgd) during dry weather days up to 800 mgd during wet weather days.⁵⁹ The TWRP is designed to treat 80 mgd and the LAGWRP is designed to treat 20 mgd. The treatment capacity of the entire Hyperion Service Area is approximately 550 mgd.⁶⁰

Incoming wastewater to the HWRP is treated via preliminary, primary, and secondary treatments. Preliminary treatment consists of a screening process to remove coarse debris and grit. This is followed by primary treatment, which is a physical separation process where solids are allowed to either settle to the bottom of tanks or float on the surface. During secondary treatment, wastewater is transported to covered, oxygen rich reactor tanks, where bacteria living in the wastewater consume most of the remaining solids. The bacteria are then allowed to settle to the bottom of the tanks and sent to clarifiers for final settling and collection. The solids that are removed from primary and secondary treatment are transported into digesters, where bacteria and other microorganisms that live without oxygen, eat half of the biosolids, destroy the pathogens and release a natural methane gas.⁶¹ After treatment is completed, the water is dispersed 5 miles offshore at a depth of 200 feet. As this treated effluent enters the ocean environment, it is diluted at a ratio of over 80 parts seawater to one part treated effluent. The discharge of effluent from the HWRP into Santa Monica Bay is regulated by the HWRP's NPDES Permit issued under the Clean Water Act and is required to meet the Regional Water Quality Control Board's requirements for a recreational beneficial use. Accordingly, the HWRP's effluent to Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed standards.

The wastewater generated by the Project would be typical of hotel and restaurant uses. No industrial discharge into the wastewater system would occur. As discussed

⁵⁸ *City of Los Angeles Department of Public Works Bureau of Sanitation, What We Do, Clean Water* www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?_adf.ctrl-state=v426zn651_4&_afLoop=29208270526435147#!, accessed July 1, 2016.

⁵⁹ *City of Los Angeles Department of Public Works Bureau of Sanitation, What We Do, Water Reclamation Plants, Hyperion Water Reclamation Plant*, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p?_adf.ctrl-state=v426zn651_4&_afLoop=29208559712533447#!, accessed July 1, 2016.

⁶⁰ *City of Los Angeles Department of Public Works Bureau of Sanitation, What We Do, Clean Water, Water Reclamation Plants*, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=v426zn651_4&_afLoop=29208372604544699#!, accessed July 1, 2016.

⁶¹ *City of Los Angeles Department of Public Works Bureau of Sanitation, What We Do, Water Reclamation Plants, Hyperion Water Reclamation Plant*, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p?_adf.ctrl-state=v426zn651_4&_afLoop=29208559712533447#!, accessed July 1, 2016.

above, wastewater generated by the Project would be collected and discharged via existing sewer mains and then conveyed to the HWRP where it would undergo treatment. As the Project's wastewater is ultimately conveyed to the HWRP and as the HWRP is in compliance with the State's wastewater treatment requirements, the Project would not exceed the wastewater treatment requirements of the Regional Water Quality Control Board. Therefore, impacts would be less than significant, and no mitigation measures are required.

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. Water and wastewater systems consist of two components, the source of the water supply or place of sewage treatment, and the conveyance systems (i.e., distribution lines and mains) that link the location of these facilities to an individual development site. An analysis of the Project's impacts on these systems is provided below.

Water

Water service to the Project Site would continue to be supplied by the City of Los Angeles Department of Water and Power (LADWP) for domestic and fire protection uses. While domestic water demand is typically the main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure, and therefore are the primary means for analyzing infrastructure capacity. Fire flow to the Project would be required to meet City of Los Angeles fire flow requirements. Section 57.507.3.1 of the LAMC establishes fire flow standards for specified land uses, including Low Density Residential, High Density Residential and Commercial Neighborhood, Industrial and Commercial, and High Density Industrial and Commercial or Industrial. Based on fire flow standards set forth in Section 57.507.3.1 of the LAMC, the Project falls within the Industrial and Commercial category, which has a required fire flow of 6,000 gallons per minute (gpm) from four hydrants to up to 9,000 gpm from six fire hydrants flowing simultaneously with a residual pressure of 20 pounds per square inch (psi). In accordance with the fire flow standards set forth in the LAMC, the Applicant would coordinate with the City to ensure that adequate water infrastructure is available to meet the required fire flows. Should the City determine that additional water connections and water infrastructure capacity is needed to meet the required fire flows, the Applicant would implement such improvements in consultation with the City. Additionally, as required by the LAMC, hydrants would be spaced per the hydrant spacing requirements set forth in Section 57.507.3.2 of the LAMC to provide adequate coverage of the building exterior and to deliver a minimum pressure of 20 pounds per square inch at full flow. Therefore, the Project would not result in the construction of new water facilities or expansion of existing facilities.

Wastewater

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the HWRP. As described above in Response to Checklist Question No. XVIII.a, the HWRP has a capacity of 450 mgd. As shown in Table B-24 on page B-125, based on sewage generation factors established by the Bureau of Sanitation, the Project would generate approximately 19,650 gallons per day (gpd) or approximately 0.01965 mgd upon completion. This estimate is conservative as it does not account for the net effect of wastewater generated by existing parking and restaurant uses on-site. The Project's average daily wastewater flow of 0.01965 mgd would represent approximately 0.007 percent of the current 275 mgd average daily flow of the HWRP.⁶² Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the HWRP.

Sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing sewer mains adjacent to the Project Site. Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable City of Los Angeles Bureau of Sanitation and California Plumbing Code standards. The Applicant would coordinate with the City to ensure that adequate sewer infrastructure is available to meet the anticipated wastewater generation of the Project. Should the City determine that additional sewer connections and sewer infrastructure capacity is needed to meet the demands of the Project, the Applicant would implement such improvements in consultation with the City.

Based on the above, impacts to water and wastewater facilities would be less than significant, and no mitigation measures are required.

c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. As discussed above in Response to Checklist Question No. IX.c., the Project Site is primarily comprised of impervious surface areas. Given the mostly impervious area of the Project Site, any stormwater that falls on the Project Site is likely directed to storm drains adjacent to the Project Site on Wilcox Avenue and Hudson Avenue and not infiltrated or captured on-site. The Project is an infill development and would replace the existing surface parking area and restaurant with a

⁶² *City of Los Angeles Department of Public Works Bureau of Sanitation, What We Do, Water Reclamation Plants, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=v426zn651_4&_afzLoop=29208833112385926#!, accessed July 1, 2016.*

Table B-24
Estimated Project Wastewater Generation^a

Proposed Land Use	Area/Units	Generation Rate^b	Total Wastewater Generated (gpd)
Hotel	134 rooms	120/room	16,080
Restaurant ^c	119 seats	30 gpd/seat	3,570
Total			19,650

gpd = gallons per day
cfs = cubic feet per second
du = dwelling unit
sf = square feet

^a *Analysis conservatively does not account for existing water demand and wastewater generation that would reduce the net demand and generation from the Project.*

^b *Generation rates provided by the City of Los Angeles Department of Public Works, Bureau of Sanitation.*

^c *Restaurant use assumes 1 seat per 30 square feet.*

Source: Eystone Environmental, February, 2016.

hotel building that would include restaurant uses. Since the Project would be constructed within the extent of the Project Site, with implementation of the Project, the Project Site would remain mostly impervious surface area. In addition, the Project would include several planter boxes throughout the building that would serve to capture some of the stormwater from the Project Site. Any stormwater not captured by the proposed planter boxes would continue to flow to the storm drains adjacent to the Project Site along Wilcox Avenue and Hudson Avenue. Therefore, the Project would not substantially alter existing drainage patterns, including through the alteration of a stream or river, which could result in an increase in substantial erosion or siltation on- or off-site. As such, the Project would not contribute to runoff which would exceed the capacity of existing drainage systems and thereby require the construction of new stormwater drainage facilities. Impacts would be less than significant, and no mitigation measures are required.

d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?

Less Than Significant Impact. LADWP provides water service to the Project Site. Water is supplied to the City from four primary sources: the Los Angeles Aqueducts, local groundwater, Metropolitan Water District of Southern California (MWD), and recycled water. LADWP's 2015 Urban Water Management Plan provides water supply and demand projections in five-year increments to 2040, based on demographic growth projections in SCAG's 2012–2035 RTP/SCS. It is noted that since preparation of the 2015 Urban Water

Management Plan, new growth forecasts have become available in SCAG's 2016–2040 RTP/SCS. According to SCAG's 2016–2040 RTP/SCS, the SCAG region's population is projected to grow slower than that of the previous years. The 2015 Urban Water Management Plan takes into account the realities of climate change and the concerns of drought and dry weather and notes that the City will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. Based on LADWP's 2015 Urban Water Management Plan water demand projections through 2040, projected water demand for the City would be met by the available supplies during an average year, single-dry year, and multiple-dry year through the year 2040, as well as the intervening years (i.e., the Project buildout year of 2018).

Consistent with LADWP's methodology, the Project's estimated water demand was calculated by applying the City's Bureau of Sanitation wastewater generation rates to the proposed land uses associated with the Project. As shown above in Table B-24 on page B-125, the Project would have an average daily domestic water demand of approximately 19,650 gpd. It should be noted that the Project's estimated water demand is conservative as it does not account for water conservation features. Specifically, the Project would comply with the LAMC requirements regarding water conservation, which include various water efficiency requirements and installation of high efficiency plumbing fixtures. Therefore, the actual net increase in water demand generated by the Project would be less. As concluded in LADWP's 2010 Urban Water Management Plan, projected water demand for the City would be met by the available supplies during an average year, single-dry year, and multiple-dry year through the year 2035, as well as the intervening years (i.e., 2019). Therefore, LADWP would be able to meet the water demand for the Project as well as existing and planned water demands of its future service area.

Based on the above, it is anticipated that sufficient water supplies would be available to serve the Project, and no new or expanded water entitlements would be needed. Impacts would be less than significant, and no mitigation measures are required.

e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As discussed above in Response to Checklist Question No. XVIII.b, wastewater generated during Project operation would be collected and discharged into the existing sewer main and conveyed to the HTP. Based on the amount of wastewater expected to be generated by the Project and future wastewater treatment capacity, adequate wastewater treatment capacity would be available to serve the Project Site together with projected future demand and existing commitments. As such,

the Project would have a less than significant impact with respect to wastewater treatment and infrastructure, and no mitigation measures are required.

f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant Impact. Various public agencies and private companies provide solid waste management services in the City of Los Angeles. Private collectors service most multi-family units and commercial developments, whereas the City Bureau of Sanitation collects the majority of residential waste from single-family and some smaller multi-family residences. Solid waste generated by the Project would be transported by a private contractor and disposed at a major Class III (municipal) landfill located in Los Angeles County. Ten Class III landfills and one unclassified landfill with solid waste facility permits are located within Los Angeles County.^{63,64} Of the 10 Class III landfills in Los Angeles County, five Class III landfills are open to the City of Los Angeles.⁶⁵ Within Los Angeles County, there are two solid waste transformation facilities that convert, combust, or otherwise process solid waste for the purpose of energy recovery. These include the Commerce Refuse to Energy Facility located in the City of Commerce and the Southeast Resource Recovery Facility located in the City of Long Beach.

Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the Los Angeles County Countywide Integrated Waste Management Plan (CoIWMP) Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.⁶⁶ Based on the most recent 2014 CoIWMP Annual Report, the remaining total disposal capacity for the County's Class III landfills is estimated at 112.09 million tons as of December 31, 2014. For the Class III landfills open to the City, the remaining total disposal capacity is estimated at 93.47 million tons.⁶⁷ In addition, in 2014, the County's

⁶³ *County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2014 Annual Report, December 2015.*

⁶⁴ *The ten Class III landfills within Los Angeles County include: Antelope Valley, Burbank, Calabasas, Chiquita Canyon, Lancaster, Pebbly Beach, San Clemente, Scholl Canyon, Sunshine Canyon City/County and Whittier (Savage Canyon). The unclassified landfill within the Los Angeles County is the Azusa Land Reclamation facility.*

⁶⁵ *The five Class III landfills open to the City of Los Angeles include: Antelope Valley, Calabasas, Chiquita Canyon, Lancaster, and Sunshine Canyon City/County. Note that while the Calabasas Landfill is open to the City of Los Angeles, its service area is limited to the cities of Hidden Hills, Agoura Hills, Westlake Village, and Thousand Oaks per Los Angeles County Ordinance No. 91-0003.*

⁶⁶ *County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2014 Annual Report, December 2015.*

⁶⁷ *This total excludes the remaining disposal capacity at the Calabasas Landfill, which is only open to portions of the City that do not include the Project Site.*

Class III landfills open to the City (excluding the Calabasas Landfill) had a total maximum daily capacity of 22,900 tons per day (tpd) and an average daily disposal of 12,844 tpd, resulting in approximately 10,016 tpd of remaining daily disposal capacity.⁶⁸ Aggressive waste reduction and diversion programs on a countywide level have helped reduce disposal levels at the County's landfills.

Based on the 2014 CoIWMP Annual Report, the County anticipates that future disposal needs can be adequately met for the next 15 years through 2029, which is well past the Project's buildout year (2019), via a multi-pronged approach that includes successfully permitting and developing proposed in-County landfill expansions, using available or planned out-of-County disposal capacity, developing necessary infrastructure to facilitate exportation of waste to out-of-County landfills, developing conversion and other alternative technologies, and increasing the countywide diversion rate by enhancing waste prevention and diversion programs.

The City's Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan sets a goal of becoming a "zero waste" city by 2030. To this end, the City of Los Angeles implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling.⁶⁹ The City has adopted the goal of achieving 90 percent by 2025, and zero waste by 2030.

Construction

The Project Site is currently improved with a surface parking lot and a restaurant. These uses currently generate solid waste within the Project Site. The Project would remove the existing surface parking lot and restaurant to allow for construction of a 134-room hotel and approximately 3,580 square feet of restaurant uses.

The construction activities necessary to build the Project would generate debris, some of which may be recycled to the extent feasible. Construction materials would be recycled in accordance with the City of Los Angeles Green Building Code (Ordinance No. 181,480), which requires a minimum construction waste reduction of approximately 50 percent. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City.

⁶⁸ County of Los Angeles, Department of Public Works. *Los Angeles County Integrated Waste Management Plan 2014 Annual Report, December 2015., Appendix E-1.*

⁶⁹ City of Los Angeles, *Solid Waste Integrated Resource Plan FAQ*; www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPFAQS.pdf, accessed February 23, 2016.

Given the remaining permitted capacity of the Azusa Land Reclamation facility, as well as the Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

Operation

As shown in Table B-25 on page B-130, operation of the Project would generate approximately 655 lbs/day (0.33 tons/day) of solid waste. It is noted that the estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures, such as compliance with AB 341, which requires California commercial enterprises and public entities that generate four or more cubic yards per week of waste, and multi-family housing with five or more units, to adopt recycling practices. The estimated solid waste generated by the Project would represent approximately 0.003 percent of the remaining daily disposal capacity of the County's Class III landfills. Therefore, the Project's estimated solid waste generation would represent a nominal percentage of the remaining daily disposal capacity of the County's Class III landfills.

Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste that would be generated by construction and operation of the Project. Therefore, impacts would be less than significant, and no mitigation measures are required.

g. Comply with federal, state, and local statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. Furthermore, Assembly Bill 341 (AB 341), which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The "blueprint" of the plan builds on the key elements of existing reduction and recycling programs and infrastructure, and combines them with new systems and conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables, soil amendments, renewable fuels, chemicals, and energy.

Table B-25
Estimated Project Solid Waste Generation

Proposed Land Use	Units/Area	Generation Rate^a	Total Solid Waste Generated (lbs/day)
Hotel	134 rooms	4 lbs/room/day	536
Restaurant (1 seat/30 sf) ^b	3,580 sf (119 seats)	1 lb/seat/day	119
Total			655

du = dwelling unit
sf = square feet
^a *CalRecycle Estimated Solid Waste Generation and Disposal Rates, Service Establishments, www.calrecycle.ca.gov/WasteChar/WasteGenRates/default.htm, accessed February 23, 2016.*
^b *Restaurant use assumes 1 seat per 30 square feet.*
Source: Eyestone Environmental, 2016.

The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that developments include a recycling area or room of specified size on the Project Site.⁷⁰ The Project would also promote compliance with AB 939, AB 341, and City waste diversion goals by providing clearly marked, source sorted receptacles to facilitate recycling. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant, and no mitigation measures are required.

h. Other utilities and service systems?

Less Than Significant Impact. The following analysis estimates the Project's electricity and natural gas usage and evaluates existing and projected supplies and the capacity of existing infrastructure to serve the Project's estimated demand. In accordance with Appendix F of the CEQA Guidelines, the analysis provided below includes relevant information and analyses that address the energy implications of the Project. The supporting energy calculations are included in Appendix G of this MND.

⁷⁰ *Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.*

Electricity transmission to the Project Site is provided and maintained by LADWP through a network of utility poles and underground utility lines. Natural gas service is provided to the Project Site by the Southern California Gas Company (SoCalGas).

Construction

During construction of the Project, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to offsite reuse and disposal facilities).

As shown in Table B-26 on page B-132, a total of 712 kilowatt-hours (kWh) of electricity, 19,819 gallons of gasoline, and 48,802 gallons of diesel fuel would be consumed during Project construction.

Electricity

As described above, electricity would be consumed during construction to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Electricity would be supplied to the Project Site by LADWP and would be obtained from existing electrical poles on or adjacent to the Project Site. Furthermore, the electricity demand during construction would be slightly offset with the removal of the surface parking lot and restaurant on-site which currently generate a demand for electricity. As shown in Table B-26, approximately 712 kWh of electricity would be consumed during Project construction. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Therefore, the use of electricity during project construction would not be wasteful, inefficient, or unnecessary.

Construction of the Project's electrical infrastructure would primarily occur within the Project Site with the possible need for off-site connections to the electrical system adjacent to the Project Site. Where feasible, the new electrical service installations and connections would be scheduled and implemented in a manner that would not result in electrical service interruptions to other properties. The Applicant would also be required to coordinate electrical infrastructure removals or relocations with LADWP and comply with site-specific

Table B-26
Summary of Energy Use During Construction^a

Fuel Type	Quantity
Electricity	
Water Consumption	712 kWh
Total Electricity	712 kWh
Gasoline	
On-Road Construction Equipment	19,819 gallons
Off-Road Construction Equipment	0 gallons
Total Gasoline	19,819 gallons
Diesel	
On-Road Construction Equipment	20,634 gallons
Off-Road Construction Equipment	28,168 gallons
Total Diesel	48,802 gallons
<hr/> <i>kWh=Kilowatt-hour</i> ^a Detailed calculations are provided in Appendix G of this MND. Source: Eyestone Environmental, 2016.	

requirements set forth by LADWP, which would ensure that service disruptions and potential impacts associated with grading, construction, and development within LADWP easements are minimized. As such, construction of the Project's electrical infrastructure is not anticipated to adversely affect the electrical infrastructure serving the Project Site and surrounding uses or utility system capacity.

Therefore, construction of the Project would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Therefore, based on the above, construction-related impacts to electricity supply and infrastructure would be less than significant, and the use of electricity during project construction would not be wasteful, inefficient, or unnecessary.

Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support project construction activities and there would be no demand generated by construction. However, the Project would involve installation of new natural gas connections to serve the Project Site. Since the Project Site is located in an area already served by existing natural gas infrastructure, the Project would likely not require

extensive infrastructure improvements to serve the Project Site. Construction impacts associated with the installation of natural gas connections are expected to be confined to trenching in order to place the lines below surface. Prior to ground disturbance, Project contractors would notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties. Adequate and safe vehicular and pedestrian access within the Project Site and immediately surrounding the Project Site would also be maintained in accordance with a Construction Management Plan to be implemented for the Project. Therefore, construction of the Project would not result in an increase in demand for natural gas to affect available supply or distribution infrastructure capabilities and would not result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Construction-related impacts to natural gas supply and infrastructure would be less than significant.

Transportation Energy

As shown in Table B-26 on page B-132, on- and off-road vehicles would consume an estimated 19,819 gallons of gasoline and approximately 48,802 gallons of diesel fuel throughout the Project's construction. The consumption of petroleum-based fuels during construction would be temporary and would cease upon the completion of construction. The consumption of petroleum-based fuels would also vary throughout construction of the Project as certain phases of construction would require greater use of petroleum-based fuels compared to other phases of construction. In addition, with regard to trips for hauling demolition material, the City has adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems, as discussed above in Response to Checklist Question Nos. XVIII.f and XVIII.g. The Project's compliance with these regulations would reduce the number of trips and fuel required to transport construction debris and in turn would reduce the wasteful, inefficient, and unnecessary consumption of energy.

Based on the above, the Project's construction activities would not result in the inefficient use of energy resources, create energy utility system capacity problems, create problems with the provision of energy services, or result in a significant impact associated with the construction of new or expanded energy facilities. As such, construction-related impacts to other utilities and service systems would be less than significant.

Operation

During operation of the Project, energy would be consumed for multiple purposes including, but not limited to, heating/ventilating/air conditioning (HVAC), refrigeration, lighting, electronics, office equipment, and commercial machinery (including kitchen appliances). Energy would also be consumed during Project operations related to water

usage, solid waste disposal, and vehicle trips. Annual energy use has been calculated for buildout of the Project and is shown in Table B-27 on page B-135.

Electricity

As shown in Table B-27, with buildout of the Project, the on-site electricity demand would be approximately 1,667,781 kWh of electricity per year.⁷¹ This estimate is conservative as it does not account for the net effect of the existing electricity consumed by the existing surface parking lot and restaurant. With regard to supply, LADWP forecasts that its total energy sales in the 2019–2020 fiscal year will be 23,399 gigawatt-hours (GWh) of electricity.^{72,73} The Project's electricity demand would represent approximately 0.007 percent of LADWP's projected sales in 2019. The Project would also incorporate a variety of energy conservation measures to reduce energy usage. Therefore, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand. Accordingly, operation of the Project would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Therefore, operational impacts to electricity supply and infrastructure capacity would be less than significant, and no mitigation measures are required.

Natural Gas

As shown in Table B-27, the Project is estimated to annually consume approximately 4,357,985 cubic feet cubic feet or approximately 11,940 cubic feet per day of natural gas.⁷⁴ The annual natural gas supply within SoCalGas's service area is estimated to be approximately 2,581 million cubic feet per day (mmcf/day) in 2019.⁷⁵ The Project's natural gas demand would represent approximately 0.0004 percent of SoCalGas's forecasted natural gas supply in 2019. Therefore, it is anticipated that SoCalGas' existing and planned natural gas supplies would be sufficient to support the Project's demand for natural gas. As such, operation of the Project would not result in an increase in demand for natural gas that exceeds available supply or distribution infrastructure capabilities that

⁷¹ *Electricity demand estimate based on estimate provided by the California Emissions Estimator Model (CalEEMod)*

⁷² *LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.*

⁷³ *LADWP, 2015 Power Integrated Resource Plan, Appendix A, Table A-1.*

⁷⁴ *Natural gas demand estimate based on estimate provided by the California Emissions Estimator Model (CalEEMod).*

⁷⁵ *California Gas and Electric Utilities, 2016 California Gas Report, p. 96.*

Table B-27
Summary of Annual Energy Use During Operation^a

Source	Project with Project Features
Electricity	
Building	1,623,172 kWh
Water	44,609 kWh
Total Electricity	1,667,781 kWh
Natural Gas	4,357,985 cf
Mobile	
Gasoline	115,286 gallons
Diesel	19,957 gallons
<hr/> <i>kWh = kilowatt-hours</i> <i>cf = cubic feet</i> ^a Detailed calculations are provided in Appendix G of this MND. Source: Eyestone Environmental, 2016.	

could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Operational impacts to natural gas supply and infrastructure would be less than significant, and no mitigation measures are required.

Transportation Energy

During operation, the Project would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. As summarized in Table B-27, buildout of the Project would consume approximately 115,286 gallons of gasoline and 19,957 gallons of diesel fuel per year, or a total of 135,243 gallons of petroleum-based fuels per year. As noted above, the Project Site is located in an urbanized area and in close proximity to several bus routes which would provide employees and tourists with various public transportation opportunities. Furthermore, the Project would be consistent with the VMT reduction policies included in SCAG's RTP/SCS. Specifically, consistent with the SCAG's RTP/SCS alignment of transportation, land use, and housing strategies, the Project would provide visitors and employees with convenient access to public transit, which would facilitate a reduction in vehicle miles traveled. As shown in Appendix A of this MND, the close proximity of transit would reduce the number of vehicular trips and related VMT by approximately 29 percent. The Project's estimated VMT reductions would be consistent with regional strategies and would be consistent with and support the goals and benefits of the SCAG RTP/SCS, which seeks

improved “mobility and access by placing destinations closer together and decreasing the time and cost of traveling between them. Thus, consistent with SCAG’s RTP/SCS, the Project would reduce VMT, and, consequently, the Project’s petroleum-based fuel usage would be reduced. As such, operational impacts to transportation energy would be less than significant.

Energy Conservation

The Project would be designed to comply with all applicable state and local codes, including the City’s Green Building Ordinance and the California Green Building Standards Code. Design features that could be implemented would include, but not be limited to, use of efficient lighting technology; energy efficient heating, ventilation and cooling equipment; and Energy Star rated products and appliances. In addition, the Project would incorporate a variety of water conservation features that would also promote energy conservation.

Overall, the Project would be designed and constructed in accordance with applicable state and local green building standards that would serve to reduce the energy demand of the Project. In addition, based on the above, the Project’s energy demand would be within the existing and planned electricity and natural gas capacities of LADWP and SoCalGas, respectively. Use of petroleum-based fuels during construction and operation would also be minimized. Therefore, development of the Project would not cause the wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F of the CEQA Guidelines. Impacts would be less than significant, and no mitigation measures are required.

XIX. Mandatory Findings of Significance

- a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

Less Than Significant Impact with Mitigation Incorporated. The Project Site is located in a highly urbanized area and does not include habitat for fish or wildlife species. Therefore, the Project would not substantially reduce the habitat of fish or wildlife species or cause a fish or wildlife population to drop below self-sustaining levels. The Project would not adversely affect historic resources, and no impact to historic resources would occur with implementation of the Project. Additionally, with compliance with existing regulations and with the incorporation of mitigation measures listed in Response to

Checklist Question No. V.c, impacts to unknown cultural resources, including archeological and paleontological resources that may be encountered during construction, would be less than significant. Overall, with compliance with existing regulatory requirements and with implementation of the mitigation measure provided above in Checklist Question No. V, impacts would be less than significant with the incorporation of mitigation measures.

b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).

Less Than Significant Impact. The potential for cumulative impacts occurs when the independent impacts of the Project are combined with the impacts of related projects in proximity to the Project Site, thereby resulting in impacts that are greater than the impacts of the Project alone. CEQA defines cumulative impacts as “two or more individual effects which, when considered together are considerable or which compound or increase other environmental impacts.”⁷⁶ In accordance with CEQA, the analysis of cumulative impacts need not be as in-depth as what is performed relative to the project, but instead is to “be guided by the standards of practicality and reasonableness.”⁷⁷ Located within the vicinity of the Project Site are other current and reasonably foreseeable projects whose development, in conjunction with that of the Project, may contribute to potential cumulative impacts. As discussed in the Traffic Study, 130 related projects were identified in the vicinity of the Project Site. A list of these related projects is provided in the Traffic Study included as Appendix F of this MND. The related projects include mixed use, residential, office, commercial, institution, recreation, hotel, and motion picture uses. Based on the proposed locations of the related projects, the nearest related projects include Related Project No. 32, Related Project No. 39, and Related Project No. 94. Related Project No. 32 is located at 6381 West Hollywood Boulevard, approximately 0.1 mile southeast of the Project Site, and includes the development of 80 hotel rooms and approximately 15,290 square feet of restaurant uses. Related Project No. 39 is located at 6523 West Hollywood Boulevard, approximately 500 feet south of the Project Site, and includes the development of 15,000 square feet of restaurant space. Related Project No. 94 is located at 6611 Hollywood Boulevard, approximately 0.2 mile southwest of the Project Site, and includes the development of 167 hotel rooms, approximately 10,500 square feet of retail, and approximately 5,400 square feet of restaurant uses. As the following analysis indicates, due to the distance of most of the related projects from the Project Site and

⁷⁶ *State CEQA Guidelines, 14 California Code of Regulations, Section 15355, et seq.*

⁷⁷ *Ibid*, § 15355.

specific on-site and surrounding conditions, the Project would not result in significant cumulative impacts for any of the environmental issue areas.

- **Aesthetics**—Project impacts to aesthetics resources have the potential to be cumulatively considerable if Project development in conjunction with related project development were to substantially alter existing views of visual resources or the visual character of the area. As analyzed above, given the availability of views of the Hollywood Hills adjacent to the Project Site, the surrounding existing development, and the proposed design of the Project featuring setbacks, the Project would not obstruct existing views of the Hollywood Hills from either Wilcox Avenue or Hudson Avenue, and views would continue to be available on an intermittent basis along adjacent roadway segments. In addition, the proposed hotel and restaurant uses that comprise the Project and the nearest related projects would be a continuation of the existing uses that comprise the visual character and quality of the Project Site and surrounding area. Therefore, given the locations of the nearest related projects and their development within existing developed sites, as well as intervening uses, the Project and related projects would not alter existing views of visual resources or the aesthetic environment in the vicinity of the Project Site. Similarly, based on the distance of related projects, the location of the Project Site, and the incorporation of project design features such as automatically controlled photo sensors, landscaped setbacks, low-level lighting, the Project and related projects would not create a new source of substantial light or glare. In addition, new buildings constructed as part of the Project would be compatible with existing buildings within the Project Vicinity. Related projects would also be reviewed on a case-by-case basis by the City to comply with LAMC requirements regarding building heights, setbacks, massing and lighting or, for those projects that require discretionary actions, to undergo site-specific review regarding building density, design, and light and glare effects. Thus, cumulative impacts associated with aesthetics would be less than significant.
- **Agriculture and Forestry Resources**—The Project area is highly urbanized and no agricultural lands or uses exist within and in the vicinity of the Project Site. In addition, the Project Site and vicinity are not designated as farmland, zoned for agricultural uses, or used for agricultural uses. The Project Site and vicinity are also not zoned for forest land and do not include any forest or timberland. Therefore, implementation of the Project and related projects would not convert farmland, forest land, or timberland. Thus, no cumulative impacts related to agricultural and forest resources would occur.
- **Air Quality**—According to SCAQMD, a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts (i.e., if an individual project exceeds the SCAQMD's recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase). As discussed in Response to Checklist Question No. III.c, by applying SCAQMD's

cumulative air quality impact methodology, implementation of the Project would not result in an addition of criteria pollutants such that cumulative impacts, in conjunction with related projects in the region, would occur. Thus, cumulative impacts related to air quality would be less than significant.

- **Biological Resources**—Due to their site-specific nature, impacts on biological resources are typically assessed on a project-by-project basis. Notwithstanding, as discussed above, due to the improved nature of the Project Site and the highly urbanized surrounding areas, as well as lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed urban settings. As such, no special status species, or wetlands and habitats supporting such resources are found in the Project vicinity. In addition, no riparian or other sensitive natural communities or water bodies and federally protected wetlands currently exist in the Project vicinity. There are also no wildlife movement corridors within and in the vicinity of the Project Site. Furthermore, as with the Project, related projects would be required to comply with the City’s Protected Tree Regulations and the Migratory Bird Treaty Act. Compliance with these regulatory requirements would similarly reduce any potential direct and indirect impacts associated with removal of protected tree species. Thus, cumulative impacts related to biological resources would be less than significant.
- **Cultural Resources**—As discussed above, the Project would not result in any significant impacts to historic resources. Thus, the Project would not contribute to any cumulative impacts associated with historic resources. With regard to potential cumulative impacts related to archeological and paleontological resources, the Project vicinity is located within an urbanized area that has been disrupted over time. In the event that archaeological resources are uncovered, each related project would be required to comply with regulatory requirements. In addition, as part of the environmental review processes for the related projects, it is expected that mitigation measures would be established as necessary to address the potential for uncovering of paleontological resources. Therefore, cumulative impacts to cultural resources would be less than significant.
- **Geology and Soils**—Due to their site-specific nature, geology and soils impacts are typically assessed on a project-by-project basis or for a particular localized area. Therefore, as with the Project, related projects would address site-specific geologic hazards through the implementation of site-specific geotechnical recommendations and/or mitigation measures. Cumulative development would expose a greater number of people to seismic hazards. However, as with the Project, related projects would be subject to local, State, and federal regulations and standards for seismic safety. Thus, cumulative impacts related to geology and soils would be less than significant.

- **Greenhouse Gas Emissions**—Based on the methodology for determining project-related GHG impacts presented above in Checklist Question No. VII, Greenhouse Gas Emissions, the analysis of greenhouse gas emissions is already cumulative in nature. As evaluated above, the Project would not result in significant impacts associated with greenhouse gas emissions. Thus, the Project would not result in significant cumulatively impacts associated with greenhouse gas emissions.
- **Hazards and Hazardous Materials**—Due to their site-specific nature, hazards and hazardous materials impacts are typically assessed on a project-by-project basis. Therefore, as with the Project, related projects would address site-specific hazards through the implementation of site-specific recommendations and/or mitigation measures. In addition, as with the Project, all related development located in the vicinity of the Project Site would be subject to local, regional, State, and federal regulations pertaining to hazards and hazardous materials. Therefore, with adherence to such regulations, development of the Project and related projects would not result in cumulatively significant impacts with regard to hazards and hazardous materials.
- **Hydrology and Water Quality**—Related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, as with the Project, related projects would be subject to the City’s LID requirements and, for applicable projects, NPDES permit requirements, including development of SWPPPs for construction projects greater than 1 acre, compliance with SUSMP requirements during operation, and compliance with other local requirements pertaining to hydrology and surface water quality. It is anticipated that related projects would also be evaluated on an individual basis by City of Los Angeles Department of Public Works to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. Thus, cumulative impacts related to hydrology and water quality would be less than significant.
- **Land Use and Planning**—As with the Project, related projects would be reviewed on a case-by-case basis to ensure consistency with existing land use policies and regulations. Where inconsistencies occur, it is anticipated that appropriate actions would be undertaken to ensure that land use impacts would be less than significant. Furthermore, no related projects that could cause land use incompatibility are known to be located in the immediate vicinity of the Project Site. Thus, cumulative land use and planning impacts would be less than significant.
- **Mineral Resources**—As the Project Site is not located within a City-designated Mineral Resource Zone or a mineral producing area as classified by the CGS, the Project would not result in the loss of a locally-important mineral resource recovery site. Furthermore, no mineral resources or extraction operations for

such resources occur in the Project vicinity. Therefore, cumulative impacts associated with the loss of mineral resources would not occur.

- **Noise**—With compliance with regulatory requirements and implementation of mitigation measures, noise impacts from construction and operation of the Project would be less than significant. Like the Project, related projects would also be required to comply with LAMC requirements related to construction and operational noise. Notwithstanding, given the location of the nearest related projects relative to the Project Site and intervening development, the Project would not combine with related projects to generate cumulative noise impacts. Thus, cumulative noise impacts would be less than significant.
- **Population and Housing**—As discussed above, the Project does not propose the development or residential uses and thus would not directly contribute to population growth within the Project Site area. In addition, the proposed restaurant uses would include a range of full-time and part-time positions that are typically filled by persons already residing in the vicinity of the workplace, and who generally do not relocate their households due to such employment opportunities. Further, the Project would not result in a notable indirect increase in demand for new housing, and any new demand, should it occur, would be minor in the context of forecasted growth for the City of Los Angeles or the Hollywood Community Plan area. Therefore, the Project would not induce substantial population growth or displace substantial numbers of people. As such, the Project's incremental contribution to potential cumulative impacts to population and housing would not be cumulatively considerable. Thus, cumulative impacts associated with population and housing would be less than significant.
- **Public Services—Fire Protection**—With regard to facilities and equipment, similar to the Project, the related projects and other development in the City would be required to implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, prior to the issuance of a building permit. Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment. As with the Project, other related projects may also include the installation of automatic fire sprinklers to enhance fire safety, which would further reduce the demand placed on the LAFD facilities and equipment. The Project, as well as the related projects, would also generate revenues to the City's Municipal Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward

the provision of new fire station facilities and related staffing, as deemed appropriate.

In addition, in accordance with the fire protection-related goals, objectives, and policies set forth in the Framework Element, the Safety Element, and the Community Plan, the City along with LAFD would also continue to monitor population growth and land development in the City and identify additional resource needs including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the required level of service. Through the City's regular budgeting efforts and updates to LAFD's Strategic Plan, LAFD's resource needs would be identified and allocated according to the priorities at the time.

With regard to response distance, given that the Project Site is located within an urban area, each of the related projects identified in the area would likewise be developed within urbanized locations that fall within an acceptable distance from one or more existing fire stations. Additionally, in accordance with Fire Code requirements, if the related projects would not be within the acceptable distance from a fire station, that related project would be required to install an automatic fire sprinkler system to comply with response distance requirements. Similarly, as with the Project, related projects would be required to comply with all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, prior to the issuance of a building permit. Furthermore, with regard to response times, the Project and related projects would introduce new uses to the Project Site which would generate additional traffic in the vicinity of the Project Site. Traffic from the Project and related projects would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by the additional traffic. As discussed above, with the addition of project traffic to the study intersections, none of the study intersections would experience a change to the volume-to-capacity ratio or delay that would exceed the significance thresholds. As such, traffic impacts at all study intersections would be less than significant during both the A.M. and P.M. peak periods under Future with Project Conditions. Accordingly, the Project is not anticipated to substantially affect existing response times in the service areas of Fire Station No. 27, Fire Station No. 41, and Fire Station No. 82, and the Project would not contribute to a cumulative impact regarding response times. Notwithstanding, it is noted that the LAFD has initiated a major reorganization of the Department's Emergency Services Bureau, creating four distinct geographic bureaus, each with a Deputy Chief reporting directly to the LAFD Chief Deputy of Emergency Operations. The bureaus operate during normal weekday business hours and

bureau commanders and staff are available 24/7 to respond to significant emergencies. The new four bureau system makes the LAFD more effective and responsive to the needs of those within the community. Also, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic.

Based on the above, the Project's contribution to cumulative impacts to fire protection would not be cumulatively considerable and cumulative impacts to fire protection would be less than significant.

- **Public Services–Police Protection**—The Project would not create a new residential population. Therefore, the Project would not directly affect the existing officer to resident ratio or the crimes per resident ratio citywide or within the Hollywood Community Police Station service area. Further, to help reduce any on-site increase in demand for police services, the Project and other development would implement comprehensive safety and security features to enhance public safety and reduce the demand for police services. In addition, the Project, as well as the related projects, would generate revenues to the City's Municipal Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new facilities and related staffing, as deemed appropriate. Furthermore, in accordance with the police protection-related goals, objectives, and policies set forth in the Framework Element, the LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and monies allocated according to the priorities at the time. Moreover, it is anticipated that the related projects would implement design features, which would reduce cumulative operational impacts to police protection services.

With regard to response times, the Project and related projects would introduce new uses to the Project Site which would generate additional traffic in the vicinity of the Project Site. Traffic from the Project and related projects would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by the additional traffic. As discussed above, with the addition of project traffic to the study intersections, none of the study intersections would experience a change to the volume-to-capacity ratio or delay that would exceed the significance thresholds. As such, traffic impacts at all study intersections would be less than significant during both the A.M. and P.M. peak periods under Future with Project Conditions. Accordingly, the Project is not anticipated to substantially affect existing response times in the service areas of the Hollywood Community Police Station, and the Project would not contribute to a cumulative impact regarding response times. Also, the drivers of emergency vehicles normally have a variety of options

for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic.

Based on the above, the Project's contribution to cumulative operational impacts to police protection services would not be cumulatively considerable. Cumulative impacts on police protection services would be less than significant.

- **Public Services—Schools, Parks, and Libraries, and Recreation**—The Project would not generate a direct residential population that could increase the demand for schools, parks and recreational facilities, and libraries and any indirect increase in the local residential population would be inconsequential. Also, some related projects would be required to pay a school developer impact fee, which would offset any potential impact to schools associated with the related projects. The related projects would also be required to provide open space and recreational amenities or comply with the parks and open space requirements established by the LAMC, which would offset any potential impacts to parks and recreation facilities associated with development of related projects. Therefore, the Project would not contribute to a cumulatively considerable impact with regard to schools, parks, recreation facilities, and libraries. Cumulative impacts to these services would be less than significant.
- **Transportation/Traffic**—As discussed in the Traffic Study, the Future with Project Conditions includes forecasted traffic increases due to related projects. Therefore, cumulative impacts on transportation/traffic are accounted for in the analysis above. Specifically, as discussed in Response to Checklist Question No. XVI.a, above, the Project would not result in significant traffic impacts under the Future with Project Conditions. Therefore, cumulative impacts of the Project in conjunction with related projects would be less than significant.
- **Utilities and Service System—Water, Wastewater, and Stormwater**—Due to shared urban infrastructure, the Project and related projects would cumulatively increase water consumption, wastewater generation, and stormwater discharge.

As concluded in LADWP's 2015 Urban Water Management Plan, projected water demand for the City would be met by the available supplies during an average year, single-dry year, and multiple-dry year through the year 2040. Further, with respect to additional growth within the LADWP service area, through LADWP's Urban Water Management Plan process, the City will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. Therefore, LADWP would be able to supply the demands of the Project and future growth through 2040 and beyond. In addition, in accordance with the City's Green Building Ordinance, certain water conservation measures are required to be implemented by the City. Such measures would reduce water use associated with the Project and related projects. As such, Project impacts on water supply would not be cumulatively considerable and cumulative impacts on water supply would be less than significant.

The City of Los Angeles Bureau of Sanitation's Integrated Resources Plan projects wastewater flows and wastewater treatment capacity through 2020. The Integrated Resources Plan projects average flow for the Hyperion Service Area in 2020 to be approximately 511.5 million gallons per day. The Hyperion Service Area's capacity would be approximately 550 million gallons per day in 2020. Therefore, based on the future wastewater flow and the wastewater treatment capacity of the Hyperion Service Area, as well as the anticipated wastewater generation of the Project and related projects, sufficient wastewater treatment capacity would be available to serve the Project and related projects. In addition, the City would continue to monitor wastewater flows and update infrastructure, as necessary, to accommodate the growth within the City. New development projects occurring in the Project vicinity, including the related projects, would also be required to coordinate with the City of Los Angeles Bureau of Sanitation via a sewer capacity availability request to determine adequate sewer capacity. Also, new development projects would be subject to Los Angeles Municipal Code Sections 64.11 and 64.12, which require approval of a sewer permit prior to connection to the sewer system. Therefore, cumulative impacts on the wastewater treatment systems would be less than significant.

With regard to stormwater infrastructure, as with the Project, related projects would be required to comply with the requirements of the City's Low Impact Development Ordinance. In accordance with the City's Low Impact Development Ordinance, related projects would also implement BMPs to capture a specified amount of runoff within the Project Site and reduce the potential impact of increased runoff to existing drainage systems.

Furthermore, utility system capacity must be demonstrated during the approval process for each related project, including through consultation with LADWP as the water provider within the City.

Based on the above, as the service providers conduct ongoing evaluations to ensure that facilities are adequate to serve the forecasted growth of the community, impacts on these utilities would be less than significant.

- **Utilities and Service System—Solid Waste**—The Project in conjunction with related projects would increase the need for solid waste disposal during their respective construction periods. However, as discussed above in Response to Checklist Question No. XVIII.f, the Azusa Land Reclamation facility and the Class III landfills open to the City would have sufficient capacity to accommodate construction waste disposal needs, including from the Project and related projects. In addition, based on the 2014 CoIWMP Annual Report, the County anticipates that future disposal needs can be adequately met through 2029. Furthermore, the County of Los Angeles conducts ongoing evaluations to ensure that landfill capacity is adequate to serve the forecasted disposal needs of the region. Therefore, cumulative impacts with regards to solid waste would be less than significant.

- **Energy**—Development of the Project and related projects would increase the use of electricity, natural gas, and petroleum-based fuels. As discussed above in Response to Checklist Question No. XVIII.h, the Project’s electricity demand would represent a nominal percent of LADWP’s projected sales for the Project’s build-out year. Similarly, the Project’s natural gas demand would represent a negligible percent of SoCalGas’ forecasted natural gas supply for the Project build-out year. Given the size and types of uses associated with the related projects, the related projects would similarly not be anticipated to generate a substantial increase in the demand for electricity and natural gas. In addition, as with the Project, the related projects would be expected to implement energy conservation features to minimize the inefficient use of energy, in accordance with applicable regulations, including the City’s Green Building Ordinance. Therefore, although Project and related project development would result in the use of electricity and natural gas resources during construction and operation, which could limit future availability, the use of such resources would be on a relatively small scale and would be consistent with growth expectations for LADWP’s and SoCalGas’ service areas. Furthermore, the Project is consistent with the 2016–2040 RTP/SCS, which is a regional planning tool that addresses cumulative growth and resulting environmental effects. Therefore, as the Project is consistent with the 2016–2040 RTP/SCS, its contribution to cumulative transportation energy use is not cumulatively considerable. Accordingly, the Project’s contribution to cumulative impacts related to electricity, natural gas, and petroleum-based fuel consumption would not be cumulatively considerable. Therefore, cumulative impacts to energy would be less than significant.

Based on the above, the Project would not result in significant cumulative impacts. No further mitigation measures beyond the Project-specific mitigation measures provided above are required.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

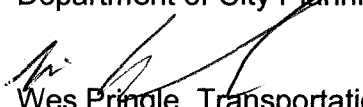
Less Than Significant With Mitigation Incorporated. Based on the analyses presented above, implementation of the proposed mitigation measures would reduce potential environmental impacts such that no substantial adverse effects on human beings would occur and as such, impacts will be less than significant.

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

1721 Wilcox Ave
DOT Case No. CEN 15-43788

Date: March 29, 2016

To: Karen Hoo, City Planner
Department of City Planning

From: 
Wes Pringle, Transportation Engineer
Department of Transportation

Subject: **TRANSPORTATION STUDY ASSESSMENT FOR THE PROPOSED
WILCOX HOTEL PROJECT AT 1721 WILCOX AVENUE**

The Department of Transportation (DOT) has reviewed the traffic analysis prepared by Gibson Transportation Consulting, Inc., dated March 2016, for a proposed hotel project located at 1721 Wilcox Avenue in the Hollywood Community Plan Area of the City of Los Angeles. Based on DOT's traffic impact criteria¹, the traffic study included the detailed analysis of eight intersections and determined that none of the study intersections would be significantly impacted by project-related traffic. The results of the traffic analysis (summarized in **Attachment 1**), which accounted for other known development projects in evaluating potential cumulative impacts, adequately evaluated the project's traffic impacts on the surrounding community.

DISCUSSION AND FINDINGS

- A. Project Description
The project proposes to construct a 140-room hotel with 3,500 square feet (sf) of ground floor restaurant use, located at 1721 Wilcox Avenue. The existing surface parking lot and restaurant will be demolished as part of the project. The project would provide a two-level subterranean parking structure. The primary vehicular access for the proposed hotel would be accommodated via a two-way driveway on Wilcox Avenue, with a secondary access for deliveries on Hudson Avenue and hotel loading on Wilcox Avenue (illustrated in **Attachment 2**). The project is expected to be completed by 2019.
- B. Trip Generation
The project is estimated to generate a net increase of approximately 1,244 daily trips, 86 trips during the a.m. peak hour and 92 trips during the p.m. peak hour. These estimates were derived using trip generation rates from the Institute of Transportation Engineers (ITE) "Trip Generation Handbook, 9th Edition." A copy of the trip generation table from the traffic study can be found in **Attachment 3**.

¹ Per DOT's Traffic Study Policies and Procedures, a significant impact is identified as an increase in the Critical Movement Analysis (CMA) value, due to project related traffic, of 0.01 or more when the final ("with project") Level of Service (LOS) is LOS E or F; an increase of 0.020 or more when the final LOS is LOS D; or an increase of 0.040 or more when the final LOS is LOS C.

C. Freeway Analysis

The traffic study included a freeway impact analysis that was prepared in accordance with the State-mandated Congestion Management Program (CMP) administered by the Los Angeles County Metropolitan Transportation Authority (MTA). According to this analysis, the project would not result in significant traffic impacts on any of the evaluated freeway mainline segments. To comply with the Freeway Analysis Agreement executed between Caltrans and DOT in October 2013, the study also included a screening analysis to determine if additional evaluation of freeway mainline and ramp segments was necessary beyond the CMP requirements. It should be noted that the Caltrans and DOT agreement was updated in December 2015, which was done after DOT approval of the project's MOU. However, the project did not meet or exceed any of the four thresholds defined in the latest agreement. Exceeding one of the four screening criteria would require the applicant to work directly with Caltrans to prepare more detailed freeway analyses. No additional freeway analysis was required.

PROJECT REQUIREMENTS

A. Construction Impacts

DOT recommends that a construction work site traffic control plan be submitted to DOT for review and approval prior to the start of any construction work. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. DOT also recommends that all construction related traffic be restricted to off-peak hours.

B. Highway Dedication and Street Widening Requirements

On August 11, 2015, the City Council adopted the Mobility Plan 2035 which represents the new Mobility Element of the General Plan. A key feature of the updated plan is to revise street standards in an effort to provide a more enhanced balance between traffic flow and other important street functions including transit routes and stops, pedestrian environments, bicycle routes, building design and site access, etc. Per the new Mobility Element, **Wilcox Avenue** has been designated as an Avenue III (Secondary highway) which would require an 23-foot half-width roadway within a 36-foot half-width right-of-way. **Hudson Avenue** has been designated a Local Street which would require an 18-foot half-width roadway within a 30-foot half-width right-of-way. The applicant should check with Bureau of Engineering's Land Development Group to determine if there are any other applicable highway dedication, street widening and/or sidewalk requirements for this project.

C. Parking Requirements

The traffic study did not indicate the number of parking spaces to be provided. The applicant should check with the Department of Building and Safety on the number of Code-required parking spaces needed for the project.

D. Driveway Access and Circulation

The conceptual site plan for the project (illustrated in **Attachment 3**) is acceptable to DOT. However, the review of this study does not constitute approval of the driveway dimensions, access and circulation scheme. Those require separate review and approval and should be coordinated with DOT's Citywide Planning Coordination Section (201 N. Figueroa Street, 4th Floor, Station 3, @ 213-482-7024). In order to minimize and prevent last minute building design changes, the applicant should contact DOT, prior to the commencement of building or parking layout design efforts, for driveway width and internal circulation requirements. New driveways should be Case 2 - designed with a recommended width of 30 feet for two-way operations. Delivery truck loading and unloading should take place on site with no vehicles having to back into the project via the proposed project driveway.

E. Development Review Fees

An ordinance adding Section 19.15 to the Los Angeles Municipal Code relative to application fees paid to DOT for permit issuance activities was adopted by the Los Angeles City Council in 2009 and updated in 2014. This ordinance identifies specific fees for traffic study review, condition clearance, and permit issuance. The applicant shall comply with any applicable fees per this ordinance.

If you have any questions, please contact Vicente Cordero of my staff at (818) 374-4697.

Attachments

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c: Chris Robertson, Council District No. 13
Jeanne Shen, Hollywood-Wilshire District
Taimour Tanavoli, DOT Case Management
Gregg Vandergriff, BOE Central District
Emily Wong, Gibson Transportation Consulting Inc.

**Attachment 1
1721 Wilcox Av**

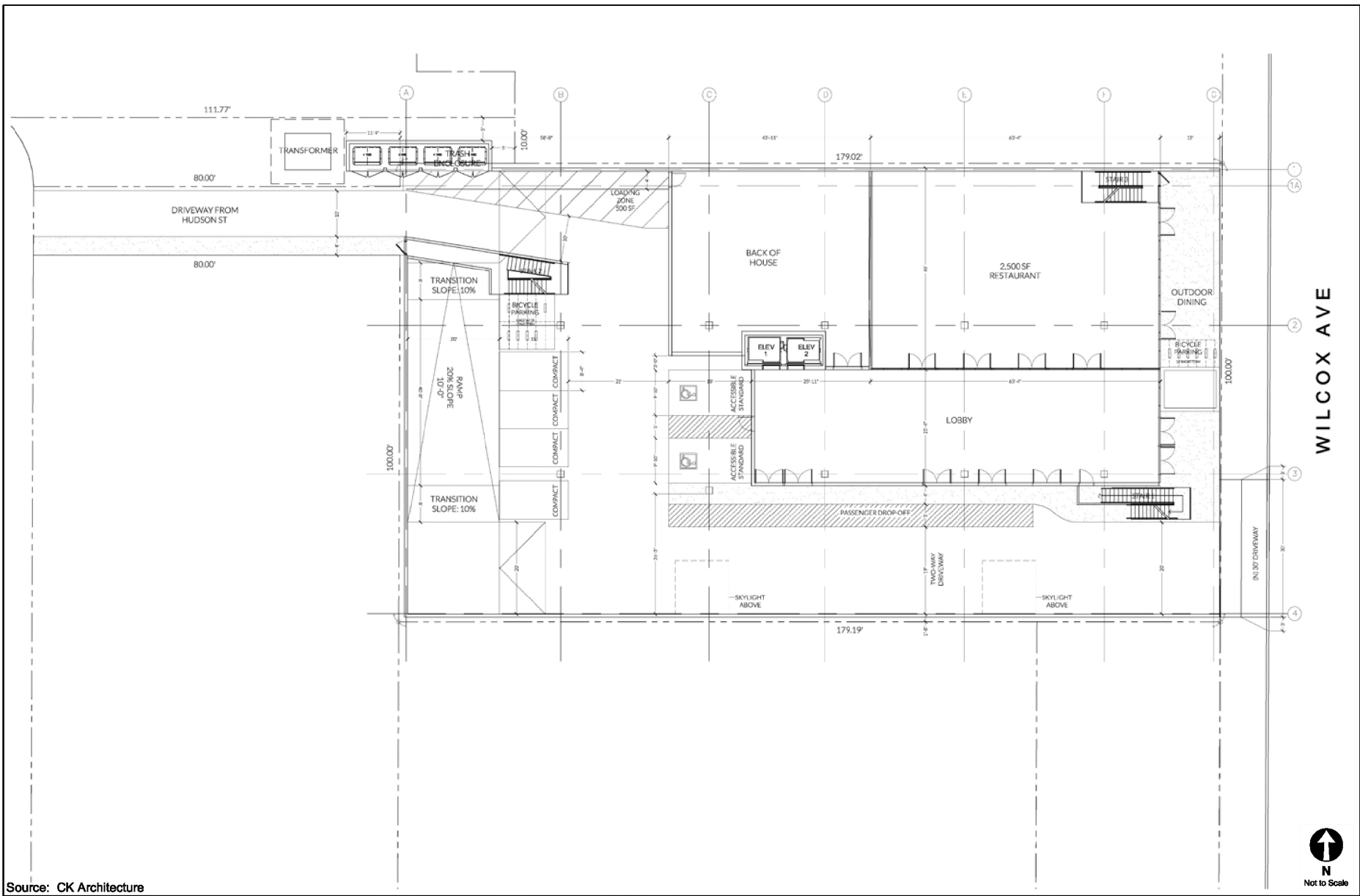
**TABLE 6
FUTURE WITHOUT PROJECT CONDITIONS (YEAR 2019)
INTERSECTION LEVELS OF SERVICE**

No.	Intersection	Peak Hour	Future without Project Conditions	
			V/C	LOS
1.	Whitley Avenue & Franklin Avenue	AM	0.681	B
		PM	0.667	B
2.	Wilcox Avenue & Franklin Avenue	AM	0.876	D
		PM	0.674	B
3.	Cahuenga Boulevard & Franklin Avenue	AM	1.039	F
		PM	0.960	E
4.	Wilcox Avenue & Yucca Street	AM	0.370	A
		PM	0.386	A
5.	Cahuenga Boulevard & Yucca Street	AM	0.569	A
		PM	0.677	B
6.	Cherokee Avenue & Hollywood Boulevard	AM	0.491	A
		PM	0.393	A
7.	Wilcox Avenue & Hollywood Boulevard	AM	0.642	B
		PM	0.655	B
8.	Cahuenga Boulevard & Hollywood Boulevard	AM	0.940	E
		PM	0.681	B

TABLE 8
EXISTING WITH PROJECT CONDITIONS (YEAR 2015)
INTERSECTION LEVELS OF SERVICE AND SIGNIFICANT IMPACTS

No.	Intersection	Peak Hour	Existing Conditions		Existing with Project			
			V/C	LOS	V/C	LOS	Change in V/C	Significant Impact
1.	Whitley Avenue & Franklin Avenue	AM	0.630	B	0.633	B	0.003	NO
		PM	0.595	A	0.597	A	0.002	NO
2.	Wilcox Avenue & Franklin Avenue	AM	0.781	C	0.787	C	0.006	NO
		PM	0.574	A	0.590	A	0.016	NO
3.	Cahuenga Boulevard & Franklin Avenue	AM	0.921	E	0.925	E	0.004	NO
		PM	0.855	D	0.859	D	0.004	NO
4.	Wilcox Avenue & Yucca Street	AM	0.347	A	0.362	A	0.015	NO
		PM	0.360	A	0.373	A	0.013	NO
5.	Cahuenga Boulevard & Yucca Street	AM	0.495	A	0.499	A	0.004	NO
		PM	0.585	A	0.588	A	0.003	NO
6.	Cherokee Avenue & Hollywood Boulevard	AM	0.411	A	0.413	A	0.002	NO
		PM	0.254	A	0.257	A	0.003	NO
7.	Wilcox Avenue & Hollywood Boulevard	AM	0.557	A	0.581	A	0.024	NO
		PM	0.512	A	0.524	A	0.012	NO
8.	Cahuenga Boulevard & Hollywood Boulevard	AM	0.792	C	0.798	C	0.006	NO
		PM	0.519	A	0.521	A	0.002	NO

Attachment 2
1721 Wilcox Av



Source: CK Architecture

PROJECT SITE PLAN

FIGURE
1

**Attachment 3
1721 Wilcox Av**

**TABLE 7
PROJECT TRIP GENERATION**

Land Use	ITE Land Use	Rate [a]	Weekday						
			Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
<u>Trip Generation Rates</u>									
Hotel	310	per room	8.17	59%	41%	0.53	51%	49%	0.60
High-Turnover Restaurant	932	per ksf	127.15	55%	45%	10.81	60%	40%	9.85
<u>Proposed Project</u>									
Hotel	310	140 rooms	1,144	44	30	74	43	41	84
		<i>Transit/Walk Adjustment - 15% [b]</i>	(172)	(7)	(4)	(11)	(6)	(7)	(13)
Subtotal - Hotel			972	37	26	63	37	34	71
Restaurant	932	3.5 ksf	445	21	17	38	20	14	34
		<i>Transit/Walk Adjustment - 15% [b]</i>	(67)	(3)	(3)	(6)	(3)	(2)	(5)
		<i>Internal Capture Adjustment - 10% [c]</i>	(38)	(2)	(1)	(3)	(2)	(1)	(3)
		<i>Pass-by Adjustment - 20% [d]</i>	(68)	(3)	(3)	(6)	(3)	(2)	(5)
Subtotal - Restaurant			272	13	10	23	12	9	21
TOTAL PROJECT TRIPS			1,244	50	36	86	49	43	92

ksf: 1,000 square feet

[a] Source: *Trip Generation, 9th Edition*, Institute of Transportation Engineers, 2012.

[b] The Project site is located within a quarter-mile of a Metro RapidBus stop (Line 780); therefore, a 15% transit adjustment was applied, per *Traffic Study Policies and Procedures*, LADOT, August 2014.

[c] Internal capture adjustments account for person trips made between distinct land uses within a mixed-use development (i.e., between hotel guests and restaurant).

[d] Pass-by adjustments account for Project trips made as an intermediate stop on the way from an origin to a primary trip destination without route diversion.

MITIGATION MONITORING PROGRAM

Section 21081.6 of the Public Resources Code requires a Lead Agency to adopt a “reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment” (Mitigation Monitoring Program, Section 15097 of the *CEQA Guidelines* provides additional direction on mitigation monitoring or reporting). This Mitigation Monitoring Program (MMP) has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6, and Section 15097 of the CEQA Guidelines. The City of Los Angeles is the Lead Agency for this project.

A Mitigated Negative Declaration (MND) has been prepared to address the potential environmental impacts of the Project. Where appropriate, this environmental document identified Project design features, regulatory compliance measures, or recommended mitigation measures to avoid or to reduce potentially significant environmental impacts of the Proposed Project. This Mitigation Monitoring Program (MMP) is designed to monitor implementation of the mitigation measures identified for the Project.

The MMP is subject to review and approval by the City of Los Angeles as the Lead Agency as part of the approval process of the project, and adoption of project conditions. The required mitigation measures are listed and categorized by impact area, as identified in the MND.

The Project Applicant shall be responsible for implementing all mitigation measures, unless otherwise noted, and shall be obligated to provide documentation concerning implementation of the listed mitigation measures to the appropriate monitoring agency and the appropriate enforcement agency as provided for herein. All departments listed below are within the City of Los Angeles unless otherwise noted. The entity responsible for the implementation of all mitigation measures shall be the Project Applicant unless otherwise noted.

As shown on the following pages, each required mitigation measure for the proposed Project is listed and categorized by impact area, with accompanying discussion of:

Enforcement Agency – the agency with the power to enforce the Mitigation Measure.

Monitoring Agency – the agency to which reports involving feasibility, compliance, implementation and development are made, or whom physically monitors the project for compliance with mitigation measures.

Monitoring Phase – the phase of the Project during which the Mitigation Measure shall be monitored.

- Pre-Construction, including the design phase
- Construction
- Pre-Operation
- Operation (Post-construction)

Monitoring Frequency – the frequency of which the Mitigation Measure shall be monitored.

Action Indicating Compliance – the action of which the Enforcement or Monitoring Agency indicates that compliance with the required Mitigation Measure has been implemented.

The MMP performance shall be monitored annually to determine the effectiveness of the measures implemented in any given year and reevaluate the mitigation needs for the upcoming year.

It is the intent of this MMP to:

Verify compliance of the required mitigation measures of the MND;

Provide a methodology to document implementation of required mitigation;

Provide a record and status of mitigation requirements;

Identify monitoring and enforcement agencies;

Establish and clarify administrative procedures for the clearance of mitigation measures;

Establish the frequency and duration of monitoring and reporting; and

Utilize the existing agency review processes' wherever feasible.

This MMP shall be in place throughout all phases of the proposed Project. The entity responsible for implementing each mitigation measure is set forth within the text of the mitigation measure. The entity responsible for implementing the mitigation shall also be obligated to provide certification, as identified below, to the appropriate monitoring agency and the appropriate enforcement agency that compliance with the required mitigation measure has been implemented.

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made by the Applicant or its successor subject to the approval by the City of Los Angeles through a public hearing. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. The flexibility is necessary in light of the proto-typical nature of the MMP, and the need to protect the environment with a workable program. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

MITIGATION MONITORING PROGRAM

Cultural Resource

V-1 Cultural Resource (Paleontology)

- A qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities at the project site. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. If paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: To be determined by consultation with paleontologist if resource(s) are discovered

Action Indicating Compliance: If unanticipated discoveries are found, submittal of compliance report by a qualified paleontologist

Noise

XII-1 The project shall include the following measures during construction period:

- The project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.
- Construction and demolition shall be restricted to the hours of 7:00 A.M. to 6:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday.
- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
- Temporary noise barriers shall be used along the northern, eastern and western property boundaries to block the line-of-sight between the construction equipment and the

adjacent residences. The noise barrier shall provide minimum 5 dBA noise reduction to the residences to the west (receptor R1) and northeast (receptor R3) and 15 dBA noise reduction to the residence to the north (receptor R1).

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Once during field inspection

Action Indicating Compliance: Field inspection sign-off

- XII-2** The applicant shall retain the services of a qualified acoustical engineer with expertise in the design of building sound insulation, who shall submit a signed report to the City during a plan check for review and approval, indicating that the proposed building design sound insulation achieves an interior sound environment of maximum 45 dBA CNEL, per the City of Los Angeles Building Code (LAMC Section 91.1207).

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Project plan check prior to issuance of grading permit

Action Indicating Compliance: Plan approval and issuance of grading permit

- XII-3** Retain the services of a qualified vibration consultant to monitor ground-borne vibration at the exterior of the adjacent buildings to the north, south and west of the project site during site grading/excavation (when the use of heavy construction equipment, such as a large bulldozer, drill rig, or loaded truck occurs) within 15 feet of the off-site building structures adjacent to the project site. If the measured ground-borne vibration levels exceed 0.2 inch/second (PPV) at the adjacent off-site structures, the project contractor shall evaluate and employ alternative construction methods, so that the ground-borne vibration levels would be below 0.2 inch/second (PPV) at the adjacent off-site structures to the north, south and west.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Once during field inspection

Action Indicating Compliance: Field inspection sign-off

Transportation and Traffic

- XVI-1** Plan construction and construction staging as to maintain adequate and safe pedestrian access on adjacent sidewalks throughout construction.

Enforcement Agency: Los Angeles Department of Building and Safety and Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Building and Safety and Los Angeles Department of Transportation

Monitoring Phase: Pre-construction; construction

Monitoring Frequency: Once at Project plan check; once during field inspection

Action Indicating Compliance: Plan approval and issuance of building permit (pre-construction); field inspection sign-off (construction)

XVI-2 Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction; construction

Monitoring Frequency: Once at Project plan check; once during field inspection

Action Indicating Compliance: Plan approval and issuance of building permit (pre-construction); field inspection sign-off (construction)

XVI-3 Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction; construction

Monitoring Frequency: Once at Project plan check; once during field inspection

Action Indicating Compliance: Plan approval and issuance of building permit (pre-construction); field inspection sign-off (construction)