Sustainable Communities Strategy CEQA Exemption Analysis
Western & Franklin Project
(1860, 1868 N. Western Avenue and 5440, 5446, 5448 W. Franklin Avenue, Los Angeles)
February 9, 2018

I. SUSTAINABLE COMMUNITIES STRATEGY		
	Yes	No
The project is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy, for which the State Air Resources Board, pursuant to section 65080(b)(2)(H) of the Government Code, has accepted a metropolitan planning organization's determination that the sustainable communities strategy or the alternative planning strategy would, if implemented, achieve the greenhouse gas emission reduction targets. *Southern California Association of Governments (SCAG) has adopted the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and the State Air Resources Board has accepted SCAG's determination that the 2016 RTP/SCS would achieve the greenhouse gas emission reduction targets (Air Resources Board Executive Order G-16-066).* *The project is consistent with the general use designation, density, and building intensity in the 2016 RTP/SCS. Using data collected from local jurisdictions, including general plans, SCAG categorized existing land use into land use types, then combined the land use types into 35 place types, and ultimately classified sub-regions into one of three land use development categories: urban, compact, or standard. SCAG used each of these categories to describe the conditions that exist and/or are likely to exist within each specific area of the region. (2016 RTP/SCS, pp. 20-21.)* *SCAG identified the existing land use type at the project site as "Commercial and Services," and the existing General Plan land use as "General Office." (SCAG Data Request Maps – Existing Land Use and General Plan Land Use, Attachment A.) After converting this data into Scenario Planning Zone-level place types, SCAG categorized the area surrounding the project as an 'urban' area. (See SCAG 2016-2040 RTP/SCS Background Documentation, pp. 18 & 19, available at: http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_SCSBackgroundDocumentation.pdf.) The RTP/SCS defines 'urban' areas as: "often found within and directly adjacent to moderate and high density urban centers. Nearly all urban growth in these areas would be considered infill or redevelopment. The majority of housing is multifamily and attached single-family (townhome), which tend to consume less water and energy than the larger types found in greater proportion in less urban locations. These areas are supported by high levels of regional and local transit service. They have well-connected street networks, and the mix and intensity of uses result in a highly walkable environment. These areas offer enhanced access and connectivity for people who choose not to drive or do not have access to a vehicle." (SCAG RTP/SCS, p. 20.) Among the place types included in the 'urban' land development category are the following: urban mixed use, urban residential, urban commercial, city mixed use, city residential, and city commercial. (SCAG 2016-2040 RTP/SCS Background Documentation, p. 90, 'Place Types Categorized Into Land Development Categories (LDCs)'; SCAG 2016-2040 RTP/SCS, UrbanFootprint Place Types, pp. 1-2, available at: http://scagrtpscs.net/documents/2016/supplemental/UrbanFootprint_PlaceTypesSummary.pdf.)* *'Urban residential' place types "are typically found within or adjacent to major downtowns. They include high- and mid- rise residential towers, with some ground-floor retail space. Parking [is] usually structured below or above ground. Residents are well served by transit, and can walk or bicycle for many of their daily needs." The land use mix for this place type is typically approximately 64 percent residential, and the residential mix is 100 percent multifamily. The average total net Floor Area Ratio (FAR) is 9.0 and the average density is 131 households per acre. (SCAG 2016-2040 RTP/SCS, UrbanFootprint Place Types, p. 1.)*	X	

'City residential' place types are "dominated by mid- and high- rise residential towers, with some ground-floor retail space. Parking is usually structured, below or above ground. Residents are well served by transit, and can walk or bicycle for many of their daily needs." The land use mix for this place type is typically approximately 65 percent residential, and the residential mix is 97 percent multifamily and 3 percent townhome. The average total net FAR is 2.9 and the average density is 58 households per acre. (SCAG 2016-2040 RTP/SCS, UrbanFootprint Place Types, p. 2.) *The project consists of a mixed-use residential and commercial building in a highly-urbanized part of the Hollywood community of the City of Los Angeles, on a site that is currently occupied by a gas station and smog center, a single-family residence, and a duplex. Adjacent land uses are a mix of low- and mid-rise buildings containing commercial, retail, and residential uses. The project is approximately 94 percent residential and the housing consists of 100 percent multifamily units. The project site is approximately 1,100 feet from the Metro Red Line Hollywood/Western station, and the project area is supported by high levels of regional and local transit. The project will provide structured parking at ground level and below ground. The project will construct 87 household units on 0.88 acre and the proposed FAR is 2.78:1. Thus, the project is consistent with the 'urban' land use designation, as well as the associated density and building intensity assumptions in the RTP/SCS.* *The project is consistent with the goals in the RTP/SCS, as outlined in Attachment B. (Consistency with the 2016-2040 RTP/SCS, Attachment B; Initial Study/MND, pp. 3-82 through 3-84; SCAG 2016-2040 RTP/SCS, available at: http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf; SCAG 2016-2040 RTP/SCS Background Documentation, available at: http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_SCSBackgroundDocumentation.pdf.)*		
II. TRANSIT PRIORITY PROJECT To be considered a Transit Priority Project (TPP) as defined by PRC section 21155(b), the project must meet all of the following criteria.		
	Yes	No
Based on total building square footage, the project contains at least 50 percent residential use. *The project will construct a mixed-use residential and commercial building with a total floor area of approximately 97,334 square feet that will consist of approximately 6,000 square feet of commercial uses and 87 residential units, with residential use totaling approximately 91,334 square feet. Therefore the project contains approximately 94 percent residential use.*	X	
AND, if the project contains between 26 percent and 50 percent non-residential uses, the Floor Area Ratio (FAR) is greater than 0.75. *The project will construct a mixed-use residential and commercial building with a total floor area of approximately 97,334 square feet that will consist of approximately 6,000 square feet of commercial uses and 87 residential units, with residential use totaling approximately 91,334 square feet. The project is therefore approximately 6 percent non-residential, and contains less than 26 percent non-residential use.*	N/A	
The project provides a minimum net density of at least 20 dwelling units per acre. *The project will develop a 0.88-acre site with a mixed-use building that includes 87 residential units. The net housing density for the project is 87 units/0.88 acres, which is more than the required minimum of 20 units per acre.*	X	

The project site is located within one-half mile of either of the following which have been included in the SCAG Regional Transportation Plan: (a) a major transit stop that contains an existing rail transit station, a ferry terminal served by transit, 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; or (b) a high quality transit corridor that has fixed route bus service with service intervals no longer than 15 minutes during peak commute hours. *The project site is approximately 1,100 feet north of the Metro Red Line Hollywood/Western station, which is considered a major transit stop. Also, there are three high-quality transit corridors within one-half mile of the project: Metro bus line 207 and Metro Rapid Line 757 run along Western Avenue, and Metro bus line 780 provides service at Hollywood Boulevard and Western Avenue. These bus lines provide service intervals under 15 minutes during peak commute hours. In addition, Metro bus lines 180/181 and 217 also provide service at Hollywood Boulevard and Western Avenue, and the Los Angeles Department of Transportation provides bus service via DASH Hollywood on Franklin Avenue. (Initial Study/MND, page 2-3). The City of Los Angeles has identified the project location as a Transit Priority Area, and SCAG has identified the project location as a high quality transit area and transit priority area (City of LA Dept. of City Planning, Transit Priority Areas, and SCAG, High Quality Transit Areas (HQTA) and Transit Priority Areas (TPA) One-Half Mile from Intersection of N. Western Ave and W. Franklin Ave [Base Year 2012 and Plan Year 2040], Attachment C.)*	X	
III. SUSTAINABLE COMMUNITIES PROJECT To be considered a Sustainable Communities Project, the Transit Priority Project (TPP) must comply with all of the following environmental criteria, as defined by PRC section 21155.1(a).		
	Yes	No
The TPP and other projects approved prior to the approval of the TPP but not yet built can be adequately served by existing utilities and the project applicant has paid, or will commit to pay, all applicable in-lieu or development fees. *The project area is already served by existing utilities and the project can be adequately served by existing utilities.* *Water service to the project site will continue to be supplied by the Los Angeles Department of Water and Power (LADWP). Existing water mains include an 9-inch main in Franklin Avenue and an 8-inch main in Western Avenue. Project water consumption is estimated to be below the available capacity. (Initial Study/MND, pp. 3-197 through 3-198).* *The project site is currently served by the existing wastewater conveyance system. Existing wastewater infrastructure include a 6-inch sewer line in Franklin Avenue and an 8-inch line in Western Avenue, which combine in a 15-inch line in Hollywood Boulevard, which then discharges into a 24-inch line in Sunset Boulevard. (Initial Study/MND, p. 3-196). There is adequate wastewater treatment capacity within the system, and thus any increase in wastewater generation will not have a significant impact on treatment plant capacity. The project will not result in or require the construction of a new wastewater treatment facility. (Initial Study/MND, p. 3-196).* *The project will not substantially alter runoff to the existing storm drain system, and thus the existing storm drain system will have sufficient capacity to carry runoff from the project. Therefore, the project will not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities. (Initial Study/MND, p. 3-199).*	X	

Electricity service to the project will be provided by LADWP, which already serves the project site and the area. LADWP's projections show that it will be capable of providing electricity in excess of projected demand. The project, when operational, is projected to consume electricity in an amount equal to less than 0.0001 percent of the LADWP's additional power capacity. LADWP's current and planned electricity supplies are sufficient to adequately serve the project. (Initial Study/MND, p. 3-219). *The project will be provided natural gas service by the Southern California Gas Company (SoCalGas), which already serves the project site and the area. The project's net increase in natural gas usage represents approximately 0.0005 percent of SoCalGas's 2018 peak demand. Based on consumption and capacity projections, the project will be adequately served by SoCalGas. (MND/Initial Study, p. 3-220.)* *The project will pay all applicable in-lieu or development fees pursuant to code requirements and conditions of the project, including applicable Recreation and Parks fees and Los Angeles Unified School District school facility development fees.*		
The TPP site does not contain wetlands or riparian areas, does not have significant value as a wildlife habitat, and implementation of the project does not harm protected species. *The project site is currently fully developed and located within an urbanized area of the City. There are no wetlands present at the project site, and the site does not include any riparian or other sensitive habitat areas. (Initial Study/MND, pp. 3-34 through 3-35).* *Due to the existing urban development on the project site and in the adjacent surroundings, there are no known locally designated natural communities on the project site. The project site contains limited vegetation around the two existing residential buildings and a street tree on the Western Avenue sidewalk right-of-way. There are no native trees or habitat types located on the project site, and the project site does not have significant value as wildlife habitat. Therefore, the project will not have a substantial adverse effect, either directly or through habitat modifications, on any protected species. (Initial Study/MND, pp. 3-34 through 3-36.)*	X	
The TPP site is not included on any list of facilities and sites compiled pursuant to Government Code section 65962.5. *The provisions in Government Code Section 65962.5 are commonly referred to as the "Cortese List," which consists of several "lists" compiled by various state boards and departments and submitted to the California Environmental Protection Agency (CalEPA). According to CalEPA, "[b]ecause this statute was enacted over twenty years ago, some of the provisions refer to agency activities that were conducted many years ago and are no longer being implemented and, in some cases, the information to be included in the Cortese List does not exist" (https://calepa.ca.gov/SiteCleanup/CorteseList/Background/). Further, although Government Code Section 65962.5 references a "list," the subject information is now largely available on the Internet sites of the boards and departments that are referenced in the statute. For example, the Department of Toxic Substances Control (DTSC) and the State Water Resources Board both have database resources that provide information regarding identified facilities or sites (e.g., EnviroStor and GeoTracker, respectively). Accordingly, CalEPA does not maintain a "list" but instead refers to various data resources that provide information regarding the facilities or sites identified as meeting the Cortese List requirements. In some instances, these data resources include additional information beyond the Cortese List requirements.* *Government Code Section 65962.5 includes the following "lists":* • *Compiled by DTSC: hazardous waste facilities subject to corrective action; land designated as hazardous waste property or border zone property; hazardous waste disposals on public land; hazardous substance release sites selected for and subject to response action by DTSC.*	X	

- *Compiled by the State Department of Health Services: a list of all public drinking water wells that contain detectable levels of organic contaminants and that are subject to water analysis.*
- *Complied by the State Water Resources Control Board: all underground storage tanks for which an unauthorized release report is filed; all solid waste disposal facilities from which there is a migration of hazardous waste and for which a California regional water quality control board has notified DTSC; all cease and desist orders issued after January 1, 1986, pursuant to Section 13301 of the Water Code, and all cleanup or abatement orders issued after January 1, 1986, pursuant to Section 13304 of the Water Code, that concern the discharge of wastes that are hazardous materials.*
- *Compiled by the Department of Resources Recycling and Recovery: all solid waste disposal facilities from which there is a known migration of hazardous waste (based on lists submitted by local enforcement agencies).*

There are no open or active items listed for the project site on any of these lists. As part of the Phase 1 Environmental Site Assessment for the project, an Environmental Data Resources database search was conducted for the project site. The database search included a review of databases and files from federal, state, and local environmental agencies to identify use, generation, storage, treatment or disposal of hazardous materials and chemicals, or release incidents of such materials which may impact the project site. According to EnviroStor, there are no cleanup sites (either Federal Superfund, State Response, voluntary, school evaluation, school investigation, military evaluation, tiered permit, or corrective action), permitted sites (either operating, post-closure, or non-operating), or SLICS (Spills, Leaks, Investigation, and Cleanup) on, in or under the project site. (Initial Study/MND, pp. 3-101 through 3-102.) According to the State of California Water Resources Control Board (SWRCB) GeoTracker website, there are no active leaking underground storage tank (LUST) sites, other cleanup sites, land disposal sites, military sites, waste discharge requirement (WDR) sites, monitoring wells, or California Department of Toxic Substances Control cleanup sites or hazardous materials permits on, in or under the project site. The project site has not been identified as a solid waste disposal site with hazardous waste levels outside of the Waste Management Unit. There are no active Cease and Desist Orders or Cleanup and Abatement Orders from the SWRCB associated with the project site. The project site is not subject to corrective action pursuant to the Health and Safety Code, as it has not been identified as a hazardous waste facility. (Initial Study/MND, p. 3-102.)

Historical resources show that the western half of the project site has been developed with a service station since 1925, and the service station use continues to operate on the project site under existing conditions. According to EnviroStor, there was one LUFT (leaking underground fuel tank) on the site for the gas station (Chevron #9-0659), which reports as Cleanup case completed on October 1, 1996. (Initial Study/MND, p. 3-102.) According to GeoTracker, there is a permitted LUST for the gas station (#9-0659), which is reported as "Cleanup Status: Completed – Case Closed" as of October 1, 1996. (Initial Study/MND, p. 3-102.) In connection with this completed case, site assessments and groundwater monitoring were conducted from 1988 to 1996. As noted above, the case (Case No. 900270161) received regulatory closure from the Regional Water Quality Control Board (RWQCB) in October 1996. (Initial Study/MND, p. 3-97.) While the project site is listed in various databases as a result of the former and current service station operations, there is no substantive information associated with any of the listings that indicate a significant environmental threat to the project site, and no environmental concerns exist as a result of the listings. (Initial Study/MND, pp. 3-97 through 3-98.)

According to CalEPA, "[a]pproximately 14,700 underground tank sites identified in unauthorized release reports are considered 'active' and are found in the GeoTracker database. Sites that are no longer considered 'active' because the Water Board, a regional board, or the County has determined that no further action is required because actions were taken to adequately remediate the release, or because the

release was minor, presents no environmental risk, and no remedial action is necessary, are listed as 'closed' or deleted from the list" (https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5c/). As discussed above, the GeoTracker database entry for the project site is not "active" but "closed." According to SWRCB staff, as a general matter, sites are not deleted from the database, but remain in the GeoTracker database after they are closed.		
The TPP site is subject to a preliminary endangerment assessment prepared by an environmental assessor to determine the existence of any release of a hazardous substance on the site and to determine the potential for exposure of future occupants to significant health hazards from any nearby property or activity. If a release of a hazardous substance is found to exist on the site, the release shall be removed or any significant effects of the release shall be mitigated to a level of insignificance in compliance with state and federal requirements. If a potential for exposure to significant hazards from surrounding properties or activities is found to exist, the effects of the potential exposure shall be mitigated to a level of insignificance in compliance with state and federal requirements. *A preliminary endangerment assessment for the project site was prepared by an environmental assessor and is attached as Attachment D. Consistent with the requirements of California Public Resources Code section 21155.1(a)(4), the assessment, prepared by Leymaster Environmental Consulting LLC, dated December 14, 2017, determines the existence of hazardous substance releases on the site and determines the potential for exposure of future occupants to significant health hazards from any nearby property or activity. In addition, the assessment includes a discussion of the mitigation measures to address the release of hazardous substances and mitigate to a level of insignificance the effects of any releases and potential exposure in compliance with state and federal requirements. The preliminary endangerment assessment concludes that with implementation of the mitigation measures, the effects of any releases of hazardous substances will be mitigated to a level of insignificance, and there will be no health risks to future occupants of the project site.* *The mitigation measures require pre-excavation surveys and boring tests, including of soil near any underground storage tanks, clarifiers, drains or other potentially contaminated equipment identified by pre-excavation survey and soil in portions of the property where historical conditions indicate potential contamination. If any underground storage tanks are discovered during the pre-excavation survey, they shall be properly registered and permanently abandoned by removal in accordance with Los Angeles Fire Department requirements. If impacted soils are encountered, a licensed Professional Geologist or Professional Engineer will oversee proper characterization and remediation of identified impacted materials in compliance with state and federal requirements. In addition, mitigation measures include a Construction Soil Management Plan to guide the redevelopment of the below-grade portions of the property, and require a technician to be on the site during demolition, excavation, and grading phases to sample and screen any residual contaminants, should they be encountered. The testing would be used to sequester the soil and determine whether the soil is either remediated on-site prior to reuse or removed and disposed. The plan provides clear step-by-step processes and safeguards to ensure that the soil is segregated and removed in a safe manner in compliance with state and federal requirements and that the site is suitable for future development, and the plan would be in place to ensure that residents and construction workers are not exposed to contaminants. With incorporation of the mitigation measures to address the release of hazardous substances, the effects of any releases and the potential for exposure of future occupants will be less than significant and in compliance with state and federal requirements.*	X	
The TPP does not have a significant effect on historical resources pursuant to section 21084.1. *There are no historical resources on the project site, and the project will result in no impact to historical resources. (Initial Study/MND, p. 3-41.)*	X	
The TPP site is not subject to any of the following:		

(a) a wildland fire hazard, as determined by the Department of Forestry and Forest Protection, unless the applicable general plan or zoning ordinance contains provisions to mitigate the risk of a wildland fire hazard; (b) an unusually high risk of fire or explosion from materials stored or used on nearby properties; (c) risk of a public health exposure at a level that would exceed the standards established by any state or federal agency; (d) seismic risk as a result of being within a delineated earthquake fault zone, as determined pursuant to section 2622, or a seismic hazard zone, as determined pursuant to section 2696, unless the applicable general plan or zoning ordinance contains provisions to mitigate the risk of an earthquake fault or seismic hazard zone; and (e) landslide hazard, flood plain, flood way, or restriction zone, unless the applicable general plan or zoning ordinance contains provisions to mitigate the risk of a landslide or flood. *The project site is not subject to a wildland fire hazard. The project site is located in an urbanized area and is currently developed. The project site is not located within a City-designated Very High Fire Hazard Severity Zone and no wildlands are present in the surrounding area. Therefore, the project will not expose people or structures to a wildland fire hazard. (Initial Study/MND, p. 3-104.)* *The project site is not subject to an unusually high risk of fire or explosion from materials stored or used on nearby properties or a risk of public health hazard in excess of federal or state standards. The Phase I Environmental Site Assessment evaluated the current gas station use, and identified potential hazards due to the underlying soils and the current and historic conditions. Mitigation measures are included to address the gas station use on the site and reduce potential impacts to a less than significant level.* *The project site is not located within a Methane Zone.* *The project site is located within an Alquist-Priolo Earthquake Fault Zone. No known active faults cross the project site, as confirmed by a fault investigation. (Initial Study/MND, p. 3-45.) The Hollywood Fault is located north of the project site. The project site is not located within a City-designated Fault Rupture Study Area. The Initial Study/MND concluded that the project's potential earthquake fault and seismic-related impacts would be less than significant. (Initial Study/MND, pp. 3-45 through 3-49.) According to current City ZIMAS mapping information, the project site is not located in a potential liquefaction zone. A thorough analysis of the underlying soils on the project site was conducted as part of the geotechnical investigation, which confirmed that due to the coarse-grained nature of the soils, the risk from liquefaction is very low. (Initial Study/MND, p. 3-48.) In any case, the site specific geotechnical analysis for building design will include liquefaction analysis and foundation and building design consistent with code requirements. (Initial Study/MND, p. 3-48.) The project will be built to the most current code requirements regulating seismic risk, including the Los Angeles Municipal Code and the California Building Code (CBC). The CBC establishes minimum standards to safeguard the public health, safety and general welfare through structural strength, means of egress from facilities, and general stability by regulating and controlling the design, construction, quality of materials, use and occupancy, location and maintenance of all buildings and structures within its jurisdiction. (Initial Study/MND, p. 3-47.)* *In addition to compliance with the CBC, the project is subject to the provisions of the Seismic Hazards Mapping Act, which requires the implementation of feasible design measures that would be used to address seismic hazards, depending on the results of the site-specific geotechnical studies. Required compliance with the CBC and compliance with the provisions of the Seismic Hazard Mapping Act would ensure that potential impacts from strong seismic ground shaking would be less than significant. Therefore, the project's seismic risks would be less than significant. (Initial Study/MND, pp. 3-46 through 3-47.)*	X	

The project site is not subject to landslide hazard. The project site is located in an area of relatively flat topography, and no significant slopes are located proximal to the site. (Initial Study/MND, p. 3-49.) Additionally, the project site is not located within a state-designated hazard zone for earthquake induced landsliding, and the City's ZIMAS mapping system does not classify the project site as within a landslide area. Therefore, the project will not expose people or structures to potential substantial adverse landslide effects. (Initial Study/MND, p. 3-49.)

The project site is not subject to flood plain, flood way or restricted zone hazards. According to the City's Safety Element, the project site is not located in a 100-year flood hazard area, and, per ZIMAS, the project site is not located within a flood zone. (Initial Study/MND, p. 3-111.) Further, the project site is not located within the 500-year special flood hazard area, which is located around Vermont Avenue, approximately one mile to the east of the site. The project will not be at risk of flooding and would not place structures in an area that would impede or redirect flood flows. (Initial Study/MND, p. 3-111.)

The TPP site is not located on developed open space.

The project is not located on developed open space. The project site is located in a highly urbanized area that includes a mixture of low-, mid-, and high-rise buildings containing a variety of uses including commercial, retail, and residential. The project site is currently developed with a gas station and smog center and two residential buildings. There is limited landscaping within and surrounding the project site. The property is not publicly owned or financed in whole or in part by public funds, nor is it predominantly lacking in structural development. X

The buildings in the TPP will be 15 percent more energy efficient than required by Chapter 6 of Title 24 of the California Code of Regulations, and the buildings and landscaping are designed to achieve 25 percent less water usage than the average household use in the region. X

The project will comply with the City's Green Building Ordinance and would thus exceed the standards in Title 24 regarding building energy efficiency. (Initial Study/MND, p. 3-221.) The project will be at least 15 percent more energy efficient than Title 24 2016 baseline requirements. See Building Performance Report – Analysis of Energy Efficiency of Project Compared to Title 24, by Donald F. Dickerson Associates, dated January 11, 2018, and attached as Attachment E. The project will incorporate design features in order to ensure that the building exceeds the Title 24 baseline by a minimum of 15 percent.

The project will be required to comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures, Ordinance No. 180,822 (Water Efficiency Requirements for New Development), and with the California Green Building Standards Code, which contains standards designed for efficient water use. (Initial Study/MND, p. 3-202.) These water-saving features pre-date most existing developments in the region, so the project will be required, at a minimum, to include more water efficient fixtures and appliances than other local residences.

According to SCAG's 2016 RTP/SCS, average residential water use in the project area is 365 gallons per household per day. (SCAG, Sustaining Our Water Resources, available at: http://scagrtpscs.net/Documents/13 Station4-SustainingOurWaterResources.pdf.) The project's net new water use, including the required water conservation features, would be less than 14,436 gallons per day. (Initial Study/MND, p. 3-197; ENV-2016-1955 Second Errata, dated January 16, 2018, Table 2.) The project will include 87 residential units. Therefore, the average household use of the project (including the gym and pool but excluding the commercial portion of the project) is approximately 141 gallons per day, or approximately 60 percent less than the average household use in the region.

To be considered a Sustainable Communities Project, the TPP must meet all of the following land use criteria as defined by PRC section 21155.1(b).

	Yes	No
The TPP site is not more than 8 acres in total area. *The project will develop a 0.88 acre site. Therefore, the project site is less than 8 acres.*	X	
The TPP does not contain more than 200 residential units. *The project will include 87 residential units. Therefore, the project will not contain more than 200 residential units.*	X	
The TPP does not result in any net loss in the number of affordable housing units within the project area. *The project would remove three existing housing units on the site and construct 87 housing units, including 11 restricted affordable housing units for Very Low Income households. Thus, the project will increase the number of affordable housing units within the project area.*	X	
The TPP does not include any single level building that exceeds 75,000 square feet. *The project will develop a 5-story building and does not include any single-level buildings. (Initial Study/MND, p. 2-5.) Therefore, the project does not include any single level building exceeding 75,000 square feet.*	X	
Any applicable mitigation measures or performance standards or criteria set forth in prior EIRs, and adopted in findings, have been or will be incorporated into the TPP. *The 2016 SCAG RTP/SCS Mitigation Monitoring and Reporting Program ("SCAG MMRP") provides a list of mitigation measures that SCAG determined a lead agency can and should consider, as applicable and feasible, where the agency has identified that a project has the potential for significant effects. (See SCAG Final 2016 Program Environmental Impact Report, Exhibit B, Mitigation Monitoring and Reporting Program, available at: http://scagrtpscs.net/Documents/2016/peir/final/2016fPEIR_ExhibitB_MMRP.pdf.) The SCAG measures are not prescriptive on the project, but nonetheless, the mitigation measures recommended in the MND for the project are consistent with those suggested in SCAG's MMRP. Please refer to Attachment F for a full discussion of the project's consistency with the SCAG MMRP.* ***Air Quality:*** *The SCAG MMRP recommends MM-AIR-2(b) and MM-AIR-4(b) as project-level mitigation measures for the potential air quality impacts identified in the Initial Study/MND. The mitigation measures recommend that "the Lead Agency can and should consider" specified measures, "or other comparable measures." (SCAG MMRP, pp. 16-19.) The Initial Study/MND for the project recommends implementation of the following mitigation measures, which are consistent with MM-AIR-2(b) and MM-AIR-4(b): Regulatory Compliance Measure ("RCM") RCM-AQ-1, RCM-AQ-3, RCM-AQ-4, MM 3-1, and MM 3-2 (Initial Study/MND, pp. 3-27 through 3-28.)* ***Biological Resources:*** *The SCAG MMRP recommends MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-BIO-4(b), and MM-BIO-5(b) as project-level mitigation measures for the potential biological resources impacts identified in the Initial Study/MND. The mitigation measures recommend that "the Lead Agency can and should consider" specified measures, "or other comparable measures." (SCAG MMRP, pp. 19-24.) The Initial Study/MND for the project recommends implementation of mitigation measure MM 4-1, which is consistent with the SCAG-recommended measures.* ***Greenhouse Gas Emissions:*** *The SCAG MMRP recommends MM-GHG-3(b) as project-level mitigation measures for the potential cumulative greenhouse gas emissions impacts identified in the Initial Study/MND. The mitigation measure recommends that "the Lead Agency can and should consider" specified measures, "or other comparable measures." (SCAG MMRP, p. 32.) The Initial Study/MND for the project recommends implementation of regulatory compliance measures RCM-AQ-1, RCM-AQ-3, and RCM-AQ-4 and mitigation measures MM 3-1 and 3-2, discussed above, and RCM-GHG-1, which are consistent*	X	

with SCAG MM-GHG-3(b).

Hazards and hazardous materials: *The SCAG MMRP recommends MM-HAZ-1(b), MM-HAZ-4(b), and MM-TRA-5(b) as project-level mitigation measures for the potential impact to hazards and hazardous materials identified in the Initial Study. The mitigation measures recommend that "the Lead Agency can and should consider" specified measures, "or other comparable measures identified by the Lead Agency." (SCAG MMRP, pp. 34-36, 59-60.) The Initial Study/MND for the project recommends implementation of the following regulatory compliance measures and mitigation measures, which are consistent with MM-HAZ-1(b) and MM-HAZ-4(b): RCM-HAZ-1, RCM-HAZ-2, RCM-HAZ-3, RCM-HAZ-4, MM 8-1, MM 8-2, MM 8-3, MM 8-4, and MM 8-5.*

Noise: *The SCAG MMRP recommends MM-NOISE-1(b) as project-level mitigation measures for the potential impacts to noise identified in the Initial Study. The mitigation measure recommends that "the Lead Agency can and should consider" specified measures, "or other comparable measures identified by the Lead Agency." (SCAG MMRP, pp. 44-46.) The Initial Study/MND for the project recommends implementation of the following regulatory compliance measure and mitigation measures, which are consistent with MM-NOISE-1(b): RCM-NO-1, MM 12-1, MM 12-2, MM 12-3, MM 12-4, MM 12-5, and MM 12-6.*

Public Services: *The SCAG MMRP recommends MM-PS-2(b) and MM-PS-3(b) as project-level mitigation measures for the potential impact to public services (police protection and schools) identified in the Initial Study/MND. The mitigation measures recommend that "the Lead Agency can and should consider" specified measures, "or other comparable measures identified by the Lead Agency." (SCAG MMRP, pp. 49-51.) The Initial Study/MND for the project recommends implementation of the following regulatory compliance measures and mitigation measures, which are consistent with MM-PS-2(b) and MM-PS-3(b): MM 14-1, MM 14-2, MM 14-3, MM 14-4, and RCM-PS-3.*

Transportation and Traffic : *The SCAG MMRP does not require mitigation for the potential transportation and traffic impact identified in the Initial Study/MND (SCAG MMRP, p. 59.) However, the Initial Study/MND for the project recommends implementation of MM 16-1.*

The Initial Study/MND for the project concluded that the project's impacts on the following will either be less than significant or there will be no impact: agriculture and forestry resources; land use and land use planning; mineral resources; population and housing; recreation; and tribal cultural resources. Therefore, the measures in the SCAG MMRP for those potential impacts are not applicable to the project.

In addition, the Initial Study/MND for the project concluded that the project's impacts on the following will either be less than significant or there will be no impact: aesthetics; cultural resources; geology and soils; hydrology and water quality; and utilities and service systems. Therefore, the measures in the SCAG MMRP for those potential impacts are not applicable to the project. However, as described below, the project nevertheless includes measures for these impact areas in accordance with mitigation measures recommended by SCAG in the RTP/SCS.

Aesthetics: *As explained in the Initial Study/MND, pursuant to Public Resources Code section 21099, the aesthetics of a project that is a mixed-use residential project on an infill site within a transit priority area shall not be considered a significant impact under CEQA. The project meets these criteria. (Initial Study/MND, pp. 3-1.) Nevertheless, the Initial Study/MND includes regulatory compliance measures RCM-AE-1, RCM-AE-2, and RCM-AE-3, which are consistent with project-level mitigation measures recommended by SCAG for consideration for potential aesthetic impacts (MM-AES-1(b) and MM-AES-3(b); SCAG MMRP, pp. 11-12).*

Cultural Resources: *The Initial Study/MND includes regulatory compliance measures RCM-CR-1, RCM-CR-2, and RCM-CR-3, which are consistent with project-level mitigation measures recommended by SCAG for consideration for potential cultural resources impacts (MM-CUL-2(b) and MM-CUL-4(b); SCAG MMRP, pp. 26-27).* ***Geology and Soils:*** *The Initial Study/MND includes regulatory compliance measures RCM-GEO-1, RCM-GEO-2, and RCM-GEO-3, which are consistent with project-level mitigation measures recommended by SCAG for consideration for potential geology and soils impacts (MM-GEO-1(b) and MM-GEO-2(b); SCAG MMRP, pp. 29-31).* ***Hydrology and Water Quality:*** *The Initial Study/MND includes regulatory compliance measures RCM-WQ-1, RCM-WQ-2, and RCM-WQ-3, which are consistent with project-level mitigation measures recommended by SCAG for consideration for potential hydrology and water quality impacts (MM-HYD-1(b); SCAG MMRP, pp. 37-40).* ***Utilities and Service Systems:*** *The Initial Study/MND includes regulatory compliance measures RCM-WS-1, RCM-WS-2, RCM-WS-3, RCM-WS-4, RCM-SW-1, RCM-SW-2, and RCM-SW-3, which are consistent with project-level mitigation measures recommended by SCAG for consideration for potential utilities and service systems impacts (MM-USS-4(b) and MM-USS-6(b); SCAG MMRP, pp. 6-63).*		
The TPP is determined not to conflict with nearby operating industrial uses. *There are no properties within a 1,500 foot radius of the project site that are zoned for or have a land use designation that allows industrial uses. (ZIMAS.) Therefore, the project will not conflict with nearby operating industrial uses.*	X	
The TPP is located within one-half mile of a rail transit station or a ferry terminal included in a regional transportation plan, or within one-quarter mile of a high-quality transit corridor included in a regional transportation plan. *The project site is approximately 1,100 feet north of the Metro Red Line Hollywood/Western station, which is considered a major transit stop and is included in the 2016 RTP/SCS. Also, there are three high-quality transit corridors within one-half mile of the project: Metro bus line 207 and Metro Rapid Line 757 run along Western Avenue, and Metro bus line 780 provides service at Hollywood Boulevard and Western Avenue. These bus lines provide service intervals under 15 minutes during peak commute hours. In addition, Metro bus lines 180/181 and 217 also provide service at Hollywood Boulevard and Western Avenue, and the Los Angeles Department of Transportation provides bus service via DASH Hollywood on Franklin Avenue. (Initial Study/MND, page 2-3). The City of Los Angeles has also identified the project location as a Transit Priority Area, and SCAG has identified the project location as a high quality transit area and transit priority area (City of LA Dept. of City Planning, Transit Priority Areas, and SCAG, High Quality Transit Areas (HQTA) and Transit Priority Areas (TPA) One-Half Mile from Intersection of N. Western Ave and W. Franklin Ave [Base Year 2012 and Plan Year 2040], Attachment C.)*	X	
To be considered a Sustainable Communities Project, the TPP must meet at least one of the following three criteria, as defined by PRC section 21155.1(c).		
	Yes	No
(a) At least 20 percent of the housing will be sold to families of moderate income, or not less than 10 percent of the housing will be rented to families of low income, or not less than 5 percent of the housing is rented to families of very low income, and the TPP developer provides sufficient legal commitments as outlined in PRC section 21155.1(c)(1)(B) to ensure the continued availability and use of the housing units for very low, low-, and moderate-income households; or	X	

(b) The TPP developer has paid or will pay in-lieu fees pursuant to a local ordinance in an amount sufficient to result in the development of an equivalent number of affordable units that would otherwise be required as outlined in the previous subsection; or (c) The TPP provides public open space equal to or greater than 5 acres per 1,000 residents of the project. *The project will provide 11 units as restricted affordable housing units for very low-income households. The 11 restricted affordable housing units represent approximately 13% of the project's total 87 units.*		