VI. Other CEQA Considerations

VI. Other CEQA Considerations

1. Significant Unavoidable Impacts

CEQA Guidelines Section 15126.2(c) requires that an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2(c) states:

> *Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.*

As evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, and summarized below, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with regard to on-site construction noise, off-site construction noise, on-site construction vibration (both with respect to building damage and human annoyance), and off-site vibration with respect to human annoyance. Implementation of the Project would result in significant cumulative impacts that cannot be feasibly mitigated with regard to off-site construction noise and off-site construction vibration with respect to human annoyance.

a. On-Site Construction Noise

As discussed in Section IV.F, Noise, of this Draft EIR, the estimated on-site noise levels during all stages of Project construction would be below the significance threshold at receptors R3 and R4. However, the estimated on-site construction-related noise would exceed the significance criteria at receptor locations R1, R2, R5 and R6. The estimated on-site construction-related noise would exceed the significance threshold by a range of 2.2 dBA at receptor location R2 to up to 29.9 dBA at receptor location R6, without implementation of mitigation. Implementation of Mitigation Measure NOI-MM-1 included in Section IV.F, Noise, of this Draft EIR, would reduce the Project's on-site construction noise levels to the extent feasible. Specifically, implementation of Mitigation Measure NOI-MM-1 (installation of temporary sound barrier) would reduce the noise generated by on site construction activities at the off-site sensitive uses, by a minimum 15 dBA at receptor locations R1 and R6; a minimum 5 dBA at receptor locations R2 and R5, which would

reduce the noise impacts at receptor locations R1, R2 and R5 to a less-than-significant level. However, the estimated construction-related noise levels would still exceed the significance thresholds at receptor location R6 with the implementation of Mitigation Measure NOI-MM-1, as temporary noise barriers are typically limited to a 15-dBA noise reduction. There are no other feasible mitigation measures that could be implemented to further reduce the temporary noise impacts from on-site construction at receptor location R6. Therefore, construction noise impacts associated with on-site noise sources would remain significant and unavoidable.

b. Off-Site Construction Noise

As discussed in Section IV.F, Noise, of this Draft EIR, the hourly noise levels generated by construction trucks during all stages of Project construction would be consistent with the existing daytime ambient noise levels along Wilcox Avenue, Cahuenga Boulevard, and Sunset Boulevard, which would be below the significance criterion of a 5-dBA increase over the ambient noise level. However, there would be up to four single-days of continuous concrete pour for the building mat foundation, which would extend over a 14-hour period, through the nighttime hours (from Friday at midnight through Saturday at 2:00 P.M.). The concrete mat pour occurring during the nighttime hours, if permitted by the Executive Director of the Board of Police Commissioners, would exceed the nighttime ambient noise levels by 5 dBA or more at off-site noise sensitive receptors R1, R2, R5, and R6. In addition, the estimated noise levels from the concrete trucks would exceed the 5-dBA significance criterion along Wilcox Avenue, Cahuenga Boulevard, and Sunset Boulevard during the nighttime hours (during the concrete mat pour). Therefore, the Project's temporary noise impacts associated with off-site construction traffic would be significant.[1] There are no feasible mitigation measures that could be implemented to reduce this short-term impact because conventional mitigation measures, such as providing temporary noise barrier walls to reduce the off-site construction truck traffic noise impacts, would not be feasible as the barriers would obstruct the access and visibility to the properties along the anticipated haul routes. Therefore, the Project's construction noise impact associated with off-site construction traffic (during the nighttime concrete mat foundation pour) would remain significant and unavoidable.

As further evaluated in Section IV.F, Noise, of this Draft EIR, off-site construction haul trucks would have a potential to result in cumulative impacts if the trucks associated with the related projects and the Project were to utilize the same haul route. Based on the existing daytime ambient noise levels, it is estimated that up to 53 truck trips along Wilcox

[1] *As evaluated in Section IV.F, Noise, of this Draft EIR, the concrete mat pour during the daytime hours would be consistent with the daytime ambient noise levels and would be below the 5-dBA significance criteria along Wilcox Avenue, Cahuenga Boulevard, and Sunset Boulevard.*

Avenue, 71 truck trips along Cahuenga Boulevard, and 339 truck trips along Gower Street per hour would increase the ambient noise levels by 5 dBA and exceed the significance criteria. As detailed in Section IV.F, Noise, of this Draft EIR, cumulative truck trips along Wilcox Avenue would be more than 53 truck trips per hour, and cumulative truck trips along Cahuenga Boulevard would be more than 71 truck trips. As such, there would be potential cumulative noise impacts along Wilcox Avenue (between Cahuenga Boulevard and Sunset Boulevard) and Cahuenga Boulevard (between Sunset Boulevard and US-101) in the event of concurrent construction activities from the Project and related projects. As such, cumulative noise impacts associated with off-site construction would be significant. As previously discussed, there are no feasible mitigation measures that could be implemented to reduce this short-term cumulative impact because conventional mitigation measures, such as providing temporary noise barrier walls to reduce the off-site construction truck traffic noise impacts, would not be feasible as the barriers would obstruct the access and visibility to the properties along the anticipated haul routes. Therefore, the cumulative construction noise impact associated with off-site construction traffic would be significant and unavoidable.

c. On-Site Construction Vibration (Building Damage)

As discussed in Section IV.F, Noise, of this Draft EIR, the estimated ground-borne vibration levels from construction equipment would be well below the 0.12-PPV building damage significance criterion for the historic structures in the vicinity of the Project Site, the 0.3-PPV building damage significance criterion for the single-story commercial buildings to the north, east and west, and the 0.5-PPV building damage criterion for the office tower and the five-story parking structure to the east. However, the estimated vibration levels would exceed the 0.3 PPV significance criteria for the single-story commercial building adjacent to the Project Site to the south. Therefore, the on-site vibration impacts during construction of the Project, pursuant to the significance criteria for potential building damage, would be significant.

With implementation of Mitigation Measure NOI-MM-2 included in Section IV.F, Noise, of this Draft EIR, potential building damage impacts to the single-story commercial building adjacent to the Project Site to the south from on-site construction would be reduced to a less-than-significant level. However, because implementation of Mitigation Measure NOI-MM-2 requires consent from the adjacent property owner, who may not agree, it is conservatively concluded that structural vibration impacts on the single-story commercial building to the south would be significant and unavoidable because it cannot be assured that all components of Mitigation Measure NOI-MM-2 can be implemented.

d. On-Site Construction Vibration (Human Annoyance)

As analyzed in Section IV.F, Noise, of this Draft EIR, the estimated ground-borne vibration levels from construction equipment would be below the 72-VdB significance criterion for human annoyance at off-site sensitive receptor locations R1 through R5. The estimated ground-borne vibration levels at receptor location R6 would exceed the 65-VdB significance criterion during the demolition and grading/excavation phases with large construction equipment (i.e., large bulldozer, caisson drilling and loaded trucks) operating within 140 feet of receptor location R6. In addition, the Arena Cinelounge movie theater across the Project Site to the west would be exposed to ground-borne vibration levels up to 75 VdB due to Project construction activities, which would exceed the 72-VdB significance threshold. Therefore, on-site vibration impacts during construction of the Project, pursuant to the significance criteria for human annoyance, would be significant.

As discussed in Section IV.F, Noise, of this Draft EIR, mitigation measures considered to reduce vibration impacts from on-site construction activities with respect to human annoyance included the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must be very deep and long to be effective and are cost prohibitive for temporary applications, such as construction, and, therefore, are considered infeasible. In addition, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate ground-borne vibration from the excavation equipment. As such, there are no feasible mitigation measures to reduce the potential vibration human annoyance impacts, and the Project's vibration impacts from on-site construction activities with respect to human annoyance would be significant and unavoidable.

e. Off-Site Construction Vibration (Human Annoyance)

As discussed in Section IV.F, Noise, of this Draft EIR, temporary vibration levels could reach approximately 72 VdB periodically as trucks pass sensitive receptors located within 25 feet from the anticipated haul routes. Therefore, the sensitive uses along anticipated construction truck routes (between the Project Site and US-101) would be exposed to ground-borne vibration up to 72 VdB, which would exceed the 65-VdB significance criterion (for recording studio use) and would be at the 72-VdB significance criterion (for residential, hotel and theater uses) from the construction trucks. As such, potential vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from construction trucks traveling along the anticipated haul routes would be significant. Mitigation measures considered to reduce vibration impacts from off-site construction activities with respect to human annoyance included the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce

noise). However, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate ground-borne vibration from the excavation equipment. In addition, it would not be feasible to install a wave barrier along the public roadways for the off-site construction vibration impacts. As such, there are no feasible mitigation measures to reduce the potential vibration human annoyance impacts. Therefore, the Project's vibration impacts from off-site construction activities with respect to human annoyance would be significant and unavoidable.

As discussed above, potential vibration impacts associated with temporary and intermittent vibration from project-related construction trucks traveling along the anticipated haul routes, including Wilcox Avenue, Cahuenga Boulevard, and Sunset Boulevard would be significant. As the related projects would be anticipated to use similar trucks as the Project, it is anticipated that construction trucks would generate similar vibration levels along the anticipated haul routes. Therefore, to the extent that other related projects use the same haul route as the Project, the cumulative vibration impact with respect to human annoyance associated with temporary and intermittent vibration from haul trucks traveling along the designated haul route would be significant. As discussed above, there are no feasible mitigation measures to reduce the potential vibration human annoyance impacts. Even though impacts would be temporary, intermittent, and limited to daytime hours when haul trucks are traveling within 25 feet of a sensitive receptor, cumulative vibration impacts from off-site construction with respect to human annoyance would be significant and unavoidable.

2. Reasons Why the Project is Being Proposed, Notwithstanding Significant Unavoidable Impacts

In addition to identification of a project's significant unavoidable impacts, CEQA Guidelines Section 15126.2(c) requires that an EIR describe the reasons why a project is being proposed, notwithstanding the effects of the identified significant and unavoidable impacts. The reasons why the Project has been proposed are grounded in the underlying purpose of the Project and the associated list of project objectives included in Section II, Project Description, of this Draft EIR.

As provided in Section II, Project Description, of this Draft EIR, the underlying purpose of the Project is to revitalize the infill Project Site by developing an integrated high-density commercial development that would generate new economic opportunities for the Hollywood area and support the growing media, entertainment, and technology industries locating within the Hollywood community. This underlying purpose and associated objectives are closely tied to the goals and objectives set forth in the Hollywood Community Plan (Community Plan), including Objective 1 and Objective 4(a), as identified in Section II, Project Description, of this Draft EIR. In addition, the Project would support

the objectives and policies of the Hollywood Community Plan, Hollywood Redevelopment Plan, City's General Plan Framework Element (Framework Element), and SCAG's 2020–2045 Regional Transportation Plan/Sustainability Communities Strategy (2020–2045 RTP/SCS).

With regard to the Hollywood Community Plan, the plan identifies the Hollywood Center as the focal point of the Hollywood Community. The Hollywood Center is located generally on both sides of Hollywood Boulevard and Sunset Boulevard between La Brea and Gower Street. The Project Site is located within the Hollywood Center. Based on the Community Plan, the Hollywood Center area shall function: (1) as the commercial center for Hollywood and surrounding communities; and (2) as an entertainment center for the entire region. Pursuant to the Hollywood Community Plan, future development should be compatible with existing commercial development, surrounding residential neighborhoods, and the transportation and circulation system. The Project's mix of office and restaurant uses would create new employment opportunities in the Hollywood Center, thereby facilitating this area's continuing function as both Hollywood's commercial center and a regional entertainment center. The Project's proposed uses would be compatible with the existing and proposed commercial and mixed-use development patterns along Sunset Boulevard. In addition, the Project's maximum building height would be consistent with the buildings in the vicinity of the Project Site. In addition, the Project's proximity to significant existing transit infrastructure, provision of bicycle parking spaces, and design features that promote walkability would ensure compatibility with the existing transportation and circulation system. As such, the Project would support this objective/policy of the Hollywood Community Plan. Furthermore, the Project would support the Hollywood Community Plan's objective to promote the economic well-being and public convenience by developing a new commercial building with office and restaurant uses along Sunset Boulevard, adjacent to other compatible building and uses and providing new employment opportunities.

As previously mentioned, the Project Site is located within the Hollywood Redevelopment Project area. The Project would meet the relevant goals and objectives of the Redevelopment Plan. Specifically, the Project would support Goal 5 of the Redevelopment Plan, to improve the quality of the environment, promote a positive image for Hollywood, and provide a safe environment. The Project would meet this goal as the proposed commercial building would be designed in a contemporary architectural style that would be compatible with the general urban characteristics of the surrounding neighborhood. The proposed commercial building would be moderated by a high degree of articulation, using both variations in building planes and façade setbacks, as well as a variety of materials, and would be designed to complement the surrounding neighborhood. The Project would also enhance the streetscape by installing landscaping, including new street trees, and by activating the street level with ground floor commercial uses. In addition, the Project would implement several safety features, such as an enhanced

closed-circuit camera system and keycard or guarded entry. Proper lighting of buildings and walkways would be incorporated to maximize visibility and provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the commercial building. Parking areas would also be lit to maximize visibility and reduce areas of concealments. Finally, entrances to and exits from the building would be designed to be open and in view of surrounding sites. Furthermore, the Project would support Goal 12 by promoting the use of public transportation and a reduction in vehicle miles traveled by concentrating new development in a designated TPA. Specifically, Metro and LADOT would provide a variety of transit options to Project employees and visitors, including bus lines and the Metro B Line Hollywood/Vine Station located 0.4 mile from the Project Site. The Project would also provide a total of 141 bicycle parking spaces, including 92 long-term spaces and 49 short-term spaces that would promote the use of alternative transportation.

The Project would also support objectives and policies of the Framework Element. In particular, the Project, as well as development of the proposed uses in an area with convenient access to public transit and opportunities for walking and biking, would promote an improved quality of life by facilitating a reduction of vehicle trips and vehicle miles traveled (Objective 3.2). The Project would promote the City's goals, objectives, and policies of the Framework Element's Urban Form and Neighborhood Design Chapter through proper design and effective use of the built environment to increase personal safety (Objective 5.9). Specifically, the Project would incorporate elements that promote individual and community safety, such as controlled access to all building elevators; proper lighting of building entries and walkways to provide for pedestrian orientation and clear identification of secure pedestrian travel routes between the parking areas and points of entry into the building; sufficient lighting of parking areas to maximize visibility and reduce areas of concealment; and design of entrances to and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites.

The Project would also support the goals of the 2020–2045 RTP/SCS. Specifically, the Project would support the goals of the 2020–2045 RTP/SCS to improve mobility, accessibility, reliability, and travel safety, as well as protect the environment and health of the region's residents by improving air quality and encouraging active transportation (e.g., bicycling and walking). The Project would be developed in an infill location within an existing urbanized area with an established network of roads and freeways that provides local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby mass transit options, including a number of bus lines and the Metro B Line. In addition, the Project would provide bicycle parking spaces for the proposed uses that would serve to promote the use of bicycles. The Project would also provide charging stations to serve electric vehicles. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and walking and biking, and

thereby improve the environment and health of nearby residents by supporting low and zero emission modes of transportation.

Furthermore, as detailed in Section V, Alternatives, of this Draft EIR, other than the No Project Alternative, none of the alternatives would eliminate all of the Project's significant and unavoidable impacts. However, the No Project Alternative would not achieve the Project's underlying purpose or the associated Project objectives. As discussed in detail in Section V, Alternatives, of this Draft EIR, the environmentally superior alternative, Alternative 2 (Existing Zoning Alternative), would not eliminate the Project's significant construction noise and vibration impacts. In addition, Alternative 2 would not fully meet the underlying purpose of the Project. Alternative 2 would also not achieve the Project objectives, including those set forth in the Community Plan, to the same extent as the Project.

Based on the above, the Project reflects a development that is consistent with: (1) the overall vision of the City for the Hollywood Community Plan area, Redevelopment Plan area, the City's Framework Element; and (2) one of the primary goals of SCAG's 2020–2045 RTP/SCS to locate supporting and synergistic uses within the community to create sustainable communities and enhance quality of life throughout the City and the region. Additionally, the Project's significant and unavoidable noise and vibration impacts would only occur during temporary and periodic construction activities, similar to those occurring at development sites in urban areas, particularly within infill locations. As such, the benefits of the Project, as outlined above, would outweigh the effects of the significant and unavoidable impacts of the Project. Furthermore, as detailed in Section V, Alternatives, of this Draft EIR, no feasible alternative was identified that would eliminate all of the Project's significant and unavoidable impacts.

3. Significant Irreversible Environmental Changes

CEQA Guidelines Section 15126.2(d) indicates that an EIR should evaluate significant irreversible environmental changes that would be caused by implementation of a proposed project. As stated in CEQA Guidelines Section 15126.2(d), "[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."

The Project would necessarily consume a limited amount of slowly renewable and non-renewable resources that could result in irreversible environmental changes. This consumption would occur during construction of the Project and would continue throughout its operational lifetime. The development of the Project would require a commitment of resources that would include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation. As demonstrated below, the Project would not consume a large commitment of natural resources or result in significant irreversible environmental changes.

a. Building Materials and Solid Waste

Construction of the Project would require consumption of resources that do not replenish themselves or which may renew so slowly as to be considered non-renewable. These resources would include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), and petrochemical construction materials (e.g., plastics).

The Project's potential impacts related to solid waste are addressed in the Initial Study prepared for the Project, which is included as Appendix A to this Draft EIR. As discussed therein, during construction of the Project, a minimum of 75 percent of construction and demolition debris would be diverted from landfills. In addition, during operation, the Project would provide on-site recycling containers within a designated recycling area to facilitate recycling in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687) and the Los Angeles Green Building Code. In accordance with Assembly Bill (AB) 1826, the Project would also provide for the recycling of organic waste. The Project would adhere to State and local solid waste policies and objectives that further goals to divert waste. Thus, the consumption of non-renewable building materials, such as aggregate materials and plastics, would be reduced.

b. Water

Consumption of water during construction and operation of the Project is addressed in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR. As evaluated therein, given the temporary nature of construction activities, the short-term and intermittent water use during construction of the Project would be less than the net new water consumption estimated for the Project at buildout, and such water demand during construction would be offset by the removal of the existing uses on the Project Site. During operation, the estimated water demand for the Project would not exceed the available supplies projected by the City of Los Angeles Department of Water and Power (LADWP), as confirmed by the Water Supply Assessment prepared by LADWP

for the Project and included as Appendix L of this Draft EIR. The Project would also be required to reduce indoor water use by at least 20 percent, in accordance with the City of Los Angeles Green Building Code. In addition, the Project would implement Project Design Feature WAT-PDF-1, which includes water conservation measures in excess of code requirements, such as high efficiency toilets, high efficiency shower heads, domestic water heating system, drip/subsurface irrigation, and proper hydro-zoned irrigation. Thus, as evaluated in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, while Project construction and operation would result in some irreversible consumption of water, the Project would not result in a significant impact related to water supply.

c. Energy Consumption

During ongoing operation of the Project, non-renewable fossil fuels would represent the primary energy source, and, thus, the existing finite supplies of these resources would be incrementally reduced. Fossil fuels, such as diesel, gasoline, and oil, would also be consumed in the use of construction vehicles and equipment. Project consumption of non-renewable fossil fuels for energy use during construction and operation of the Project is addressed in Section IV.D, Energy, of this Draft EIR. As discussed therein, construction activities for the Project would not require the consumption of natural gas but would require the use of fossil fuels and electricity. 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. In addition, trucks and equipment used during construction activities would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Further, on-road vehicles (i.e., haul trucks, worker vehicles) would be subject to federal fuel efficiency requirements. Therefore, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Thus, impacts related to the consumption of fossil fuels during construction of the Project would be less than significant.

During operation, the Project's increase in electricity and natural gas demand would be within the anticipated service capabilities of LADWP and the Southern California Gas Company (SoCalGas), respectively. In addition, as discussed in Section IV.D, Energy, of this Draft EIR, the Project would comply with energy conservation policies and plans relevant to the Project, including the California Title 24 energy standards, the 2019 CALGreen Code, the City of Los Angeles Green Building Code, City of Los Angeles Green New Deal and the 2020–2045 RTP/SCS. Such requirements of the Title 24, CALGreen Code, and Green Building Code include specific lighting requirements to conserve energy, window glazing to reflect heat, enhanced insulation to reduce heating and ventilation energy usage, and enhanced air filtration. The Project would implement these measures as required by the applicable code. The 2019 Title 24 Standards ensure that builders use

the most energy efficient and energy conserving technologies and construction practices. In addition, the Project would implement measures to comply with Title 24 energy efficiency requirements, including Project Design Features GHG-PDF-1 and WAT-PDF-1, as discussed above and included in Section IV.C, Greenhouse Gas Emissions, and Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, respectively.

With regard to transportation uses, the Project design would reduce VMT in comparison to developments located in non-infill, non-urban areas and encourage use of alternative modes of transportation. The Project would be consistent with regional planning strategies that address energy conservation. As discussed above and in Section IV.E, Land Use and Planning, of this Draft EIR, SCAG's 2020–2045 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, the 2020–2045 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources. The Project would be consistent with the energy efficiency policies emphasized in the 2020–2045 RTP/SCS. Most notably, the Project is a commercial development located in an area characterized by a high degree of pedestrian activity. The Project Site is located within a High-Quality Transit Areas (HQTA), as designated by the 2020–2045 RTP/SCS. The 2020–2045 RTP/SCS identifies HQTAs 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. Local jurisdictions are encouraged to focus housing and employment growth within HQTAs to reduce VMT. The Project would provide greater proximity to neighborhood services and would be well-served by existing public transportation, as evidenced by the Project Site's location within a designated HQTA. The Project's introduction of new job opportunities within an HQTA is consistent with numerous policies in the 2020–2045 RTP/SCS related to locating new jobs near transit.

Therefore, based on the above, 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. In addition, Project operations would not conflict with adopted energy conservation plans. Refer to Section IV.D, Energy, of this Draft EIR, for further analysis regarding the Project's consumption of energy resources.

d. Environmental Hazards

The Project's potential use of hazardous materials is addressed in the Initial Study for the Project, included as Appendix A to this Draft EIR. As evaluated therein, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used in commercial developments. Specifically, operation of the

Project would be expected to involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, paints, pesticides for landscaping, and petroleum products. Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Additionally, any soil contamination, asbestos or lead based paint encountered during demolition and construction would be handled and disposed of in compliance with applicable federal, State, and local regulations. Therefore, any associated risk due to use or disposal of hazardous materials would be reduced to a less-than-significant level through compliance with these standards and regulations. As such, compliance with regulations and standards would serve to protect against significant and irreversible environmental change that could result from the accidental release of hazardous materials.

e. Conclusion

Based on the above, Project construction and operation would require the irreversible commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these resources and the Project Site for future generations or for other uses. However, the consumption of such resources would not be considered substantial and would be consistent with regional and local growth forecasts and development goals for the area. The loss of such resources would not be highly accelerated when compared to existing conditions, and such resources would not be used in a wasteful manner. Therefore, although irreversible environmental changes would result from the Project, such changes are concluded to be less than significant, and the limited use of nonrenewable resources that would be required by Project construction and operation is justified.

4. Growth-Inducing Impacts

CEQA Guidelines Section 15126.2(e) requires that growth-inducing impacts of a project be considered in a Draft EIR. Growth-inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant that, for example, may allow for more construction in service areas). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, thus requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also require a discussion of the characteristics of projects which may encourage and facilitate other activities that could

significantly affect the environment, either individually or cumulatively. Finally, the CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.

a. Population

As discussed in Section II, Project Description, of this Draft EIR, the Project would include the construction of new office and restaurant uses. Since the Project does not propose a housing component, it would not directly induce a new residential population, which would contribute to population growth in the vicinity of the Project Site or the Hollywood Community Plan area.

b. Employment

The Project would have the potential to generate indirect population growth in the vicinity of the Project Site as a result of the employment opportunities generated by the Project. During construction, the Project would create temporary construction-related jobs. However, the work requirements of most construction projects are highly specialized such 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. Thus, construction workers would not be expected to relocate to the Project vicinity as a direct consequence of working on the Project. Therefore, given the availability of construction workers, the Project would not be considered growth-inducing from a short-term employment perspective. Rather, the Project would provide a public benefit by providing new employment opportunities during the construction period.

Based on employee generation factors from the LADOT, the Project is estimated to generate approximately 1,710 net new employees on the Project Site.[2] According to SCAG's 2020–2045 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2020 is approximately 1,887,969 employees.[3] In 2026, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,947,972 employees.[4] Therefore, the projected employment growth in the

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[2] *LADOT and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.*

[3] *SCAG, 2020–2045 RTP/SCS, Demographics and Growth Forecast Appendix, Table 14, page 35. Based on a linear interpolation of SCAG's employment data for 2016 and 2045 data. The 2020 extrapolated value is calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to 2020: ((2,135,900 – 1,848,300) ÷ 29) * 4) + 1,848,300 = 1,887,969.*

[4] *SCAG, 2020–2045 RTP/SCS, Demographics and Growth Forecast Appendix, Table 14, page 35. Based on a linear interpolation of 2016 and 2045 data. The 2026 extrapolated value is calculated using SCAG's*

(Footnote continued on next page)

City between 2020 and 2026 based on SCAG's 2020–2045 RTP/SCS is approximately 60,003 employees. The Project's 1,710 estimated net new employees would constitute approximately 2.85 percent of the employment growth forecasted between 2020 and 2026. Overall, the provision of new jobs would constitute a small percentage of employment growth and would not be considered "unplanned growth" such that the employment opportunities generated by the Project would induce unplanned residential growth.

Specifically, it is anticipated that some of the employment opportunities generated by the Project would be filled by people already residing in the Project Site's vicinity and who would not create a demand for additional housing. In particular, the Project's underlying purpose is to revitalize the infill Project Site by developing an integrated high-density commercial development that would generate new economic opportunities for the Hollywood area and support the growing, media, entertainment, and technology industries located within the Hollywood community area. To this extent, the proposed office and restaurant uses would complement the employment base (e.g., existing residential, commercial, office, hotels, and entertainment venues) of the Community Plan area, and could attract employees that specifically reside in the Hollywood Community Plan area for such employment opportunities. The employment opportunities provided by the Project would also be filled by employees who would commute to the Project Site from adjacent neighborhoods and cities and who also would not create a new demand for additional housing in the Community Plan area. The Project Site in particular is highly accessible from a variety of public transit options, including bus lines along Sunset Boulevard and the Metro Hollywood/Vine Station located 0.4 mile from the Project Site, which would facilitate access from employees outside of the Community Plan area. While it is possible that some of the employment opportunities offered by the Project would be filled by persons moving into the surrounding area, which could increase demand for housing, it is anticipated that most of this demand would be filled by then-existing vacancies in the housing market and others by any new residential developments that may occur in the vicinity of the Project Site. Overall, 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 or who would commute to the Project Site, the potential growth associated with Project employees who may relocate their place of residence to be near their place of employment would not be substantial as not all employees generated by the Project would move to the Community Plan area. As such, the Project's office and restaurant uses would be unlikely to create an indirect demand for additional housing or households in the area.

*2016 and 2045 values to find the average increase between years and then applying that annual increase to 2026: ((2,135,900 – 1,848,300) ÷ 29) * 10) + 1,848,300 = 1,947,472.*

c. Utility Infrastructure Improvements

The area surrounding the Project Site is already developed with a mix of residential, commercial, and industrial uses, and the Project would not remove impediments to growth. The Project Site is located within an urban area that is currently served by existing utilities and infrastructure. While the Project would require local infrastructure to connect the Project Site to the mainlines, such improvements would be limited to serving Project-related demand and would not necessitate major local or regional utility infrastructure improvements that have not otherwise been accounted and planned for on a regional level.

d. Conclusion

Overall, the Project would be consistent with the growth forecast for the City of Los Angeles Subregion and would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of VMT. In addition, the Project would not require any major roadway improvements or open any large undeveloped areas for new use. Any access improvements would be limited to driveways necessary to provide immediate access to the Project Site and to improve safety and walkability. Therefore, direct and indirect growth-inducing impacts would be less than significant.

5. Potential Secondary Effects of Mitigation Measures

CEQA Guidelines Section 15126.4(a)(1)(D) states that "if a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed." With regard to this section of the CEQA Guidelines, the potential impacts that could result with the implementation of each mitigation measure proposed for the Project was reviewed. The following provides a discussion of the potential secondary impacts that could occur as a result of the implementation of the proposed mitigation measures, listed by environmental issue area.

a. Air Quality

Mitigation Measure AIR-MM-1 requires that during plan check, the Project representative make available to the lead agency or City's Department of Building and Safety and the South Coast Air Quality Management District a comprehensive inventory of all off-road construction equipment that will be used during the mat foundation phase. Implementation of Mitigation Measure AIR-MM-1 would be beneficial in addressing the Project's air quality impacts during construction and would not result in any physical

improvements, as it would reduce construction emissions during the mat foundation phase. With full implementation of Mitigation Measure AIR-MM-1, daily regional NO_x emissions would be reduced from 151 pounds per day to 93 pounds per day and below the SCAQMD regional threshold of 100 pounds. As such, implementation of Mitigation Measure AIR-MM-1 would not result in adverse secondary impacts.

b. Noise

Mitigation Measure NOI-MM-1 requires temporary and impermeable sound barriers to be installed during construction, while Mitigation Measure NOI-MM-2 requires that prior to the start of construction, the Applicant retain a qualified structural engineer to visit the single-story commercial building adjacent to the Project Site to the south to inspect and document the physical condition of the building. Also prior to construction, the Applicant would be required to retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a vibration monitoring program capable of recording and documenting the construction-related ground vibration levels at the single-story commercial building during demolition, shoring, and excavation. The installation of the sound barriers would include limited construction activities associated with installation. Any noise associated with this installation would not result in additional noise beyond what has already been disclosed in the discussion of construction impacts. In addition, temporary construction fencing would be placed along the periphery of the Project Site to screen construction activity from view at the street level. This would include screening of the temporary sound barrier. Furthermore, the sound barrier would reduce the Project's noise impacts from construction and, upon completion of construction, the temporary sound barriers would be removed. Additionally, Mitigation Measure NOI-MM-2 would be beneficial in addressing any potential vibration impacts to the adjacent single-story commercial building to the south during construction of the Project, as the sound barrier would help minimize vibration from off-site haul trucks and would not result in physical improvements. As such, implementation of these mitigation measures would not result in adverse long term secondary impacts.

c. Transportation

Mitigation Measure TR-MM-1 requires the installation of new traffic signal equipment to allow a protected/permitted left-turn phase with reoptimized signal timing for westbound Sunset Boulevard at Van Ness Avenue. This mitigation measure would not involve any physical improvements at the ground that could require construction activities to occur. As such, this mitigation measure would not generate construction-related activities that could result in air emissions or generate construction-related noise. This mitigation measure would be beneficial in addressing potential freeway safety issues at the US-101 Northbound Off-ramp to Sunset Boulevard as it would help alleviate congestion on Sunset Boulevard that, in turn, would reduce the off-ramp queue onto the freeway mainline, fully

mitigating the Project impact. As such, implementation of Mitigation Measure TR-MM-1 would not result in adverse secondary impacts.

6. Effects Not Found to Be Significant

CEQA Guidelines Section 15128 states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the EIR. An Initial Study was prepared for the Project and is included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City of Los Angeles determined through the Initial Study that the Project would not have the potential to cause significant impacts related to aesthetics, agriculture and forestry resources; air quality (objectionable odors); biological resources; geology and soils; hazards and hazardous materials; hydrology and water quality; land use and planning (physical division of an established community); mineral resources; noise (airport and airstrip noise); population and housing; transportation (hazardous design features and emergency access); and solid waste. A summary of the analysis provided in Appendix A for these issue areas is provided below.

a. Aesthetics

As detailed in the Initial Study, Senate Bill (SB) 743 [Public Resources Code (PRC) Section 21099(d)] sets forth guidelines for evaluating project aesthetics and parking impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." Pursuant to PRC Section 21099, the Project is an employment center project that would be located on an infill site within a TPA. The Project is considered an employment center project because it is located on property that is zoned to permit commercial uses with a maximum FAR greater than 0.75. In addition, the Project Site is located on an infill site, as that term is defined in PRC Section 21099(a)(4), because the Project Site includes lots located within an urban area that has been previously developed. Lastly, the Project Site is located within a TPA, as that term is defined in PRC Section 21099(a)(7), because it is located within one-half mile of an existing "major transit stop." In particular, the Project Site is located within one-half mile of the Metro B Line Hollywood/Vine Station and bus routes, including the Metro Local Line 2. Therefore, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment and therefore do not have to be evaluated under CEQA. However, an analysis of the Project's potential aesthetics impacts is included in the Initial Study for informational purposes only and not for determining whether the Project will result in significant impacts

on the environment. Refer to the Initial Study prepared for the Project included in Appendix A of this Draft EIR for a detailed analysis of the Project's potential aesthetics impacts.

b. Agriculture and Forestry Resources

The Project Site is located in an urbanized area of the City of Los Angeles and is developed with commercial buildings and surface parking. The Project Site and surrounding area are not zoned for agricultural or forest uses, and no agricultural or forest lands occur onsite or in the vicinity of the Project Site. Therefore, as concluded in the Initial Study, no impacts to agriculture and forestry resources would occur.

c. Air Quality (Odors)

No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of 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.

With respect to Project operation, 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, therefore, would not result in substantially adverse odor impacts.

In addition, the construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403 regarding visible emissions violations. In particular, SCAQMD Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material, which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. Therefore, with compliance with existing regulatory requirements, the Project would not create odors that would adversely affect a substantial number of people.

Based on the above, the Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Therefore, as concluded in the Initial Study, Project impacts related to odors would be less than significant.

d. Biological Resources

The Project Site is located in an urbanized area and is developed with three buildings and surface parking. Landscaping within the Project Site is limited to common ornamental trees, grasses, and shrubs. Due to the developed nature of the Project area, species likely to occur onsite are limited to small terrestrial and avian species typically found in developed settings. Thus, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). There are no riparian or other sensitive natural communities, or federally protected wetlands as defined by Section 404 of the Clean Water Act on the Project Site or in the surrounding area. In addition, there are no established native resident or migratory wildlife corridors on the Project Site or in the vicinity. Accordingly, development of the Project would not impact any regional wildlife corridors or native wildlife nursery sites. Furthermore, no water bodies that could serve as habitat for fish exist on the Project Site or in the vicinity. As the USFWS database of conservation plans and agreements does not show any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans applicable to the Project Site, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans.

As discussed above, landscaping within the Project Site is limited. There are four trees within the Project Site and 12 street trees along the Project perimeter. None of the trees within the Project Site are protected under the City of Los Angeles Native Tree Protection Ordinance. To allow for development of the Project Site, the existing four on-site trees and 12 street trees in the adjacent right-of-way would be removed. Pursuant to requirements of the City of Los Angeles Urban Forestry Division, the on-site trees are to be removed and replaced at a 1:1 ratio, and the street trees are to be removed and replaced at a 2:1 basis.

As previously stated, the Project would involve removal of the four on-site trees and the 12 street trees adjacent to the Project Site. Although unlikely due to the Project Site's location within a highly urbanized area, these trees could potentially provide nesting sites for migratory birds. However, the Project would comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish and Game Code Section 3503 states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." No exceptions are

provided in the California Fish and Game Code, and CDFW has never promulgated any regulations interpreting these provisions.

In accordance with the Migratory Bird Treaty Act and California Fish and Game Code, tree removal activities associated with the Project would take place outside of the nesting season (February 1–August 31), to the extent feasible. Should vegetation removal activities 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 buffer would be established until the fledglings have left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and is based on the professional judgement of the monitoring biologist, in coordination with the CDFW. With compliance with the Migratory Bird Treaty Act, the Project would not 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.

For all the foregoing reasons, Project impacts to biological resources would be less than significant.

e. Geology and Soils (Paleontological Resources)[5]

The Project Site is not located within a currently established Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards or a City-designated Fault Rupture Study Area. In addition, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Therefore, as concluded in the Initial Study, since the potential for surface rupture due to faulting occurring beneath the Project Site is considered low, impacts would be less than significant.

In addition, the Project would be constructed in accordance with the most current Los Angeles Building Code regulations and the recommendations of the design level geotechnical investigation for the Project. As such, as concluded in the Initial Study, impacts related to strong seismic ground shaking would be less than significant.

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[5] *In January 2018, OPR proposed comprehensive updates to the CEQA Guidelines, which revised thresholds for aesthetics, air quality, cultural resources, geology and soils, hydrology and water quality, land use and planning, noise, population and housing, transportation, and utilities and service systems. Prior to the release of the revised thresholds, the question or threshold related to potential impacts to paleontological resources was considered under cultural resources. This threshold has since been moved and is now addressed under geology and soils.*

The Project Site is not located in an area that has been identified by the State or the City of Los Angeles as being potentially susceptible to liquefaction. The Geotechnical Feasibility Report included as Appendix IS-3 of the Initial Study found that due to the depth of the historical highest groundwater level, the type of soils underlying the Project Site, and the liquefaction mapping by the City and State, the Project Site would not be susceptible to liquefaction during an earthquake event. As such, as concluded in the Initial Study, impacts associated with liquefaction would be less than significant.

The Project Site is not located in a landslide area as mapped by the State or the City of Los Angeles. Further, the development of the Project does not propose substantial alteration to the existing topography. As such, as concluded in the Initial Study, impacts from landslides would occur and lateral spreading impacts would be less than significant.

Project construction activities, including grading, excavation, and other construction activities, have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. As concluded in the Initial Study, with compliance with regulatory requirements that include the implementation of Best Management Practices (BMPs), impacts related to soil erosion would be less than significant.

As discussed in IV.J.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project Site is located within a community served by existing wastewater infrastructure and the Project's wastewater demand would be accommodated by connections to the existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems.

With regard to paleontological resources, since the Project Site has been previously graded and developed, surficial paleontological resources that may have existed at one time have likely been previously disturbed. In addition, a paleontological records search conducted by the Natural History Museum for the Project Site, included in Appendix IS-4 of the Initial Study, indicates that there are no previously encountered fossil vertebrate finds located within the Project Site. However, according to the records search, vertebrate fossil localities have been discovered either at the surface, or at depth nearby, from the same sedimentary deposits that occur on the Project Site. As detailed in the records search, fossil localities have been found in older alluvium in the vicinity of the Project Site. Furthermore, as discussed in the Geotechnical Feasibility Report, included as part of the Initial Study included in Appendix A of this Draft EIR, artificial fill materials were encountered within the Project Site to approximately 2 feet depth. Older alluvial fan deposits lie below the fill materials to maximum depth explored (over 40 feet). Therefore, very shallow excavations are unlikely to uncover significant vertebrate deposits. However,

the Project would include excavations up to a maximum depth of 52 feet below ground surface. Thus, the possibility exists that paleontological artifacts that were not discovered during prior construction, or other human activity, may be present. The City has established a standard condition of approval to address inadvertent discovery of paleontological resources. Should paleontological resources be inadvertently encountered, the City's condition of approval, which would be required for the Project, provides for temporarily halting construction activities near the encounter and retaining a qualified paleontologist to assess the find and, if necessary, developing a plan for removal and treatment of the find. Overall, with adherence to the City's condition of approval, the Project would not directly or indirectly destroy a unique paleontological resource, and impacts would be less than significant.

f. Hazards and Hazardous Materials

The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used for commercial uses. Specifically, operation of the proposed uses would be expected to involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and petroleum products. Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials would be used and stored 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.

The Phase I ESA, included as Appendix IS-5 of the Initial Study, included a review of environmental records for the Project Site and a site reconnaissance to identify potential on-site hazards. The Phase I ESA identified that there was a former gasoline service station and automotive repair on a portion of the Project Site from 1938 to 1994. Based on a review of the closure reports for the underground storage tanks (USTs) and the assessment reports for the auto garage area, this area is considered to be a Historical Recognized Environmental Condition (HREC) and is not considered a concern at this time. However, as provided in the Phase I ESA for 6450 Sunset Boulevard, there may be a potential for residual contaminants in the underlying soil requiring proper handling, and disposal and monitoring are recommended. In the event that contaminated soils are encountered during construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166.

In addition, according to the Phase I ESAs for the properties within the Project Site, there is no potential vapor encroachment conditions, no visible signs of mold on the Project Site, and the potential for radon to be a concern is low.

Based on the age of the existing buildings onsite, there is a possibility that asbestos-containing materials (ACM) and lead-based paint (LBP) may be encountered during construction. In the event any suspect ACM or LBP is found, the Project would adhere to all federal, State, and local regulations prior to their removal. These regulations include, but are not limited to, the Toxic Substances Control Act (TSCA), the Resource Conservation and Recovery Act (RCRA), the federal and State Occupational Safety and Health Acts, SCAQMD Rule 1403 pertaining to asbestos emissions from renovation/demolition activities, and the Residential Lead-Based Paint Reduction Act. Mandatory compliance with applicable federal and State standards and procedures would reduce risks associated with ACM and LBP to less-than-significant levels.

Typical sources of polychlorinated biphenyls (PCBs) include electrical transformer cooling oils, fluorescent light fixture ballasts, and hydraulic oil. In 1976, the United States Environmental Protection Agency (USEPA) banned the manufacture and sale of PCB-containing transformers. According to the Phase I ESAs for the properties on the Project Site, one electrical transformer was observed at 6450 Sunset Boulevard that appeared to be in good condition with no visible evidence of leakage. No other equipment likely to contain PCBs was observed on the Project Site. In the event that PCBs are found within areas proposed for demolition, suspect materials would be removed in accordance with all applicable federal, State, and local regulations. Therefore, with compliance with applicable regulations, the Project would not 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, and impacts related to the removal of PCBs during demolition would be less than significant. In accordance with existing regulations, which ban the manufacture of PCBs, the new electrical systems to be installed as part of the Project would not contain PCBs. Therefore, during operation of the Project, maintenance of such electrical systems would not expose people to PCBs and operation of the Project would not expose people to any risk resulting from the release of PCBs in the environment. Therefore, the Project would not 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, and no impacts related to PCBs during Project operation would occur.

Based on a review of the relevant Munger oil and gas field maps and State of California Geologic Energy Management Division (CalGEM), formerly the California Division of Oil, Gas and Geothermal Resources (DOGGR), Well Finder GIS, the Project Site is not located within any oil or gas field, and no oil or natural gas wells were located on the Project Site.

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. Thus, as concluded in the Initial Study, impacts related to the release of hazardous materials into the environment would be less than significant.

The Blessed Sacrament School is located within 0.25 mile of the Project Site. Although the Project would have the potential to emit and would involve the handling of hazardous materials, particularly during construction activities, all such activities involving the handling and disposal of hazardous materials and wastes would occur in compliance with all applicable federal, State, and local requirements concerning the handling and disposal of hazardous waste. Therefore, with compliance with relevant regulations and requirements, the Project would not create a significant hazard to nearby schools, and impacts regarding the Project's emission or handling of hazardous materials and wastes would be less than significant.

Portions of the Project Site were listed on hazardous materials or hazardous wastes databases. Specifically, the portion of the property located at 6450 Sunset Boulevard is listed on the HAZNET, CERS HAZ WASTE, SWEEPS UST, HIST UST, CA FID UST, RCRA, NonGen/NLR, FINDS and ECHO governmental databases. The property is listed within the UST databases due to the former gasoline service station that was previously located on the property. The RCRA NonGen/NLR, FINDS and ECHO are related to the existing Staples and are typical for this business. The portion of the Project Site located at 1428 Wilcox Avenue is listed under the HAZNET governmental environmental databases for Plain Rap Press. In addition, 1433 Cole Place is listed in the Los Angeles Fire Department (LAFD) Historical UST database. A review of the LAFD records reported that the tank was not a UST but, rather, an above ground tank (AST). This tank was reported to be a 1,150-gallon atmospheric tank (pressure vessel) and interpreted to be containing liquefied petroleum gas (LPG) to fuel delivery trucks. Based on this information, there is a low potential for environmental impact to the Project from the reported AST. In regard to the HAZNET record, the hazardous waste tracking system has no records for disposal. It is likely that the USEPA number was not used for disposal and currently is an inactive number and not a concern. Therefore, based on the above, the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard, and impacts regarding this threshold would be less than significant.

The Project Site is not located within 2 miles of an airport or a private airstrip or located within an airport planning area and would not result in a safety hazard for people residing or working in the area.

According to the Safety Element of the City's General Plan (Safety Element), the nearest disaster route to the Project Site is Santa Monica Boulevard, which is located

approximately 0.5 mile south of the Project Site, and US-101, which is located less than 1 mile east of the Project Site. While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with the Project's Construction Traffic Management Plan prepared pursuant to Project Design Feature TR-PDF-2 that would be implemented to ensure adequate circulation and emergency access. In addition, the Project would comply with LAFD access requirements and would not impede emergency access in the vicinity of the Project Site. Thus, as concluded in the Initial Study, impacts related to implementation of the City's Emergency Response Plan would be less than significant.

As discussed in the Initial Study, there are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or within a City-designated fire buffer zone. Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. Therefore, as concluded in the Initial Study, no impacts would occur.

g. Hydrology and Water Quality

During Project construction, stormwater runoff could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. On-site watering activities to reduce airborne dust could also contribute to pollutant loading in runoff. Pollutant discharges related to the storage, handling and use of chemicals could also occur. However, during construction, the Project would be required to implement standard erosion controls in accordance with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit that outlines best management practices (BMPs) to control stormwater runoff from the construction site and sediment and pollutants in this runoff. Project excavation and grading activities would be required to obtain a City grading permit that includes required erosion and sediment control requirements.

As discussed in the Initial Study, the Project would include excavation of the Project Site to a depth of approximately 52 feet below grade on the northern portion of the Project Site and 23 feet below grade on the southern portion of the Project Site. Groundwater was encountered at depths between 52.2 and 60.5 feet below grade. Therefore, groundwater may be encountered during Project construction, and dewatering could occur. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with the NPDES permit. The temporary system would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations. Furthermore, if dewatering is required, the treatment and disposal of the dewatered water would occur in accordance with the requirements of the Los Angeles

Regional Water Quality Control Board's (LARWQCB) Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.

Based on the above, with compliance with NPDES requirements and City's grading permit regulations, construction of the Project would not result in discharges that would violate any surface water quality standard or waste discharge requirements. Thus, temporary construction-related impacts on surface water quality would be less than significant.

During operation, the Project would introduce sources of potential stormwater pollution that are typical of commercial developments (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with vehicular parking and circulation areas). Consistent with the City's Low Impact Development (LID) Ordinance, the Project would implement BMPs onsite to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system and would result in improved surface water quality compared to existing conditions. As such, impacts to surface water quality during operation of the Project would be less than significant.

Furthermore, the Project Site is virtually impervious (approximately 96.2 percent) in the existing condition, and there is minimal groundwater recharge potential. The Project would develop hardscape and structures that cover virtually the entire Project Site with impervious surfaces, and, therefore, the groundwater recharge potential would remain minimal. Furthermore, the Project's BMPs would control stormwater runoff with no increase in runoff resulting from the Project. Also, the Project would not include the installation of water supply wells, and there are no existing wells or spreading ground within 1 mile of the Project Site. Therefore, the Project would not decrease groundwater supplies or interfere substantially with groundwater recharge, such that the Project may impede sustainable groundwater management of the basin. With adherence with applicable regulations, Project operation would not violate surface water or groundwater quality standards or groundwater recharge or result in substantial erosion or siltation; as such, impacts would be less than significant. Moreover, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan.

As discussed in the Initial Study, the Project Site is not located within a 100-year flood hazard area as mapped by FEMA or by the City. In addition, the Safety Element does not map the Project Site as being located within a tsunami hazard area. Therefore, no tsunami or tsunami events would be expected to impact the Project Site. Additionally, there are no standing bodies of water near the Project Site that may experience a seiche. Earthquake-induced flooding can result from the failure of dams or other water-retaining structures resulting from earthquakes. The Safety Element shows that the Project Site is

located in the potential inundation area for the Hollywood Reservoir, which is held by the Mulholland Dam. The Mulholland Dam is a Los Angeles Department of Water and Power (LADWP) dam located in the Hollywood Hills. Dam safety regulations are the primary means of reducing damage or injury due to inundation occurring from dam failure. The Mulholland Dam, as well as others 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. Specifically, the California Division of Safety of Dams regulates the siting, design, construction, and periodic review of all dams in the State. In addition, LADWP operates the dams in the Project Site area and mitigates the potential for overflow and seiche hazard through control of water levels and dam wall height. These measures include seismic retrofits and other related dam improvements completed under the requirements of the 1972 State Dam Safety Act. The City's Local Hazard Mitigation Plan, which was adopted in July 2011, provides a list of existing programs, proposed activities and specific projects that may assist the City in reducing risk and preventing loss of life and property damage from natural and human-cause hazards, including dam failure. The Hazard Mitigation Plan evaluation of dam failure vulnerability classifies dam failure as a moderate risk. Given the oversight by the California Division of Safety of Dams, including regular inspections, and the LADWP'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. Additionally, as discussed above, the Project would include new structural BMPs throughout the Project Site, which would reduce the amount of pollutants entering the stormwater system and groundwater. For all the foregoing reasons, Project impacts to groundwater and hydrology would be less than significant.

h. Land Use and Planning (Physical Division of an Established Community)

The area surrounding the Project Site is developed primarily with a mix of low- to high-intensity residential, commercial, and mid- to high-rise office buildings, which vary widely in building style and period of construction. Land uses adjacent to the Project Site include the Rise Hollywood mixed-use development, the Los Angeles Police Department Hollywood Station, and Los Angeles Fire Department Station 27 south of the Project Site, the 14-story CNN building east of the Project Site, and an 11-story office building located west of the Project Site. The Project would remove and replace the existing commercial buildings and surface parking areas on the Project Site with a new commercial development containing restaurant and office uses. These uses would be consistent with other office and commercial developments located adjacent to and in the general vicinity of the Project Site. All proposed development would also occur within the boundaries of the Project Site. In addition, the Project does not propose a freeway or other large infrastructure that would divide the existing surrounding community. Therefore, the Project

would not physically divide an established community. Project impacts related to the physical division of an established community would be less than significant.

i. Mineral Resources

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. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone, where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey. The Project Site is also not located within a City-designated oil field or oil drilling area. Therefore, as concluded in the Initial Study, no impacts related to mineral resources would occur.

j. Noise (Airport and Airstrip)

The Project Site is not located within 2 miles of an airport or within an area subject to an airport land use plan. The nearest airport is the Bob Hope Airport located approximately 7.3 miles from the Project Site. Furthermore, the Project Site is not located within the designated Airport Influence Area of the Los Angeles International Airport as designed by the County of Los Angeles Land Use Committee. The Project Site is also not located within the vicinity of a private airstrip. The nearest private airstrip is the Los Alamitos Army Airfield, located approximately 31 miles southeast of the Project Site. Therefore, the Project would not expose people working in the Project area to excessive noise levels from airports or airstrips, and no impacts would occur.

k. Population and Housing

The Project would include the construction of new commercial uses. Since the Project does not propose a housing component, it would not directly induce a new residential population, which would contribute to population growth in the vicinity of the Project Site or the Hollywood Community Plan area. The Project would have the potential to generate indirect population growth in the vicinity of the Project Site as a result of the employment opportunities generated by the Project.

Based on employee generation factors from the LADOT, the Project is estimated to generate approximately 1,710 net new employees on the Project Site. According to SCAG's 2020–2045 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2020 is approximately 1,887,969 employees. In 2026, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,947,972 employees. Therefore, the projected employment growth in the City between 2020 and 2026 based on SCAG's 2020–2045 RTP/SCS is approximately 60,003 employees. The Project's 1,710 estimated net new employees would constitute

approximately 2.85 percent of the employment growth forecasted between 2020 and 2026. Therefore, the Project would not cause an exceedance of SCAG's employment projections contained in the 2020–2045 RTP/SCS. Overall, the provision of new jobs would constitute a small percentage of employment growth and would not be considered "unplanned growth" and would not produce such a high quantity of new jobs that it would have the possibility to induce unplanned residential growth. Therefore, the Project would not cause an exceedance of SCAG's employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities. As such, given that the Project would not directly contribute to substantial unplanned population growth in the Project area through the development of residential uses and as some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site or who would commute, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Further, as the Project would be located in a highly developed area with an established network of roads and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth.

The Project Site is currently occupied by commercial uses, and no housing currently exists on the Project Site. The Project would not displace any existing people or housing. Therefore, as concluded in the Initial Study, no impact would occur.

I. Public Services

(1) Schools

The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). As the Project does not propose the development of residential uses, implementation of the Project would not result in a direct increase in the number of students within the service area of LAUSD. In addition, the number of students that may be indirectly generated by the Project that could attend LAUSD schools serving the Project Site would not be anticipated to be substantial because not all employees of the Project are likely to reside in the vicinity of the Project Site. Furthermore, pursuant to Senate Bill 50, the Project Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related school impacts. Thus, the Project would not result in the need for new or altered school facilities. Therefore, impacts would be less than significant.

(2) Parks

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in on-site residents, who would utilize nearby parks and/or recreational facilities. Additionally, 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, only a fraction of the new employees generated by the Project could create a demand for parks. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks. In addition, Project employees would be more likely to use parks near their homes during non-work hours. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks or the need for new or physically altered parks. Impacts would be less than significant.

m. Recreation

As discussed above, the Project does not propose the development of residential uses which would create a demand on nearby parks and/or recreational facilities. Additionally, 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, only a fraction of the new employees generated by the Project could create a demand for parks and recreational facilities. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks and recreational facilities. In addition, Project employees would be more likely to use parks near their homes during non-work hours. Therefore, the Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. The impact on parks and recreational facilities would be less than significant.

n. Transportation

The Project's design does not include hazardous geometric design features (e.g., sharp curves or dangerous intersections). The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. In addition, the Project would not result in incompatible uses as the proposed uses are consistent with the commercial uses in the Project vicinity. Furthermore, the design and implementation of new driveways would comply with the City's applicable requirements,

including emergency access requirements set forth by the LAFD. The Project design would also be reviewed by the City's Department of Building and Safety and the LAFD during the City's plan check review process to ensure all applicable requirements are met. Therefore, no impacts would occur.

With respect to emergency access, while it is expected that the majority of construction activities for the Project would primarily be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access (refer to Project Design Feature TR-PDF-2 in Section IV.H, Transportation, of this Draft EIR). With regard to operation, the Project does not propose the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from the surrounding streets. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. Therefore, the Project would not result in inadequate emergency access, and impacts would be less than significant.

o. Utilities and Service Systems—Solid Waste

The construction activities necessary to build the Project would generate debris, some of which may be recycled to the extent feasible. Pursuant to the requirements of Senate Bill (SB) 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, are disposed of in inert waste landfills. The County's inert landfill is the Azusa Land Reclamation landfill. The Project would generate a total of approximately 2,075 tons of demolition debris and 762 tons of construction debris, for a combined total of 3,049 tons of construction-related waste generation. Applying the 75-percent diversion rate, the Project would dispose of approximately 762 tons of construction-related waste in Azusa Land Reclamation Landfill throughout the construction period. This amount of construction and debris waste would represent approximately 0.001 percent of the Azusa Land Reclamation Landfill's remaining disposal capacity of 57.72 million tons. Thus, consistent with the conclusion in the Initial Study, the County's inert waste landfill would be able to accommodate Project-generated waste, and construction of the Project would not result in the need for an additional disposal facility to adequately handle Project construction-related waste.

During operation, Project-generated solid waste would be collected by a private waste hauler and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles. The estimated remaining capacity for the County's Class III landfills open to the City of Los Angeles is approximately 163.39 million tons. Upon full buildout, the Project would result in a net increase in solid waste generation of 714 tons per year. 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 Assembly Bill 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025. The estimated annual net increase in solid waste that would be generated by the Project of 714 tons represents approximately 0.0004 percent of the remaining capacity (163.39 million tons) for the County's Class III landfills open to the City of Los Angeles. Therefore, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste that would be generated by the construction and operation of the Project, and impacts would be less than significant.

Additionally, 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 development projects include an on-site recycling area or room of specified size. The Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste, impacts would be less than significant.

p. Wildfire

The Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. The Project Site is located in an urbanized area, and there are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone. Therefore, no impacts regarding wildfire risks would occur.