CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
CITY HALL 200 NORTH SPRING STREET LOS ANGELES CA 90012

Sustainable Communities Environmental Assessment

Found Residences Project

Case Number: ENV-2022-1049-SCEA
CPC-2022-1048-DB-HCA

Project Location: 6422 W. Selma Avenue, 1540-1552 N. Wilcox Avenue Los Angeles, 90028

Community Plan Area: Hollywood

Council District: 13 – Hugo Soto-Martinez

Project Description: The Found Residences Project (the "Project") encompasses a Project area of approximately 15,022 square feet (0.35 acre), inclusive of the area to be incorporated following the requested lot line adjustment (the "Project Site"). 6422 Selma Owner, LLC (the "Applicant") proposes the demolition of the existing one-story storage building and the retention and refurbishment of portions of the existing one-story historic commercial building on the Project Site to develop a 15-story building with 45 4-bedroom residential units. The Project would encompass a total floor area of up to 67,599 square feet resulting in a Floor Area Ratio (FAR) of 4.5:1 and would have a maximum building height of 180 feet and five inches (180'-5"). In total, the Project would provide 6,456 square feet of common open space which includes two ground floor courtyards, and three common-space terraces (on floors 13 and 14, and the roof), The Project also includes 10 common-space living-rooms with balconies (on floors 3-12), and private balconies (on floors 3-14). The Project would provide up to 36 parking spaces, with vehicle access provided via a two-way driveway on Selma Avenue. In addition, the Project would provide 44 bicycle spaces including five short term spaces, and 39 long term spaces located within an enclosed bicycle storage area on the ground level.

PREPARED FOR:

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APPLICANT:

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March 2023

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I. INTRODUCTION

A. PURPOSE OF A SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT

The purpose of this Sustainable Communities Environmental Assessment (SCEA) is to evaluate the environmental effects of the proposed Found Residences Project (Proposed Project; Project) in accordance with the California Environmental Quality Act (CEQA). In addition, the SCEA evaluates the Project's consistency with the Southern California Association of Government's (SCAG's) Connect SoCal 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS) adopted in September 2020, and incorporates the feasible mitigation measures, performance standards, and/or criteria from the Connect SoCal RTP/SCS Environmental Impact Report (EIR) into the Proposed Project.

The SCEA form of CEQA documentation was established by SB 375 to provide streamlined environmental review for certain "Transit Priority Projects." SB 375 (Public Resources Code [PRC] § 21155(b)) defines Transit Priority Projects (TPPs) as projects that shall:

(1) contain at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;

(2) provide a minimum net density of at least 20 dwelling units per acre; and

(3) be within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan. A major transit stop is as defined in § 21064.3, except that, for purposes of this section, it also includes major transit stops that are included in the applicable regional transportation plan. For purposes of this section, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours. A project shall be considered to be within one-half mile of a major transit stop or high-quality transit corridor if all parcels within the project have no more than 25 percent of their area farther than one-half mile from the stop or corridor and if not more than 10 percent of the residential units or 100 units, whichever is less, in the project are farther than one-half mile from the stop or corridor.

See **Chapter III, SCEA Assessment Eligibility,** for a discussion of the Project's consistency with the criteria listed above.

The intent of the CEQA streamlining provisions is not to undercut or circumvent CEQA requirements, but rather to reduce documentation and redundancy and to provide an incentive for TPPs that are consistent with a larger effort to reduce greenhouse gas (GHG) emissions by integrating transportation and land use planning.

A SCEA is comparable to an Initial Study / Mitigated Negative Declaration since the lead agency must find that all potentially significant impacts of a project have been identified, adequately analyzed, and mitigated to a level of insignificance. However, unlike a negative declaration, the SCEA need not consider the cumulative effects of the project that have been adequately addressed and mitigated in prior EIRs, in this case the SCAG Connect SoCal RTP/SCS EIR. Also, growth-inducing impacts are not required to be referenced, described, or addressed and project specific or cumulative impacts from cars and light duty truck trips on global warming or the regional transportation network need not be referenced, described or discussed. The SCEA will also incorporate applicable and feasible mitigation measures from the SCAG Connect SoCal RTP/SCS EIR.

B. PROJECT SUMMARY

The Applicant, 6422 Selma Owner, LLC, proposes the development of the Found Residences Project (Proposed Project) on an approximately 15,022 square foot (0.35 acre) site (Project Site) located within the Hollywood Community Plan (Community Plan) Area in the City of Los Angeles (City). The Project Site is located at 6422 Selma Avenue, and portions of 1540-1552 N. Wilcox Avenue, Lots 2, 3, 4, and 5 of Tract No. 1754, Assessor Parcel Numbers (APN) 5546-013-002, and 5546-013-003. The portion of the site fronting Selma Avenue (APN 5546-013-003) is currently developed with a 1-story, approximately 6,500 square foot commercial building. The remainder of the site is currently developed with a 1-story, approximately 9,945 square foot storage building. The 3-story Gilbert Hotel building abuts the proposed new development to the west, fronting Wilcox Avenue, and although this building is a part of the subject property, the Proposed Project will be located on the adjacent portions of the property and will not affect this building, which will remain entirely in place. The Project Applicant is requesting a Lot Line Adjustment which would adjust the lot lines between Lots 2, 3, 4, and 5 of Tract No. 1754, Assessor Parcel Numbers (APN) 5546-013-002, and 5546-013-003, such that the commercial building fronting Selma and the storage building to be demolished will be on one lot, and the Gilbert will be the other lot(s), and

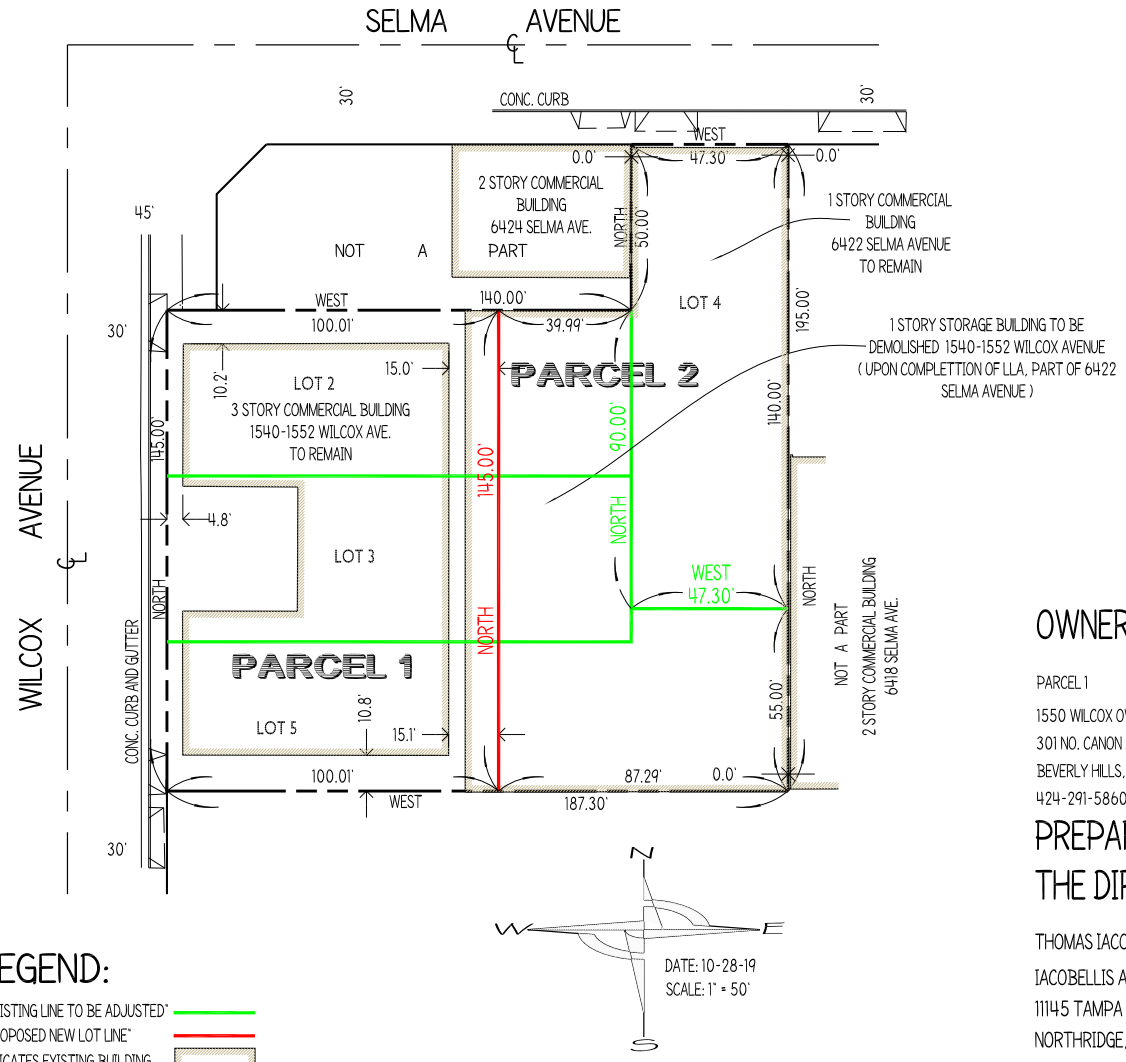
that the proposed new development will only be on the new Selma-fronting lot (6422 Selma, the Project Site). Please refer to **Figure I-1, Lot Line Adjustment Diagram**.

The Applicant proposes the redevelopment of the Project Site with a new 15-story multi-family residential building containing 45 residential units and up to 36 on-site parking spaces. The Proposed Project would rise to a maximum building height of approximately 180 feet and five inches (180'-5") and would include a total square footage of up to approximately 67,599 square feet, resulting in a Floor Area Ratio (FAR) of 4.5 to 1 (4.5:1). The Proposed Project would provide twelve residential levels above two levels of at- and above-grade stacked parking, ground-floor residential amenity space, a roof terrace, and a basement area containing a 50,000 gallon fire water storage tank, a fire pump room, and two elevator pits. A total of 15 percent of the proposed residential units (six units) would be designated as restricted affordable housing for Very Low Income Households.

Project parking would be provided on the lower two levels of the Project, accessed by one driveway along Selma Avenue. The parking may be provided through a stacking system, tall enough to accommodate three automobiles high. Therefore, although the parking area physically occupies the two lower levels of the Project, it is only accessible on the ground-floor level. The Project will also provide 39 long-term and five short-term residential bicycle parking spaces.

LOT LINE ADJUSTMENT NO. AA-2018-476-PMEX

"LOT LINE FOR THE PURPOSES OF MERGING"



LEGEND:

"EXISTING LINE TO BE ADJUSTED"

"PROPOSED NEW LOT LINE"

INDICATES EXISTING BUILDING

SURVEYOR'S NOTES:

1. ZONING: C4-2D
2. DISTRICT MAP NO. 148-5A187
3. AREAS:

EXISTING PARCEL 1: 22,901.50 SQ. FT. OR 0.5257 ACRES
EXISTING PARCEL 2: 6,622.00 SQ. FT. OR 0.1520 ACRES

EXISTING LOT 2: 7,000.00 SQ. FT. OR 0.1607 ACRES
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EXISTING LOT 4: 6,622.00 SQ. FT. OR 0.1520 ACRES
EXISTING LOT 5: 8,901.50 SQ. FT.. OR 0.2044 ACRES

PROPOSED PARCEL 1: 14,501.32 SQ. FT. OR 0.3329 ACRES
PROPOSED PARCEL 2: 15,022.18 SQ. FT. OR 0.3449 ACRES

4. ADDRESS:

PARCEL 1: 1548-1552 WILCOX AVENUE
PARCEL 2: 6422 SELMA AVENUE

EXISTING LEGAL DESCRIPTION:

LOTS 2, 3, 4 AND 5 OF TRACT 1754, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 20 PAGE 101 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

OWNER:

PARCEL 1

1550 WILCOX OWNER, LLC
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424-291-5860

PARCEL 2

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424-291-5860

PREPARED UNDER THE DIRECTION OF:

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PROFESSIONAL LAND SURVEYOR
MARK FOX
PLS 6892
EXP. 06-30-21
STATE OF CALIFORNIA

SOURCE: Iacobellis and Associates, 2019

FIGURE I-1

IMPACT SCIENCES

Lot Line Adjustment Diagram

C. STATUTORY BACKGROUND

The Sustainable Communities and Climate Protection Act of 2008 amended the CEQA regulations to add Chapter 4.2, Implementation of the Sustainable Communities Strategy (PRC § 21155), which provides a CEQA exemption for Sustainable Community Projects and streamlined CEQA analysis for TPPs.

One such streamlining provision is the SCEA, the provisions of which are specified primarily in PRC § 21155.2. Section 21155.2(a) states that if a TPP incorporates all feasible mitigation measures, performance standards, or criteria set forth in the prior applicable environmental impact reports and adopted findings made pursuant to PRC § 21081, then it shall be eligible for a SCEA. For a detailed analysis of the project's compliance with SCEA statutory requirements, see the "Sustainable Communities Environmental Assessment Eligibility" section of this document.

D. ORGANIZATION OF THE SCEA

This SCEA is organized into six sections as follows:

I. **Introduction.** This section provides introductory information summarizing the key elements of the Sustainable Communities and Climate Protection Act and information about the Project.

II. **Project Description.** This section contains a detailed project description, contact information, existing general plan land use and zoning information, description of surrounding land uses, project objectives, a summary of required approvals, and the cumulative development scenario.

III. **Sustainable Communities Environmental Assessment Eligibility.** This section analyzes the Proposed Project's consistency with the TPP Criteria, the project's consistency with SCAG's Connect SoCal RTP/SCS goals and policies and identifies applicable mitigation measures from previously prepared and certified EIRs, in this case the SCAG Connect SoCal RTP/SCS EIR.

IV. **Sustainable Communities Environmental Assessment – Initial Study Analysis.** This section contains the completed Initial Study Checklist (Checklist) showing the significance level under each environmental impact category. Each environmental issue identified in the Initial Study Checklist contains an assessment and discussion of impacts associated with each subject area. When the evaluation identifies potentially significant effects, as identified

in the Checklist, mitigation measures are provided to reduce such impacts to a less than significant level.

V. **List of Preparers.** This section provides a list of City personnel, other governmental agencies, and consultant team members that participated in the preparation of the SCEA.

VI. **Appendices.** Includes various documents, technical reports, and information used in the SCEA and can be found in the case file for the Proposed Project.

II. PROJECT DESCRIPTION

A. INTRODUCTION

The Applicant, 6422 Selma Owner, LLC, proposes the development of the Found Residences Project (Proposed Project) on an approximately 15,022 square foot (0.35 acre) site (Project Site) located within the Hollywood Community Plan (Community Plan) Area in the City of Los Angeles (City). The Project Site is located at 6422 Selma Avenue, and portions of 1540-1552 N. Wilcox Avenue, Lots 2, 3, 4, and 5 of Tract No. 1754, Assessor Parcel Numbers (APN) 5546-013-002 and 5546-013-003.

The Project Site is located in a predominately commercial area roughly bounded by Selma Avenue to the north, Sunset Boulevard to the south, Cahuenga Boulevard to the east, and Wilcox Avenue to the west. The portion of the site fronting Selma Avenue (APN 5546-013-003) is currently developed with a 1-story, approximately 6,500 square foot commercial building. The remainder of the site is currently developed with a 1-story, approximately 9,945 square foot storage building. The 3-story Gilbert Hotel building abuts the proposed new development to the west, fronting Wilcox Avenue, and although this building is a part of the subject property, the Proposed Project will be located on the adjacent portions of the property and will not affect this building, which will remain entirely in place. The Project Applicant is requesting a Lot Line Adjustment which would adjust the lot lines between Lots 2, 3, 4, and 5 of Tract No. 1754, Assessor Parcel Numbers (APN) 5546-013-002, and 5546-013-003, such that the commercial building fronting Selma and the storage building to be demolished will be on one lot, and the Gilbert will be the other lot(s), and that the proposed new development will only be on the new Selma-fronting lot (6422 Selma, the Project Site). Please refer to **Figure II-3, Lot Line Adjustment Diagram**.

The Applicant proposes the redevelopment of the Project Site, with a new, 15-story multi-family residential building containing 45 4-bedroom residential units and up to 36 on-site parking spaces. The Proposed Project would rise to a maximum building height of approximately 180 feet and five inches (180’-5”), and would include a total square footage of up to approximately 67,599 square feet, with a Floor Area Ratio (FAR) of 4.5 to 1 (4.5:1), providing twelve residential levels above two levels of at- and above-grade stacked parking, a roof terrace, and a basement area containing a 50,000 gallon fire water storage tank, a fire pump room, and two elevator pits. A total of 15 percent of the proposed residential units (six units) would be designated as restricted affordable

housing for Very Low Income Households.

Project parking would be provided on the lower two levels of the Project, accessed by one driveway entering from Selma Avenue, through the existing commercial building, retaining the building's façade and front third of the original structure. The parking may be provided through a stacking system, tall enough to accommodate three automobiles high. Therefore, although the parking area physically occupies the two lower levels of the Project, it is only accessible on the ground-floor level. The Project will also provide 39 long-term and five short-term residential bicycle parking spaces.

B. PROJECT LOCATION AND SURROUNDING USES

As shown in **Figure II-2, Project Site and Vicinity**, the Project Site is located in a highly urbanized location surrounded by a mix of land uses including commercial, multi-family residential, institutional, and office space, roughly bounded by Selma Avenue to the north, Sunset Boulevard to the south, Cahuenga Boulevard to the east, and Wilcox Avenue to the west. The Project Site is located approximately 0.82 miles west from Interstate Highway 101 (US 101); in the Project vicinity.

The Site is served by the 2 Metro Local Line that stops at the corner of Wilcox Avenue and Sunset Boulevard approximately 0.16 miles from the Project Site. Additionally, there are several major bus routes running along Hollywood Boulevard, Highland Avenue, and Vine Street. Nearby transit service includes the 212 Metro Local Line, 210 Metro Local Line, 217 Metro Local Line, 222 Metro Local Line, Beachwood Canyon DASH Bus, Hollywood Clockwise DASH, Hollywood Counterclockwise DASH, and the Hollywood/DASH. The Project site is approximately 0.33 miles from the Hollywood/Vine Station of the Metro B Line (formerly the Red Line).

C. SITE BACKGROUND AND EXISTING SITE CONDITIONS

The Project Site is currently developed with a one-story commercial building currently occupied by a small business, and a one-story storage building which is vacant. The buildings were constructed in 1909 and 1925, respectively. As further described in Section IV-5 Cultural Resources, the existing commercial building on the Project Site is eligible as a historical resource under CEQA, while the storage building on the Project Site is not. Refer to Section IV-5. Cultural Resources.

There is currently no existing landscaping on the Project Site.

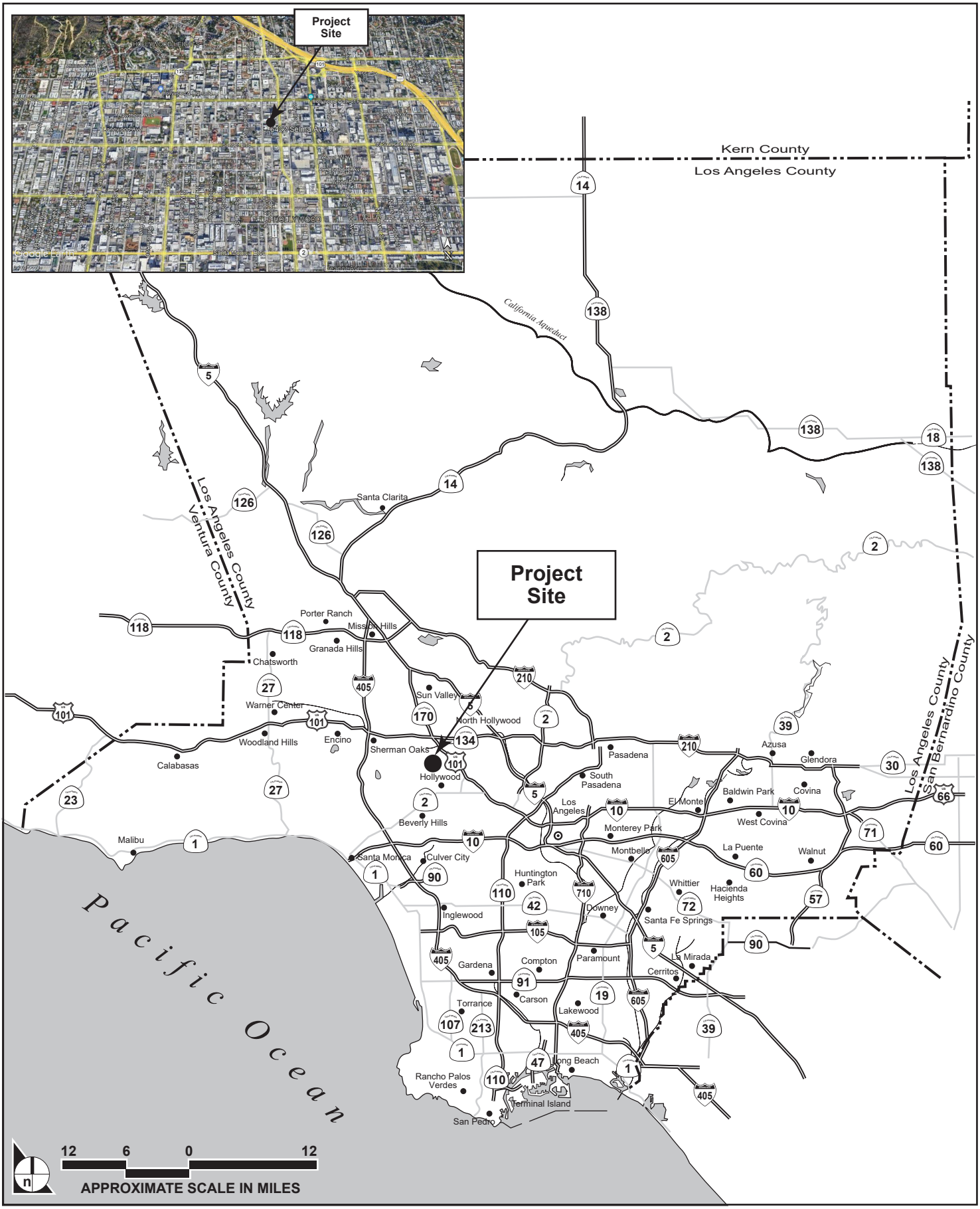
D. PLANNING AND ZONING

The Project Site is within the City of Los Angeles Hollywood Community Plan Area and is designated as a Transit Priority Area in the City of Los Angeles.[1] The Site's General Plan designation is Regional Center Commercial. The Property is currently zoned C4-2D. The C4 zoning designation allows multifamily development, and while the Project Site is located within Height District 2, which permits a maximum Floor Area Ratio (FAR) of 6:1, it is also subject to a D limitation which limits the FAR to 3:1. The base density permitted by the underlying zone is 400 square feet per dwelling unit.

Transit Priority Areas are identified under Zoning Information File No. 2452 as an area within one half mile of a major transit stop that is existing or planned.[2] The Project site is approximately 0.33 miles from the Hollywood/Vine Station of the Metro B Line (formerly the Red Line). Further, the Project site is served by the 2 Metro Local Line that stops at the corner of Wilcox Avenue and Sunset Boulevard approximately 0.16 miles from the Project Site. Additionally, there are several major bus routes running along Hollywood Boulevard, within approximately 0.16 miles of the Site, all of which have frequency of service intervals of 15-minutes or less during the morning and afternoon peak commute periods.

1 ZIMAS, LA City, Available online: http://zimas.lacity.org/, accessed March 3, 2020,

2 Section 21064.3 of the Public Resources Code (PRC) defines a "major transit stop" as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. For purposes of Section 21099 of the PRC, a transit priority area also includes major transit stops in the City of Los Angeles (City) that are scheduled to be completed within the planning horizon of the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS). City of Los Angeles Department of City Planning, ZI No. 2452, https://pdf4pro.com/view/city-of-los-angeles-department-of-city-planning-zoning-44bd27.html.



SOURCE: Impact Sciences, 2021

FIGURE **II-1**

Regional and Project Vicinity Map

IMPACT SCIENCES

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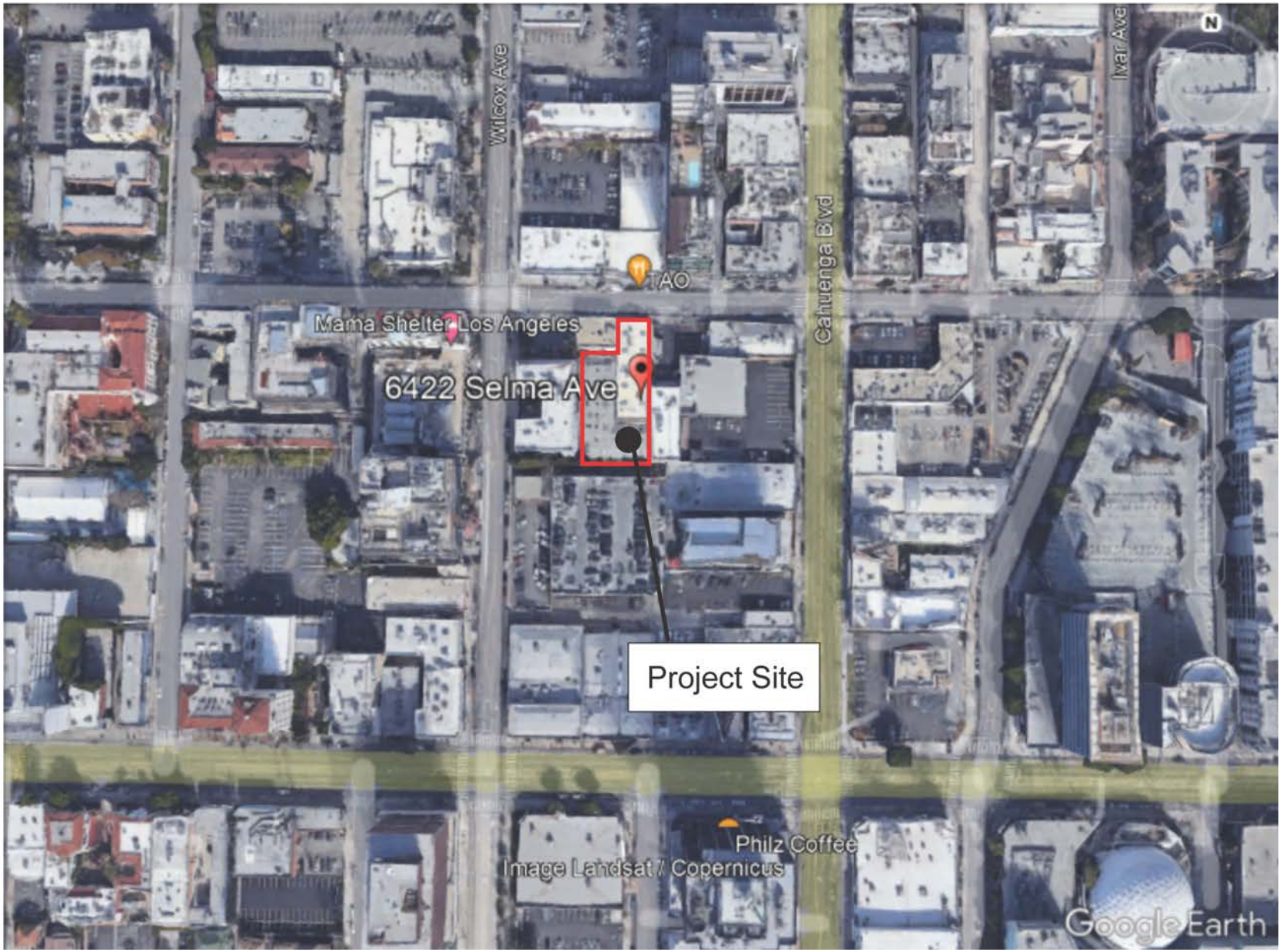

SOURCE: Google Earth, 2020

FIGURE **II-2**

IMPACT SCIENCES

Aerial View of the Project Site

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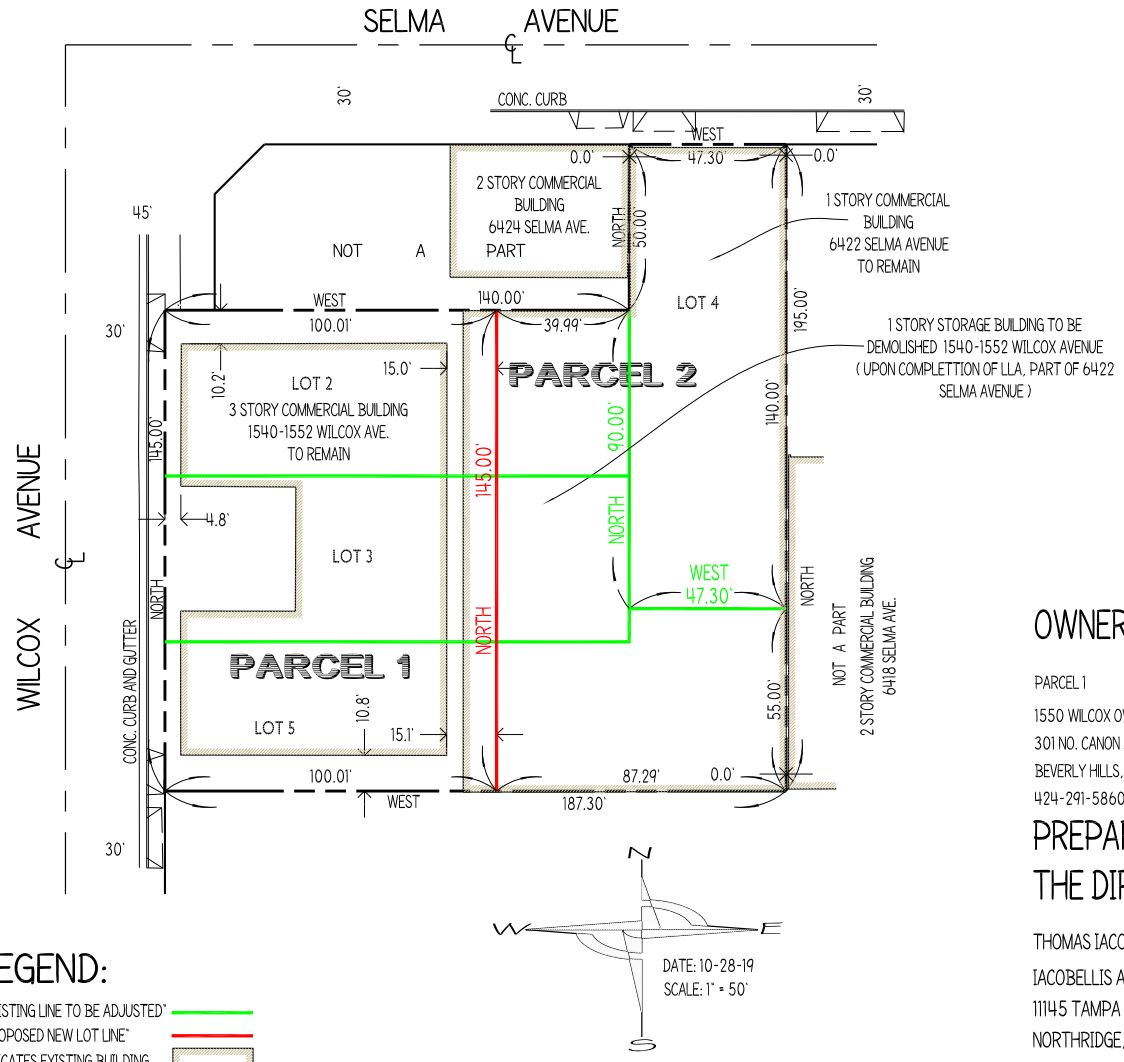
LOT LINE ADJUSTMENT NO. AA-2018-476-PMEX

"LOT LINE FOR THE PURPOSES OF MERGING"



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PROFESSIONAL LAND SURVEYOR
MARK FOX
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EXP. 06-30-21
STATE OF CALIFORNIA

SOURCE: Iacobellis and Associates, 2019

FIGURE **II-3**

IMPACT SCIENCES

Lot Line Adjustment Diagram

E. PROJECT CHARACTERISTICS

The Project would demolish the existing one-story storage building, retain and refurbish the front third of the one-story commercial building fronting Selma Avenue, demolish the rest of the building, and construct a new 15-story multi-family residential building containing 45 4-bedroom residential units and up to 36 on-site parking spaces. The Proposed Project would rise to a maximum building height of approximately 180 feet and five inches (180'-5") and would include a total square footage of up to approximately 67,599 square feet with a Floor Area Ratio (FAR) of 4.5 to 1, providing twelve residential levels above two levels of at- and above-grade stacked parking, and ground-floor residential amenity space. A total of 15 percent of the proposed residential units (six units) would be designated as restricted affordable housing for Very Low Income Households.

Project parking would be provided on the lower two levels of the Project, accessed by one driveway entering from Selma Avenue, through the existing commercial building, retaining the building's façade and front third of the original structure. The parking may be provided through a stacking system, tall enough to accommodate three automobiles high. Therefore, although the parking area physically occupies the two lower levels of the Project, it is only accessible on the ground-floor level. The Project will also provide 39 long-term and five short-term residential bicycle parking spaces.

The proposed uses are summarized in **Table II-1, Project Summary**.

Table II-1
Project Summary

Total Lot Area[a]	15,022 SF
Total Permitted Floor Area (3:1 FAR without bonus)	45,066 SF
Total Permitted Floor Area (with density bonus)	67,599 SF
Total Proposed Maximum Floor Area	67,599 SF
Floor Area Ratio (FAR)	4.5 to 1
General Plan Designation	Regional Center Commercial
Zoning / Land Uses	C4-2D
Residential - Four-Bedroom	45 units total
Total Required LAMC Open Space	7,785 SF
Ground Floor (Rear Year & North Yard)	2,083 SF
Terraces @ 13th Floor	1,223 SF
Terraces @ 14th Floor	1,319 SF
Terrace @ 15th Floor (Roof Terrace)	1,831 SF

Total Provided LAMC Open Space	6,456 SF
Additional Open Space Not Counted Toward LAMC Open Space	
Private Balconies @ Typ. Floors = 170 SF x 10 (Level 3-12)	1,700 SF
Private Balconies @ Level 13	132 SF
Private Balconies @ Level 14	94 SF
Covered Roof Outdoor Area @ Level 14	65 SF
All the Interior Common Amenity = 294 SF x 10 (Levels 3-12)	2,940 SF
Total Open Space	11,387 SF
New Trees	10

Note:
a - Prior to Case No. AA-2019-476-PMEX, the total lot area of both the Selma and Wilcox Sites is 29,523 SF. Once the LLA is approved, the properties located at 6422 W. Selma Avenue will have a resultant lot area of 15,022 square feet and the properties located at 1540-1552 N. Wilcox Avenue will have a resultant lot area of 14,501 square feet.
Source: DLR Group, November 2022

Project Design, Open Space and Landscaping

The new building provides a variety of architectural materials and building planes, with special attention to maintaining the historic building façade at 6422 Selma Avenue, and interior wooden trusses. The building incorporates clean lines, articulated details, quality materials, and dignified presentation. The Proposed Project is modern in conceptual design, using alternate textures, colors, materials, and distinctive architectural treatments to add visual interest. Prior to the issuance of a building permit, the type or categories of all exterior glass and architectural features on the building façades and rooftops would be submitted for review to the Department of Building and Safety to ensure that highly reflective materials are not utilized. The proposed landscaping plan provides a mix of ground cover and trees to compliment the architecture. Plant material has been selected for temperature hardiness and low water use.

Open Space

Per Los Angeles Municipal Code (LAMC) 12.21 G, the Proposed Project is required to provide 175 square feet of useable open space for each dwelling unit with three or more habitable rooms for a total requirement of 7,785 square feet of total usable open space per LAMC. The Applicant proposes to construct 6,456 square feet of the proposed usable open space per LAMC as common open space areas. Specifically, the Proposed Project would provide approximately 2,083 square feet of ground floor open space, an approximately 1,223 square foot terrace on the 13th floor, an approximately 1,319 square foot terrace on the 14th floor, and an approximately 1,831 square foot 15th floor (rooftop) terrace. In addition, the Proposed Project would provide approximately 1,926 square feet of private balcony space, and 3,005 additional square feet of

common amenity space not counted towards the LAMC-required open space requirements. As such, the Proposed Project would provide approximately 11,387 square feet of total open space.

Access and Circulation

Automobile Parking

Pursuant to AB 2097, signed by the Governor on September 22, 2022, because of the Project's proximity to a Major Transit Stop, no parking is required for the Project. However, the Applicant will provide parking for residents on the lower two levels of the Project, accessed by one driveway along Selma Avenue, and the parking may be provided through a stacking system, tall enough to accommodate three automobiles high. Therefore, although the parking area physically occupies the two lower levels of the Project, it is only accessible on the ground-floor level. The Applicant will provide accessible parking spaces in conformance with the Americans with Disabilities Act (ADA) standards. Up to 30 percent the spaces provided will be equipped to be Electric Vehicle (EV) spaces and of those, 10 percent will be installed with Electric Vehicle Charging Stations (EVCS). The total number of required and provided electric vehicle spaces will be confirmed during the plan check process according to the California Green Building Code (CALGreen).

Bicycle Parking

Pursuant to LAMC Section 12.21 A.16 the Project would be required to provide a minimum of 44 bicycle parking spaces. The Project would be required to supply five short-term and 39 long term bicycle parking related to the Proposed Project. The Project will meet these requirements.

Lighting and Signage

New lighting would include building identification, commercial accent lighting, wayfinding, balcony lighting, and security lighting. Pedestrian areas including pathways and entryways into the Project would be well-lit for security. Light fixtures would be shielded and directed towards the areas to be lit and away from adjacent light-sensitive residential land uses.

The building would also include street address and identification/wayfinding signage for the vehicular and pedestrian entries to the building. Lighting would be designed in conformance with LAMC requirements and would not exceed the footcandle light intensity level required at the property line of the nearest sensitive receptor.

Security

Design Out Crime/Crime Prevention through Environmental Design. Through the City's land use and building permit process, the LAPD's Crime Prevention Unit provides guidance on design techniques for new developments to incorporate crime prevention into the development design. The techniques and process are outlined in the Design Out Crime Guidelines: Crime Prevention Through Environmental Design, and include the following basic concepts:

- Natural surveillance: The placement of physical features, activities, and people in a way that maximizes visibility.
- Natural access control: Restricting or encouraging people to come into a space through the placement of entrances, exits, fencing, landscaping, and lighting.
- Territorial reinforcement: The use of physical attributes to define ownership and separate public and private space.

The Proposed Project would include installation of security and fire sprinkler alarm systems that would be connected to a UL (Underwriters Laboratories Inc.) listed 24-hour monitoring station and local police and/or fire departments.

Closed circuit television (CCTV) cameras would be located throughout the Project and would record activity on the property at all times.

The main lobby at the ground floor level would have intercom access/controlled access. Residential parking would be gated with intercom access/controlled (card key or 'clicker') access.

The project is a 360-degree design, with building access and windows on all sides of the building, therefore placing "eyes" in all directions to create a system of natural surveillance.

The lobby entrance is located on the north side of the building. Sufficient building identification, wayfinding, and security lighting would be provided at the sidewalk level all around the building to help maintain a safe and secure environment for pedestrians walking to and around the building.

Green Building and Sustainability

Energy saving and sustainable design would be incorporated throughout the Project. The Project will meet California Green Building Standards Code, sometimes known as the Title 24 Building Standards Code (collectively known as the CALGreen Code). The Project's infill location would

promote the concentration of development in a developed location with extensive infrastructure. The proposed Project's proximity to public transportation and services would aid in reducing vehicle miles traveled for residents and employees.

In order to promote sustainability, this Project would be aligned to sustainable development targets including:

- Residential air filtering MERV 13
- Smoking prohibited in the building and within 25 feet of any opening
- ENERGY STAR Appliances
- Water sense labeled Low water use fixtures
- Drought tolerant landscaping
- Weather based irrigation control
- No invasive plants
- Drip irrigation only
- Insulated pipes
- LED lighting
- EV parking spaces
- Bike lockers, and storage

Thirty percent of the building parking would be reserved for electric vehicles (EV), 10 percent of which would be provided with electric vehicle service equipment (EVSE), the remaining 20 percent would be future EVSE ready (i.e., power capacity and conduits would be in place at build-out).

The building will be sustainably designed to meet and/or exceed all City of Los Angeles current building code and Title 24 requirements. As such, the Project will incorporate eco-friendly building materials, systems, and features wherever feasible, including Energy Star appliances, water saving/low flow fixtures, non-VOC paints/adhesives, drought tolerant landscaping, and high-performance building envelopment.

Project Construction

The Project is anticipated to be constructed over a period of approximately 24 months, with completion anticipated in January of 2026. Grading activities would include approximately 9,196 cubic yards of soil being exported from the Project Site. Construction hours would occur in accordance with the LAMC requirements, which prohibit construction between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any

time on Sunday.

In addition, all contractors would be required to comply with the City of Los Angeles Noise Ordinance, i.e. Section 41.40 of the LAMC, which regulates noise from demolition and construction activities, and prohibits construction activity (including demolition) and repair work, where the use of any power tool, device, or equipment would disturb persons occupying sleeping quarters in any dwelling hotel, apartment, or other place of residence, between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, and between 6:00 p.m. and 8:00 a.m. on Saturdays and holidays; all such activities are also prohibited on Sundays. Section 112.05 of the LAMC also specifies the maximum noise level of construction machinery that can be generated in any residential zone of the City or within 500 feet thereof. Refer also to Section IV-13, Noise.

During construction, construction walls and barriers would be erected to protect the Site from vandalism consistent with LAMC Section 91.6205, which regulates signage on construction barriers.

On-site grading and site preparation must comply with all applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. Further, the Proposed Project will be required to comply with standard regulations, including South Coast Air Quality Management District Rule 402, which will reduce construction erosion impacts. Rule 402 requires dust suppression techniques be implemented to prevent dust and soil erosion from creating a nuisance off-site.

Additionally, the Construction General Permit (CGP) issued by the State Water Resources Control Board (SWRCB), effective July 1, 2010, regulates construction activities to minimize water pollution, including sediment. The Proposed Project will be subject to National Pollution Discharge Elimination System permitting regulations, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP). Construction contractors will be required to prepare and implement a SWPPP and associated best management practices (BMPs) in compliance with the CGP, along with the City of Los Angeles Best Management Practices Handbook, Part A Construction Activities during grading and construction. Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from project-related grading and construction activities.

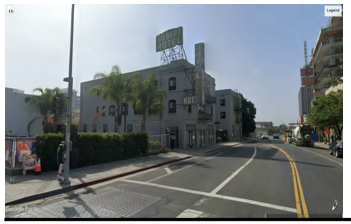
Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAPD. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until such

temporary street closures are complete.

Construction worker parking and building material laydown during construction of the Proposed Project would take place on the Project Site as much as is feasible.

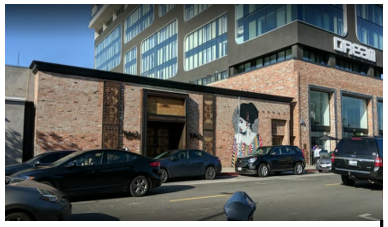
US Postal

1615 Wilcox Ave, Los Angeles, CA 90028
Post Office - 2 stories



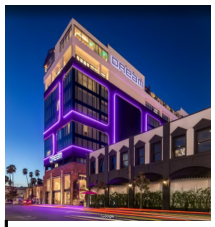
Gilbert Hotel

1550 Wilcox Ave, Los Angeles, CA 90028
Hotel - 3 stories



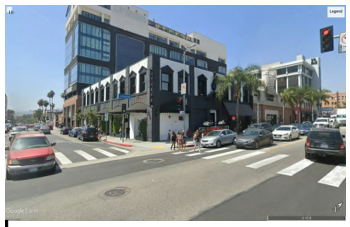
TAO Restaurant

6421 Selma Ave, Los Angeles, CA 90028
Restaurant - 1 story



Dream Hollywood

6417 Selma Ave, Hollywood, CA 90028
Hotel - 11 stories



Avenue

1601 N Cahuenga Blvd, Los Angeles, CA 90028
Cocktail Bar - 2 stories

Cafe Etc.

6371 Selma Ave, Los Angeles, CA 90028
Coffee Shop - 2 stories

Stout Burgers and Beers

1544 N Cahuenga Blvd, Los Angeles, CA 90028
Restaurant - 1 story

SOURCE: DLR Group, 2021

FIGURE **II-4**

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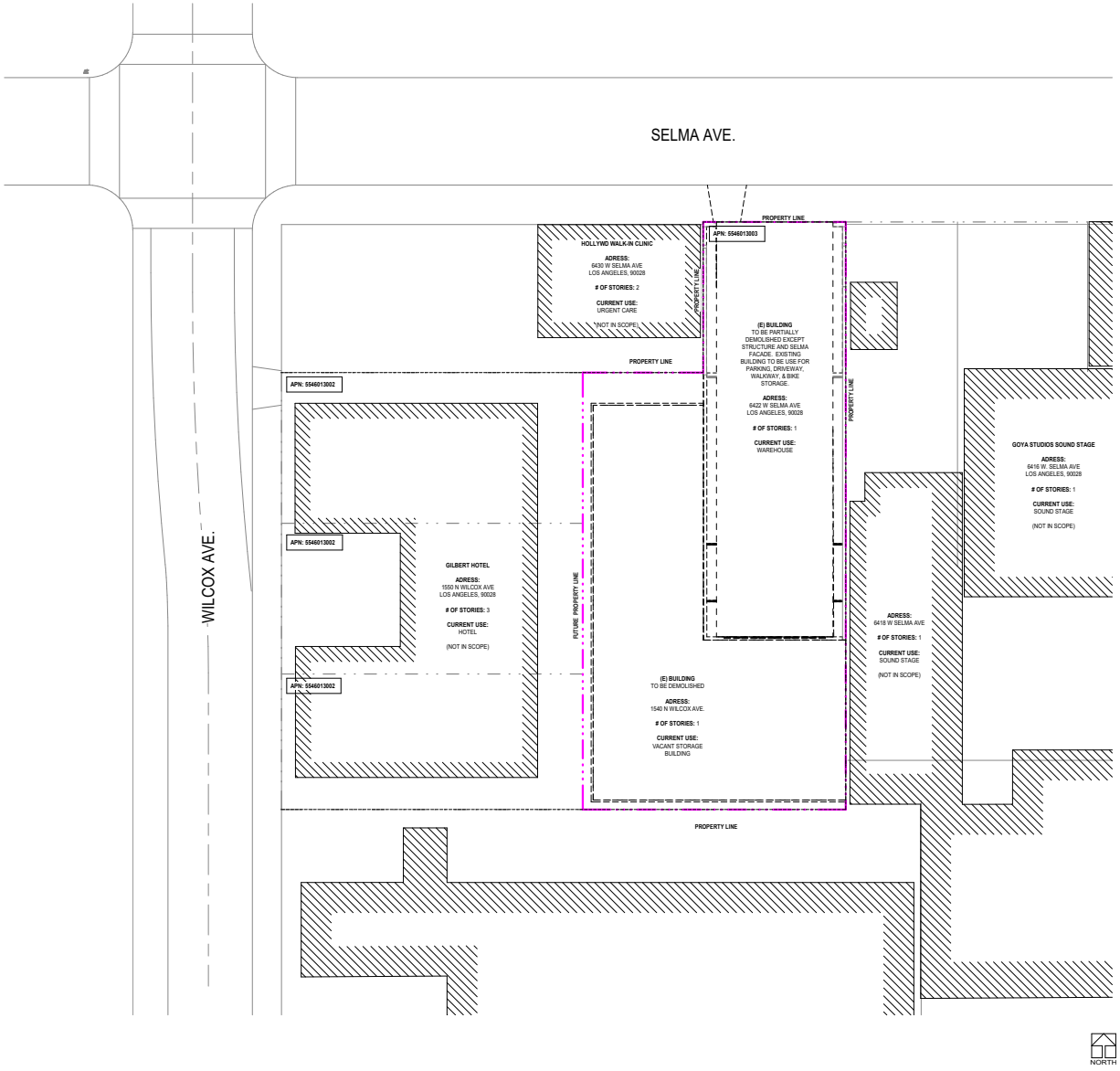
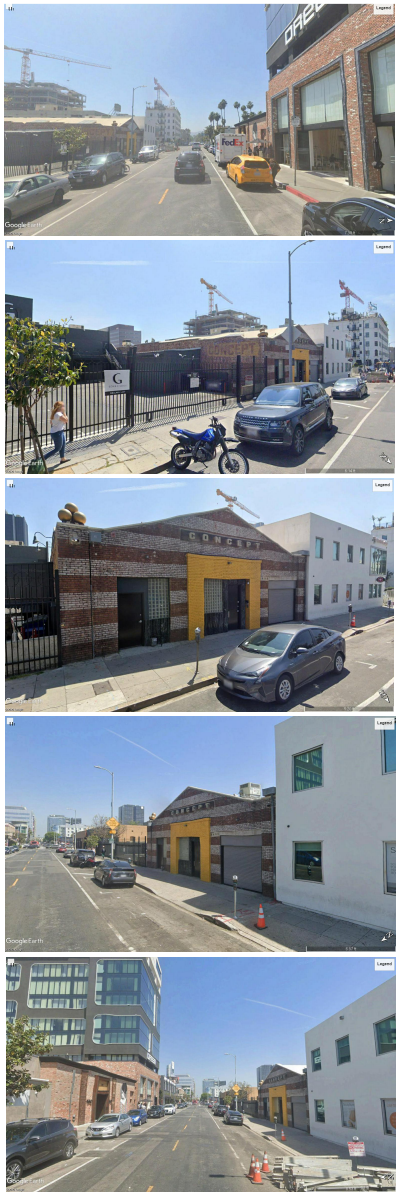
Project Area Context





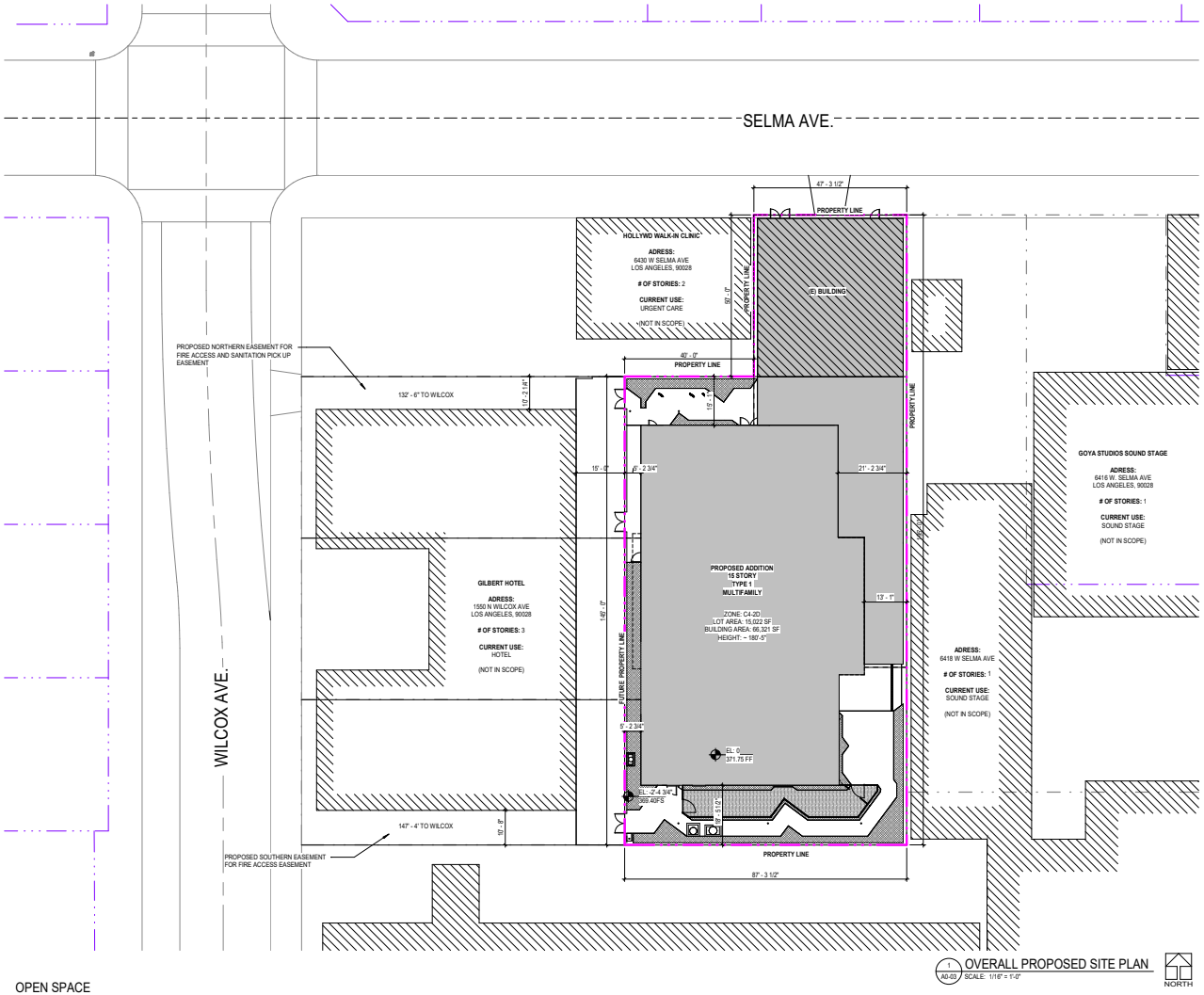
SOURCE: DLR Group, 2022

FIGURE **II-5**

Existing Site Plan and Site Context

IMPACT SCIENCES

1340.002•10/22



1 A0-03 OVERALL PROPOSED SITE PLAN
SCALE: 1/16" = 1'-0"

ZONING/BUILDING SUMMARY

PROJECT NAME: **FOUND RESIDENCES**

ZONING	REQUIRED/ALLOWABLE	PROPOSED
6422 SELMA	C4 - 2D	

OCCUPANCY CLASSIFICATION	REQUIRED/ALLOWABLE	PROPOSED
6422 SELMA		GROUP R-4; S-2 (GARAGE)

OCCUPANCY SEPARATION (CBC Table 508.3.3)	SEPARATION REQUIRED
OCCUPANCY	N/A

GENERAL PLAN DESIGNATION	REQUIRED/ALLOWABLE	PROPOSED
6422 SELMA	REGIONAL CENTER COMMERCIAL	

COMMUNITY PLAN AREA	REQUIRED/ALLOWABLE	PROPOSED
6422 SELMA	HOLLYWOOD	

CONSTRUCTION TYPE	REQUIRED/ALLOWABLE	PROPOSED
6422 SELMA	TYPE III-B (EXISTING)	TYPE I-A (15 STORIES)

LOT AREA	REQUIRED/ALLOWABLE	PROPOSED
6422 SELMA	15,022 SF (CALCULATED)	

STORIES	REQUIRED/ALLOWABLE	PROPOSED
6422 SELMA	UNLIMITED	15 STORIES (15 ABOVE GRADE, 1 BELOW GRADE)

DENSITY	REQUIRED/ALLOWABLE	PROPOSED
6422 SELMA	BONUS (1/200) = 75 UNITS	45 4-BEDROOM UNITS

FAR	REQUIRED/ALLOWABLE	PROPOSED MAX
6422 SELMA	3:1 PER D - CONDITION	67,599 GROSS SF ABOVE GRADE / 15,022 SITE AREA = 4.5:1 (PER INCENTIVE)

FLOOR AREA (PER L.A.M.C.12.03)	REQUIRED/ALLOWABLE	PROPOSED MAX
6422 SELMA	15,022 X 4.5 = 67,599 SF DENS BON INCENTIVE	67,599 SF (SEE TABLE)

MAXIMUM HEIGHT (ZONING)	REQUIRED/ALLOWABLE	PROPOSED
6422 SELMA	UNLIMITED	180'-5"

SETBACKS: 6422 SELMA	REQUIRED/ALLOWABLE	PROPOSED
FRONT YARD (NORTH)	0' PER CA ZONE	0'
SIDE YARD (WEST)	16'	0' (PER DENS BON INCENTIVE)
SIDE YARD (NORTH)	16'	0' (PER DENS BON INCENTIVE)
SIDE YARD (EAST)	17'	0' (PER DENS BON INCENTIVE)
REAR YARD (SOUTH)	20'	0' (PER DENS BON INCENTIVE)

OPEN SPACE: 6422 SELMA
7,785 SF (175 x 45 UNITS WITH MORE THAN 3 HABITABLE ROOMS REQUIRED)

LANDSCAPE AREA: 6422 SELMA	REQUIRED/ALLOWABLE	PROPOSED
6422 SELMA	25% OF OPEN SPACE = 1,946 SF REQUIRED DENS BON INCENTIVE	1,966 SF; SEE A0-05
NUMBER OF TREES		10 TREES

VEHICULAR PARKING	REQUIRED/ALLOWABLE	PROPOSED
6422 SELMA	0 SPACES REQUIRED, PER AB 2097	23 SPACES, UP TO 36
	TOTAL PARKING REQUIRED: 0 SPACES, PER AB 2097	TOTAL PARKING PROPOSED: 23-36 SPACES

PARKING CALCULATIONS

AUTO PARKING REQUIRED	
SELMA: PER AB 2097	0 SPACES

AUTO PARKING PROVIDED	NUMBER OF SPACES
STANDARD SPACES (MECHANICAL LIFT BY KLAUS TRENDVARIO SYSTEM)	33
ACCESSIBLE SPACES	2
STANDARD SPACE	1
TOTAL SPACES PROVIDED	**36**

GUEST PARKING: NOT REQUIRED
ELETRIC VEHICLE CHARGING SPACES: 7 PROVIDED.

BIKE PARKING REQUIRED PER L.A.M.C. Table 12.21 A.16

RESIDENTIAL	NUMBER OF SPACES
SELMA: SHORT-TERM BIKE PARKING	5
SELMA: LONG-TERM BIKE PARKING	39
GRAND TOTAL REQUIRED	44

Short-term Spaces
Dwelling Units
1-25 :1 space per 10 units =25/10 = 3
26-100 :1 space per 15 units =20/15 = 2
TOTAL = 5

Long-term Spaces
Dwelling Units
1-25 :1 space per units =25/1 = 25
26-100 :1 space per 1.5 units =20/1.5 = 14
TOTAL = 39

BIKE PARKING PROVIDED

RESIDENTIAL	NUMBER OF SPACES	LEVEL
SHORT-TERM BIKE PARKING	5	L1
LONG-TERM BIKE PARKING	39	L1
GRAND TOTAL PROVIDED	44	

OPEN SPACE

	DESCRIPTION	AREA
REQUIRED OPEN SPACE	175 SF PER DU W/3 OR MORE HABITABLE ROOMS = 7,785 SF	**7,785 SF**
PROPOSED COMMON OPEN SPACE	REAR YARD + NORTH YARD (@GROUND FLOOR)	2,083 SF
	TERRACES @ 13TH FLOOR	1,223 SF
	TERRACES @ 14TH FLOOR	1,319 SF
	TERRACE @ 15TH FLOOR	1,831 SF
		6,456 SF
PROPOSED OPEN SPACE NOT COUNTED TOWARDS COMMON OPEN SPACE	PRIVATE BALCONIES @ TYP. FLOORS (LEVEL 3-12) = 170 x 10	1,700 SF
	PRIVATE BALCONIES @ LEVEL 13	132 SF
	PRIVATE BALCONIES @ LEVEL 14	94 SF
	COVERED ROOF OUTDOOR AREA @ LEVEL 14	65 SF
	ALL THE INTERIOR COMMON AMENITY = 294 SF X 10 (LEVEL 3-12)	2,940 SF
		2,931 SF

PROPOSED NUMBER OF TREES	
	LEVEL 01 = 5 TREES
	LEVEL ROOF = 5 TREES

FAR CALCULATION (PER L.A.M.C. 12.03)

REQUIRED 3:1 PROPOSED ALLOWABLE MAX 4.5:1	15,022 X 4.5 = **67,599 SF**

PROPOSED GROSS AREA ABOVE GRADE	
FIRST	1,040 SF
SECOND	1,091 SF
THIRD - TWELFTH	5,692 SF (x10) = 56,920 SF
THIRTEENTH	4,469 SF
FOURTEENTH	3,363 SF
FIFTEENTH	385 SF
TOTAL PROPOSED	**67,268 SF**

AREA TYPES - F.A.R. LEGEND

AREAS INCLUDED IN F.A.R.
- AMENITIES
- RESIDENTIAL UNITS, BOH, TRASH/RECYCLE RM, COVERED WALKWAY
- CORRIDOR, LOBBY

AREAS EXCLUDED FROM F.A.R.
EXTERIOR WALLS, STAIRWAYS, SHAFTS, ROOMS HOUSING BUILDING-OPERATING EQUIPMENT OR MACHINERY, PARKING AREAS WITH ASSOCIATED DRIVEWAYS AND RAMPS, SPACE DEDICATED TO BICYCLE PARKING, SPACE FOR THE LANDING AND STORAGE OF HELICOPTERS, AND BASEMENT STORAGE AREAS.

DENSITY BONUS INCENTIVES REQUEST

ON-MENU:
OPEN SPACE REQUIREMENT REDUCTION BY 19%
REAR YARD SETBACK REDUCTION TO 18'-5 1/2"

OFF-MENU:
FLOOR AREA RATIO INCREASE TO 4.5:1

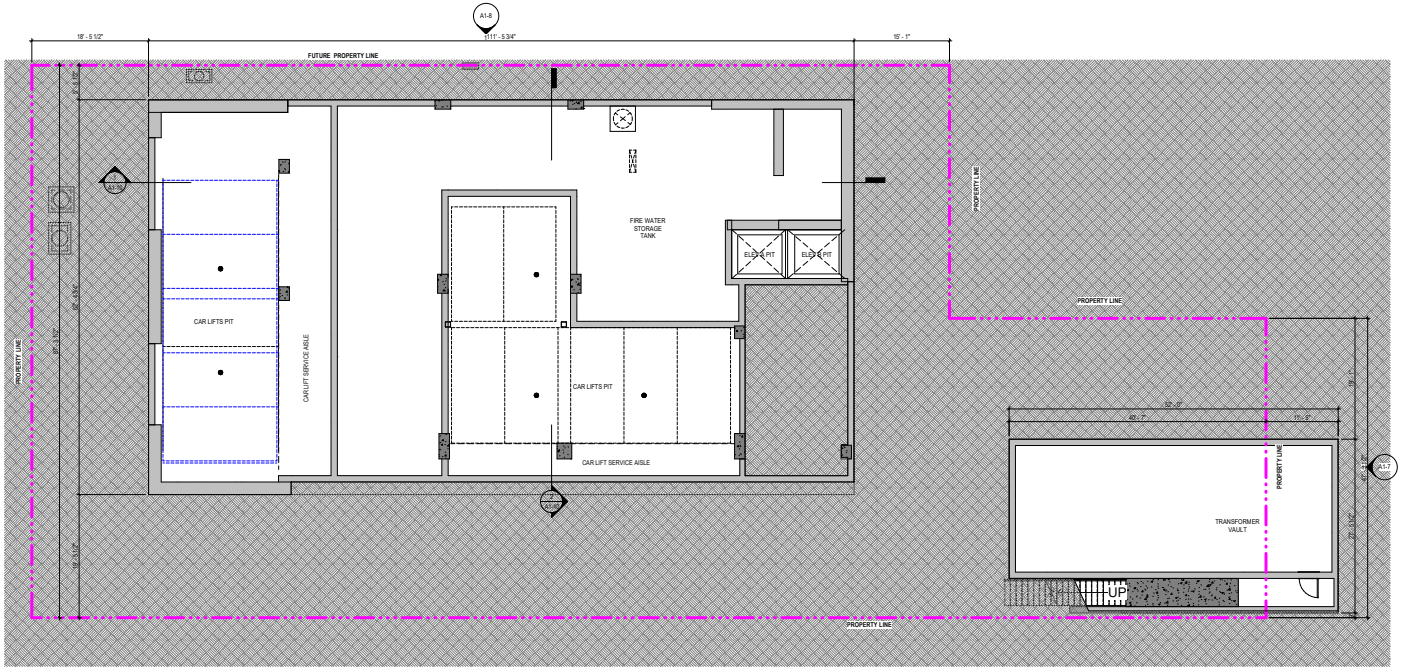
WAIVER OF DEVELOPMENT STANDARDS:
NORTHLY SIDE YARD SETBACK REDUCTION TO 0'
WESTERLY SIDE YARD SETBACK REDUCTION TO 0'
EASTERLY SIDE YARD SETBACK REDUCTION TO 0'
DRIVE AISLE REDUCTION TO 23'-0"

SOURCE: DLR Group, 2023

FIGURE **II-6**

Proposed Project Site Plan

IMPACT SCIENCES



OVERALL BASEMENT PLAN
SCALE: 1/8" = 1'-0"

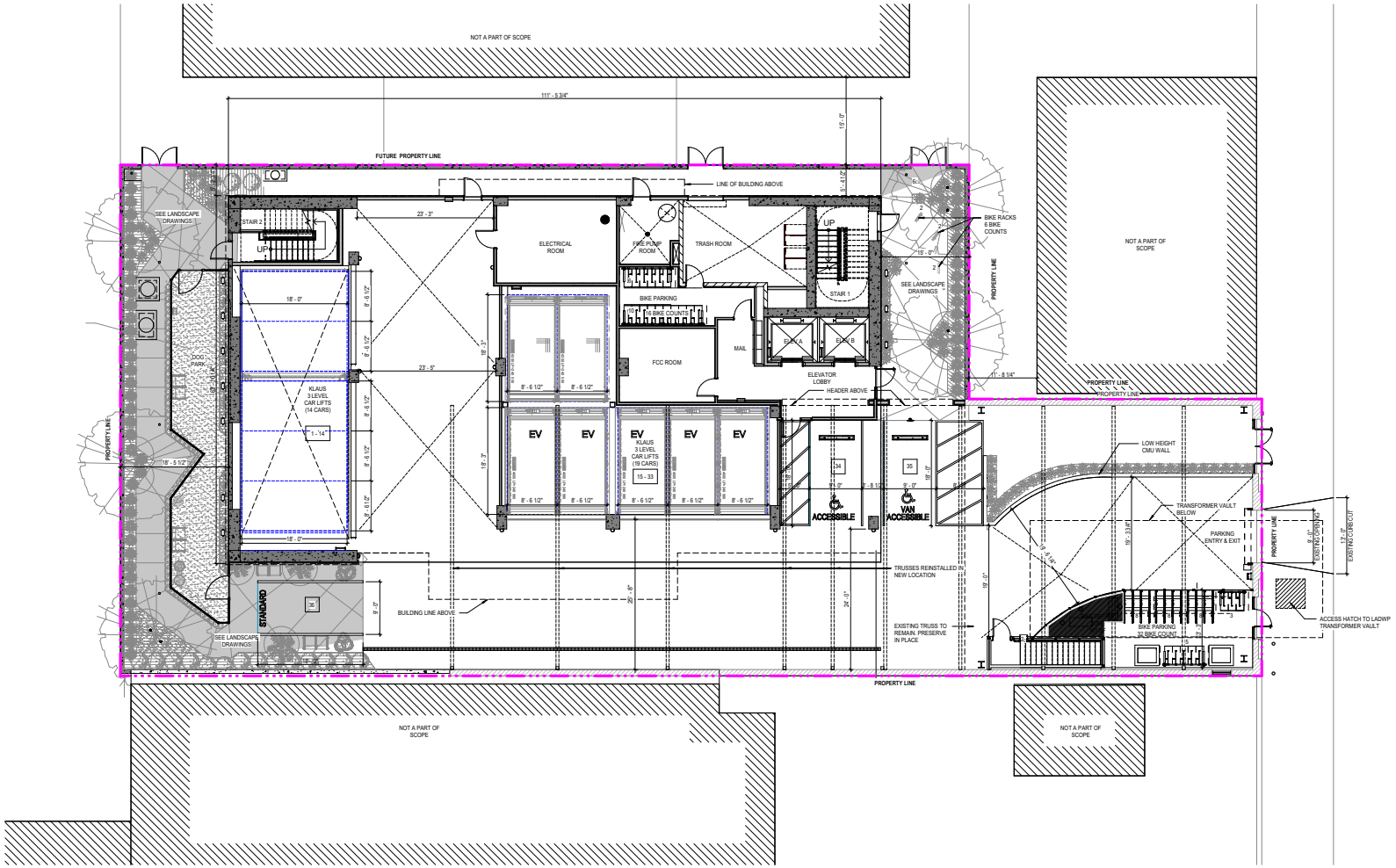
SOURCE: DLR Group, 2022

FIGURE **II-7**

Basement Plan

IMPACT SCIENCES

1340.002•12/22



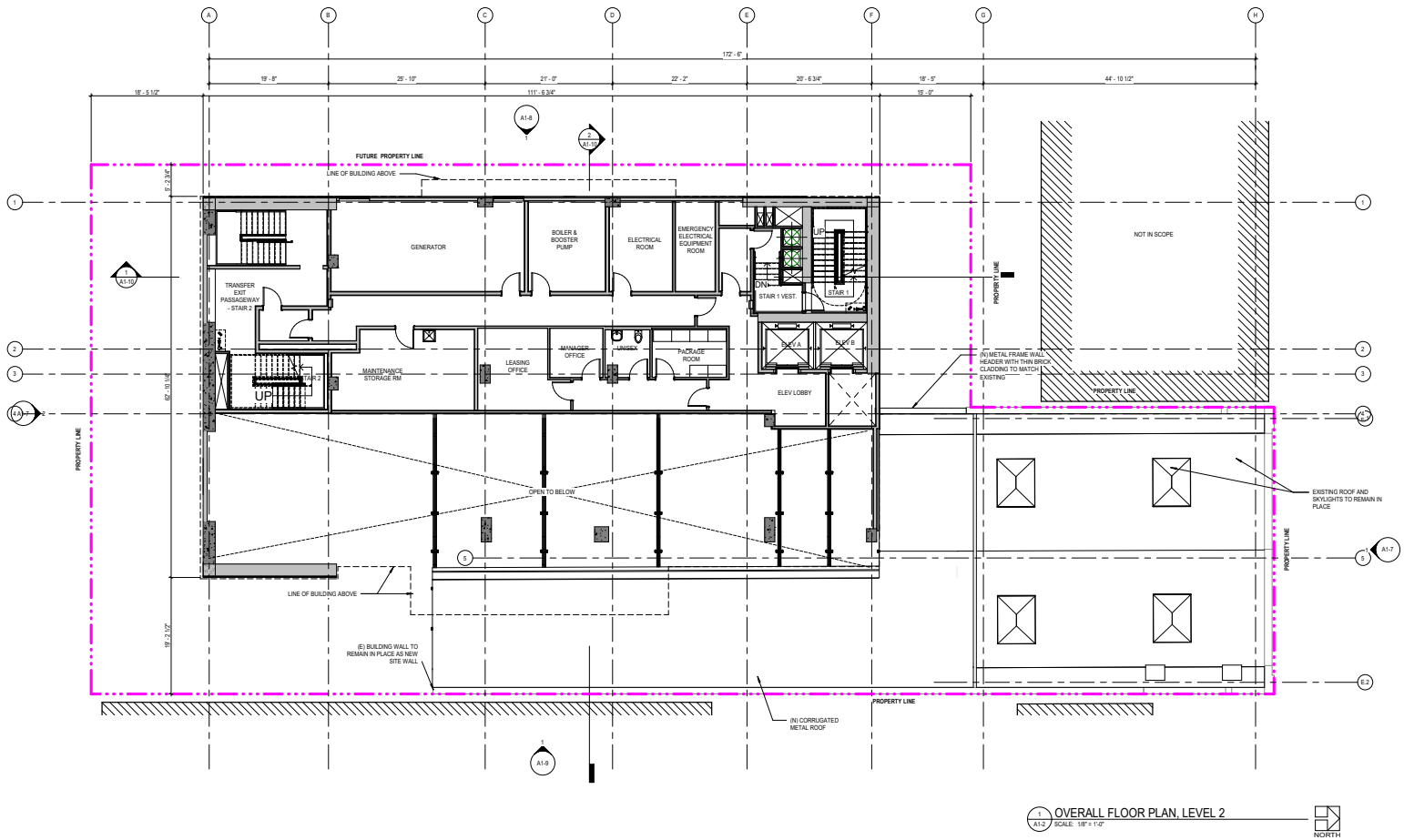
SOURCE: DLR Group, 2022

FIGURE **II-8**

IMPACT SCIENCES

Ground Floor Plan

1340.002•12/22



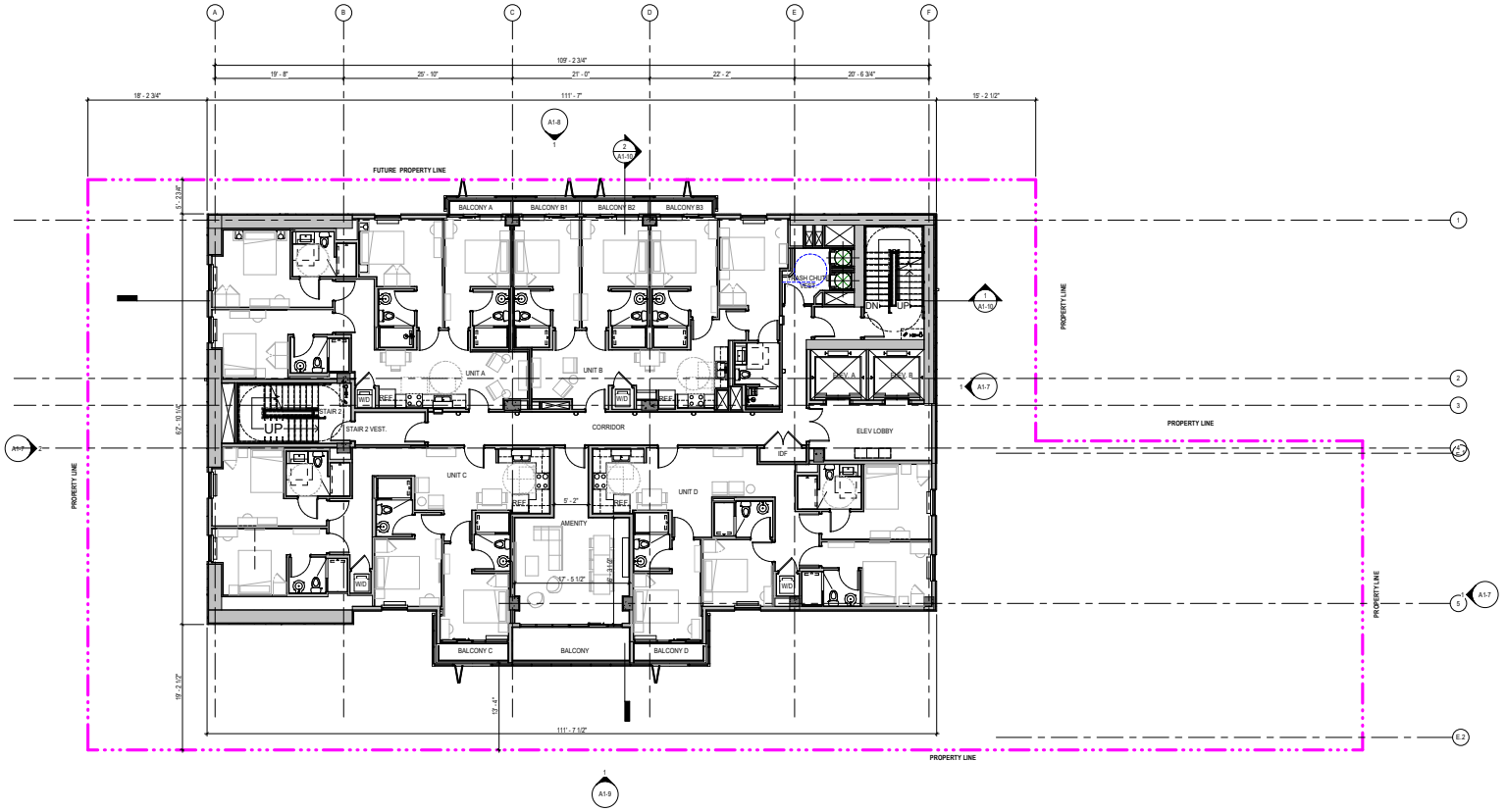
SOURCE: DLR Group, 2022

FIGURE **II-9**

IMPACT SCIENCES

Second Floor Plan

1340.002•12/22



1 A1-3 OVERALL FLOOR PLAN, TYPICAL (LEVEL 3-12)
SCALE: 1/8" = 1'-0"

NORTH

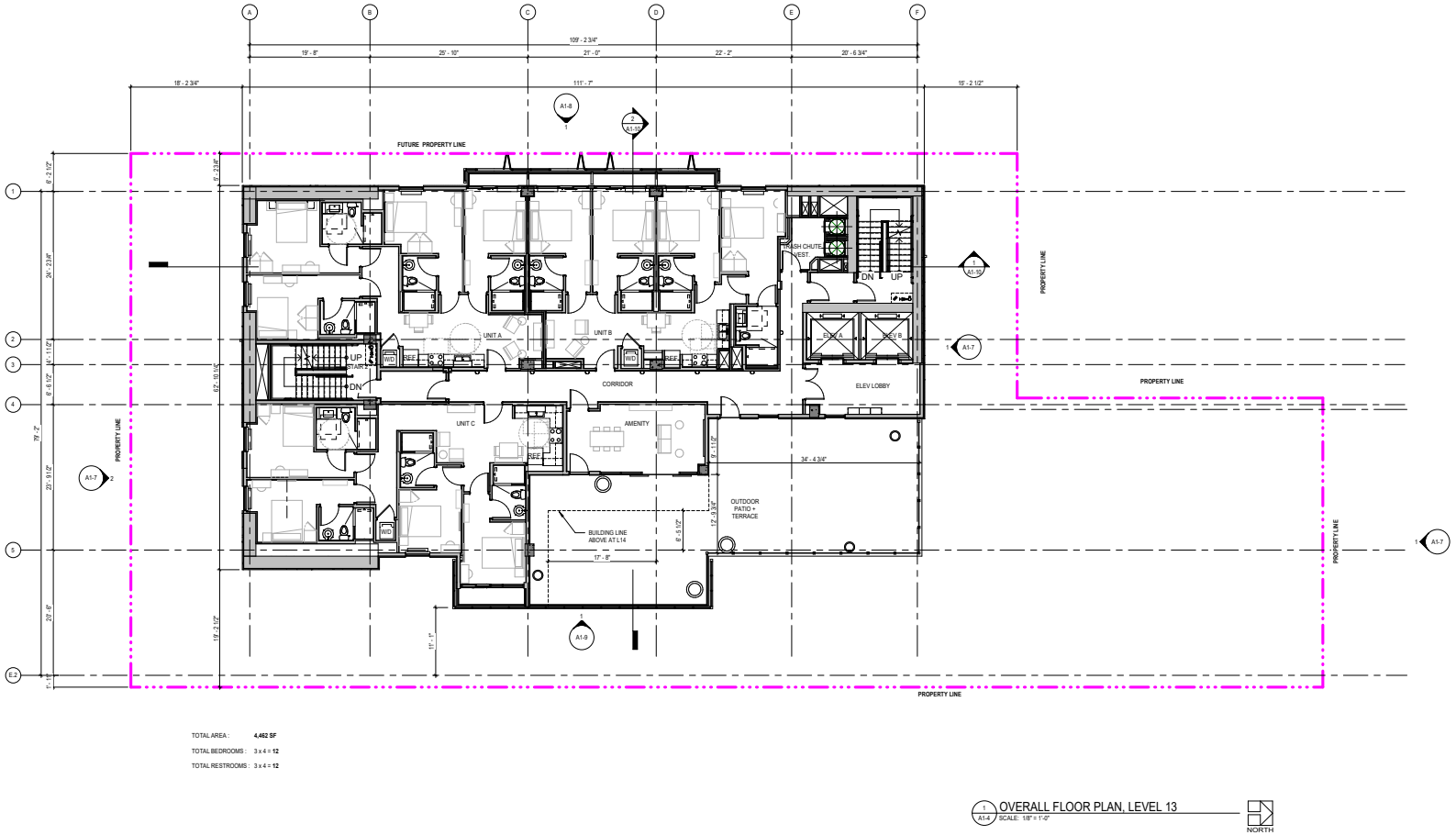
SOURCE: DLR Group, 2022

FIGURE **II-10**

Typical Floor Plan(Levels 3 - 12)

IMPACT SCIENCES

1340.002•12/22



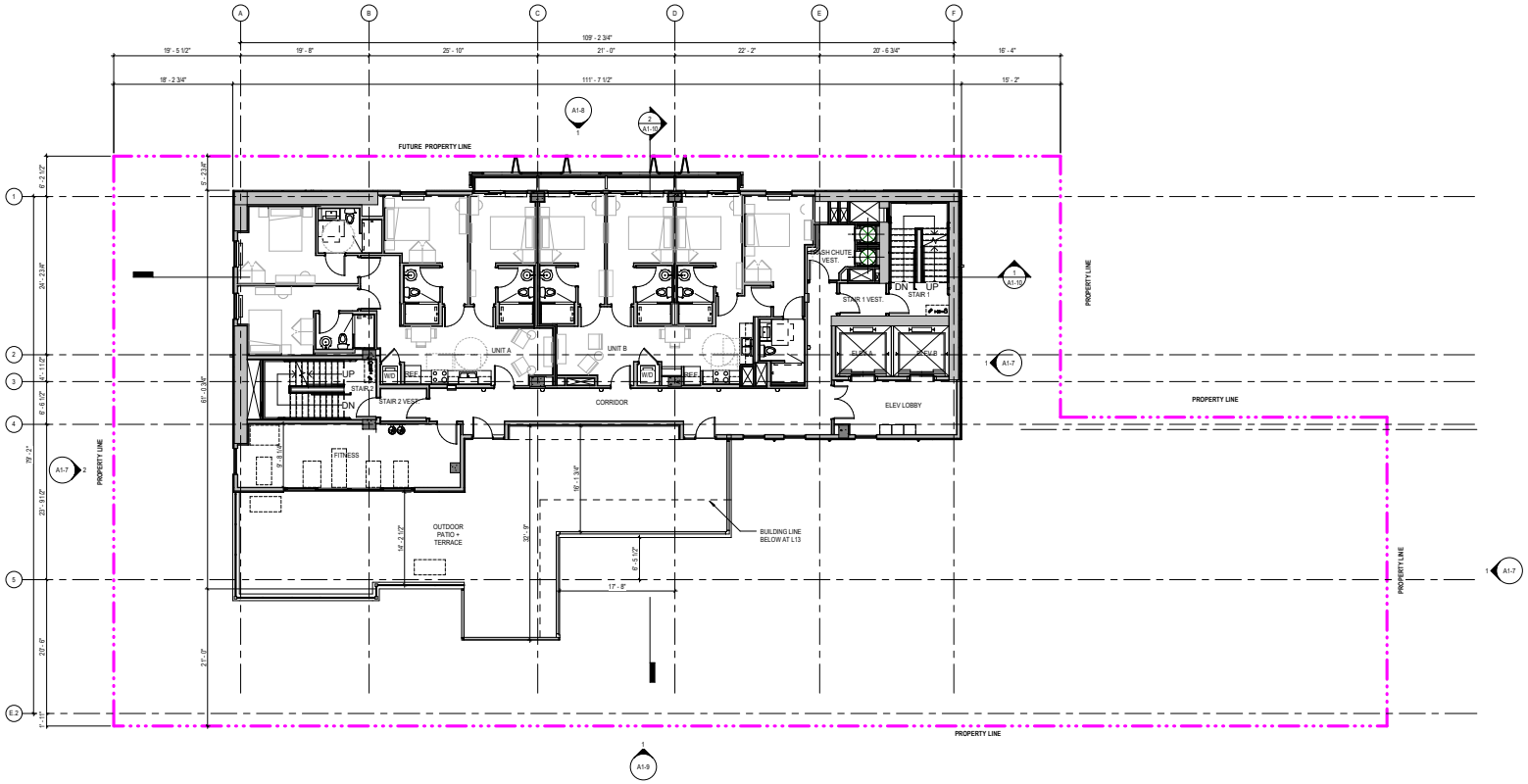
SOURCE: DLR Group, 2022

FIGURE **II-11**

IMPACT SCIENCES

Level 13 Floor Plan

1340.002•12/22



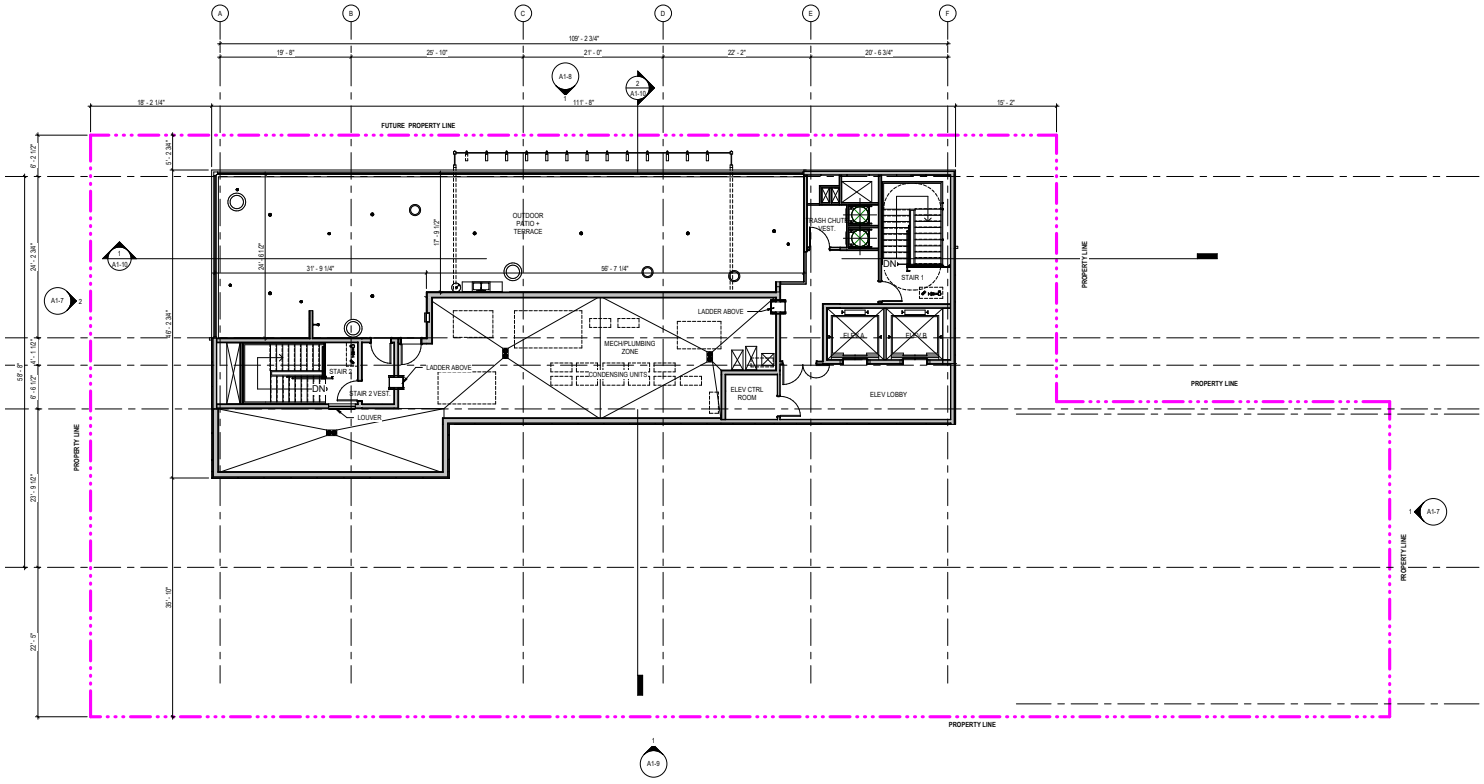
SOURCE: DLR Group, 2022

FIGURE **II-12**

Level 14 Floor Plan

IMPACT SCIENCES

1340.002•12/22



1 A1-6 OVERALL FLOOR PLAN, LEVEL 15 & LOWER ROOF
SCALE: 1/8" = 1'-0"

NORTH

SOURCE: DLR Group, 2022

FIGURE **II-13**

IMPACT SCIENCES

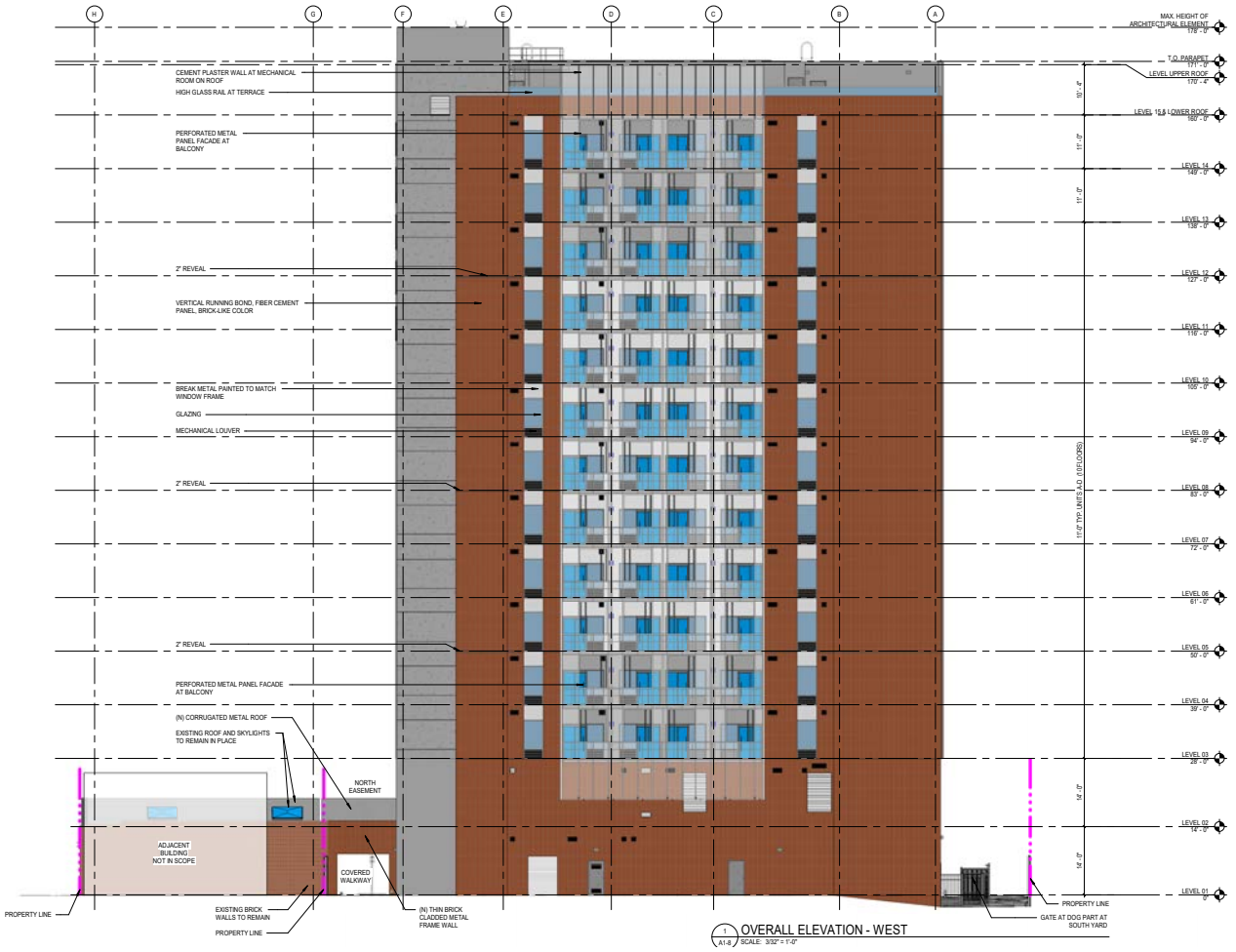
Level 15 & Lower Roof Floor Plan

1340.002•12/22

SOURCE: DLR Group, 2022

FIGURE **II-14**

South and North Building Elevations



SOURCE: DLR Group, 2022

FIGURE **II-15**

IMPACT SCIENCES

West Building Elevation

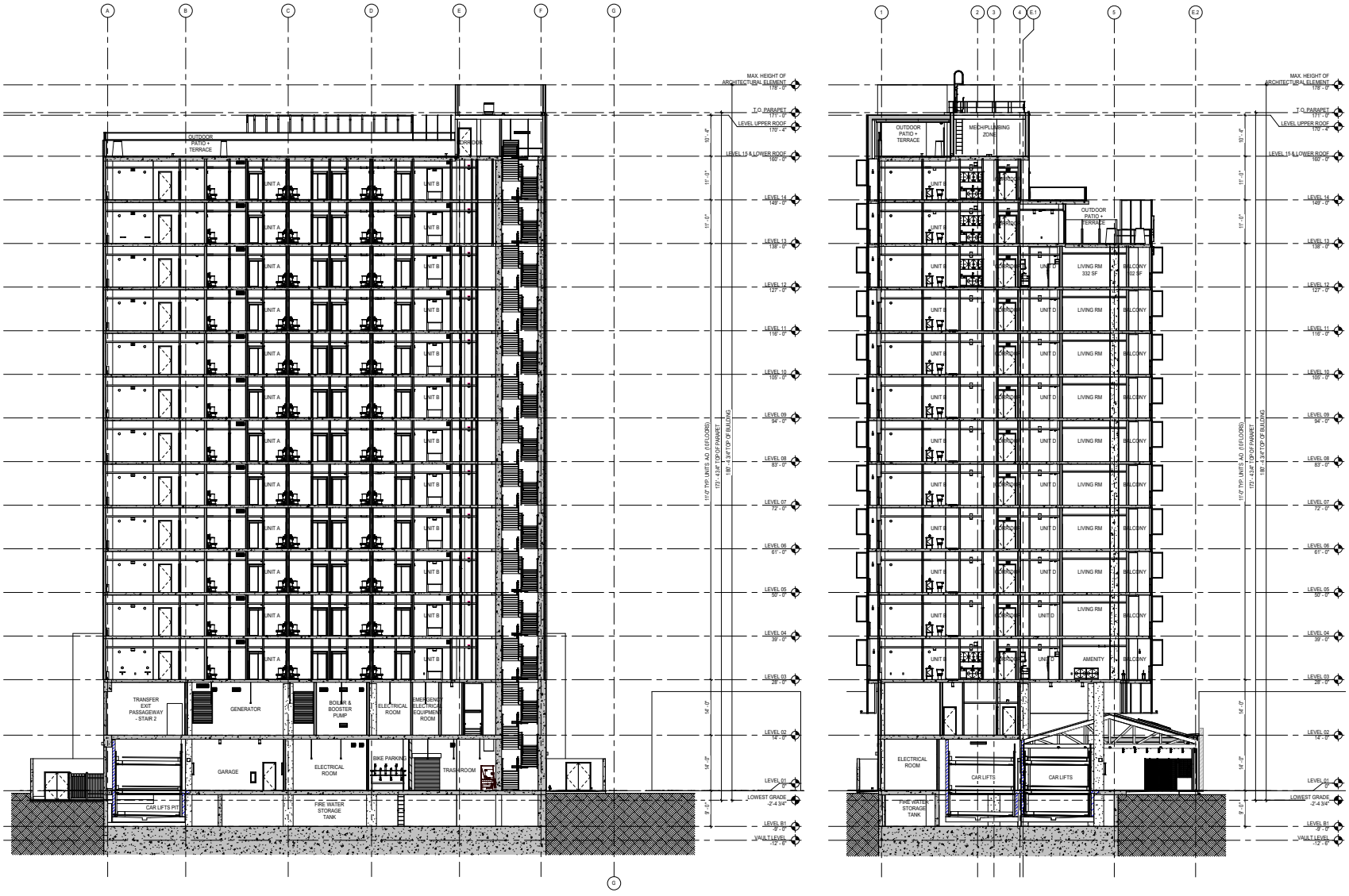
1340.002•12/22

SOURCE: DLR Group, 2022

FIGURE **II-16**

IMPACT SCIENCES

East Building Elevation



1 A1-10 OVERALL BUILDING SECTION - NORTH/SOUTH
SCALE: 3/32" = 1'-0"

2 A1-10 OVERALL BUILDING SECTION - WEST/EAST
SCALE: 3/32" = 1'-0"

SOURCE: DLR Group, 2022

FIGURE **II-17**

IMPACT SCIENCES

Building Sections

1340.002•12/22

SOURCE: DLR Group, 2022

FIGURE **II-18**

IMPACT SCIENCES

Conceptual Rendering - View from Selma Avenue Looking Southwest

1340.002•12/22

SOURCE: DLR Group, 2022

FIGURE **II-19**

IMPACT SCIENCES

Historic Facade on Selma Avenue - Existing and Proposed

1340.002•07/22

SOURCE: DLR Group, 2022

FIGURE II-20

IMPACT SCIENCES

Conceptual Renderings - Proposed Ground Floor Interiors

Discretionary Actions

Discretionary entitlements, reviews, and approvals required for implementation of the Project would include, but would not necessarily be limited to, the following:

- **Density Bonus,** pursuant to LAMC Section 12.22.A 25, for a project with 45 dwelling units including six (6) units (15%) for Very Low Income Households for a period of 55 years with the following Incentives**:**

- **Additional Incentives – On-Menu**

  - **Yard/Setback**. A reduction in the required rear yard setback to allow eighteen feet and 5½ inches (18'-5½") in lieu of the 20-feet feet required for a fifteen-story building in C4-2D zone.

  - **Open Space.** A 19% reduction in the required open space to permit 6,456 square feet of common open space in lieu of the required 7,785 square feet.

- **Additional Incentives – Off-Menu**

  - **Floor Area Ratio.** An increase in Floor Area Ratio (FAR) to 4.5:1 in lieu of the permitted base FAR of 3.0:1 (pursuant to Ordinance No. 165,660), as permitted by LAMC 12.22.A.25(f)(4)(ii) to permit a total Floor Area of up to 67,599 sq. ft.; and

- **Waiver of Development Standards**

  - **Yard/Setback**. A reduction in the required northly side yard setback to allow zero (0) feet in lieu of the seventeen (17) feet otherwise required for a fifteen-story building in C4-2D zone,

  - **Yard/Setback.** A reduction in the required westerly side yard setback, to allow zero (0) feet in lieu of the seventeen (17) feet otherwise required for a fifteen-story building in C4-2D zone.

  - **Yard/Setback.** A reduction in the required easterly side yard setback, to allow zero (0) feet in lieu of the sixteen (16) feet otherwise required for a fifteen-story building in C4-2D zone.

- **Drive Aisle Reduction.** A reduction in drive aisle width to twenty-three feet and 5 inches (23'-5") in lieu of the required twenty-seven feet four inches (27'-4") feet, and the corresponding elimination of the 10" column clearance required for a reduced drive-aisle, as required by LAMC 12.21.A.5.

- Adoption of a **Sustainable Communities Environmental Assessment** (SCEA)**,** pursuant to SB 375, for a project within a High-Quality Transit Corridor.

- A **Hollywood Redevelopment Project Area (RPA)** administrative clearance.

- A **Lot Line Adjustment** (related case, currently filed under Case No. AA-2019-476-PMEX).[3]

- Approval of other permits, ministerial or discretionary, may be necessary in order to execute and implement the Project. Such approvals may include, but are not limited to: construction permits, building permits, landscaping approvals, exterior approvals, storm water discharge permits, grading permits, haul route permits, and installation and hookup approvals for public utilities and related permits.

3 Subsequent to Case No. AA-2019-476-PMEX, the properties located at 6422 W. Selma Avenue will have a resultant lot area of 15,022 square feet and the properties located at 1540-1552 N. Wilcox Avenue will have a resultant lot area of 14,501 square feet. Refer to **Figure II-3, Lot Line Adjustment Diagram**.

III. SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT ELIGIBILITY

A. SUSTAINABLE COMMUNITIES STRATEGY CONSISTENCY ANALYSIS

SB 375 provides CEQA streamlining opportunities for TPPs that are "consistent with the use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy, for which the California Air Resources Board (CARB) has accepted a metropolitan planning organization's determination that the sustainable communities strategy or the alternative planning strategy would, if implemented, achieve the greenhouse gas emission reduction targets established by CARB (see PRC, § 21155 (a)).

Use Designation, Density, and Building Intensity

On May 7, 2020, SCAG's Regional Council approved the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for conformity purpose by the Federal Highway Administration (FHWA). On September 3, 2020, the SCAG Regional Council formally adopted the Connect SoCal plan to provide a roadmap to expand transportation options, improve air quality and bolster Southern California's long-term economic viability.

A qualifying Transit Priority Project is a project that is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in the SCAG Connect SoCal 2020-2045 RTP/SCS.

The Proposed Project would be consistent with the land use patterns promoted by the Connect SoCal Forecasted Regional Development Pattern. SCAG's Sustainable Communities Strategy (SCS) is built on a "bottom up" land use approach with engagement from local jurisdictions, meaning the overall uses are developed in coordination with local jurisdictions. Projects that are generally consistent with the general plan land use (or community or specific plan) would therefore be consistent with SCAG's use designations, as the local plans inform the SCS. Further, if the

project is not in an identified "constrained" area[1] and consistent with SCS policies (see policy consistency analysis in **Table III-3**) - it is therefore consistent with SCAG's use designations.

The Project Site, which is approximately 0.33 miles from a major transit stop, is in an area that is considered by SCAG as a High Quality Transit Area.[2] Furthermore, the project would not be located in any absolutely constrained areas such as on agricultural land, open space, or tribal lands.[3]

The Project would demolish the existing one-story storage building, retain and refurbish the front third of the one-story commercial building fronting Selma Avenue, demolish the rest of the building, and construct a 15-story, approximately 180 feet and 5 inches (180'-5") tall, multi-family residential project consisting of 45 dwelling units (with 15 percent (six units) restricted to Very Low-Income households), with two levels of parking. Overall, the Project would include a maximum floor area of approximately 67,599 square feet with an FAR of 4.5 to 1.

The Project would be served by Metro Line 2 (which stops at the corner of Wilcox Avenue and Sunset Boulevard approximately 0.1 miles from the Project Site), along with Metro Line 212, Metro Line 210, Metro Line 217, Metro Local Line 222, which run along Hollywood Boulevard, Highland Avenue, and Vine Street – refer to **Figure III-1** through **Figure III-4**.

Table III-1, Transit Priority Analysis, shows the Metro lines that serve the project area and the peak times. The nearest Metro Line 2 stop is the Wilcox Avenue and Sunset Boulevard stop located approximately 830 feet (0.16 miles) southwest of the Project Site. In addition, Metro Lines 212 and 217 have stops located at the intersection of Hollywood Boulevard and Wilcox Avenue, approximately 830 feet (0.16 miles) northwest of the Project Site.

1 Southern California Association of Governments. 2021. Variable Constrained Areas (VCAs) – SCAG Region. Available at: https://hub.arcgis.com/datasets/10938b4b749d4fb9af1b89e51ee8f314_1?geometry=-118.359%2C34.056%2C-118.319%2C34.069, last accessed June 23, 2021.

2 Southern California Association of Governments. 2021. High Quality Transit Area – SCAG Region. Available at: https://gisdata-scag.opendata.arcgis.com/datasets/high-quality-transit-areas-hqta-2045-scag-region/explore?location=34.052624%2C-118.273920%2C12.00, last accessed September 30, 2021.

3 Southern California Association of Governments. 2020. Sustainable Communities Strategy Technical Report. Available at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_sustainable-communities-strategy.pdf?1606002097 last accessed September 30, 2021.

Table III-1
Transit Priority Analysis

Line	Approximate Peak Frequency in Minutes	Qualifies?
Metro Line 2	5-10	Yes
Metro Line 212	5-10	Yes
Metro Line 217	5-10	Yes

Source: Metro. Bus and Rail System. Available at: https://media.metro.net/documents/a5e11b4f-11ac-4807-8cd2-0e7cff6aa94e.pdf last accessed September 30, 2021.

The Proposed Project is also along the Metro B Line (Red Line) route, within approximately 0.33 mile of the Metro stop at Hollywood Boulevard and Vine Street. The Project Site is listed as being within a Transit Oriented Community (TOC) Incentive Area per the Los Angeles Department of City Planning.[4] Refer to **Figures III-1** through **III-4**.

Based on Exhibit 5 and Exhibit 6 of SCAG's SCS Background Documentation, the Project Site and surrounding area are within the "City" Land Development Category. The Proposed Project would be consistent with the *City Residential* Place Type. The Connect SoCal 2020-2045 RTP/SCS describes City Residential development as:

> *A dense residential-focused type, City Residential is dominated by mid- and high-rise residential towers, with some ground floor retail space. Parking is usually structured, below or above ground. Residents are well served by transit, and can walk or bicycle for many of their daily needs.*[5]

City Residential Place Type is further identified as: Similar to the Urban Residential land use mix, the land use mix for the City Residential place type is 65 percent residential, four percent employment, 11 percent mixed use, and 20 percent open/civic space. The City Residential place type is a dense residential-focused type, dominated by mid- and high-rise residential towers, with some ground-floor retail space. Parking is usually structured, below or above ground. Residents are well served by transit and can walk or bike for many daily needs. Residential density may

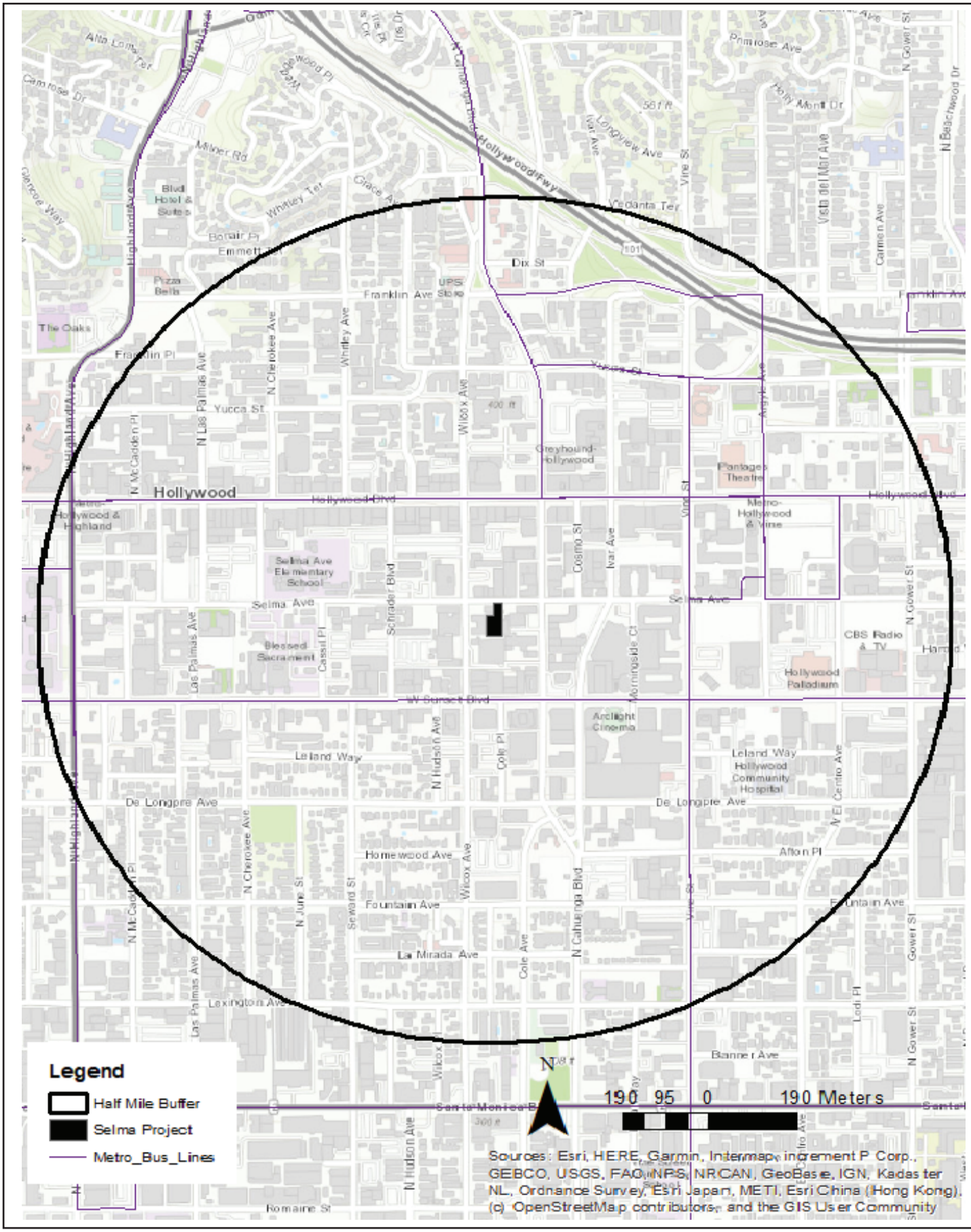
4 City of Los Angeles, ZIMAS. Available online: http://zimas.lacity.org/, accessed March 3, 2020.

5 Southern California Association of Governments, *Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy*, Adopted September 2020. Available online at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176, accessed July 21, 2021.

range from 35-75 households per acre, building heights may range from 5-40 stories, and total net FAR of the built environment within this place type may achieve 2.9:1.[6]

The Proposed Project is in a highly urbanized area within the City of Los Angeles near rapid transit, within the Hollywood Community Plan Area. The Project is an infill multi-family residential project that would provide 45 residential dwelling units. It is located within a High Quality Transit Area (HQTA) as defined by SCAG and a Transit Priority Area (TPA) as defined by SB 743, which supports transit opportunities and promotes a walkable environment. Additionally, access to the Project Site is served by a well-connected street network, which consists of a grid pattern as is most of the City of Los Angeles. As such, the Proposed Project is highly connected and provides accessibility for persons who choose not to drive or do not have access to a vehicle.

6 Southern California Association of Governments, *2020-2045 RTP/SCS Urban Footprint Place Types Summary*, page 2, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_sustainable-communities-strategy-appendix.pdf?1606002108, accessed July 21, 2021.

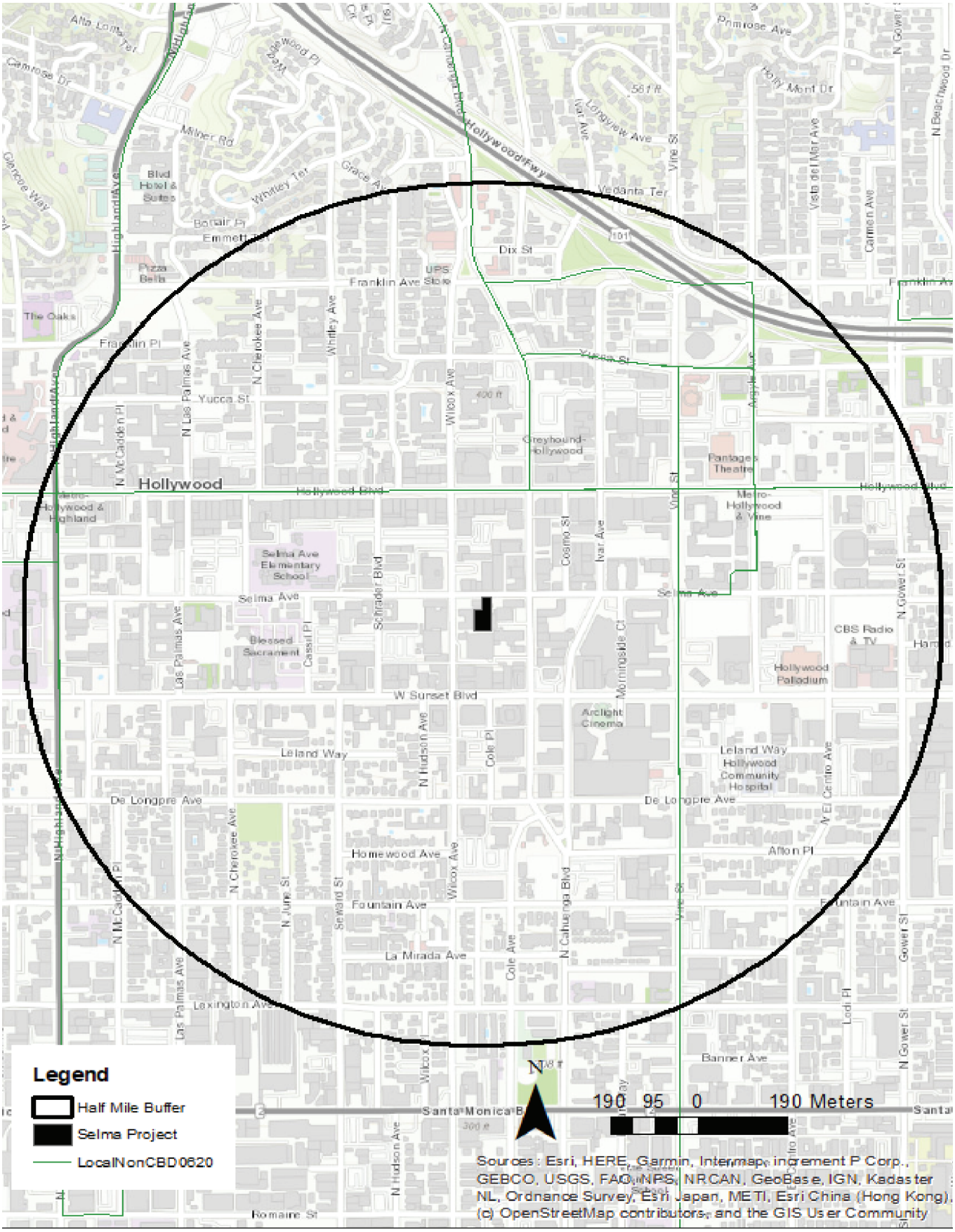


SOURCE: City of Los Angeles Geo Hub, 2021.

FIGURE **III-1**

IMPACT SCIENCES

1340.002•09/2021

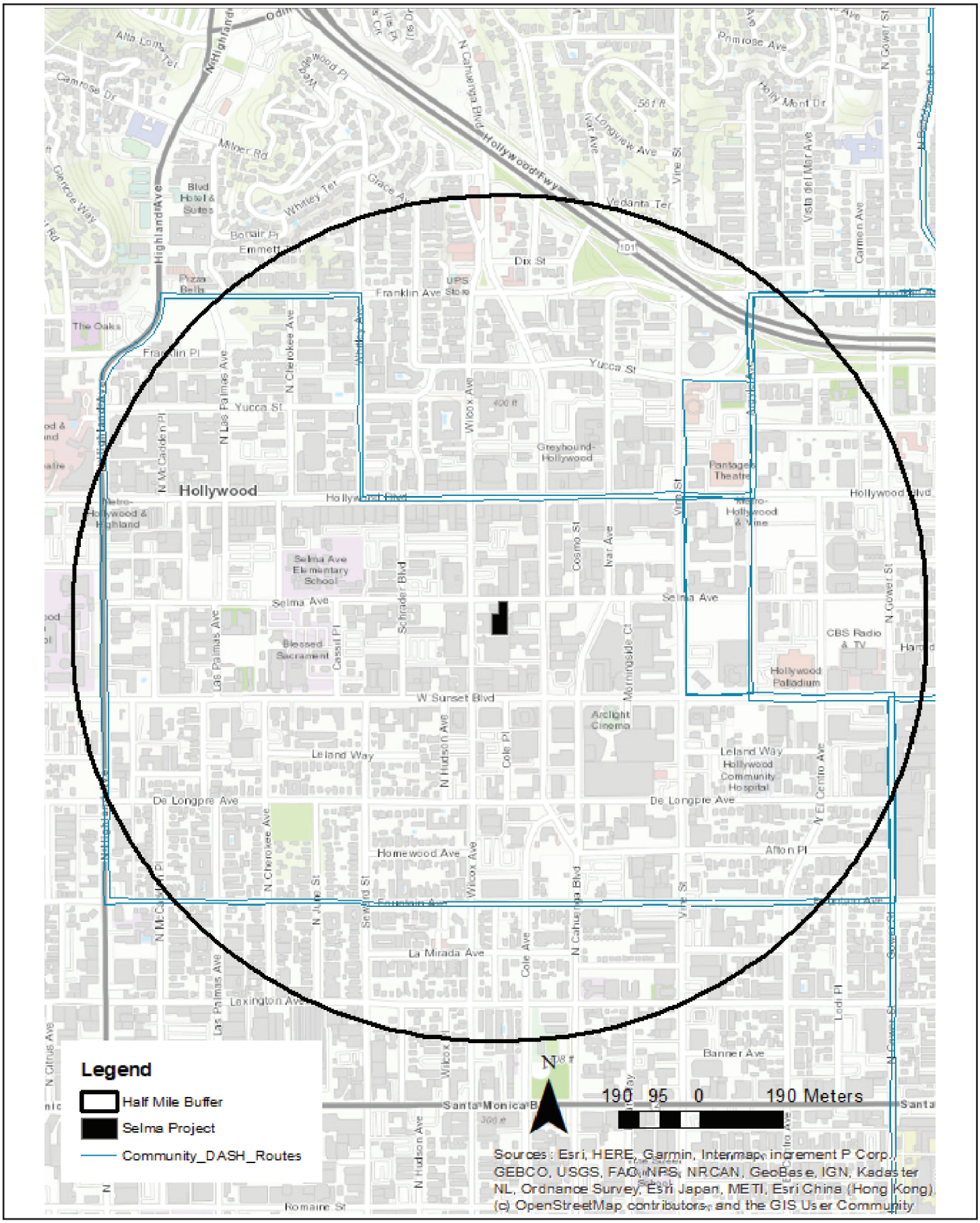


SOURCE: City of Los Angeles Geo Hub, 2021.

FIGURE **III-2**

Local Non-CBD Lines within Half Mile Radius

IMPACT SCIENCES

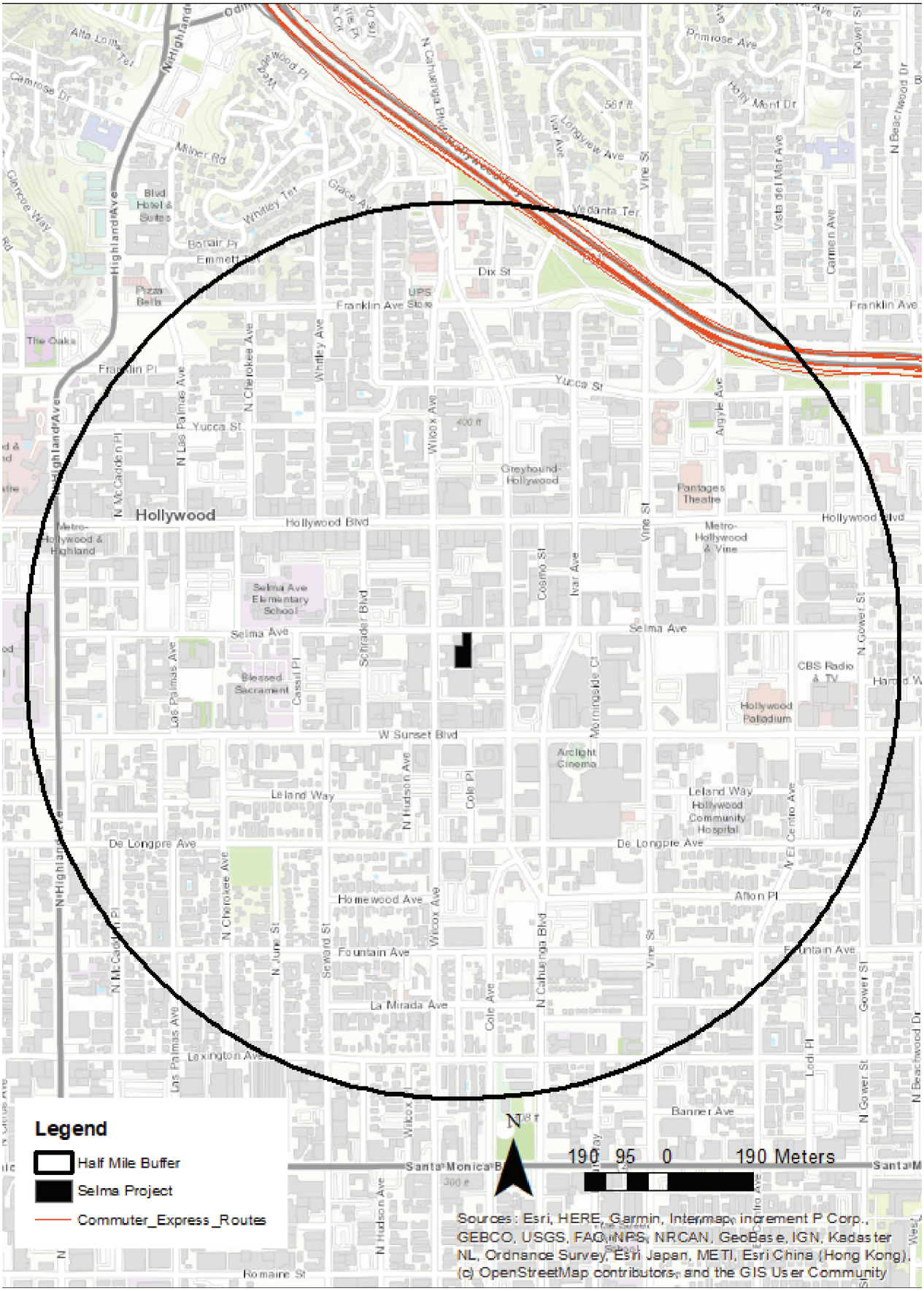


SOURCE: Esri, et al., 2021

FIGURE **III-3**

IMPACT SCIENCES

Community DASH Routes within Half Mile Radius

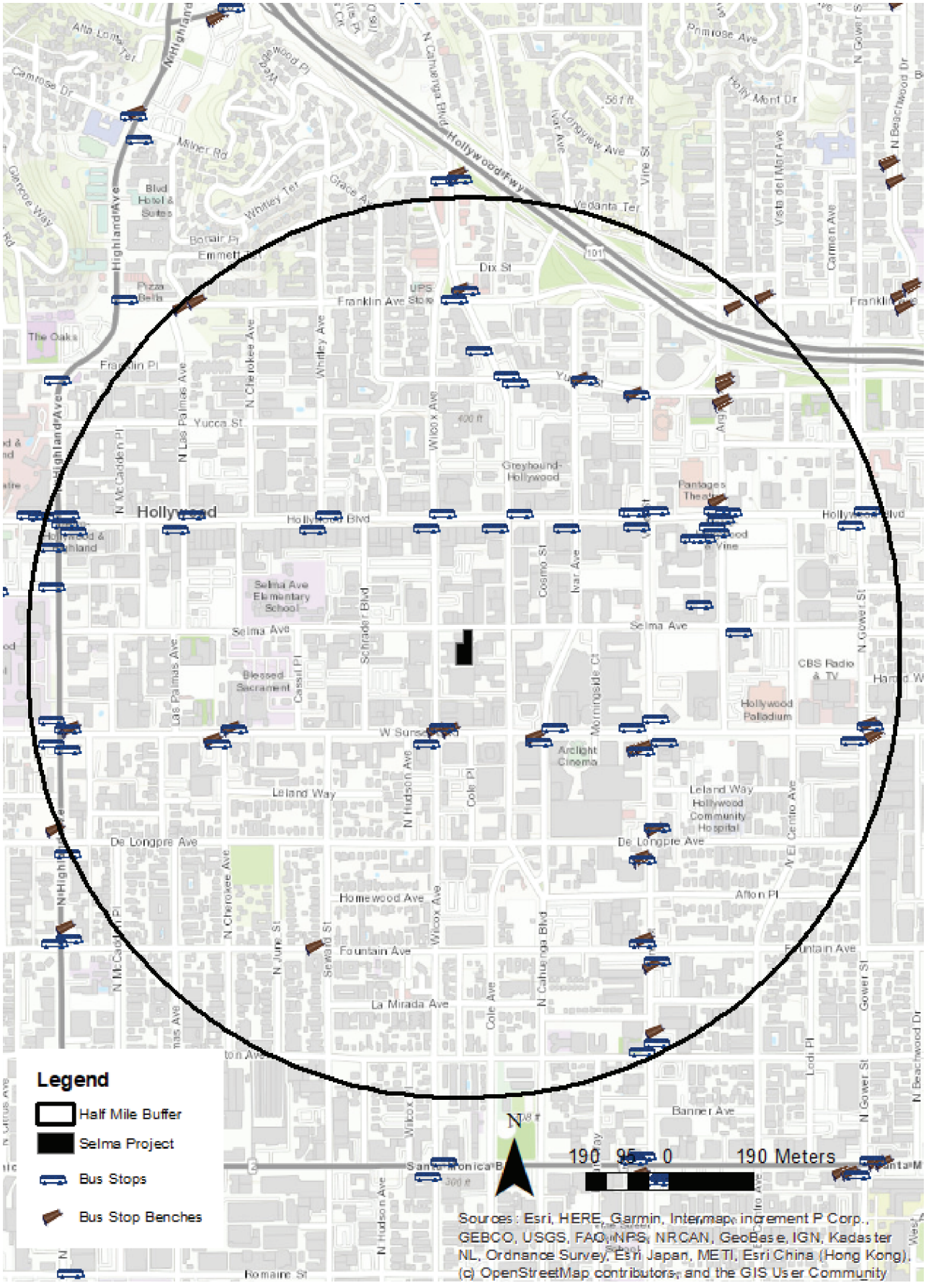


SOURCE: Esri, et al., 2021

FIGURE **III-4**

IMPACT SCIENCES

Commuter Express Route within Half Mile Radius

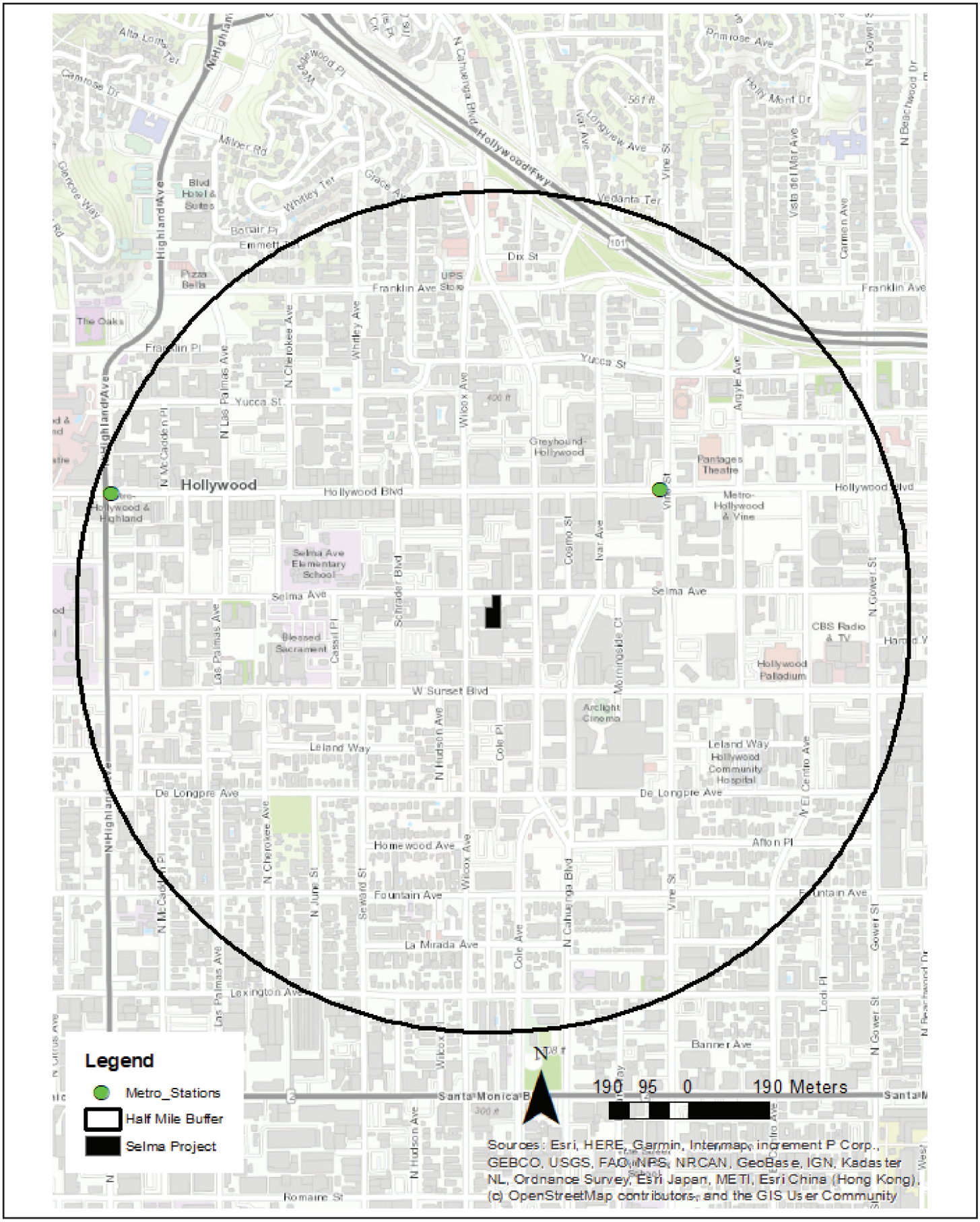


SOURCE: Esri, et al., 2021

FIGURE **III-5**

IMPACT SCIENCES

Bus Stops and Bus Benches within Half Mile Radius

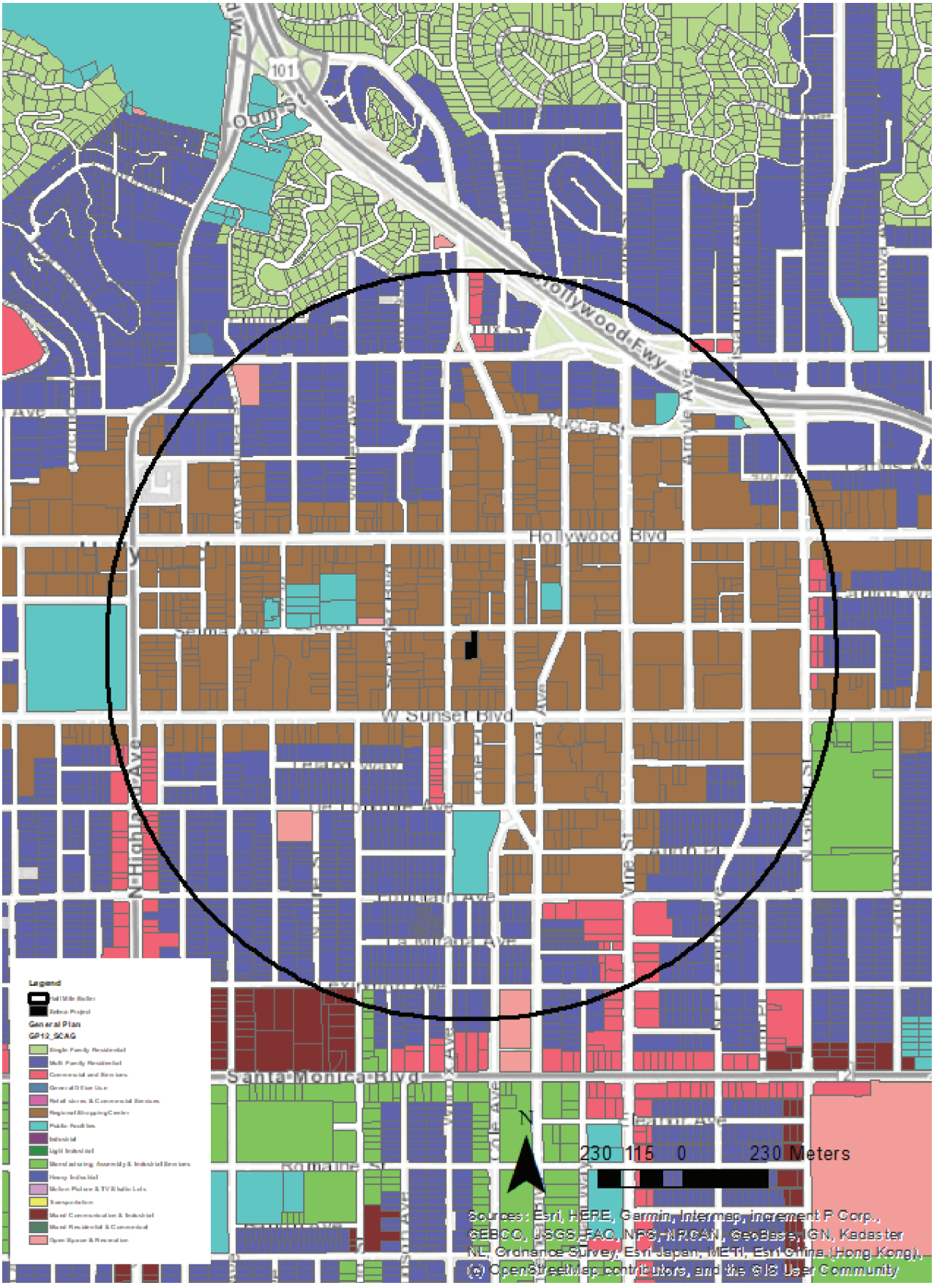


SOURCE: Esri, et al., 2021

FIGURE **III-6**

IMPACT SCIENCES

Metro Stations within Half Mile Radius

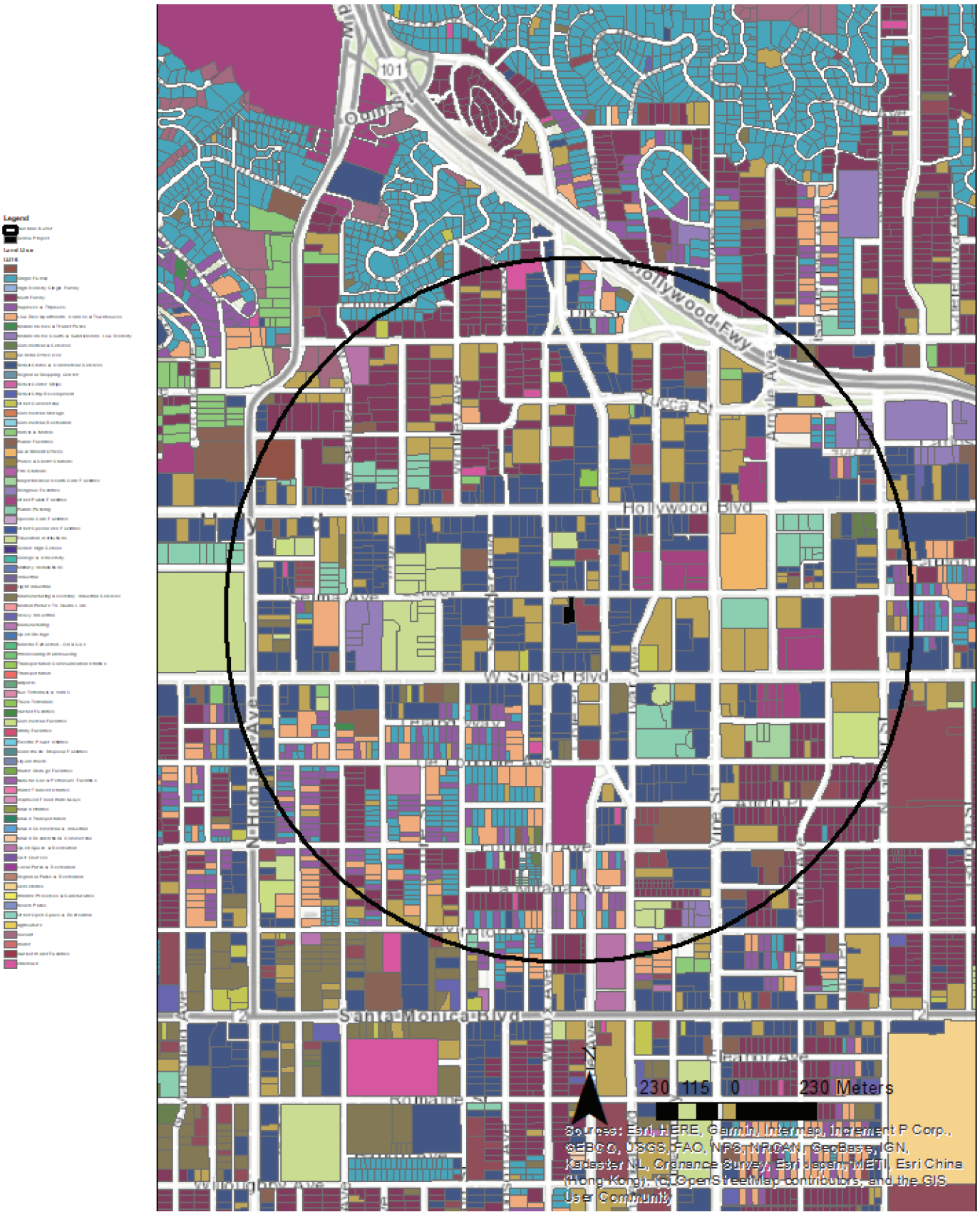


SOURCE: Esri, et al., 2021

FIGURE **III-7**

IMPACT SCIENCES

General Plan within Half Mile Radius

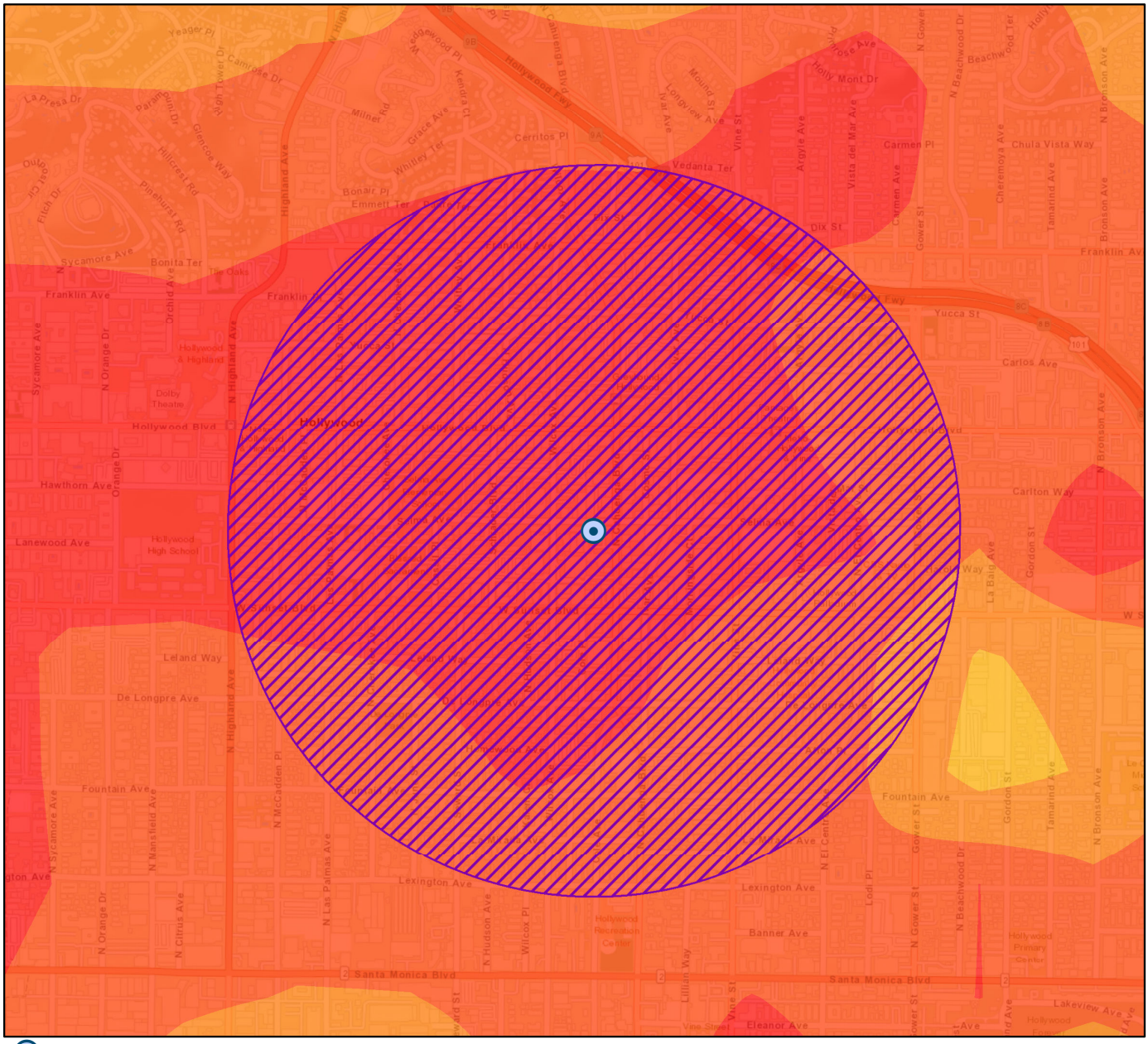


SOURCE: Esri, et al., 2021

FIGURE **III-8**

IMPACT SCIENCES

Land Use Plan within Half Mile Radius



SOURCE: Southern California Association of Governments, 2021

FIGURE III-9

IMPACT SCIENCES

SCAG Land Development Categories within Half-Mile Radius of the Project Site

1340.002•10/2021

The Connect SoCal 2020-2045 RTP/SCS further demonstrates that HQTAs may include high-density development, support pedestrian and bike infrastructure, reduce parking requirements, and retain affordable housing near transit. It also states HQTAs represent under three-percent of the region's acreage but are projected to be home to over 51 percent of new households between 2016 and 2045. Infrastructure investments that support walkable, compact communities that integrate land use and transportation planning for a better functioning built environment are essential within HQTAs.[7] Therefore, active transportation and new developments should be context-sensitive, responding to the existing physical conditions of the surrounding area. The Proposed Project is a multi-family housing development within approximately 0.16 miles of numerous existing rapid transit stops. It would promote pedestrian activity and bicycling activity by providing new housing in a dense, urbanized area.

The Proposed Project would construct a 14-story multi-family residential building consisting of 45 residential units. The Project would be approximately 180 feet and 5 inches (180'-5") in height and would include a maximum total square footage of approximately 67,599 square feet. Fifteen percent of the proposed residential units (six units) would be restricted as affordable housing for Very Low-Income households. The Proposed Project would provide automobile and bicycle parking that is consistent with LAMC standards. Therefore, the Proposed Project is similar to other developments within HQTAs.

Table III-2
SCAG Population, Housing, and Employment Projections for the City of Los Angeles, Los Angeles County, and the SCAG Region

Population			
Region	**2016**	**2045**	**% Annual Growth (2016-2045)**
Los Angeles City	3,933,800	4,771,300	0.73%
Los Angeles County	10,110,000	11,674,000	0.53%
SCAG Region	18,832,000	22,504,000	0.67%
Households			
Region	**2016**	**2045**	**% Annual Growth (2016-2045)**
Los Angeles City	1,367,000	1,793,000	1.07%
Los Angeles County	3,319,000	4,119,000	0.83%
SCAG Region	6,012,000	7,633,000	0.92%

7 Southern California Association of Governments. 2020. *Sustainable Communities Strategy Technical Report.* Available at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_sustainable-communities-strategy.pdf?1606002097 last accessed September 30, 2021.

Employment			
Region	**2016**	**2045**	**% Annual Growth (2016-2045)**
Los Angeles City	1,848,300	2,135,900	0.54%
Los Angeles County	4,743,000	5,382,000	0.46%
SCAG Region	8,389,000	10,049,000	0.62%

Source:
SCAG, Connect SoCal 2020-2045 RTP/SCS Growth Forecast, Demographics and Growth Forecast Appendix, adopted September 2020.

Based on the number of units, unit type, and habitable rooms per unit, the construction of Proposed Project's 45 new multi-family residential dwelling units would result in a potential increase of approximately 180 net new residents in the City of Los Angeles.[8] A shown in **Table III-2, SCAG Population, Housing, and Employment Projections for the City of Los Angeles, Los Angeles County, and the SCAG Region**, the proposed increase in housing units and population would be consistent with SCAG's forecast of 426,000 additional households and approximately 837,500 persons in the City of Los Angeles between 2016 and 2045. Refer also to **Section V, Sustainable Communities Environmental Assessment**, **Section 13, Population and Housing**, for a discussion on the Proposed Project's consistency with SCAG's population and housing growth.

Further analysis of the Proposed Project's consistency with Connect SoCal 2020-2045 RTP/SCS is provided in **Table III-3, Consistency Analysis with Connect SoCal (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy)**.

Table III-3
Consistency Analysis with Connect SoCal
(2020–2045 Regional Transportation Plan/Sustainable Communities Strategy)

Goals and Strategies	Consistency Assessment
Connect SoCal Goals	
Goal 1: Encourage regional economic prosperity and global competitiveness	**Not Applicable.** This Goal is directed at SCAG and the City of Los Angeles and does not apply to the Proposed Project. This strategy calls on encouraging regional economic prosperity and global competitiveness. As such, the Proposed Project would not interfere with such policymaking.

8 To be conservative, because all of the units for the Proposed Project would be four-bedroom units, this SCEA assumes an occupancy of four persons per unit, rather than the standard 2.80 persons per unit as shown in the U.S. Census Bureau. *City of Los Angeles*. Persons per Household 2015-2019. Available online at: https://www.census.gov/quickfacts/losangelescitycalifornia, accessed on September 30, 2021.

Goals and Strategies	Consistency Assessment
Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods	**Consistent.** The Project Site is in an urbanized area within the City of Los Angeles. The Proposed Project would develop 45 multi-family residential and affordable units as well as commercial space within a High Quality Transit Area (HQTA) as defined by SCAG and a transit priority area as defined by SB 743. The Project Site is located approximately 0.16 miles from qualifying Metro Bus Lines with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. Furthermore, the site is located less than 0.33 miles from the Metro B (Red) Line station located at the intersection of Hollywood Boulevard and Vine Street. The Proposed Project would provide residents, and visitors with convenient access to public transit and opportunities for walking and biking. The Project would include 39 long-term and five short-term bicycle parking spaces located within the ground floor of the development. As such, the location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this Goal.
Goal 3: Enhance the preservation, security, and resilience of the regional transportation system	**Not Applicable.** This Goal is directed towards SCAG and does not apply to the Proposed Project. This strategy calls on enhancing the preservation, security, and resilience of the transportation system, the Proposed Project would not interfere with such policymaking. While not directed toward the Project, the Proposed Project would nevertheless be within the Metro B (Red) Line Extension route along Hollywood Boulevard. As such, while this goal is not directly applicable to the Proposed Project, it would not interfere with this goal.
Goal 4: Increase person and goods movement and travel choices within the transportation system	**Not Applicable.** This strategy calls on SCAG to increase person and goods movement and travel choices across the transportation system. The Project would not interfere with this goal. The Proposed Project would place housing in a priority growth area. As such, the Proposed Project would indirectly contribute to the available transportation options in the area.
Goal 5: Reduce greenhouse gas emissions and improve air quality	**Consistent.** The Project would result in criteria air pollutant and GHG emissions during construction and operation. However, air pollutant emissions would not exceed SCAQMD significance thresholds and the project's GHG emissions would be consistent with SCAG's Connect SoCal Plan and CARB's 2017 Scoping Plan. As such, the project would be consistent with this goal.
Goal 6: Support healthy and equitable communities	**Consistent.** The Proposed Project meets this goal by incorporating sustainable design features, such as meeting Cal Green and Title 24 Building Standards Code, and creating a healthy community for the residents. The low environmental footprint of the project also contributes to the overall health of the region by generating fewer GHG emissions and minimizing use of water. As such, the project would help achieve this goal.

Goals and Strategies	Consistency Assessment
Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network	**Consistent.** The Proposed Project would be located in proximity to public transit opportunities. Further, the Project includes sustainable features such as weather-based irrigation control, EV parking spaces, and bike lockers and storage to address climate adaptation. As such, the project would help to achieve this goal.
Goal 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel	**Not Applicable.** This Goal is directed towards SCAG and does not apply to the Proposed Project. This strategy calls on SCAG to use new transportation technologies and data-driven solutions to increase travel efficiency. As such, the Proposed Project would not interfere with this goal.
Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options	**Consistent.** The Proposed Project would construct 45 four-bedroom multi-family residential units. Furthermore, 15 percent of the units would be set aside for Very Low-Income residents. The Project Site is served by Metro Bus Lines with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods within 0.16 miles of the Project Site. Furthermore, the site is located approximately 0.33 miles from the Metro B (Red) Line station located at the intersection of Hollywood Boulevard and Vine Street. As such, the Proposed Project would help achieve this goal.
Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats	**Not Applicable.** This Goal is directed towards SCAG and does not apply to the Proposed Project. This strategy calls on SCAG to promote the conservation of natural and agricultural land and the restoration of habitats. As such, the Proposed Project would not interfere with this goal.
Connect SoCal Strategies	
Strategy 1: Focus growth near destinations and mobility options	**Consistent.** The Project Site is located within a HQTA and transit priority area as defined by SCAG and SB 743. The Project Site is located within approximately 0.16 miles of Metro Bus Lines with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods within 0.16 miles of the Project Site. Furthermore, the site is located approximately 0.33 miles from the Metro B (Red) Line station located at Hollywood Boulevard and Vine Street. As such, the Proposed Project would be consistent with this goal.
Strategy 2: Promote diverse housing choices.	**Consistent.** The Proposed Project would develop 45 four-bedroom multi-family residential units. Furthermore, 15 percent of the unit would be set aside for Very Low-Income residents. As such, the Proposed Project would be consistent with this goal.
Strategy 3: Leverage technology innovations	**Not Applicable.** This strategy is directed to SCAG and does not apply to the Proposed Project. This strategy aims to promote low emission technologies, improve access to services through technology, and identify ways to incorporate “micro-power grids” in communities. As such, the Proposed Project would not interfere with this strategy.

Goals and Strategies	Consistency Assessment
Strategy 4: Support implementation of sustainability policies	**Consistent.** The Project would be designed to meet or exceed Cal Green and Title 24 Building Standards Code (CALGreen Code). The building will be sustainably designed to meet and/or exceed all City of Los Angeles current building code and Title 24 requirements. As such, the Project will incorporate eco-friendly building materials, systems, and features wherever feasible, including Energy Star appliances, water saving/low flow fixtures, non-VOC paints/adhesives, drought tolerant planting, and a high-performance building envelopment. As such, the Proposed Project would be consistent with this goal.
Strategy 5: Promote a Green Region	**Not Applicable.** This strategy is directed towards SCAG and does not apply to the Proposed Project. However, insofar as this relates to the Connect SoCal Goal 5, above, the Proposed Project would be Consistent.

Source: SCAG Connect SoCal 2020 – 2045 Regional Transportation Plan/Sustainable Communities Strategy.

B. TRANSIT PRIORITY PROJECT CRITERIA ANALYSIS

SB 375 provides CEQA streamlining opportunities for certain Transit Priority Projects (TPPs). A TPP is a project that meets the following three criteria (see PRC, § 21155 (b)):

a) Contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;
b) Provides a minimum net density of at least 20 units per acre; and
c) Is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

As discussed below, the Proposed Project qualifies as a TPP pursuant to the criteria set by PRC § 21155.

Consistency with Criterion #1a

The Proposed Project consists of 45 four-bedroom multi-family units encompassing a maximum of approximately 67,599 square feet. The new construction is 100 percent residential and as such, the Proposed Project would consist of over the minimum of 50 percent residential uses and be consistent with this Criterion. If considered as part of the larger Project Site, the usable, residential component encompasses up to approximately 67,599 square feet of the approximately 93,369

square feet of gross floor area, or approximately 72 percent of the gross floor area, which is also over the minimum of 50 percent residential uses.

Consistency with Criterion #2a

The Project Site is approximately 0.35 acres (15,022 sf). With 45 residential dwellings, the Proposed Project would have a density of 129 units per acre. As such, the Proposed Project would have over the required minimum density of 20 units per acre and be consistent with this Criterion.

Consistency with Criterion #3a

Public Resources Code (PRC) § 21155 (b) defines a "high-quality transit corridor" as a corridor with fixed route bus service with service intervals no longer than 15-minutes during peak commute hours.

PRC § 21099 defines a "transit priority area" as an area within one-half mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to § 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." PRC § 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15-minutes or less during the morning and afternoon peak commute periods." PRC § 21155 (b) states that a "major transit stop" is defined in PRC § 21064.3, except that, for purposes of § 21155 (b), it also includes major transit stops that are included in the applicable regional transportation plan.

The Proposed Project is located within a High Quality Transit Area (HQTA) as defined by SCAG and a transit priority area as defined by SB 743. The Project Site is located within approximately 0.33 miles of the Metro Hollywood/Vine Station. The Metro B (Red) Line provides service intervals less than 15-minutes during peak commute hours. As such, the Project would be located within one-half mile of a major transit stop and be consistent with this Criterion.

C. INCORPORATION OF FEASIBLE MITIGATION MEASURES, PERFORMANCE STANDARDS, AND CRITERIA FROM PRIOR APPLICABLE EIRS

PRC § 21151.2 requires that a transit priority project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City of Los Angeles (City) has complied with PRC § 21151.2 by reviewing all suggested mitigation measures in Connect SoCal 2020-2045 RTP/SCS EIR and the Hollywood Community Plan EIR for imposition on the Project, refer to **Appendix A, Incorporation of Mitigation Measures**, of this SCEA. The mitigation measures were not imposed if the Project was found to be in substantial compliance with the mitigation measure as proposed or if the mitigation measures were found not to be relevant. If the Project was not found to be in substantial compliance or the mitigation measure was found relevant, the City considered whether to use the mitigation measure or an equally effective City mitigation measure (including the mitigation measures developed for the SCEA prepared for the Proposed Project). The applicable mitigation measures, performance standards, or criteria from the aforementioned documents are included in applicable technical sections of the Environmental Checklist portion of this SCEA. Some of the mitigation measures from prior applicable EIRs are duplicative or have minor inconsistencies with the Project-specific mitigation measures set forth below. The City, as lead agency, retains the discretion to modify or delete the measures from the prior EIRs to avoid duplication or resolve inconsistencies.

IV. SCEA ENVIRONMENTAL CHECKLIST

A. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

	Aesthetics		Agriculture and Forestry Resources		Air Quality
	Biological Resources		Cultural Resources		Energy
	Geology and Soils		Greenhouse Gas Emissions		Hazards and Hazardous Materials
	Hydrology and Water Quality		Land Use and Planning		Mineral Resources
	Noise		Population and Housing		Public Services
	Recreation		Transportation		Tribal Cultural Resources
	Utilities and Service Systems		Wildfire		Mandatory Findings of Significance

DETERMINATION: (to be completed by the Lead Agency)

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
I find that, although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared.	
I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	
I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment., but at least effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	

I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	
I find that the Project is a qualified "transit priority project" that satisfies the requirements of Sections 21155 and 21155.2 of the Public Resources Code (PRC), and a qualified "residential or mixed use residential project" that satisfies the requirements of Section 21159.28(d) of the PRC, and although the Project could have a potentially significant effect on the environment as identified in the Initial Study contained herein, there will not be a significant effect in this case, because this Sustainable Communities Environmental Assessment (SCEA) contains measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the Project.	**X**

MORE SONG	CITY PLANNER	MARCH 3, 2023
Name	Title	Date

B. EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact' is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Unless Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The Lead Agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," may be cross-referenced).

5) Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. See *CEQA Guidelines* Section 15063(c)(3)(D). Earlier analyses are discussed in Section 21 at the end of the checklist.

    a) Earlier Analysis Used. Identify and state where they are available for review.

    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal

standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

c) Mitigation Measures. For effects that are "less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier documents and the extent to which address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) The explanation of each issue should identify:

a) The significance criteria or threshold, if any, used to evaluate each question; and

b) The mitigation measure identified, if any, to reduce the impact to less than significant.

C. ENVIRONMENTAL IMPACTS

(explanations of all answers are required):

1. Aesthetics

In January 2016 the City of Los Angeles Planning Department provided guidance in the form of Zoning Information File ZI No. 2451 regarding Transit Priority Areas (TPAs) and exemptions when analyzing Aesthetics and Parking within TPAs pursuant to CEQA, as established in State Senate Bill (SB) 743.

Senate Bill 743, signed into law in September 2013, made several changes to CEQA for projects located in areas served by transit (i.e., TPAs). While the thrust of SB 743 addressed a major overhaul on how transportation impacts are evaluated under CEQA, it also limited the extent to which aesthetics and parking are defined as impacts under CEQA. Specifically, § 21099 (d)(1) of the Public Resources Code (PRC) states that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if:

1. The project is a residential, mixed-use residential, or employment center project, and

2. The project is located on an infill site within a transit priority area.

Section 21099 (a) of the PRC defines the following terms:

> *(4) "Infill site" means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.*
>
> *(7) "Transit priority area" means an area within one-half mile of a major transit stop that is existing or planned.*

Section 21064.3 of the PRC defines a "major transit stop" as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15-minutes or less during the morning and afternoon peak commute periods.

For purposes of § 21099 of the PRC, a transit priority area also includes major transit stops in the City of Los Angeles (City) that are scheduled to be completed within the planning horizon of the Southern California Association of Governments (SCAG) Regional Transportation Plan / Sustainable Community Strategy (RTP/SCS).

The Site is served by the 2 Metro Local Line that stops at the corner of Wilcox Avenue and Sunset Boulevard approximately 0.16 miles from the Project Site. Additionally, there are several major bus routes running along Hollywood Boulevard, Highland Avenue, and Vine Street. Serviced by the 212 Metro Local Line, 210 Metro Local Line, 217 Metro Local Line, 222 Metro Local Line, Beachwood Canyon DASH Bus, Hollywood Clockwise DASH, Hollywood Counterclockwise DASH, and the Hollywood/DASH. The Project site is approximately 0.33 miles from the Hollywood/Vine Station of the Metro B Line (formerly the Red Line). The B Line, Metro's 1st subway line to be built, runs between Downtown Los Angeles and North Hollywood. Landmark stops include: Grand Central Market, the LA Convention Center, Staples Center, MacArthur Park, the Pantages Theater, the Hollywood Walk of Fame and Universal Studios.[1] Furthermore, the site is within a Transit Priority Area within the City of Los Angeles.[2] For these reasons, the Proposed Project qualifies for the SB 743 exemption and the Project's aesthetic and parking impacts shall not be considered a significant impact. The analysis below is provided for **informational purposes only.**

According to Appendix G of the *State CEQA Guidelines*, the impacts of a proposed project related to aesthetics would be considered significant if the project would:

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b)	Substantially damage scenic resources, including, but not limited to, tress, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒

1 Metro B Line Guide and Rail Map. Available online at: https://www.metro.net/riding/guide/b-line/, accessed October 1, 2021.

2 ZIMAS. LA City. Available online at: http://zimas.lacity.org/, accessed March 3, 2020.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

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

This discussion is for informational purposes only. The Proposed Project is located in a highly urbanized area in the City of Los Angeles. The Project Site is surrounded by a mix of commercial, retail, institutional, and residential uses.

Public views are those which can be seen from vantage points that are publicly accessible, such as streets, freeways, parks, and vista points. These views are generally available to a greater number of persons than are private views. Private views are those that can be seen from vantage points located on private property. The City of Los Angeles CEQA Thresholds do not protect views available from private vantage points such as private offices or residences.

At the street level, views in all directions are largely constrained by structures on adjacent parcels. As such, views from the street level near the Project Site would not be substantially affected as the existing building facade fronting Selma Avenue would be retained and refurbished and remain comparable in height to the existing buildings both to the west and east of the Project Site.

Pursuant to regulations provided in SB 743, which applies to residential, mixed-use residential, and employment center projects on infill sites within TPAs, aesthetic impacts cannot be considered significant. A TPA is defined as an area within one-half mile of a main transit stop that is existing or planned. As noted in **Chapter III, SCEA Eligibility**, the proposed project qualifies as a Transit Priority Project (TPP). Therefore, pursuant to CEQA § 21099(d), the project would have no impacts to scenic vistas.

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

This discussion is for informational purposes only. No officially designated or eligible State-designated scenic highways are located adjacent to, or within view of, the Project Site.[3] Currently, the only portion of a scenic highway officially designated by the California Department of Transportation (Caltrans) within the City of Los Angeles is a short portion of the Pasadena Freeway (also known as the Arroyo Seco Historic parkway). A portion of Pacific Coast Highway (PCH), (beginning in the City of Santa Monica and heading towards the City of Malibu), is eligible to be designated as a State Scenic Highway.[4]

Pursuant to regulations provided in SB 743, which applies to residential, mixed-use residential, and employment center projects on infill sites within TPAs, aesthetic impacts cannot be considered significant. A TPA is defined as an area within one-half mile of a main transit stop that is existing or planned. As noted in **Chapter III, SCEA Eligibility**, the proposed project qualifies as a Transit Priority Project (TPP). Therefore, the Proposed Project would have no impacts to state scenic highways or scenic roadway corridors.

c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

This discussion is for informational purposes only. As the Project is located in an urbanized area, this analysis focus on whether the Project would conflict with applicable zoning and other regulations governing scenic quality. The entire property is designated for Regional Center Commercial land uses by the Hollywood Community Plan. The Regional Center Commercial designation corresponds to the C2, C4, P, PB, RAS3, and RAS4 zones, thus the Property's C4-2D zone is consistent with the Community Plan. The C4 zone paired with a "2" height district allows for unlimited height and stories while the "D" Development Limitation (Ordinance No. 165,660) permits a base floor area ratio of 3:1. The Proposed Project will seek an Off-Menu Incentive for an increase in Floor Area Ratio from 3.0:1 to 4.5:1, and thus would not exceed the FAR restrictions.

3 California Department of Transportation. State Scenic Highway Map. Available at: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed February 19, 2021.

4 California Department of Transportation. State Scenic Highway Map. Available at: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed February 19, 2021.

The property is also located within the boundaries of the Hollywood Redevelopment Project Area ("RPA"). The RPA (formerly CRA/LA) is intended to guide design and scale of commercial and residential buildings within Hollywood. The property is located within the Regional Center area of the RPA and conforms to the letter and intent of the RPA with respect to the community's design priorities, FAR, and residential density.

The buildings to the east and west range from approximately 5 to 10 stories in height. The proposed height and scale of the proposed buildings would be consistent with the surrounding commercial and residential buildings to the east and west. Therefore, the Project would not conflict with applicable zoning or other regulations governing scenic quality and there would be no impact.

Other Visual and Aesthetic Considerations

No scenic highways in the Project area are designated by the State as analyzed for Impact 1(b) above.

During construction, construction walls and barriers would be erected to protect the Project Site from vandalism and, which have the potential to attract unauthorized bills and postings, consistent with LAMC Section 91.6205, which regulates signage on construction barriers.

During operation, the Project would be maintained in a safe and sanitary condition and good repair, and free from, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to LAMC Section 91.8104.

Overall, while the Project would change the visual character of the Project Site, the height of the proposed building, design, massing, and scale would be compatible with the existing urban uses that set the aesthetic character of the vicinity. Based on the analysis above, the Project would not substantially degrade the existing visual character or quality of the Project Site or surrounding vicinity.

Furthermore, pursuant to regulations provided in SB 743, which applies to residential, mixed-use residential, and employment center projects on infill sites within TPAs, aesthetic impacts cannot be considered significant. A TPA is defined as an area within one-half mile of a main transit stop that is existing or planned. As noted in **Chapter III, SCEA Eligibility**, the proposed project qualifies as a Transit Priority Project (TPP). Therefore, impacts would be less than significant.

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

This discussion is for informational purposes only. Light impacts are typically associated with the use of artificial light during the evening and nighttime hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point-source lighting that contrasts with existing low ambient light conditions.

The Project will be required to incorporate lighting design specifications to meet City standards as outlined in the Section 93.0117 of the LAMC, to ensure that the Project will have a less than significant impact on light and glare.

Pursuant to regulations provided in SB 743, which applies to residential, mixed-use residential, and employment center projects on infill sites within TPAs, aesthetic impacts cannot be considered significant. A TPA is defined as an area within one-half mile of a main transit stop that is existing or planned. As noted in **Chapter III, SCEA Eligibility**, the Proposed Project qualifies as a Transit Priority Project (TPP). As such, there would be no aesthetic impacts.

2. Agriculture and Forestry Resources

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒

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

No Impact. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland." The Farmland Mapping and Monitoring Program indicates that the Project Site is Urban and Built-Up Land, which is land that contains man-made structures or buildings under construction, and the infrastructure required for development (i.e. paved roads, sewers, water, electricity, drainage, or flood control facilities) that are specifically designed to serve that land.[5] The site is zoned C4-2D, is located within an

5 California Department of Conservation. California Important Farmland Finder. Available online at: https://maps.conservation.ca.gov/DLRP/CIFF/

urbanized area of the City of Los Angeles, and is currently developed which would classify the site as Urban and Built-Up Land. Therefore, implementation of the Proposed Project would not convert farmland to non-agricultural use. As such, no impacts would occur.

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

No Impact. The Project Site is within the City of Los Angeles Hollywood Community Plan Area and is zoned C4-2D. The Project Site is not zoned for agricultural uses nor do agricultural uses occur on the Project Site. Only land located within an agricultural preserve is eligible for enrollment under a Williamson Act contract. Accordingly, the Project Site does not contain any lands covered by a Williamson Act contract. Therefore, implementation of the Proposed Project would not conflict with existing agricultural zoning or a Williamson Act Contract. As such, no impacts on agricultural resources would occur.

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

No Impact. The Project Site is zoned is zoned C4-2D. The site and the surrounding area do not contain any forest land or land zoned for timberland production. Implementation of the Proposed Project would not conflict with existing zoning for, or cause rezoning of forest land or timberland. No impacts would occur.

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

No Impact. See response to Section 2(c) above.

Additionally, forest land is defined as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits."[6] Timberland is defined as "land…which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees."[7] The Project Site is not zoned for forest land or timberland and there is no forest land or timberland on-site or in the

6 California PRC § 12220[g]

7 California PRC § 4526

project vicinity and project development would not cause a loss of forest land or timberland.[8] As such, no impacts would occur.

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

No Impact. See responses to Sections 2(a) through 2(d), above. The site is located in an urbanized area and there are no agricultural uses or related uses on the site. The site does not result in the conversion of farmland, to other uses. No impacts would occur.

3. Air Quality

The analysis provided below is primarily based on technical data prepared in the Air Quality and Greenhouse Gas Technical Study (refer to **Appendix B**).

Introduction

The California Air Resources Board (CARB) divides the state into air basins that share similar meteorological and topographical features. The City of Los Angeles is located within the South Coast Air Basin (SCAB), which incorporates approximately 12,000 square miles consisting of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Gorgonio Pass area in Riverside County. The South Coast Air Quality Management District (SCAQMD) is the agency principally responsible for comprehensive air pollution control in the Basin. Air quality impacts were evaluated in accordance with the methodologies recommended by CARB and the South Coast Air Quality Management District (SCAQMD). Where criteria air pollutant quantification was required, emissions were modeled using the California Emissions Estimator Model version 2020.4.0 (CalEEMod). CalEEMod is a statewide land use emissions computer model designed to quantify criteria pollutant emissions associated with both construction and operations from a variety of land use projects.

Air Pollution Climatology

The SCAB is in an area of high pollution potential due to the climate and topography of the region. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average with speeds.[9] The area is

8 City of Los Angeles. Zimas. Available at: http://zimas.lacity.org/

9 South Coast Air Quality Management District. 2017. *2016 Air Quality Management Plan*. Available online at: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf.

considered semi-arid and is characterized by warm summers, mild winters infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The annual average temperature varies little throughout the SCAB region, ranging from the low 60s to the high 80s, measures in degrees Fahrenheit (F°).

Wind patterns across the south coastal region are characterized by westerly or southwesterly onshore winds during the day and by easterly or northeasterly breezes at night. Wind speed is higher during the dry summer months than during the rainy winter. Between periods of wind, air stagnation may occur in both the morning and evening hours. Air stagnation is one of the critical determinants of air quality conditions on any given day. During the winter and fall, surface high-pressure systems over the SCAB, combined with other meteorological conditions, can result in very strong, downslope Santa Ana winds. These winds normally continue a few days before predominant meteorological conditions are reestablished.

In conjunction with the two characteristic wind patterns that affect the rate and orientation of horizontal pollutant transport, two similarly distinct types of temperature inversions control the vertical depth through which pollutants are mixed. These inversions are the marine/subsidence inversion and the radiation inversion. The height of the base of the inversion at any given time is known as the “mixing height.” The combination of winds and inversions is a critical determinant leading to highly degraded air quality in the summer and generally good air quality in the winter in Los Angeles.

Air Pollutants of Concern

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards for outdoor concentrations.[10] The federal and state standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons such as children, pregnant women, and the elderly, from illness or discomfort. Criteria air pollutants include ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), particulate matter 2.5 microns or less in diameter (PM2.5), particulate matter ten microns or less in diameter (PM10), and lead (Pb). Note that reactive organic gases (ROGs), which are also known as reactive organic compounds (ROCs) or volatile organic compounds (VOCs), and nitrogen oxide (NOx) are not classified as criteria pollutants. However, ROGs and NOx are widely emitted from land development projects and participate in photochemical reactions in the

10 California Air Resources Board. *Air Quality Standards*. Available online at: https://ww2.arb.ca.gov/resources/background-air-quality-standards.

atmosphere to form O_3; therefore, NOx and ROGs are relevant to the Proposed Project and are of concern in the air basin and are listed below along with the criteria pollutants. Sources and health effects commonly associated with criteria pollutants are summarized in **Table IV.3-1, Criteria Pollutants Summary of Common Sources and Effects**.

Table IV.3-1
Criteria Pollutants Summary of Common Sources and Effects

Pollutant	Major Man-Made Sources	Human Health & Welfare Effects
Carbon Monoxide (CO)	An odorless, colorless gas formed when carbon in fuels is not burned completely; a component of motor vehicle exhaust.	Reduces the ability of blood to deliver oxygen to vital tissues, affecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.
Nitrogen Dioxide (NO_2)	A reddish-brown gas formed during fuel combustion for motor vehicles and industrial sources. Sources include moto vehicles, electric utilities, and other sources that burn fuel.	Respiratory irritant; aggravates lung and heart problems. Precursor to ozone and acid rain. Contributes to global warming and nutrient overloading which deteriorates water quality. Causes brown discoloration of the atmosphere.
Ozone (O_3)	Formed by a chemical reaction between volatile organic compounds (VOC) and nitrous oxides (NOx) in the presence of sunlight. VOCs are also commonly referred to as reactive organic gases (ROGs). Common sources of these precursor pollutants include motor vehicle exhaust, industrial emissions, gasoline storage and transport, solvents, paints, and landfills.	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing, and pain when inhaling deeply; decreases lung capacity; aggravates lung and heart problems. Damages plants; reduces crop yield. Damages rubber, some textiles, and dyes.
Particulate Matter (PM10 & PM2.5)	Produced by power plants, steel mills, chemical plants, unpaved roads and parking lots, wood-burning stoves and fireplaces, automobiles, and others.	Increased respiratory symptoms, such as irritation of the airways, coughing or difficulty breathing; aggravated asthma; development of chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility (haze).
Sulfur Dioxide (SO_2)	A colorless, nonflammable gas formed when fuel containing sulfur is burned; when gasoline is extracted from ore. Examples are petroleum refineries, cement manufacturing, metal processing facilities, locomotives, and ships.	Respiratory irritant; aggravates lung and heart problems. In the presence of moisture and oxygen, sulfur dioxide converts to sulfuric acid which can damage marble, iron, and steel. Damages crops and natural vegetation. Impairs visibility. Precursor to acid rain.

Source: CAPCOA, Health Effects. Available: http://www.capcoa.org/health-effects/

Air Monitoring Data

Ambient air quality in Los Angeles can be inferred from ambient air quality measurements conducted at nearby air quality monitoring stations. Existing levels of ambient air quality and historical trends and projections in the vicinity of Los Angeles are documented by measurements made by the South Coast Air Quality Management District (SCAQMD), the air pollution regulatory agency in the SCAB regions maintains air quality monitoring stations which process ambient air quality measurements.

The purpose of the monitoring station is to measure ambient concentrations of pollutants and determine whether ambient air quality meets the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS). Ozone and particulate matter (PM10 and PM2.5) are pollutants of particular concern in the SCAB. The monitoring station located closest to the Proposed Project Site and most representative of air quality near the Proposed Project Site is the Los Angeles – North Main Street station, located at 1630 North Main Street approximately 6.41 miles southeast of the Proposed Project Site. Ambient emission concentrations vary due to localized variations in emissions sources and climate and should be considered "generally" representative of ambient concentrations near the Proposed Project Site. The Los Angeles – North Main Street station monitors O_3, PM2.5, PM10, and NO_2, see **Table IV.3-2, Los Angeles – North Main Street Air Monitoring Station Ambient Pollutant Concentrations**.

Table IV.3-2
Los Angeles – North Main Street Air Monitoring Station Ambient Pollutant Concentrations

Pollutant	Standards[1]	Year 2018	2019	2020
Ozone (O_3)				
Maximum 1-hour concentration monitored (ppm)		0.098	0.085	0.185
Maximum 8-hour concentration monitored (ppm)		0.073	0.080	0.093
Number of days exceeding state 1-hour standard	0.09 ppm	2	2	14
Number of days exceeding federal/state 8-hour standard	0.070 ppm	4	2	22
Nitrogen Dioxide (NO_2)				
Maximum 1-hour concentration monitored (ppm)		0.070	0.070	0.062
Annual average concentration monitored (ppm)		0.018	0.018	0.017
Number of days exceeding state 1-hour standard	0.18 ppm	0	0	0
Respirable Particulate Matter (PM_{10})				
Maximum 24-hour concentration monitored (µg/m^3)		68.2	62.0	77.0
Annual average concentration monitored (µg/m^3)		30.2	25.5	2.0
Number of samples exceeding state standard	50 µg/m^3	31	3	24
Number of samples exceeding federal standard	150 µg/m^3	0	0	0
Fine Particulate Matter ($PM_{2.5}$)				
Maximum 24-hour concentration monitored (µg/m^3)		61.4	43.5	47.3
Annual average concentration monitored (µg/m^3)		12.8	10.8	12.3
Number of samples exceeding federal standard	35 µg/m^3	6	1	2

Source: California Air Resources Board, "Air Quality Data Statistics," http://www.arb.ca.gov/adam/. 2020.
SCAQMD. 2021. Air Quality South Coast Air Quality Management District, https://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year
NA = not available
[1] Parts by volume per million of air (ppm), micrograms per cubic meter of air (µg/m^3), or annual arithmetic mean (aam).
[2] The 8-hour federal O_3 standard was revised from 0.075 ppm to 0.070 ppm in 2015. The statistics shown are based on the 2015 standard of 0.070 ppm.

The attainment status for the SCAB region is included in **Table IV-3, Attainment Status of Criteria Pollutants in the South Coast Air Basin**. Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as nonattainment areas. The SCAB region is designated as a nonattainment area for federal ozone, PM2.5, and lead standards and are designated as nonattainment for state ozone, PM10, and PM2.5 standards.

Table IV.3-3
Attainment Status of the South Coast Air Basin

Pollutant	State	Federal
Ozone (O_3)	Non-Attainment	Non-Attainment
Particulate Matter (PM10)	Non-Attainment	Attainment
Particulate Matter (PM2.5)	Non-Attainment	Non-Attainment
Carbon Monoxide (CO)	Attainment	Attainment
Nitrogen Dioxide (NO_2)	Attainment	Attainment
Sulfur Dioxide (SO_2)	Attainment	Attainment
Lead	Attainment	Non-Attainment (Partial)[1]

Source: South Coast Air Quality Management District. 2016. National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin. naaqs-caaqs-feb2016.pdf, accessed March 2021.
[1] The Los Angeles County portion of the Basin is designated as a non-attainment area for the federal lead standard on the basis of source-specific monitoring at two locations as determined by U.S. EPA using 2007-2009 data. However, all stations in the Basin, including the near-source monitoring in Los Angeles County, have remained below the lead NAAQS for the 2012 through 2015 period. The SCAQMD will request that the U.S. EPA re-designated the Los Angeles County portion of the Basin as attainment for lead.

Toxic Air Contaminants

In addition to the criteria pollutants discussed above, toxic air contaminants (TACs) are another group of pollutants of concern. TACs are considered either carcinogenic or noncarcinogenic based on the nature of the health effects associated with exposure to the pollutant. For regulatory purposes, carcinogenic TACs are assumed to have no safe threshold below which health impacts would not occur, and cancer risk is expressed as excess cancer cases per one million exposed individuals. Noncarcinogenic TACs differ in that there is generally assumed to be a safe level of exposure below which no negative health impact is believed to occur. These levels are determined on a pollutant-by-pollutant basis.

There are many different types of TACs, with varying degrees of toxicity. Sources of TACs include industrial processes, such as petroleum refining and chrome-plating operations; commercial operations, such as gasoline stations and dry cleaners; and motor vehicle exhaust. Public exposure to TACs can result from emissions from normal operations, as well as from accidental releases of hazardous materials during upset conditions. The health effects associated with TACs are quite diverse and generally are assessed locally, rather than regionally. TACs can cause long-term health effects such as cancer, birth defects, neurological damage, asthma, bronchitis, or genetic damage, or short-term acute affects such as eye watering, respiratory irritation (a cough), running nose, throat pain, and headaches.

To date, CARB has designated 244 compounds as TACs. Additionally, CARB has implemented control measures for a number of compounds that pose high risks and show potential for effective control. The majority of the estimated health risks from TACs can be attributed to a relatively few compounds.[11]

CARB identified diesel particulate matter (DPM) as a TAC. DPM differs from other TACs in that it is not a single substance but rather a complex mixture of hundreds of substances. Diesel exhaust is a complex mixture of particulates and gases produced when an engine burns diesel fuel. DPM is a concern because it causes lung cancer; many compounds found in diesel exhaust are carcinogenic. DPM includes the particle-phase constituents in diesel exhaust. The chemical composition and particle sizes of DPM vary between different engine types (heavy-duty, light-duty), engine operating conditions (idle, accelerate, decelerate), fuel formulations (high/low sulfur fuel), and the year of the engine. Some short-term (acute) effects of diesel exhaust include eye, nose, throat, and lung irritation, and diesel exhaust can cause coughs, headaches, light-headedness, and nausea. DPM poses the greatest health risk among the TACs. Almost all diesel exhaust particle mass is 10 microns or less in diameter. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung.

Sensitive Receptors

Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardiovascular diseases.[12]

Residential areas are considered sensitive receptors to air pollutions because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Children are considered more susceptible to health effects of air pollution due to their immature immune systems and developing organs.[13] As such, schools are also considered sensitive receptors, as children are present for extended durations and engage in regular outdoor activities. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on

11 California Air Resources Board. *CARB Identified Toxic Air Contaminants*. Available online at: https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants.

12 California Air Resources Board. *Sensitive Receptor Assessment*. Available online at: https://ww2.arb.ca.gov/capp-resource-center/community-assessment/sensitive-receptor-assessment.

13 Office of Environmental Health Hazard Assessment and The American Lung Association of California. *Air Pollution and Children's Health*. Available online at: https://oehha.ca.gov/media/downloads/faqs/kidsair4-02.pdf.

respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreation.

The nearest sensitive receptors to the proposed project site are residents of the Gilbert Hotel located adjacent to the proposed project site to the west.

Regulatory Setting

Federal

Clean Air Act

The Clean Air Act (CAA) of 1970 and the CAA Amendments of 1971 required the U.S. Environmental Protection Agency (EPA) to establish NAAQS, with states retaining the option to adopt more stringent standards or to include other specific pollutants. On April 2, 2007, the Supreme Court found that carbon dioxide is an air pollutant covered by the CAA; however, no NAAQS have been established for carbon dioxide.[14]

These standards are the levels of air quality considered safe, with an adequate margin of safety, to protect the public health and welfare. They are designed to protect those "sensitive receptors" most susceptible to further respiratory distress such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed as compared to sensitive receptors due to differences in breathing rates and overall health.

The EPA has classified air basins (or portions thereof) as being in attainment, nonattainment, or unclassified for each criteria air pollutant, based on whether or not the NAAQS have been achieved.[15] If an area is designated unclassified, it is because inadequate air quality data were available as a basis for a nonattainment or attainment designations. **Table IV.3-3** lists the federal attainment status of the SCAB for the criteria pollutants.

[14] Massachusetts, et al. v. Environmental Protection Agency, et al. No. 05-112. https://www.supremecourt.gov/opinions/06pdf/05-1120.pdf

[15] U.S. Environmental Protection Agency. 2021. *NAAQS Designation Process*. Available online at: https://www.epa.gov/criteria-air-pollutants/naaqs-designations-process.

National Emissions Standards for Hazardous Air Pollutants Program

Under the CAA, the EPA is required to regulate emissions of hazardous air pollutants.[16] 187 substances are currently listed as hazardous air pollutants (HAPs). Major sources of specific HAPs are subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAPS) program. The EPA has established regulatory schemes for specific source categories and requires implementation of the Maximum Achievable Control Technologies (MACT) for major sources of HAPs in each source category.[17] State law (Assembly Bill 1807 [1983]) has established the framework for California's toxic air contaminants (TAC) identification and control program, which is generally more stringent than the federal program and is aimed at HAPs that are a problem is California.[18] The State has formally identified 244 substances as TACs and is adopting appropriate control measures for each.[19] Once adopted at the State level, each air district will be required to adopt a measure that is equally or more stringent.

National Ambient Air Quality Standards

The Federal CAA required the EPA to establish NAAQS. The NAAQS set primary standards and secondary standards for specific air pollutants (see **Table IV.3-4**)**.** Primary standards define limits for the intention of protecting public health, which include sensitive populations such as asthmatics, children, and the elderly. Secondary Standards define limits to protect public welfare to include protection against decreased visibility, damage to animals, crops, vegetation, and buildings. A summary of the federal ambient air quality standards is shown in **Table IV.3-4, National Ambient Air Quality Standards**.

16 U.S. Environmental Protection Agency. *Initial List of Hazardous Air Pollutants with Modifications*. Available online at: https://www.epa.gov/haps/initial-list-hazardous-air-pollutants-modifications.

17 U.S. Environmental Protection Agency. *Reducing Emissions of Hazardous Air Pollutants*. Available online at: https://www.epa.gov/haps/reducing-emissions-hazardous-air-pollutants.

18 California Air Resources Board. *AB 1807 – Toxics Air Contaminant Identification and Control*. Available online at: https://ww2.arb.ca.gov/resources/documents/ab-1807-toxics-air-contaminant-identification-and-control.

19 California Air Resources Board. *CARB Identified Toxic Air Contaminants*. Available online at: https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants.

Table IV.3-4
National Ambient Air Quality Standards

Pollutant		Primary/Secondary	Averaging Time	Level
Carbon Monoxide		Primary	8 hours	9 ppm
			1 hour	35 ppm
Lead		Primary and secondary	Rolling 3-month average	0.15 µg/m^3
Nitrogen dioxide		Primary	1 hour	100 ppb
		Primary and secondary	Annual	0.053 ppm
Ozone		Primary and secondary	8 hours	0.070 ppm
Particulate Matter	PM2.5	Primary	Annual	12 µg/m^3
		Secondary	Annual	15 µg/m^3
		Primary and secondary	24 hours	35 µg/m^3
	PM10	Primary and secondary	24 hours	150 µg/m^3
Sulfur dioxide		Primary	1 hour	75 ppb
		Secondary	3 hours	0.5 ppm

Source: California Air Resources Board. May 2016. Ambient Air Quality Standards. Available online: https://www.arb.ca.gov/research/aaqs/aaqs2.pdf, accessed January 12, 2021.

State

California Clean Air Act of 1988

The California CAA of 1988 (CCAA) allows states to adopt ambient air quality standards and other regulations provided that they are at least as stringent as federal standards. The California Air Resources Board (CARB), a part of the California Environmental Protection Agency (Cal EPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California, including setting the CAAQS. The CCAA, amended in 1992, requires all air quality management districts (AQMDs) in the state to achieve and maintain the CAAQS. The CAAQS are generally stricter than national standards for the same pollutants and has also established state standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles, for which there are no national standards. CARB also conducts research, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB also has primary responsibility for the development of California's State Implementation Plan (SIP), for which it works closely with the federal government and the local air districts.[20]

20 California Air Resources Board. *The California Air Resources Board*. Available online at: https://ww2.arb.ca.gov/about.

California Ambient Air Quality Standards

The federal CAA permits states to adopt additional or more protective air quality standards if needed. California has set standards for certain pollutants, such as particulate matter and ozone, which are more protective of public health than respective federal standards. California has also set standards for some pollutants that are not addressed by federal standards. The state standards for ambient air quality are summarized in **Table IV.3-5, California Ambient Air Quality Standards**.

Table IV.3-5
California Ambient Air Quality Standards

Pollutant		Averaging Time	Level
Carbon monoxide		8 hours	9 ppm
		1 hour	20 ppm
Lead		30-day average	1.5 µg/m^3
Nitrogen dioxide		1 hour	0.180 ppm
		Annual	0.030 ppm
Ozone		8 hours	0.070 ppm
		1 hour	0.09 ppm
Particulate matter	PM2.5	Annual	12 µg/m^3
	PM10	24 hours	50 µg/m^3
		Annual	20 µg/m^3
Sulfur dioxide		1 hour	0.25 ppm
		24 hours	0.04 ppm
Sulfates		24 hours	25 µg/m^3
Hydrogen sulfide		1 hour	0.03 ppm
Vinyl chloride		24 hours	0.01 ppm

Source: California Air Resources Board. May 2016. Ambient Air Quality Standards. Available online: https://www.arb.ca.gov/research/aaqs/aaqs2.pdf, accessed January 12, 2021.

California State Implementation Plan

The federal CAA (and its subsequent amendments) requires each state to prepare an air quality control plan referred to as a State Implementation Plan (SIP).[21] The SIP is a living document that is periodically modified to reflect the latest emissions inventories, plans, and rules and regulations of air basins as reported by the agencies with jurisdiction over them. The CAA Amendments

21 California Air Resources Board. *California State Implementation Plans*. Available online at: https://ww2.arb.ca.gov/our-work/programs/california-state-implementation-plans.

dictate that states containing areas violating the NAAQS revise their SIPs to include extra control measures to reduce air pollution. The SIP includes strategies and control measures to attain the NAAQS by deadlines established by the CAA. The EPA has the responsibility to review all SIPs to determine if they conform to the requirements of the CAA.

State law makes CARB the lead agency for all purposes related to the SIP. Local air districts and other agencies prepare SIP elements and submit them to CARB for review and approval. CARB then forwards SIP revisions to the EPA for approval and publication in the Federal Register. The 2016 Air Quality Management Plan (2016 AQMP) is the SIP for SCAB. The 2016 AQMP is a regional blueprint for achieving air quality standards and healthful air in the SCAB and those portions of the Salton Sea Air Basin (SSAB) that are under the SCAQMD's jurisdictions. The 2016 AQMP represents a new approach, focusing on available, proven, and cost effective alternatives to traditional strategies, while seeking to achieve multiple goals in partnerships with other entities promoting reductions in greenhouse gases and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. The most effective way to reduce air pollution impacts is to reduce emissions from mobile sources. The AQMP relies on regional and multi-level partnerships of governmental agencies at the federal, state, regional, and local level. Those agencies (EPA, CARB, local governments, Southern California Association of Governments [SCAG] and the SCAQMD) are the primary agencies that implement the AQMP programs. The 2016 AQMP incorporates the latest scientific and technical information and planning assumptions, including SCAG's 2016-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. The 2016 AQMP includes integrated strategies and measures to meet the NAAQS.

On September 3, 2020, SCAG's Regional Council unanimously voted to approve and fully adopt Connect SoCal 2020-2045 RTP/SCS (Connect SoCal). However, the forecasts and measures in the plan have not been incorporated into any applicable air quality plan for the region.[22]

California Air Toxics "Hot Spots" Information and Assessment Act (AB 2588)

The California Air Toxics Program is supplemented by the Air Toxics "Hot Spots" program, which became law (AB 2588, Statutes of 1987) in 1987. In 1992, the AB 2588 program was amended by Senate Bill 1731 to require facilities that pose a significant health risk to the community to perform a risk reduction audit and reduce their emissions through implementation of a risk

22 Southern California Association of Governments. *Adopted Final Connect SoCal* (2020-2045 RTP/SCS). Available online at: https://scag.ca.gov/read-plan-adopted-final-plan.

management plan. Under this program, which is required under the Air Toxics "Hot Spots" Information and Assessment Act (Section 44363 of the California Health and Safety Code), facilities are required to report their air toxics emissions, assess health risks, and notify nearby residents and workers of significant risks when present.

Typically, land development projects generate diesel emissions from construction vehicles during the construction phase, as well as some diesel emissions from small trucks during the operational phase. Diesel exhaust is mainly composed of particulate matter and gases, which contain potential cancer-causing substances. Emissions from diesel engines currently include over 40 substances that are listed by EPA as hazardous air pollutants and by CARB as TACs. On August 27, 1998, CARB identified particulate matter in diesel exhaust as a TAC, based on data linking diesel particulate emissions to increased risks of lung cancer and respiratory disease.[23]

In March 2015, the OEHHA adopted "The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments" in accordance with the Health and Safety Code, Section 44300. The Final Guidance Manual incorporates the scientific basis from three earlier developed Technical Support Documents to assess risk from exposure to facility emissions. The 2015 OEHHA Final Guidance has key changes including greater age sensitivity in particular for children, decreased exposure durations, and higher breathing rate profiles. Because cancer risk could be up to three times greater using this new guidance, it may result in greater mitigation requirements, more agency backlog, and increased difficulty in getting air permits. Regardless of the change in calculation methodology, actual emissions and cancer risk within South Coast Air Basin has declined by more than 50 percent since 2005.

The CARB provides a computer program, the Hot Spots Analysis and Reporting Program (HARP), to assist in a coherent and consistent preparation of an HRA. HARP2, an update to HARP, was released in March 2015. HARP2 has a more refined risk characterization in HRA and CEQA documents and incorporates the 2015 OEHHA Final Guidance.

Regional

South Coast Air Quality Management District

The SCAQMD is the air pollution control district for Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The agency's primary responsibility is

23 Diesel exhaust is included within pollutants subject to the hotspot program. Please refer to OEHHA's Air Toxics Hot Spot Program Risk Assessment Guidelines. https://oehha.ca.gov/air/crnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0.

ensuring that the SCAB region meets attainment for the federal and state standards. The SCAQMD is responsible for preparing an air quality management plan in order to meet federal attainment status. The SCAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, and conducting public education campaigns, as well as many other activities. All projects are subject to SCAQMD rules and regulations in effect at the time of construction.

SCAQMD Rules and Regulations

The following is a list of noteworthy SCAQMD rules that are required of construction activities associated with the Proposed Project:

- **Rule 402 (Nuisance)** – This rule prohibits the 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. This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.[24]

- **Rule 403 (Fugitive Dust)** – This rule requires fugitive dust sources to implement best available control measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. This rule is intended to reduce PM10 emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM10 suppression techniques are summarized below.[25]

  - Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.

  - All on-site roads will be paved as soon as feasible or watered periodically or chemically stabilized.

24 South Coast Air Quality Management District. 1976. *Rule 402. Nuisance*. Available online at: http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf.

25 South Coast Air Quality Management District. Amended 2005. *Rule 403. Fugitive Dust*. Available online at: http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf.

- All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
- The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.
- Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the work day to remove soil tracked onto the paved surface.

- **Rule 1113 (Architectural Coatings)** – This rule requires manufacturers, distributors, and end-uses of architectural and industrial maintenance coatings to reduce ROG emissions from the use of these coatings, primarily by placing limits on the ROG content of various coating categories.[26]

- **Rule 445 (Wood-Burning Devices)** – The purpose of this rule is to reduce the emission of particulate matter from wood-burning devices and establish contingency measures for applicable ozone standards for the reduction of volatile organic compounds.

The rule requires that any new residential or commercial development that begins construction on or after March 9, 2009 only install gaseous-fueled fireplaces and stoves.[27]

Local

Air Quality Element of the Los Angeles General Plan

The *Air Quality Element of the City of Los Angeles General Plan* (Air Quality Element) was adopted on November 24, 1992, and sets forth the goals, objectives and policies that guide the City in the implementation of its air quality improvement programs and strategies.[28] The Air Quality Element acknowledges that numerous efforts are underway at the regional, county and city levels addressing clean air concerns and that coordination of these various efforts and the

26 South Coast Air Quality Management District. Amended 2016. *Rule 1113. Architectural Coatings*. Available online at: http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf?sfvrsn=24.

27 South Coast Air Quality Management District. 2019. *Rule 445 – Wood Burning Devices Local Government, Builder, Contractor, Architect Answers to Frequently Asked Questions (FAQs).* Available online at: http://www.aqmd.gov/docs/default-source/rule-book/support-documents/rule-445/detailed-rule-445-information.pdf.

28 City of Los Angeles Planning Department. 1992. *Air Quality Element*. Available online at: https://planning.lacity.org/odocument/0ff9a9b0-0adf-49b4-8e07-0c16feea70bc/Air_Quality_Element.pdf.

involvement of the area's residents are crucial to the achievement of State and Federal air quality standards.

Relevant to the Proposed Project, the Air Quality Element establishes the following goals and policies aimed to reduce air quality emissions across the City of Los Angeles:

Goal 1. Good air quality and mobility in an environment of continued population growth and healthy economic structure.

> **Objective 1.1.** It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.
>
> > **Policy 1.1.1.** Encourage demonstration projects which involve creative and innovative uses of market incentive mechanisms to achieve air quality objectives.
>
> **Objective 1.3.** It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.
>
> > **Policy 1.3.1.** Minimize particulate emissions from construction sites.
> >
> > **Policy 1.3.2.** Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.

Goal 2. Less reliance on single-occupant vehicles with fewer commute and non-work trips.

> **Objective 2.2.** It is the objective of the City of Los Angeles to increase vehicle occupancy for non-work trips by creating disincentives for single passenger vehicles, and incentives for high occupancy vehicles.
>
> > **Policy 2.2.1.** Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.

Goal 3. Efficient management of transportation facilities and system infrastructure using cost effective system management and innovative demand management techniques.

> **Objective 3.2.** It is the objective of the City of Los Angeles to reduce vehicular traffic during peak periods.

Policy 3.2.1. Manage traffic congestion during peak periods.

Goal 4. Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.

Objective 4.1. It is the objective of the City of Los Angeles to include the regional attainment of ambient air quality standards as a primary consideration in land use planning.

Policy 4.1.1. Coordinate with all appropriate regional agencies in the implementation of strategies for the integration of land use, transportation, and air quality policies.

Policy 4.1.2. Ensure that project level review and approval of land use development remain at the local level.

Objective 4.2. It is the objective of the City of Los Angeles to reduce vehicle trips and vehicle miles traveled associated with land use patterns.

Policy 4.2.1. Revise the City's General Plan/Community Plans to achieve a more compact, efficient urban form and to promote more transit-oriented development and mixed-use development.

Policy 4.2.2. Improve accessibility for the City's residents to places of employment, shopping centers, and other establishments.

Policy 4.2.3 Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.

Policy 4.2.4. Require that air quality impacts to be a consideration in the review and approval of all discretionary projects.

Policy 4.2.5. Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.

Hollywood Community Plan

The Hollywood Community Plan was released in 1988 and is currently being updated to account for the anticipated development to already urbanized areas of the Community Plan Area.[29] The draft of the Updated Community Plan was released in February 2021.[30] The plan area includes about 13,961 acres of the northern Mid-City section of Los Angeles. The eastern edge of the community plan borders the I-5, while the western edge abuts Cahuenga Pass, Bel Air, West Hollywood, and the City of Beverly Hills. To the south lies central Mid-City Los Angeles. The Hollywood Community Plan has a pattern of low-density residential uses, interspersed with minimal medium and high-density residential uses. The high-density residential spaces are found slightly north of the main commercial area. Corridors of commercial activity can be found along major streets including Sunset, Hollywood, and Santa Monica Blvd. The plan area north of the central commercial corridors includes Griffith Park, and accounts for 40% of the acreage, and almost all of the open space land in the community boundary. The Hollywood Community Plan sets forth planning goals and objectives to maintain the community's distinctive character, the goals and objectives relevant to this proposed project include:

Goal LU1. Complete, livable and quality residential neighborhoods that provide a variety of housing types, densities, forms, and designs and a mix of uses and services that support the needs of residents throughout Hollywood.

> **Policy LU1.2.** Provide housing that accommodates households of all sizes, as well as integrates safe and convenient access to schools, parks, and other amenities and services.

Goal LU4. Multi-family residential neighborhoods that are well-designed, safe, provide amenities for residents, and exhibit the architectural characteristics and qualities that distinguish Hollywood neighborhoods.

> **Policy LU4.1.** Encourage multi-family housing development within neighborhoods designated for higher density multi-family residential.

Goal LU5. Multi-family residential neighborhoods that provide a range of housing opportunities at a variety of price points including affordable housing, through a mix of ownership and rental units.

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29 City of Los Angeles. 2021. *Hollywood Community Plan Update*. Available online at: https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update.

30 City of Los Angeles. 2021. *Hollywood Community Plan.* Available online at: https://planning.lacity.org/odocument/73938107-9332-404e-b2fa-75f8a0fe19ae.pdf.

Policy LU5.1. Provide a variety of rental and ownership housing opportunities for households of all income levels, sizes, and needs, including middle income and workforce populations.

Policy LU5.5. Encourage affordable housing near transit.

Goal LU11. Sustainable land uses, site design, and development, including paving and stormwater infiltration systems.

Policy LU11.1. Promote sustainable land use, streetscape and building policies to protect the environment and public health.

Thresholds of Significance

The impact analysis provided below is based on the application of the following California Environmental Quality Act (CEQA) Guidelines Appendix G, which indicates that a project would have a significant impact on air quality if it would:

a) Conflict with or obstruct implementation of any applicable air quality plan.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard.

c) Expose sensitive receptors to substantial pollutant concentrations.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The significance criteria established by the applicable air quality management or air pollution control district (SCAQMD) may be relied upon to make the above determinations. According to the SCAQMD, an air quality impact is considered significant if the proposed project would violate any ambient air quality standard, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations. The SCAQMD has established thresholds of significance for air quality for construction and operational activities of land use development projects, shown in **Table IV.3-6, South Coast AQMD Regional Significance Thresholds**.

Table IV.3-6
South Coast AQMD Air Quality Significance Thresholds

Mass Daily Thresholds [a]		
Pollutant	**Construction [b]**	**Operation [c]**
NOx	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM10	150 lbs/day	150 lbs/day
PM2.5	55 lbs/day	55 lbs/day
SOx	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs), Odor, and GHG Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to South Coast AQMD Rule 402	
GHG	10,000 MT/yr CO_2eq for industrial facilities	
Ambient Air Quality Standards for Criteria Pollutants [d]		
NO_2 1-hour average annual arithmetic mean	South coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
PM10 24-hour average annual average	10.4 µg/m^3 (construction) [e] & 2.5 µg/m^3 (operation) 1.0 µg/m3	
PM2.5 24-hour average	10.4 µg/m^3 (construction) [e] & 2.5 µg/m^3 (operation)	
SO_2 1-hour average 24-hour average	0.25 ppm (state) & 0.075 ppm (federal - 99th percentile) 0.04 ppm (state)	
Sulfate 24-hour average	25 µg/m^3 (state)	
CO 1-hour average 8-hour average	South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
Lead 30-day Average Rolling 3-month average	1.5 µg/m^3 (state) 0.15 µg/m^3 (federal)	

[a] Source: South Coast AQMD CEQA Handbook (South Coast AQMD, 1993)
[b] Construction thresholds apply to both the South Coast Air Basin and Coachella Valley (Salton Sea and Mojave Desert Air Basins).
[c] For Coachella Valley, the mass daily thresholds for operation are the same as the construction thresholds.
[d] Ambient air quality thresholds for criteria pollutants based on South Coast AQMD Rule 1303, Table A-2 unless otherwise stated.
[e] Ambient air quality threshold based on South Coast AQMD Rule 403.

CO Hotspot Analysis

In addition to the daily thresholds listed above, the proposed project area would also be subject to the ambient air quality standards through an analysis of localized CO impacts. The California 1-hour and 8-hour CO standards are:

- 1-hour = 20 parts per million
- 8-hour = 9 parts per million

The significance of localized impacts depends on whether ambient CO levels in the vicinity of the project site are above state and federal CO standards. Carbon monoxide concentrations in Los Angeles no longer exceed either the CAAQS or the NAAQS criteria. Additionally, the SCAB region is designated as attainment under the 1-hour and 8-hour standards (see **Table IV.3-3**).

Localized Significance Thresholds

In addition to regional emissions and the CO hotspot analysis, the SCAQMD has developed a set of mass emissions rate look-up tables that can be used to evaluate localized impacts that may result from construction and operational-period emissions called localized significance thresholds (LSTs). If the on-site emissions from proposed construction activities are below the emission levels found in the LST mass rate look-up tables for the project site receptor area (SRA), then emissions would not have the potential to cause a significant localized air quality impact. When quantifying mass emissions for LST analysis, only emissions that occur on site are considered. Consistent with SCAQMD LST guidance, emissions from offsite delivery hauling trucks, or employee trips are not considered in the evaluation of localized impacts (SCAQMD 2008).

The proposed project site lies within SCAQMD SRA 1 and the proposed project site is approximately 0.35-acres. Therefore, **Table IV.3-7, Local Significance Thresholds – Pounds per Day,** shows the LST screening threshold for a 1-acre project site in SRA 1 with sensitive receptors located approximately 25 meters of the proposed project site.

Table IV.3-7
Local Significance Thresholds – Pounds per Day

Phase	Nitrogen Oxide (NO_x)	Carbon Monoxide (CO)	Coarse Particulate Matter (PM10)	Fine Particulate Matter (PM2.5)
Construction	74	680	5	3
Operation	74	680	2	1

Source: SCAQMD. 2009. Appendix C Mass Rate Look Up Table. Available at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2.

Methodology

Air quality impacts were evaluated in accordance with the methodologies recommended by CARB and the SCAQMD. Where criteria air pollutant quantification was required, emissions modeled using the California Emissions Estimator Model version 2020.4.0 (CalEEMod). CalEEMod is a statewide land use emissions computer model designed to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	☐	☐	☒	☐

a. Conflict with or obstruct implementation of any applicable air quality plan?

No Impact. As part of its enforcement responsibilities, the EPA requires each state with nonattainment areas to prepare and submit a SIP that demonstrates the means to attain the

federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under state law, the CCAA requires an air quality attainment plan to be prepared for areas designated as nonattainment with regard to the federal and state ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

SCAQMD drafted the 2016 AQMP[31] As described above, the 2016 AQMP was developed in effort with CARB, SCAG, and the U.S. EPA to establish a program of rules and regulations to reduce air pollutant emissions to achieves CAAQS and NAAQS. The plan's pollutant control strategies are based on SCAG's 2016 RTP/SCS. While SCAG adopted the updated Connect SoCal 2020-2045 RTP/SCS in September 2020, it has not been incorporated into an applicable air quality plan.

Criteria for determining consistency with the AQMP are defined in Chapter 12, § 12.2 and § 12.3 of the SCAQMD's 1993 CEQA Air Quality Handbook, and include the following:

- Consistency Criterion No. 1: The project will not result in an increase in the frequency or severity of an existing air quality violation, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

- Consistency Criterion No. 2: The project will not exceed the assumptions in the AQMP or increments based on the years of the project build-out phase.

The violations to which Consistency Criterion No. 1 refers are the CAAQS and the NAAQS. As evaluated under Impact 2 below, the project would not exceed the short-term construction standards or long-term operational standards and in so doing would not violate any air quality standards (see **Table IV.3-8** and **Table IV.3-9**). As such, no significant impact would occur, and the Proposed Project would be consistent with first criterion.

Concerning Consistency Criterion No. 2, the 2016 AQMP contains air pollutant reduction strategies based on SCAG's growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. The proposed

31 South Coast Air Quality Management District. 2016. *Air Quality Management Plan*. Available online at: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf.

project would increase local population by approximately 180 residents.[32] The proposed project is consistent with the land use designation and development density prepared in the City of Los Angeles' General Plan. Therefore, the proposed project would not exceed the population or job growth projections used by the SCAMQD to develop the 2016 AQMP. Thus, no impact would occur, as the proposed project is also consistent with the second criterion.

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

Less than significant impact. A project may have a significant impact if project-related emissions would result in a cumulatively considerable net increase for an criteria pollutant for which the region in nonattainment under applicable federal or state ambient air quality standards. The cumulative analysis of air quality impacts follows the SCAQMD's guidance such that construction or operational Project emissions will be considered cumulatively considerable if Project-specific emissions exceed an applicable SCAQMD recommended daily threshold.

Regional Construction Significance Analysis

Construction associated with the Proposed Project would generate short-term emissions of criteria air pollutants.[33] The criteria pollutants of primary concern within the Proposed Project area include ozone-precursor pollutants (i.e., ROG and NOx), PM10, and PM2.5. Construction-generated emissions are short term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD's thresholds of significance.

Construction results in the temporary generation of emissions resulting from site grading and excavation, road paving, motor vehicle exhaust associated with construction equipment and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities as well as weather conditions and the appropriate application of water.

The duration of construction activities associated with the proposed project is estimated to last approximately 24 months. Construction-generated emissions associated with the

32 Estimated population based on CalEEMod modeling, refer to **Appendix B, Attachment A** .

33 California Air Resources Board. *Construction & Earthmoving Equipment*. Available online at: https://ww2.arb.ca.gov/our-work/topics/construction-earthmoving-equipment.

proposed project were calculated using the SCAQMD- and CARB-approved CalEEMod model. CalEEMod is designed to model construction and operational emissions for land use development projects. The model incorporates typical construction requirements such as construction equipment, demolition debris, and hauling trips. The assumptions used in the CalEEMod model, including construction equipment usage, the demolition of approximately 7,196 tons of the existing structure and surface pavement,[34] and grading quantity of approximately 450 cubic yards of soil export and 400 cubic yards of soil import, were based on information provided by the project applicant. In addition, the project applicant provided estimates of the construction equipment expected to be used during each phase of project construction as well as the expected usage during that phase of construction.[35] Predicted maximum daily construction-generated emissions for the Proposed Project are summarized in **Table IV.3-8, Construction-Related Criteria Pollutant and Precursor Emissions – Maximum Pounds per Day.**

During construction, the contractors are required to comply with SCAQMD Rule 402 (Nuisance) and Rule 403 (Fugitive Dust), among others, which assist in reducing short-term construction-related air pollutant emissions. Rule 402 prohibits emissions that would cause a public nuisance and Rule 403 requires fugitive dust sources to implement best available control measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. The Proposed Project would be subject to Rules 402, 403, and 113 described in the Regulatory Framework subsection above. As shown below, all criteria pollutant emissions would remain below their respective thresholds. Thus, the Proposed Project would not result in a cumulatively considerable net increase of any criteria air pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard.

34 Demolition tons based on the existing detached garage (9,945 SF) and assumes complete demolition of the warehouse/office (6,522 SF). The warehouse/office will retain its frontages that will be incorporated into the Proposed Project and, as a result, will not be entirely demolished. Therefore, our analysis presents a conservative approach. Calculations to determine demolition tonnage from the existing buildings is provided in **Appendix B, Attachment A**.

35 See **Appendix B**, **Attachment A**, for project construction assumptions.

Table IV.3-8
Construction-Related Criteria Pollutant and Precursor Emissions – Maximum Pounds per Day

Construction Year	ROG	NOx	CO	SO_2	PM10	PM2.5
2022	1.47	16.38	14.39	0.04	2.50	0.91
2023	2.42	19.45	22.32	0.05	2.40	0.87
2024	5.00	18.23	22.07	0.05	1.17	0.79
Regional Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Exceed?	*No*	*No*	*No*	*No*	*No*	*No*

*Source: Impact Sciences, CalEEMod modeling, 2021. See **Appendix B**, Attachment A.*
Note: Project emissions account for the reductions from SCAQMD Rule 403 (Fugitive Dust).

Regional Operational Significance Analysis

Proposed Project-generated emissions would be associated with motor vehicle use, energy use, and area sources, such as the use of natural-gas-fired appliances, landscape maintenance equipment, consumer cleaning products, and architectural coatings associated with the operation of a 45-unit apartment building, 6,456 square feet of common open space per LAMC, and an up to 36-space parking garage. The Proposed Project will be replacing a detached garage and warehouse with associated office space. The operational emissions from the Proposed Project and existing uses were calculated within CalEEMod and the net operational emissions were compared against SCAQMD regional thresholds to determine Project significance.

Emissions associated with vehicle travel depend on the year of analysis because emission control technology requirements are phased-in over time. Therefore, the earlier the year analyzed in the model, the higher emission rates used by CalEEMod. The earliest year the Project could possibly be constructed and fully occupied would be 2025. Emissions associated with build-out later than 2025 would be lower, because newer vehicles have to meet increasingly more stringent emissions standards, while older, more polluting, vehicles are used less.

CalEEMod allows the user to enter specific vehicle trip generation rates. The Transportation Assessment Memorandum of Understanding (MOU) prepared by Los Angeles Department of Transportation estimates that the proposed Project will generate 172 trips per day and the

existing project site generates 47 trips per day. As a result, the Project will result in a net increase of 125 trips per day.

Finally, the Project proposes a series of design features that will increase building efficiency. The model accounts for ENERGY STAR rated appliances, low-flow fixtures, and drought tolerant landscaping. The Proposed Project also plans to use non-VOC paint and adhesives as part of the design. Our model conservatively assumed that non-VOC paints and adhesives would only be used in the interior of the building and modeled the exterior with the CalEEMod default VOC assumptions for paint.

Long-term operational emissions attributable to the Project are summarized in **Table IV.3-9, Long-Term Operational Emissions – Maximum Pounds per Day**.

Table IV.3-9
Long-Term Operational Emissions – Maximum Pounds per Day

Source	ROG	NOx	CO	SO_2	PM10	PM2.5
Proposed Project Emissions						
Area Source	1.56	0.68	3.99	0.004	0.072	0.072
Energy Use	0.012	0.10	0.04	0.001	0.008	0.008
Mobile Source	0.49	0.53	4.83	0.010	1.06	0.29
Total	2.06	1.31	8.86	0.015	1.14	0.37
Existing Project Emissions						
Area	0.15	>0.001	>0.001	0.00	0.00	0.00
Energy	0.002	0.02	0.02	>0.001	0.0014	0.0013
Mobile	0.08	0.40	1.04	0.004	0.33	0.090
Total	0.23	0.42	1.07	0.004	0.33	0.10
Net Operational Emissions	1.83	0.89	7.79	0.011	0.81	0.27
Regional Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed?	No	No	No	No	No	No

*Source: Impact Sciences, CalEEMod modeling, 2021. See **Appendix B**, **Attachment A**.*

As shown in **Table IV.3-8** and **Table IV.3-9**, the Proposed Project's construction and operational emissions would not exceed the SCAQMD's thresholds for any criteria air pollutants. Therefore, regional construction and operational emissions would not result in a significant long-term regional air quality impact. According to the SCAQMD, the district uses

the same regional significance thresholds for project specific and cumulative impacts.[36] Thus, the Proposed Project would not result in a cumulatively considerable net increase of any criteria air pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard. Therefore, regional construction and operation operational emissions would not result in a significant long-term regional air quality impact and would not result in a cumulative air quality impact.

Air Quality Health Impacts

On December 24, 2018, the California Supreme Court published its opinion on the *Sierra Club et al. v. County of Fresno et. Al.* (Case No. S219783) which determined that an environmental review must adequately analyze a project's potential impacts and inform the public how its bare numbers translate to a potential adverse health impacts or explain how existing scientific constraints cannot translate the emissions numbers to the potential health impacts.

SCAB is in state non-attainment for PM2.5, PM10, and O_3 and federal non-attainment for PM2.5 and O_3. Therefore, an increase in emissions of particulate matter or ozone precursors (ROG and NOx) has the potential to push the region further from reaching attainment status and, as a result, are the pollutants of greatest concern in the region. As noted in **Table IV.3-8** and **Table IV.3-9** above, the Proposed Project will emit criteria air pollutants during construction and operation**.** However, the Proposed Project will not exceed SCAQMD thresholds for ozone precursors (ROG and NOx), PM2.5, PM10, or any other criteria air pollutants, and will not result in a cumulatively significant impact for which the region is in non-attainment. This discussion focuses on the health effects from the pollutants for which the region is in non-attainment and why it is not feasible to provide an analysis to relate the emissions of ozone precursors from an individual project to likely health consequences.

Exposure to particulate matter can affect both a person's lungs and heart and has been linked to a variety of health problems including aggravated asthma, decreased lung function, and increased respiratory symptoms. DPM is a type of particulate that is emitted from diesel engines and is estimated to cause approximately 70% of total known cancer risks related to air toxics in California.[37] As discussed below (**Air Quality Impact C**), the Proposed Project would not result in an increased health risk as a result from exposure to DPM or other TACs.

36 South Coast Air Quality Management District. 2003. *Cumulative Impacts White Paper Appendix A*. Available online at: http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf

37 California Air Resources Board. *Overview: Diesel Exhaust & Health*. Available online at: https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

Further, since the Proposed Project will not exceed SCAQMD regional thresholds for particulate matter, the Proposed Project will not result in a cumulatively significant impact to particulate matter in the region.

Exposure to O_3 can cause respiratory irritation, lung damage, aggravate asthma, and may worsen existing chronic lung diseases such as emphysema and chronic bronchitis.[38] O_3 is formed in the atmosphere when heat and sunlight cause a chemical reaction between NOx and ROG emissions. NOx and ROG are referred to as ozone precursors and affect air quality on a regional scale. Health effects related to O_3 are therefore the product of emissions generated by numerous sources throughout a region. Existing models have limited sensitivity to small changes in criteria pollutant concentrations, and, as such, translating project-generated criteria pollutants to specific health effects or additional days of nonattainment would produce meaningless results. In other words, the Proposed Project's less than significant increases in regional air pollution from criteria air pollutants would not have measurable effect on the human health implications of the Basin's ambient air quality.

The Congressional Research service prepared the *Background Ozone: Challenges in Science and Policy* report for U.S. Congress which provides a summary of the scientific capabilities of measuring ozone and understanding the needs and improvements necessary to understand contributions from background sources. While this paper specifically addresses background concentrations of ozone and ozone modeling, it demonstrates the difficulty in assessing ozone and related health implications from any single source or project. According to the Congressional Research Service, currently there are several data and analytical challenges to reliably assess background ozone concentrations and to model ozone. First, the current understanding of the amount, location, and type of pollutant emissions from many types of sources is insufficient. Therefore, inventories typically provide estimation, which may not be precise enough for apportioning contributions. Second, meteorological data (i.e., wind speed, wind direction, temperature, cloud cover, humidity, etc.) is not currently measured at a fine enough spatial scale to adequately represent relevant weather processes. Third, data on pollutant concentrations are limited, which increases the challenges of understanding ozone formation and movement. Fine spatial and temporal measurements are needed both horizontally across the surface and vertically to higher levels of the atmosphere. Finally,

38 U.S. Environmental Protection Agency. *Ozone and Your Health*. Available online at: https://www.airnow.gov/sites/default/files/2020-02/ozone-c.pdf.

background ozone source contributions change by year, season, day, and hour and from location to location.[39]

While several models and tools are available to quantify emissions, these models are limited by a number of factors in their ability to determine health impacts of individual development projects. The U.S. EPA currently performs health impact assessments (HIAs) using the Community Multiscale Air Quality (CMAQ)[40] model for pollutant transport modeling and Environmental Benefits Mapping and Analysis Program – Community Edition (BENMAP – CE) for health impact calculations.[41] However, these models are designed to estimate health impacts over a large scale (e.g., city-wide, state-wide). In addition, the CMAQ model requires inputs such as regional sources of pollutants and global meteorological data, which are not readily accessible. In general, the current suite of available models are not able to accurately model concentrations or dispersion of ozone because they are regional models unable to provide accurate results for individual projects. If reliable ozone concentrations can be determined, there is also limitation on being able to correlate concentrations to related health effects.

The SCAQMD acknowledges that quantifying the health impacts from O_3 is difficult. The *2012 Air Quality Management Plan* determines that a reduction of 432 tons (864,000 pounds) per day of NOx and a reduction of 187 tons (374,000 pounds) per day of VOC would reduce O_3 levels at the highest monitored site by only nine parts per billion.[42] Meaning, large reductions in precursor emissions translate to incremental reductions in measured ozone. Therefore, quantifying O_3 and related O_3 health impacts caused by NOx or VOC emissions from relatively small projects (defined as projects with regional scope) is limited. Thus, as the Proposed Project would not exceed SCAQMD thresholds for construction and operational air emissions (see **Table IV.3-8** and **Table IV.3-9**), it can be reasonably concluded that the Proposed Project would not have a measurable effect on the human health in the Basin's, nor would it have implications for the ambient air quality. As a result, the Proposed Project would have a less than significant impact for air quality health impacts.

39 Congressional Research Service. 2019. *Background Ozone: Challenges in Science and Policy.* Available online at: https://fas.org/sgp/crs/misc/R45482.pdf.

40 U.S. Environmental Protection Agency. *CMAQ: Community Multiscale Air Modeling System*. Available online at: https://www.epa.gov/cmaq.

41 U.S. Environmental Protection Agency. *Environmental Benefits Mapping and Analysis Program – Community Edition (BenMAP – CE)*. Available online at: https://www.epa.gov/benmap.

42 South Coast Air Quality Management District. *Final 2012 AQMP*. Available online at: https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2012-air-quality-management-plan.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less than significant impact. The Proposed Project has the potential to expose nearby sensitive receptors to air toxics during construction and operation. A full discussion of the impacts is provided in the Air Quality and Greenhouse Gas Technical Study, see **Appendix B.**

Localized Significance Thresholds

Construction

The nearest sensitive receptors to the Proposed Project Site are residents of the Gilbert Hotel, located adjacent to the Proposed Project Site (see above). To identify impacts to sensitive receptors, the SCAQMD recommends addressing LSTs for construction.

LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAMQD provided the *Final Localized Significance Threshold Methodology* for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with project-specific analysis.

As detailed above, the SRA for the LST is the Central LA County area (SRA 1) since this area includes the Proposed Project Site. LSTs apply to CO, NO_2, PM10, and PM2.5. The SCAMQD produced look-up tables for projects that disturb areas less than or equal to 5 acres in size. The Proposed Project Site is approximately 0.35-acres; therefore, consistent with SCAQMD recommendations, the LST threshold for one acre was used for the construction LST analysis.

The SCAQMD's methodology states that "off-site mobile emissions from the project should not be included in the emissions compared to LSTs." Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered. The nearest sensitive receptor to the Project Site is a multi-story hotel that serves as a dormitory that is adjacent to the Project Site on the west. LST screening thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. Therefore, LSTs for receptors located at 25 meters were utilized in this analysis.

Table IV.3-10, Localized Significance of Construction Emissions – Maximum Pounds per Day, presents the Proposed Project's localized emissions during construction activity. As shown in **Table IV.3-10**, the on-site air pollutant emissions on the peak day of construction (with assumed compliance of SCAQMD Rule 403) would not exceed the applicable LST.

Therefore, the Proposed Project's localized air quality impacts would not expose sensitive receptors to substantial air pollutant concentrations. Impacts would be less than significant.

Table IV.3-10
Localized Significance of Construction Emissions – Maximum Pounds per Day

Construction Year	NOx	CO	PM10	PM2.5
2022	1.47	16.38	2.50	0.91
2023	2.42	19.45	2.40	0.87
2024	5.00	18.23	1.17	0.79
LST Screening Threshold	**74**	**680**	**5**	**3**
Exceed?	***No***	***No***	***No***	***No***

*Source: Impact Science, CalEEMod modeling, 2021. See **Appendix B, Attachment A**.*
Note: Building Construction, Paving, and Architectural Coating phases will all overlap in 2024. The on-site maximum daily emissions during each phase were added together to provide the most conservative assessment of possible emissions on the Proposed Project Site.

Localized Operational Significance Analysis

According to the SCAQMD LST methodology, LSTs would apply to the operational phase of a Proposed Project only if the project includes stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., warehouse or transfer facilities). The Project is proposing a development with 45 residential units and 6,456 square feet of common space and, therefore, does not include such land uses. Thus, due to the lack of queuing and idling emissions, no long-term localized significance threshold analysis is needed. The Proposed Project's operational LST impacts would not expose sensitive receptors to substantial air pollutant concentrations. Impacts would be less than significant.

Localized Air Quality Health Impacts

As evaluated above, the Proposed Project's air emissions would not exceed the SCAQMD's LST thresholds. Therefore, the Project would not cause or contribute to an exceedance of the most stringent applicable NAAQS or CAAQS for emissions of CO, NOx, PM10, or PM2.5. It should be noted that the ambient air quality standards are developed and represent levels at which the most susceptible persons are protected. In other words, the ambient air quality standards are purposely set in a stringent manner to protect children, elderly, and those with existing and respiratory problems. Thus, air quality health impacts would be less than significant.

Carbon Monoxide Hotspots

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels (i.e., adversely affecting residents, school children, hospital patients, the elderly, etc.).

The SCAB is designated as an attainment/maintenance area for the federal CO standards and attainment area for state standards. CO emissions have declined in recent years even as Vehicle Miles Traveled (VMT) on urban and rural roads have increased nationwide. Estimated anthropogenic CO emissions have decreased 68 percent between 1990 and 2014. In 2014, mobile sources accounted for 82 percent of the nation's total anthropogenic CO emissions.[43] Three major control programs have contributed to the reduced per-vehicle CO emissions: exhaust standards, cleaner burning fuels, and motor vehicle inspection/maintenance programs.

According to the SCAQMD CEQA Air Quality Handbook, a potential CO hotspot may occur at any location where the background CO concentration already exceeds 9.0 ppm, the CAAQS for 8-hour ozone. The SCAQMD prepared a detailed CO analysis in the *Federal Attainment Plan for Carbon Monoxide* as part of the 2003 AQMP.[44] The 2003 AQMP is the most recent AQMP that addresses CO concentrations. The CO analysis included microscale modeling of CO at the worst-case intersections in SCAB. Of these locations, the Wilshire Boulevard and Veteran Avenue intersection in Los Angeles experienced the highest CO concentration of 4.6 ppm. At the time of analysis, the Wilshire Boulevard and Veteran Avenue intersection was the most congested intersection in Los Angeles County with an average daily traffic volume of approximately 100,000 vehicles per day. As CO impacts at the Wilshire Boulevard and Veteran Avenue intersection did not exceed the 8-hour CAAQS, it can be inferred that the intersections near the Proposed Project Site, which generate fewer vehicles per day, would not create any CO hotspots. Furthermore, as previously discussed, the site is located in SRA 1, Central Los Angeles County. The monitoring station closest to the Project Site is the Los Angeles – North Main Street station, located at 1630 North Main Street approximately 6.44 miles east of the Project Site. According to data obtained from the EPA's AirData database for CO pollutants, the highest eight-hour concentration reported for the VA Hospital, West Los

43 U.S. Environmental Protection Agency. 2018. *Report on the Environment: Carbon Monoxide Emissions*. Available online at: https://cfpub.epa.gov/roe/indicator.cfm?i=10.

44 South Coast Air Quality Management District. *2003 Air Quality Management Plan*. Available online at: https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/2003-aqmp.

Angeles station in 2020 was 1.6 ppm.[45] As such, the background CO concentration in combination with the CO concentration at worst-case scenario intersection in SCAB do not exceed 9.0 ppm and a CO hotspot would not occur. Therefore, the Proposed Project's CO hotspot impacts would not expose sensitive receptors to substantial air pollutant concentrations. Impacts would be less than significant.

Diesel Particulate Matter

Project Construction

Construction would result in the generation of diesel particulate matter (DPM) emissions from the use of off-road diesel equipment required for grading and excavation, paving, and other construction activities. The amount to which the receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.

Generally, the use of diesel-powered construction equipment would be temporary and episodic. The duration of exposure would be short and exhaust from construction equipment dissipates rapidly. Current methodology for conducting health risk assessments are associated with long term exposure periods (9, 30, and 70 years). Therefore, short-term construction activities would not generate a significant health risk.

Additionally, the Project Site is approximately 0.35-acres. Generally, construction for projects contained in a site of such size to represent less than significant health risk impacts due to limitations of the off-road diesel equipment able to operate and thus a reduced amount of generated DPM, reduced amount of dust-generating ground-disturbance possible compared to larger construction sites, and reduced duration of construction activities compared to the development of larger sites. Furthermore, construction would be subject to and would comply with California regulations limiting the idling of heavy-duty construction equipment to no more than 5-minutes, which would further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions.[46] For these reasons, DPM generated by construction activities,

45 U.S. Environmental Protection Agency. 2018. *Monitor Values Report*. Available online at: https://www.epa.gov/outdoor-air-quality-data/monitor-values-report.

46 California Air Resources Board. 2015. *Frequently Asked Questions Regulation for In-Use Off-Road Diesel-Fueled (Off-Road Regulation)*. Available online at: https://ww3.arb.ca.gov/msprog/ordiesel/faq/idlepolicyfaq.pdf.

in and of itself, would not be expected to expose sensitive receptors to substantial amounts of air toxics and the Proposed Project would have a less than significant impact.

Project Operation

The greatest potential during long-term operations for exposure to TACs is from the use of heavy-duty diesel trucks and stationary generators that use diesel fuel.[47] The Proposed Project is a 45-unit residential development with 6,456 square feet of common open space. Once operational, the majority of vehicle trips to the Project Site would be from residents and, as a result, the Proposed Project would attract very few diesel truck trips. Additionally, the Project does not propose any stationary generators on-site. Furthermore, the existing uses at the Project Site include a commercial building that attracts vehicle trips from workers. The Proposed Project would replace these land uses and emission sources from the Project Site. For these reasons, once operational, the Proposed Project would not be expected to expose nearby sensitive receptors to substantial amounts of air toxics and the Project would have a less than significant impact.

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than significant impact. The SCAQMD *CEQA Air Quality Handbook* (1993) identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. Once operational, the Proposed Project will serve as a residential development with minor office uses. The Proposed Project would not include any of the land uses that have been identified by the SCAQMD as odor sources.

Construction activities associated with the Proposed Project may generate detectable odors from heavy-duty equipment exhaust and architectural coatings. However, construction-related odors would be short-term in nature and cease upon Proposed Project completion. In addition, the Proposed Project would be required to comply with the California Code of Regulations, Title 13, §s 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. This would reduce the detectable odors from heavy-duty equipment exhaust. The Proposed Project would also be required to comply with the SCAQMD Rule 1113 –

47 California Air Resources Board. *Overview: Diesel Exhaust & Health*. Available online at: https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

Architectural Coating, which would minimize odor impacts from ROG emissions during architectural coating. Any odor impacts to existing adjacent land uses would be short-term and not substantial. As such, the Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant.

4. Biological Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

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

No Impact. The City of Los Angeles is rich in natural habitats including wetland habitat, mountains, and beaches, with an abundance of biological diversity within those habitats. The California Department of Fish and Wildlife has a database in which it provides information for communities across the State that have conservation plans which it is a signature to. However, the Proposed Project is located within a developed urban area, and there are no known unique, rare, or endangered plant or animal species or habitats on or near the site. Moreover, the Hollywood community is not within an identified Natural Community Conservation or Habitat Plan.[48] Therefore, there would be no impacts to local or regional plans.

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

No Impact. The Project Site has been previously developed within an urbanized setting. According to the California Department of Fish and Wildlife's data, no riparian or other sensitive natural community are located on or adjacent to the Project site.[49] The Project Site is also not located within a significant ecological area as determined by the City or County of Los Angeles.[50] Therefore, no impacts would occur.

48 California Department of Fish and Wildlife, Natural Community Conservation Plans/Habitat Conservation Plans. Available online at: https://wildlife.ca.gov/conservation/planning/nccp/plans, accessed March 18, 2021.

49 California Department of Fish and Wildlife, Lands Interactive Map. Available online at: https://apps.wildlife.ca.gov/lands/, accessed March 18, 2021.

50 City of Los Angeles General Plan. 2001. *Conservation Element*. Available online at: https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf.

c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. Drainage courses with definable bed and bank and their adjacent wetlands are "waters of the United States" and fall under the jurisdiction of the U.S. Army Corps of Engineers (USACE) in accordance with Section 404 of the Clean Water Act. Jurisdictional wetlands, as defined by the USACE are lands that, during normal conditions, possess hydric soils, are dominated by wetland vegetation, and are inundated with water for a portion of the growing season.

The Project is located in a developed urban area, and there is no naturally occurring wetland habitat near the Site. The Project Site does not include any discernable drainage courses, inundated areas, wetland vegetation, or hydric soils, and thus does not include USACE jurisdictional drainages or wetlands. Therefore, the Proposed Project would have no impact to federally protected wetlands as defined by Section 404 of the Clean Water Act.

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

No Impact. The Project is located in a fully developed urban community. No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located on the Project Site or in the surrounding area. There are currently no trees/vegetation on the Project Site. Given the urban landscape and lack of vegetation, the Project Site is not located in an area known for migratory bird movement;[51] and there would be no impacts to native resident or migratory fish or wildlife species. However, the addition of new trees as part of the proposed development would potentially enhance migratory movement.

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

No Impact. The City's Protected Tree Ordinance No. 177,404 (Chapter IV, Article 6 of the LAMC), lists protected trees as:

- Native species of oak (*Quercus* sp., except scrub oak [*Q. berberidifolia*]),
- Southern California black walnut (*Juglans californica*),
- California bay laurel (*Umbellularia californica*) and
- western sycamore (*Platanus racemosa*)

51 National Audubon Society, Spring Migration in California. Available online at: https://ca.audubon.org/news/spring-migration-california, accessed March 30, 2021.

Protected trees are also defined as at least four inches in diameter (cumulative for multi-trunked trees) at 4.5 feet above the ground level at the base of the tree ("diameter-at-breast height," or DBH).

On December 11, 2020, the City adopted Ordinance No. 186,873, extending protection status to include two native shrub species:

- Mexican Elderberry (*Sambucus mexicana*) and
- Toyon (*Heteromeles arbutifolia*)

and amended provisions of Sections 12.21, 17.02, 17.05, 17.06, 17.51, 46.00, 46.01, 46.02, 46.03, 46.04, and 46.06 of the Los Angeles Municipal Code (LAMC).

As previously discussed, there are currently no trees or shrubs on the Project Site. As such the Proposed Project would not conflict with any local policies or ordinances protecting biological resources and there would be no impact.

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

No Impact. The Project Site is not located in any local, regional, or State mapped conservation area nor is it part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.[52] Therefore, no impacts would occur.

52 City of Los Angeles Significant Ecological and Coastal Resource Areas Policy Map, and CDFW, "NCCP Plan Summaries," Available online at: https://www.wildlife.ca.gov/conservation/planning/nccp/plans, accessed March 18, 2021.

5. Cultural Resources

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☒	☐	☐
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c)	Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

a. Cause a substantial adverse change in the significance of a historical resource pursuant to *CEQA Guidelines* Section 15064.5?

Less Than Significant Impact with Mitigation Incorporated. Section 15064.5(b) of the *CEQA Guidelines* states that a project would have a significant impact on historic resources if it would result in a substantial adverse change in the significance of a historic resource. Section 15064.5(a) of the *CEQA Guidelines* defines a historic resource as: 1) listed in, or determined to be eligible for listing, in the California Register of Historical Resources (CRHR); 2) included in a local register of historical resources; or 3) identified as significant in an historical resources survey. Any object, building, structure, site, area, place, record, or manuscript may be historically significant if the resource meets the criteria for listing on the CRHR.[53] The CRHR automatically includes all properties listed in or formally determined to be eligible for listing the National Register of Historic Places (NRHP).

To be eligible for listing in the NRHP, a property must be at least 50 years of age (unless it is of "exceptional importance") and be significant in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:

1. Associated with events that have made a significant contribution to American history;

2. Associated with the historical significant persons;

53 *CEQA Guidelines* §15064.5(a)(3).

3. Embody distinctive characteristics of a type, period, or method of construction/work of a master; possess high artistic values; or represent a significant and distinguishable entity; or

4. Yield information important in prehistory or history.

To be eligible for listing in the CRHR, a property generally must be at least 50 years of age and be significant at the local, state, or national level under one or more of the following four criteria:

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history in California or the United States;

2. Associated with the lives of persons important to local, California, or national history;

3. Embody the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or

4. Yielded information important in the prehistory or history of the local area, California, or the country.

The CRHR consists of properties that are listed automatically as well as those that must be nominated through an application and public hearing process.

The Proposed Project consists of the demolition of an existing 1-story storage building originally built as a garage for the Gilbert Hotel located at 1550 North Wilcox Avenue, and the partial demolition (with the retention and refurbishment of the front third) of an existing 1-story brick building originally constructed as an automotive garage (the Baker Garage building) located at 6422 Selma Avenue, to allow for the redevelopment the site with a 15-story, 45-unit residential building. These properties are not currently listed in the CRHR; they are not California Points of Historical Interest or California State Historical Landmarks. They are also not currently listed on the NRHP. The property at 6422 Selma Avenue (Baker Garage) was recorded as part of the historic resources survey of the Hollywood Redevelopment Project Area, completed by the Architectural Resources Group, GPA Consulting, and the Historic Resources Group in 2020 (2020 Survey). In the 2020 Survey results, the Baker Garage was recognized as the only commercial building remaining from pre-annexation Hollywood. This was based on the assessor's office date of 1909, but further research has confirmed that the building was constructed in 1912, after the 1910 annexation. The storage building located

within the Project area was built as the parking garage for the Gilbert Hotel in 1925, concurrent with the hotel. The 2020 Survey included the Gilbert Hotel sign but recommended the hotel building was not eligible due to alterations.

A Historic Resources Assessment Report (HRAR), prepared by ASM Affiliates (ASM) in August 2021 and included as **Appendix C** to this SCEA, further evaluated the buildings at 6422 Selma Avenue (Baker Garage) and 1550 North Wilcox Avenue (the Gilbert Hotel and affiliated Garage) for their eligibility for designation within a local-level context on the local and state registers as individual resources, and as potential contributors to a historic district or Historic Preservation Overlay Zone (HPOZ), in accordance with CEQA, the City of Los Angeles Register of Historic-Cultural Monuments (HCM), and CRHR guidelines.

In their evaluation of the Baker Garage, ASM considered whether the building is a good representation of two historic contexts: Pre-Consolidation Communities of Los Angeles, 1850-1932, and Commercial Development and the Automobile, 1910-1970. Since further research revealed that the building was constructed after the annexation of Hollywood, the pre-consolidation context is not applicable. However, the building was associated with automobiles from its initial construction until its conversion to offices in 1986. Although there have been some interior renovations, the building retains overall integrity, including high integrity of location, design, materials, workmanship, feeling, and association; there has been some loss of integrity of setting. As such, it is a rare example of this building type as well as a good representation of the theme of Commercial Development and the Automobile in Hollywood. Therefore, 6422 Selma Avenue is recommended eligible as an individual resource under CRHR/HCM criteria 1 and 3 listed above.

The storage building was originally built as a garage for the Gilbert Hotel constructed in 1925 at 1550 North Wilcox Avenue. Although the Hotel was previously evaluated and given a status code of 5S2,[54] recent surveys of Hollywood have indicated only the sign is eligible. Because it is not visible from the public right-of-way, the garage building was not included in any previous surveys of Hollywood. ASM evaluated the Gilbert Garage as an ancillary structure to the Hotel under the contexts Commercial Development, 1850-1980 and theme Hotels, 1880-1980 and Architecture and Engineering, 1850-1980 theme Mediterranean and Indigenous Revival Architecture, 1887-1952, Sub-theme Spanish Colonial Revival 1915-1942. Because of extensive alterations, the Hotel has lost character defining features and integrity to the point

54 California Historical Resource Status Code 5S2: Individual property that is eligible for local listing or designation. Listing available at https://ohp.parks.ca.gov/pages/1069/files/Resource-Status-Codes.pdf, accessed September 16, 2021.

where it no longer reflects these contexts and therefore the Gilbert Hotel, and its ancillary garage, are not eligible as an individual resource under any CRHR or HCM criteria.

As previously discussed, as a result of ASM's evaluation, the Baker Garage at 6422 Selma Avenue is recommended eligible for the CRHR and local register and therefore is a historical resource for the purposes of CEQA. CEQA Section 21084.1 states that significant impacts may occur if "a project may cause a substantial adverse change in the significance to a historic resource." *CEQA Guidelines* Section 15064.5(b)(1) defines a substantial adverse change as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired."

According to Section 15064.5(b)(2)(A), "the significance of a historic resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a lead agency for purposes of CEQA." Projects that are found to be in conformance with the Secretary of the Interior's (SOI) Standards for the Treatment of Historic Properties (Standards) will not result in a substantial adverse change in the significance of a historical resource.

ASM reviewed the proposed plans for the alteration of the garage and new construction to assess whether the design of the Project is in accordance with the Standards.

Secretary of Interior's Standards

The Standards were codified in 1995 (36 CFR Part 68) to establish professional standards that apply to all proposed development grant-in-aid projects assisted through the National Historic Preservation Fund and serve as general guidance for work on any other historic building (Weeks et al. 2001). Of the four preservation approaches in the Standards, Rehabilitation is appropriate approach for the subject Project. Approach. The 10 Standards for Rehabilitation are:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.

2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.

4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.

5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.

6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The garage at 6422 Selma Avenue would be incorporated into the first floor of the new residential project and become the entrance for pedestrian and vehicular traffic. The first third of the north (primary) and west façades of the garage would be retained and braced during construction to prevent damage to the brick walls and features. Additionally, most of the east façade would be retained. The south (rear) and portions of the west facades would be demolished resulting in 33% of the original brick walls removed, with 63% remaining in place and 4% removed and rebuilt in the original location. One-third of the wood trusses (four) would

be retained in place. An additional four trusses would be removed during construction and reinstalled in their original locations. Two of the original trusses would be preserved and reinstalled in different locations and one truss would be removed. The current roof is not original, but 35 percent of this material would remain in place. The rest of the roof would either be removed (26 percent) or reconstructed (39 percent) and sheathed in sheet metal to differentiate it from the current roof. For the north, east, and partial west wall that would be retained, damaged brick would be repaired or, if beyond repair, replaced in-kind. On portions of the new north wall surrounding the entrance to the new lobby, a layer of brick veneer would be applied using brick salvaged from the portions of the original walls to be demolished. A brick-veneer header would be installed above the lobby opening and the brick-veneer wall would extend west of the lobby to the control room. The first third of the garage's interior space would be returned to its original use for automobile parking.

The openings of the north façade would be altered to more closely reflect their original uses. The east bay was probably a window originally although photographic evidence is not available. It was turned into a door in the 1940s and further altered with the marble and glass brick at a later date. The marble and glass block would be removed, and a more appropriate glazed door and window installed. The central bay, which is currently also filled in with glass block and marble, would be returned to the vehicular entrance depicted in the only known historic photograph of the building. The west bay, which was originally a window, was converted to roll-up door. This bay would become a pedestrian entrance and restore a sense of the symmetry of the original primary façade. Additionally, the Project includes the removal of the paint on the brick surround and primary façade.

In consideration of whether the proposed alterations follow the Standards, the alterations to the garage would return the building to its original use per Standard 1 but would result in more than "minimal changes to its distinctive materials, features, spaces, and spatial relationships." Per Standard 2, some of the "historic character of the property will be retained and preserved;" whereas the removal of the south and west walls and the roof constitutes removal of distinctive materials and alterations of spatial arrangements that characterize the garage. Similarly, only some of the "distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved" per Standard 5. Per Standard 6, deteriorated brick would be repaired rather than replaced and the gentlest means possible would be used to clean and treat the brick per Standard 7.

Standard 9 states that new construction should be designed in a way that is compatible with the historic building in terms of design, materials, features, size, scale and proportion, and

massing, as well as relationship of solids to voids, color, and texture. The design may be contemporary or reference historic style/design motifs; however, the new construction should be designed in a manner that it is clearly differentiated from the historic building.[55] Furthermore, new additions and adjacent or related new construction should be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired (Standard 10). As new "related construction" the 15-story building is differentiated from the garage while attempting to be compatible with the materials of the historic property. Additionally, the new construction is set back on the parcel to the point where the scale and massing of the garage would not be impacted from the street-level/pedestrian view. Because the new construction would be integrated with the original building, it would not be unimpaired if removed in the future and does not comply fully with this standard.

Although the new construction and parts of the proposed renovation for the garage conform with many of the Standards, the loss of some of the materials, features, character, and spatial relationships of the historic building means the Project does not fully comply with Standards. Therefore, the proposed Found Residences Project would result in an adverse change in the significance of a historical resource and significant impacts pursuant to CEQA Section 21084.1.

As proposed, the Project does not fully comply with the Standards. According to Section 15126.4 of *CEQA Guidelines*, feasible measures should be considered that minimize the significant impacts to the building at 6422 Selma Avenue. Project redesign is always the preferred option to minimize adverse impacts. Through consultation with the client and architect, several versions of the Project were created to retain more of the original building's materials and features. However, as analyzed in Section 6 of the HRAR, the proposed design would still result in a significant impact.

However, with the implementation of mitigation measures **MM CUL-1** through **MM CUL-4** adverse impacts to the historical resource would be reduced to less than significant, pursuant to PRC Code § 21081.6.

MM CUL-1 Prior to any demolition or construction activity, the garage at 6422 Selma Avenue will be documented to Historic American Buildings Survey (HABS) Level 2 standards, according to the outline format described in the Historic

55 Weeks, Kay, et al, 2001. Secretary of the Interior's Standards for the Treatment of Historic Properties; NPS online publication: http://www.nps.gov/hps/tps/standguide/. Accessed May 2021.

American Building Survey Guidelines for Preparing Written Historical Descriptive Data. Photographic documentation should follow the Photographic Specification–Historic American Building Survey, including 10-15 archival quality, large-format photographs of the exterior and interior of the building and its architectural elements. Construction techniques and architectural details should be documented, especially noting the measurements, hardware, and other features that tie architectural elements to a specific date. If original architectural plans are located, they should be archivally reproduced, following HABS standards. Three copies of the HABS documentation package, with one copy including original photo negatives, will be produced, with at least one copy placed in an archive or history collection accessible to the general public.

MM CUL-2 Additional review of the project by Los Angeles City Planning's Office of Historic Resources (OHR) will only be required if, during construction, more than 10 percent of the materials currently proposed for retention cannot be retained as planned. For example, if after removal and storage of the wooden trusses it is discovered that 5 percent more of the wood must be replaced prior to reinstallation, no additional review will be required and the wood elements of the truss that require replacement will be made in-kind. However, if 15 percent more of the brick walls must be removed than is currently planned (33 percent), subsequent review of the construction plans would be required by OHR.

MM CUL-3 Develop at least two interpretative signs or murals that would communicate the significance of the garage at 6422 Selma Avenue to the Hollywood community. This could consist of a permanent interpretive exhibit that would incorporate information from historic photographs, HABS documentation, or other materials to highlight the building's association with the automobile and the significance of the automobile to Hollywood. The interpretive signs should be developed by a team that includes a SOI-qualified historian. At least one of the signs should be located near the Selma entrance to the garage to be accessible by the general public. The second mural could be located on the interior of the garage.

MM CUL-4 Prior to the start of construction, surveys shall be performed to document the conditions of the masonry of the remaining walls at 6422 Selma Avenue as well as the Gilbert Hotel building. A structural monitoring program shall be

implemented and recorded during construction to ensure that ground borne vibration levels do not exceed 0.12 inches per second, peak particle velocity (PPV). The structural monitoring plan shall include documentation, consisting of video and/or photographic documentation of accessible and visible areas on the exterior of the buildings. A historic architect (meeting the Secretary of the Interior's Professional Qualification Standards) or structural engineer with experience with historic masonry buildings shall establish baseline structural conditions of the building and prepare the shoring design. Additionally, a qualified acoustical engineer shall be retained to review the proposed construction equipment and develop and implement a vibration monitoring program capable of documenting the construction-related ground vibration levels at the Project site during demolition and excavation phases where heavy construction equipment (e.g., large bulldozer and drill rig) would be operating within 15 feet of the affected buildings.

The vibration monitoring system shall measure and continuously store the PPV in inch/second. Vibration data shall be stored on a one-second interval. The system shall also be programmed for two preset velocity levels: a warning level of 0.07 inch/second (PPV) and a regulatory level of 0.12 inch/second (PPV). The system shall also provide real-time alert when the vibration levels exceed either of the two preset levels.

- In the event the warning level of 0.07 inch/second (PPV) is triggered, the contractor shall identify the source of vibration generation and provide steps to reduce the vibration level, including but not limited to halting/staggering concurrent activities and utilizing lower vibratory techniques.

- In the event the regulatory level of 0.12 inch/second (PPV) is triggered, the contractor shall halt the construction activities and visually inspect the Baker Garage for any damage. Results of the inspection must be logged. The contractor shall identify the source of vibration generation and provide steps to reduce the vibration level. Vibration measurement shall be made with the new construction method to verify that the vibration level is below the warning level of 0.07 inch/second (PPV). Construction activities may then restart.

- In the event damage occurs to historic finish materials due to construction vibration, such materials shall be repaired in consultation with a qualified preservation consultant.

- The structure-monitoring program shall be submitted to the City of Los Angeles Department of Building and Safety (LADBS) and received into the case file for the associated discretionary action permitting the Project prior to initiating any construction activities.

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

Less Than Significant Impact with Mitigation Incorporated. Section 15064.5 of the *State CEQA Guidelines* defines significant archaeological resources as resources which meet the criteria for historical resources, or resources which constitute unique archaeological resources.

The Project Site is located in a highly urbanized area of the City and has been previously disturbed and developed.

However, as construction of the Proposed Project would include a basement area containing a 50,000-gallon fire water storage tank, a fire pump room, and two elevator pits that would involve grading and excavation to greater depths than previously undertaken, Project-related grading and excavation activities could disturb previously unknown archaeological resources buried in site soils. In the event of an unexpected disturbance, significant impacts to archaeological resources could occur.

All development would be subject to the numerous laws and regulations, cited below that require State, and local agencies to consider the effects of a proposed project on potentially buried cultural resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies. They provide guidance concerning analytical techniques and approaches to defining compliance measures where potentially significant impacts may occur, such that in the event that archaeological resources are uncovered on the project site during grading or other construction activities, the Applicant must notify the City of Los Angeles Planning Department immediately and work must stop within a 100-foot radius until a qualified archeologist to be approved by the City, has evaluated the find. Construction activity may continue unimpeded on other portions of the project site. If the find is determined

by the qualified archeologist to be a unique archeological resource, as defined by § 21083.2 of the PRC, the site shall be treated in accordance with the provisions of § 21083.2 of the PRC. If the find is determined not to be a unique archeological resource, no further action is necessary, and construction may continue. Compliance with these protocols would reduce impacts to a less than significant level.

MM-CUL-5 Inadvertent Discovery of Archaeological Resources

- If any archaeological materials are encountered during the course of Project development, all further development activity in the vicinity of the materials shall halt and:

- The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact;

- The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource; and

- The Project Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study, or report.

- Project development activities may resume once copies of the archaeological survey, study or report are submitted to:

  SCCIC Department of Anthropology
  McCarthy Hall 477
  CSU Fullerton
  800 North State College Boulevard
  Fullerton, CA 92834

- Prior to the issuance of any building permit, the Project Applicant shall submit a letter to the case file indicating what, if any, archaeological reports

have been submitted, or a statement indicating that no material was discovered.

- A covenant and agreement binding the Project Applicant to this condition shall be recorded prior to the issuance of a grading permit.

c. Would the project disturb any human remains, including those interred outside of formal ceremonies?

Less Than Significant Impact. The Project Site is not part of a formal cemetery and is not known to have been used for disposal of historic or prehistoric human remains, and human remains are not expected to be encountered during construction of the Proposed Project. In the unlikely event that human remains are uncovered during ground-disturbing activities, there are regulatory provisions to address the handling of human remains in California Health and Safety Code § 7050.5, PRC § 5097.98, and *CEQA Guidelines* § 15064.5(e). Pursuant to these codes, in the event that human remain are discovered, it requires that disturbance of the site shall remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative, in the manner provided in § 5097.98 of the PRC. The coroner is required to make a determination within two working days of notification of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, he or she shall consult with the NAHC by telephone within 24 hours, to designate a Most Likely Descendant (MLD) who shall recommend appropriate measures to the landowner regarding the treatment of the remains. If the owner does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC. Compliance with these protocols would reduce impacts to a less than significant level.

6. Energy

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than significant. A significant impact may occur if the Project were to consume energy resources in a wasteful, inefficient, or unnecessary way during construction or operation.

Petroleum Fuel

The Proposed Project would not create an increase in enough demand such that new energy sources would be required. Construction of the Proposed Project would result in short-term consumption of petroleum-based fuels to power construction vehicles and equipment. During construction, energy would be consumed in the form of petroleum-based fuels (i.e., gasoline and diesel) used to power off-road construction vehicles and equipment on the Project Site, for construction worker travel to and from the Project Site, as well as for delivery truck trips; and to operate generators to provide temporary power for lighting and electronic equipment. Specifically, during construction, the Proposed Project is anticipated to consume approximately 8,155 gallons of gasoline and 53,268 gallons of diesel, see **Table IV.6-1, On-Road Construction Fuel Consumption** and **Table IV.6-2, Off-Road Construction Fuel Consumption**.

Table IV.6-1
On-Road Construction Fuel Consumption

Phase	Number of Trips	Number of Days	Average Commute Distance (in miles)	Fuel Usage (mpg)	Gasoline/Diesel Usage (in gallons)
Worker Trips (Gasoline)					
Demolition	18	44	10.8	24.2	354
Grading	23	10	10.8	24.2	103
Building Construction	39	433	10.8	24.2	7,536
Paving	15	12	10.8	24.2	80
Architectural Coating	8	23	10.8	24.2	82
			Total Gasoline Usage		**8,155**
Vendor Trips and Hauling Trips (Diesel)					
Demolition	712		25	5.3	3,360
Grading	106		25	5.3	500
Building Construction	866		25	5.3	4,085
			Total Diesel Usage		**7,945**

Source: Impact Sciences, 2021. See CalEEMod output files provided in the Air Quality and GHG Technical Study, ***Appendix B, Attachment A****.*
Bureau of Transportation Statistics. Average Fuel Economy by Major Vehicle Category. Available online at: https://afdc.energy.gov/data/10310.

Table IV.6-2
Off-Road Construction Fuel Consumption

Phase	Equipment Type	Units	Hours	Horse Power	Load Factor	Number of Days	Fuel Usage/HP/hr	Diesel Usage (in gallons)
Demolition	Concrete/ Industrial Saws	1	8	81	0.73	44	0.05	1,045
	Rough Terrain Forklifts	1	8	212	0.43	44	0.05	1,610
	Excavators	1	8	100	0.40	44	0.05	710
	Rubber Tired Loaders	1	8	203	0.36	44	0.05	1,290
	Signal Boards	2	8	6	0.82	44	0.05	175
	Skid Steer Loader	1	8	65	0.37	44	0.05	425
Grading	Crawler Tractors	1	8	130	0.42	10	0.05	220
	Excavators	1	8	158	0.38	10	0.05	245
	Signal Boards	4	8	6	0.82	10	0.05	60
	Skid Steer Loader	1	8	65	0.37	10	0.05	100
	Tractors/Loaders/ Backhoes	1	7	97	0.37	10	0.05	130
Building Construction	Cranes	2	8	231	0.29	433	0.05	23,210
	Excavators	1	8	158	0.38	433	0.05	10,400
	Tractors/Loaders/ Backhoes	1	6	97	0.37	433	0.05	4,665
Paving	Cement and Mortar Mixers	1	6	9	0.56	12	0.05	20
	Pavers	1	6	130	0.42	12	0.05	200
	Paving Equipment	1	8	132	0.36	12	0.05	230
	Rollers	1	7	80	0.38	12	0.05	155
	Tractors/Loaders/ Backhoes	1	8	97	0.37	12	0.05	173
Architectural Coating	Air Compressors	1	6	78	0.48	23	0.05	260
							Total Diesel Consumption	**45,323**

Source: Impact Sciences, 2021. See CalEEMod output files provided in the Air Quality and GHG Technical Study, ***Appendix B, Attachment A****. Fuel usage estimate of 0.05 gallons per horse-power-hour is from SCAQMD CEQA Air Quality Handbook, Table A9-3E.*

The additional petroleum fuel resources used during construction would not cause a significant reduction in available supplies. Further, the Proposed Project contractors would be required to adhere to CARB regulations that govern construction equipment retrofitting, repowering, or replacements of construction equipment. CARB has also adopted 5-minute limits to heavy-duty diesel trucks idling in order to reduce diesel particulate matter which would

also work to limit diesel fuel use. Compliance with CARB regulations would result in an efficient use of construction-related petroleum fuel use.

During operation, motor vehicle travel and building maintenance equipment would consume petroleum-based fuels. Fuel consumption of motor vehicles in California is regulated by the National Highway Traffic Safety Administration and EPA's Safer Affordable Fuel Efficiency (SAFE) Vehicles. The Project Site is located near the Site is served by the 2 Metro Local Line that stops at the corner of Wilcox Avenue and Sunset Boulevard approximately 0.16 miles from the Project Site and the Hollywood/Vine Station of the Metro B Line (formerly the Red Line) which would encourage the use of transit to and from the project site. Furthermore, the Proposed Project would install bicycle parking which would promote people to bike and reduce reliance on cars and would reduce petroleum demand during operation.

Natural Gas

Project construction, including demolition, grading, building construction, and painting, is not anticipated to use natural gas and, as a result, there would be no impact to natural gas resources during Project construction.

During operation, the Proposed Project is anticipated to consume a net increase of approximately 0.925 British Thermal Units per year (kBTU/year), see **Table IV.6-3, Estimated Natural Gas Use.**

Table IV.6-3
Estimated Natural Gas Use

Land Use	Size	Total Use (kBTU/year)
Proposed Project		
Residential	45 du	1.11092
Parking	up to 36 spaces	0
Total Proposed Project Natural Gas Use		**1.11092**
Existing Project		
Storage Building/Parking	9,945 sf	0
Commercial	6,500 sf	0.186011
Total Existing Project Natural Gas Use		**0.186011**
Net Natural Gas Use		**0.924909**

kBTU = 1,000 British Thermal Units' du = dwelling unit; sf = square foot
Source: Impact Sciences, 2021. See CalEEMod output files provided in the Air Quality and GHG Technical Study.

Natural gas is provided to the Project Site by Southern California Gas Company (SoCal Gas). According to SoCal Gas 2020 California Gas Report, utility-driven, statewide natural gas demand is projected to decline at an average rate of 1.0 percent a year through 2035. The decline in natural gas use can be attributed to energy efficiency programs and statewide efforts to produce lower carbon energy sources.[56] While Project operation would result in the consumption of natural gas, these statewide efforts and efficiency programs such as the Renewables Portfolio Strategy and CALGreen building standards would lead to the efficient use of natural gas. The Renewable Portfolio Strategy is a regulatory mandate to increase production of energy from renewable sources such as wind, solar, biomass, and other alternatives to fossil fuel. The CALGreen building standards set thresholds for the natural gas efficiency of water heaters, furnaces, and household cooking appliances. Therefore, at the Project-level there would be an efficient use of natural gas and result in the growing decrease in natural gas consumption.

Electricity

The Proposed Project would be constructed in accordance with all applicable laws and regulations, including state and federal laws, and building regulations pursuant to the LAMC and the LA Green Building Code. The Proposed Project would obtain energy from the Los Angeles Department of Water and Power (LADWP).

During construction of the Project, electricity would be consumed to supply and convey water for dust control and to power electric construction equipment as well as temporary lighting. Electricity use would be minor and cease upon the completion of construction.

During operation, the Proposed Project is anticipated to consume a net increase of approximately 170,344 kilo Watt-hour per year (kWh/year), see **Table IV.6-4, Estimated Project Electricity Demand**.

56 California Gas and Electric Utilities. *2020 California Gas Report*. Available online at: https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf.

Table IV.6-4
Estimated Project Electricity Demand

Land Use	Size	Total Use (kWh/year)
Proposed Project		
Residential	45 du	172,377
Parking	up to 36 spaces	82,688
Total Proposed Project Electricity Use		**255,065**
Existing Project		
Commercial	6,500 sf	84,721
Total Existing Project Electricity Use		**84,721**
Net Electricity Use		**170,344**

kWhr= kilo Watt-hour; du = dwelling unit; sf = square foot
Source: Impact Sciences, 2021. See CalEEMod output files provided in the Air Quality and GHG Technical Study, ***Appendix B, Attachment A****.*

The LADWP has a net capacity of 8,009 megawatts (MW), with the highest recorded peak being 6,502 MW.[57] Therefore, there is adequate supply capacity to service the Proposed Project. In addition, the Project is required to be in compliance with Title 24 and CALGreen Building Standards as well as LA Green Building Code. Electricity will be provided by LADWP and as a result, electrical service would be provided in accordance with the LADWP's Rules Governing Water and Electric Service.[58]

Accordingly, the Project would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation. Impacts would be less than significant.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. A significant impact may occur if a project were to conflict with a state or local plan for renewable energy or energy efficiency.

The Proposed Project would be required to comply with building regulations pursuant to the LAMC, and the LA Green Building Code. In addition, the Project would be required to comply with the 2019 CALGreen requirements and would exceed the energy standards in the California Energy Code, Part 6 of the California Building Standards Code (Title 24), and the

57 Los Angeles Department of Water and Power. *Facts and Figures*. Available online at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=idbmmh3qg_4&_afrLoop=395193534996386.

58 Los Angeles Department of Water and Power. 2008. *Rules Governing Water and Electric Service*.

LA Green Building Code, as applicable. As such, the Proposed Project would not obstruct or conflict with plans for renewable energy or energy efficiency and there would be no impact.

7. Geology and Soils

The following analysis is based on the following report, included as **Appendix D** of this SCEA:

> **Geotechnical Investigation**, Report for Geotechnical Investigation Proposed Building, 6422 Selma Avenue, Los Angeles, California, Project No. G21-003/1, conducted by Garcrest Engineering and Construction, Inc, dated May 17, 2021.

The geotechnical investigation included a site reconnaissance, field exploration, laboratory testing, engineering analysis, and the preparation of the report. The site was explored on January 21, 2021 by excavating three hollow-stem-auger borings to depths between 11½ and 41½ feet below the existing ground surface. Laboratory tests were performed on selected soil samples obtained during the investigation to determine pertinent physical and chemical soil properties. Following the completion of the drilling for Boring B-1, the boring was converted into a percolation well. The piping was removed and the borings backfilled at the completion of the testing.

Impact Analysis

In 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369(Case No. S213478) (*CBIA v. BAAQMD*)[59] held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The City's revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project physically exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. Thus, in accordance with Appendix G of the *State CEQA Guidelines* and the *CBIA v. BAAQMD* decision, the Project would have a significant impact related to geology and soils if it would result in any of the following impacts.

59 Relevant case information, including a full copy of the Decision, can be found at this link: https://ceqaportal.org/ceqacase.cfm?cq_id=1225, accessed February 22, 2022.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

Less than Significant Impact. By definition, a Holocene-active fault is one that has had surface displacement within Holocene time (about the last 11,700 years). A pre-Holocene fault has demonstrated surface displacement during Quaternary time (approximately the last 1.6 million years) but has had no known Holocene movement. Faults that have not moved in the last 1.6 million years are considered inactive.

The Site is not within a state-designated Alquist-Priolo Earthquake Fault Zone nor a City-designated Preliminary Fault Rupture Study Area[60] for surface fault rupture hazards. The closest active fault to the site is the Hollywood Fault located approximately 0.5 miles to the north. No Holocene-active or pre-Holocene faults with the potential for surface fault rupture are known to pass directly beneath the Site.[61]

The geologic review does not indicate the presence of active surface faulting within or directly adjacent to the Site. Therefore, the potential for surface rupture due to faulting occurring beneath the Site during the design life of the proposed development is considered low and impacts are considered less than significant.

ii. Strong seismic ground shaking?

Less than Significant Impact. The Project Site is located within seismically active Southern California and therefore could be subject to moderate and possibly strong ground motion due to earthquakes. The Site could be subjected to strong ground shaking in the event of an earthquake. However, this hazard is common in Southern California and the effects of ground shaking can be mitigated if the proposed structures are designed and constructed in conformance with current building codes and engineering practices.

Impacts will be reduced to a less than significant level by following all relevant California Building Code (CBC) and the City of Los Angeles Uniform Building Code (UBC) seismic standards, which require design of structures to resist the effects of earthquake motions

60 Los Angeles ZIMAS. Available online at: http://zimas.lacity.org/, accessed March 25, 2021.

61 California Geological Survey 2020b, Earthquake Zones of Required Investigation. Available online at: https://maps.conservation.ca.gov/cgs/EQZApp/app/ accessed January 10, 2022.

in accordance the American Society of Civil Engineers standards.[62,63] Furthermore, compliance with existing laws regarding the risk of loss, injury, or death, from strong seismic ground shaking would reduce potential impacts to less than significant levels.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, gradation characteristics of the subsurface soils, in-situ stress conditions, and the depth to groundwater. Liquefaction is typified by a loss of shear strength in the liquefied layers due to rapid increases in pore water pressure generated by earthquake accelerations.

The current standard of practice, as outlined in the "Recommended Procedures for Implementation of DMG Special Publication 117, Guidelines for Analyzing and Mitigating Liquefaction in California" and "Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California" requires liquefaction analysis to a depth of 50 feet below the lowest portion of the proposed structure. Liquefaction typically occurs in areas where the soils below the water table are composed of poorly consolidated, fine to medium-grained, primarily sandy soil. In addition to the requisite soil conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to induce liquefaction.

The State of California Seismic Hazard Zone Map for the Hollywood Quadrangle indicates that the Site is not located within an area designated as having a potential for liquefaction. In addition, a review of the County of Los Angeles Safety Element indicates that the Site is not located within an area identified as having a potential for liquefaction. The Site is underlain by Pleistocene age alluvial sediments that are considered stiff to hard or medium dense to very dense and are not prone to liquefaction. As such, the potential for liquefaction and associated ground deformations beneath the Site is very low and impacts would be less than significant.

62 California Building Code available at: https://up.codes/viewer/california/ibc-2018/chapter/16/structural-design#1613

63 Los Angeles Building Code available at: https://up.codes/viewer/los_angeles/ibc-2018

iv. Landslides?

Less than Significant Impact. The topography at the site is relatively level and the topography in the immediate Site vicinity slopes gently to the south-southwest. The Site is not located within a City of Los Angeles Hillside Grading Area or a Hillside Ordinance Area.[64] Also, the Site is not located within an area identified as having a potential for seismic slope instability.[65] There are no known landslides near the Site, nor is the Site in the path of any known or potential landslides. Therefore, the potential for slope stability hazards to adversely affect the Project is considered low and impacts would be less than significant.

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

Less than Significant Impact. Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion in the vicinity of the Project area include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earthmoving activities if erosion-control measures are not used.

The Project Site is located in a highly urbanized area of the City and is relatively level, with minimal rises or changes in elevation. No major slopes or bluffs are on or adjacent to the Project Site.

Construction of the Proposed Project would involve soil disturbance activities including excavation and grading that would leave soil on the Project Site exposed. Common means of soil erosion include water, wind, and being tracked off-site by vehicles. These activities could result in soil erosion. However, the Proposed Project will be subject to local and state codes and requirements for erosion control and grading during construction. Including, but not limited to, grading permits and haul route approval from the LADBS, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, on-site grading and site preparation must comply with all applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. Further, the Proposed Project will be required to comply with standard regulations, including South Coast Air Quality Management District Rule 402, which will reduce construction erosion impacts. Rule 402

64 Los Angeles ZIMAS. Available online at: http://zimas.lacity.org/, accessed March 25, 2021.

65 California Geological Survey 2020b, Earthquake Zones of Required Investigation. Available online at: https://maps.conservation.ca.gov/cgs/EQZApp/app/ accessed January 10, 2022.

requires dust suppression techniques be implemented to prevent dust and soil erosion from creating a nuisance off-site.

Additionally, the Construction General Permit (CGP) issued by the State Water Resources Control Board (SWRCB), effective July 1, 2010, regulates construction activities to minimize water pollution, including sediment. The Proposed Project will be subject to National Pollution Discharge Elimination System permitting regulations, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP). Construction contractors will be required to prepare and implement a SWPPP and associated best management practices (BMPs) in compliance with the CGP, along with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities during grading and construction. Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from project-related grading and construction activities.

Therefore, soil erosion impacts from grading and construction activities associated with construction and operation of the Proposed Project will not occur and soil erosion impacts will be less than significant.

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

Less than Significant Impact. As discussed above, the Site is not located within an 'Earthquake-Induced Landslide' zone.

Lateral spreading is a phenomenon in which surficial soil displaces along a shear zone that has formed within an underlying liquefied layer. The surficial blocks are transported downslope or in the direction of a free face, by earthquake and gravitational forces. The Site is relatively flat and does not include a free-facing slope in proximity of the Site. Therefore, the potential for lateral spreading is considered very low.

The Site is underlain by Pleistocene age alluvial sediments that are considered stiff to hard or medium dense to very dense and are not prone to liquefaction. Based on the analysis in the geotechnical report, the soils encountered at the site are considered to have a low potential for liquefaction and impacts are considered less than significant.

The Proposed Project is not located on known unstable soils or geologic units, and therefore, would not likely cause on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse. Modern engineering practices and compliance with established building standards,

including the California Building Code, would ensure the Project would not cause any significant impacts from unstable geologic units or soils. Impacts are considered less than significant.

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

Less than Significant Impact. Expansive soils experience swelling or shrinking due to moisture change as a result of cyclic wet/dry weather cycles, irrigation, landscaping, or site grading. Swelling and shrinking soils can result in differential movement of structures, including floor slabs and foundations, and site work, including hardscape, utilities, and sidewalks. Soils that exhibit shrinkage and swelling under these conditions generally consist of plastic clay.

Based on depth of the proposed subterranean levels, which would be 15 or 25 feet below the existing ground surface, including foundation depths, the proposed structure would not be prone to the effects of expansive soils.[66] Impacts are considered less than significant.

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

No Impact. The Project will be required to connect to the existing sewer system. Therefore, soil suitability for septic tanks or alternative wastewater disposal systems is not applicable in this case, and the Proposed Project would have no associated impacts.

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

Less than Significant Impact with Mitigation Incorporated. The Project Site, located in an urbanized area, has been previously disturbed by past development activities and contains an existing building and an associated storage building.

However, construction of the Proposed Project would include a basement area containing a 50,000-gallon fire water storage tank, a fire pump room, and two elevator pits that would involve grading and excavation to greater depths than previously undertaken. Project-related grading and excavation activities could disturb unknown paleontological resources buried in site soils. In the event of an unexpected disturbance, significant impacts to paleontological

66 Report for Geotechnical Investigation Proposed Building, 6422 Selma Avenue, Los Angeles, California, Project No. G21-003/1, conducted by Garcrest Engineering and Construction, Inc, dated May 17, 2021. Included as **Appendix D** to this SCEA.

resources could occur. Implementation of mitigation measure **MM-GEO-1** would mitigate any potential significant impacts.

MM-GEO-1: In the event that paleontological resources are unearthed during ground-disturbing activities, the City of Los Angeles Department of Building and Safety will be notified immediately, and all work will cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California PRC § 21083.2.

Compliance with **MM-GEO-1** would reduce impacts to a less than significant level.

8. Greenhouse Gas Emissions

The analysis provided below is primarily based on the Air Quality and Greenhouse Gas Technical Study included as **Appendix B** to this SCEA.

Setting

Global climate change refers to any significant change in climate measurements, such as temperature, precipitation, or wind, lasting for an extended period (i.e., decades or longer)[67] Climate change may result from:

- Natural factors, such as changes in the sun's intensity or slow changes in the Earth's orbit around the sun;
- Natural processes within the climate system (e.g., changes in ocean circulation, reduction in sunlight from the addition of GHG and other gases to the atmosphere from volcanic eruptions); and
- Human activities that change the atmosphere's composition (e.g., through burning fossil fuels) and the land surface (e.g., deforestation, reforestation, urbanization, desertification).

In recent decades, changes in climate have caused impacts on natural and human systems on all continents and across the oceans. Impacts are due to observed climate change, irrespective

67 US EPA Over View of Greenhouse Gases, available at: https://www.epa.gov/ghgemissions/overview-greenhouse-gases. Accessed November 15, 2021.

of its cause, indicating the sensitivity of natural and human systems to changing climate.[68] Continuing changes to the global climate system and ecosystems, and to California, are projected to include:

- Rapidly diminishing sea ice and mountain snowpack levels, thereby increasing sea levels and sea surface evaporation rates with a corresponding increase in tropospheric water vapor due to the atmosphere's ability to hold more water vapor at higher temperatures;[69]
- Rising average global sea levels primarily due to thermal expansion and the melting of glaciers, ice caps, and ice sheets;
- Changing weather patterns, including changes to precipitation, ocean salinity, and wind patterns, and more energetic aspects of extreme weather, including droughts, heavy precipitation, heat waves, extreme cold, and the intensity of tropical cyclones;
- Changing levels in snowpack, river flow and sea levels indicating that climate change is already affecting California's water resources;[70]
- Dry seasons that start earlier and end later, evoking more frequent and intense wildland fires;[71] and
- Increasing demand for electricity due to rising temperatures.[72]

The natural process through which heat is retained in the troposphere[73] is called the "greenhouse effect." Various gases in the Earth's atmosphere, classified as atmospheric greenhouse gases, play a critical role in determining the Earth's surface temperature. Solar radiation enters Earth's atmosphere as short wave radiation. It travels through the atmosphere without warming it and is absorbed by the Earth's surface. When the Earth re-emits this radiation back toward space, the radiation changes to long wave radiation. GHGs are transparent to incoming short wave solar radiation but absorb outgoing long wave radiation. As a result, radiation that otherwise would

68 Intergovernmental Panel on Climate Change. "Climate Change 2021: The Physical Science Basis." Available online at: https://www.ipcc.ch/report/sixth-assessment-report-working-group-i/. Accessed November 15, 2021.
69 Intergovernmental Panel on Climate Change. "Climate Change 2021: The Physical Science Basis." Available online at: https://www.ipcc.ch/report/sixth-assessment-report-working-group-i/. Accessed November 15, 2021
70 California Office of Environmental Health hazards, 2018 Report: Indicators of Climate Change in California, https://oehha.ca.gov/climate-change/report/2018-report-indicators-climate-change-california, accessed November 15, 2021.
71 California Office of Environmental Health hazards, 2018 Report: Indicators of Climate Change in California, https://oehha.ca.gov/climate-change/report/2018-report-indicators-climate-change-california, accessed November 15, 2021.
72 California Office of Environmental Health hazards, 2018 Report: Indicators of Climate Change in California, https://oehha.ca.gov/climate-change/report/2018-report-indicators-climate-change-california, accessed November 15, 2021.
73 The troposphere is the bottom layer of the atmosphere, which varies in height from the Earth's surface from 6- to 7-miles).

escape back into space is now retained, warming the atmosphere. This phenomenon is known as the greenhouse effect.

Greenhouse Gas Compounds

California State law defines GHGs as including the following six compounds:

- **Carbon Dioxide** (CO_2) is released to the atmosphere when solid waste, fossil fuels (oil, natural gas, and coal), and wood and wood products are burned. CO_2 emissions from motor vehicles occur during operation of vehicles and operation of air conditioning systems.

- **Methane** (CH_4) is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in solid waste landfills, raising livestock, natural gas and petroleum systems, stationary and mobile combustion, and wastewater treatment.

- **Nitrous Oxide** (N_2O) is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels. N_2O emissions from motor vehicles generally occur directly from operation of vehicles.

- **Hydrofluorocarbons** (HFCs) are one of several high global warning potential (GWP) gases that are not naturally occurring and are generated from industrial processes. HFC (refrigerant) emissions from vehicle air conditioning systems occur due to leakage, losses during recharging, or release from scrapping vehicles at end of their useful life.

- **Perfluorocarbons** (PFCs) are another high GWP gas that are not naturally occurring and are generated in a variety of industrial processes. Emissions of PFCs are generally negligible from motor vehicles.

- **Sulfur Hexafluoride** (SF_6) is another high GWP gas that is not naturally occurring and is generated in a variety of industrial processes. Emissions of SF_6 are generally negligible from motor vehicles.

Regulatory Framework

Federal

Paris Climate Agreement

The Paris Climate Agreement is an international treaty on climate change adopted on December 12, 2015. The goal of the agreement is to limit global warming to 1.5 degrees Celsius as compared to pre-industrial levels. Countries will aim to reach global peaking of GHG emissions as soon as possible to achieve a climate neutral world by mid-century. In order to achieve these reductions, the Paris Climate Agreement works on a 5-year cycle of increasingly ambitious climate action carried out by countries. Therefore, by 2020, countries were required to submit their plans for climate action, known as nationally determined contributions. Additionally, the Agreement provides a framework for financial, technical and capacity building support to those countries who need it. Developed counties will take a lead in providing financial assistance to other countries since large scale investments are required for GHG mitigation and climate adaptation.[74]

The United States joined 190 other countries in the Paris Climate Agreement under the Obama administration in September 2016.[75] Under the Trump administration, the former President announced his intention to withdraw from the Agreement in June 2017 and formally notified the United Nations in November 2019. However, the Agreement requires a year-long waiting period before a formal withdrawal will be recognized. As a result, the United States officially withdrew the Agreement in November 2020.[76] However, on January 20, 2021, President Biden accepted and rejoined the Paris Climate Agreement and the U.S. formally rejoined on February 19, 2021.[77][78]

74 United Nations. *The Paris Agreement*. Available online at https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement.

75 The White House. *President Obama: The United States Formally Entered the Paris Agreement*. Available online at: https://obamawhitehouse.archives.gov/blog/2016/09/03/president-obama-united-states-formally-enters-paris-agreement.

76 NPR. *U.S. Officially Leaving Paris Climate Agreement*. Available online at: https://www.npr.org/2020/11/03/930312701/u-s-officially-leaving-paris-climate-agreement.

77 The White House. 2021. *Paris Climate Agreement*. Available online at: https://www.whitehouse.gov/briefing-room/statements-releases/2021/01/20/paris-climate-agreement/.

78 The White House. 2021. *The United States Formally Rejoins Paris Agreement*. Available online at: https://www.state.gov/the-united-states-officially-rejoins-the-paris-agreement/.

State

Executive Order (EO) S-03-05

On June 1, 2005, Executive Order EO S-03-05 was issued by Governor Schwarzenegger in order to set statewide emissions reduction standards. The order required the state to reduce GHG emissions to 1990 levels by 2020 and reduce GHG emissions to 80% below 1990 levels by 2050. EO S-3-05 also calls for the Secretary of California Environmental Protection Agency (Cal/EPA) to be responsible for coordination of state agencies and progress reporting.

Assembly Bill (AB) 32

AB 32 (California Global Warming Solutions Act of 2006) was codified into law in 2006 and codified into law the 2020 GHG emissions targets set by EO S-03-05. AB 32 represents the first enforceable statewide program to limit GHG emissions from all major sectors with penalties for noncompliance.

Senate Bill (SB) 32

SB 32 was signed into law in 2015 and sets into law the mandated reduction targets set in EO B-30-15, which required a reduction in GHG emissions to 40% below the 1990 levels by 2030.

CARB's 2017 Final Scoping Plan

The California Air Resources Board (CARB) in collaboration with over twenty state agencies issued a Final Scoping Plan in 2017 in order to set a framework for the state to meet the overall reduction goals set in SB 32. The 2017 Scoping Plan identified key sectors of the implementation strategy, which includes improvements in low carbon energy, industry, transportation sustainability, natural and working lands, waste management, and water. Through a combination of data synthesis and modeling, CARB determined that the target statewide 2030 emissions limit is 260 MMT CO_2e, and that further commitments will need to be made to achieve an additional reduction of 50 MMT CO_2e beyond current policies and programs. Key elements of the 2017 Update include a proposed 20 percent reduction in GHG emissions from refineries and an expansion of the Cap-and-Trade program to meet the aggressive 2030 GHG emissions goal.

Regional

SCAQMD Draft Guidance Regarding Interim CEQA GHG Significance Thresholds

SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds. In its October 2008 document, the SCAQMD proposed the use of a percent emission reduction target (e.g., 30 percent) to determine significance for commercial/residential projects that emit greater than 3,000 metric tons per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where the SCAQMD is lead agency. However, SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects) and has formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds. The draft tier thresholds recommended by the SCAQMD Working Group were never authorized as guidance for GHG analyses. These recommended thresholds are over a decade old; as a result, these thresholds were not utilized in this analysis.

SCAG 2020 Connect SoCal Plan RTP/SCS

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council unanimously voted to approve and fully adopt Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS]).

Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whole collaboration can improve the quality of life for Southern Californians. In addition, Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's greenhouse gas emission reduction goals and federal CAA requirements. The plan also strives to achieve broader regional objectives, such as the preservation of natural lands, improvement of public health, increased roadway safety, support for the region's vital goods movement industries and more efficient use of resources.

City of Los Angeles Green New Deal

In 2019, the City of Los Angeles adopted the Green New Deal as a four year update to the 2015 Sustainable pLAn that accelerates the existing goals in order to secure clean air and water and a

stable climate, improve community resilience, expand access to health food and open space, and promote environmental justice. Key principles of the plan include the following:[79]

1. A commitment to the Paris Climate Agreement and to act urgently with a scientifically-driven strategy for achieving a zero carbon grid, zero carbon transportation, zero carbon buildings, zero waste, and zero wasted water.
2. A responsibility to deliver environmental justice and equity through an inclusive economy, producing results at the community level, guided by communities themselves.
3. A duty to ensure that every Angeleno has the ability to join the green economy, creating pipelines to good paying, green jobs and a just transition in a changing work environment.
4. A resolve to demonstrate the art of the possible and lead the way, walking the walk and using the City's resources – our people and our budget – to drive change.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

Methodology

GHG emissions and climate change were evaluated in accordance with Appendix G of the 2019 *CEQA Guidelines*. *CEQA Guidelines* Section 15064.4 states that, when making a determination with respect to the significance of a project's GHG emissions, a lead agency shall have discretion to determine whether to: (1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use; and/or (2) Rely on a qualitative analysis or performance-based standards. Section 15064.4 also states that a lead agency should consider the following factors when assessing the significance of the impact of GHG emissions on the environment: (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting; (2) Whether the project emissions

79 City of Los Angeles. 2019. *L.A.'s Green New Deal*. Available online at: https://plan.lamayor.org/sites/default/files/pLAn_2019_final.pdf.

exceed a threshold of significance that the lead agency determines applies to the project; and (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

GHG emissions were calculated in the same CalEEMod model used to determine the proposed project's criteria air pollutant emissions. Consistent with SCAQMD recommendations, construction emissions were amortized over a thirty-year period and added to the annual operational emissions to determine the proposed project's annual GHG emissions. Consistent with *CEQA Guidelines* Section 15064(h)(3), project significance was determined based on the proposed project's consistency with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the proposed project. CARB's 2017 Scoping Plan and SCAG's 2020 Connect SoCal Plan apply to the proposed project and are intended to reduce GHG emissions to meet the statewide targets set in Senate Bill (SB) 32. Thus, the proposed project would not have a significant effect on the environment if it is found to be consistent with CARB's 2017 Scoping Plan and SCAG's 2020 Connect SoCal Plan.

Would the project:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than Significant Impact. Both construction period and operational period activities would have the potential to generate GHG emissions.

Construction Emissions

The Proposed Project would generate GHG emissions during temporary, short-term construction activities such as demolition, site preparation and grading, running of construction equipment engines, movement of on-site heavy-duty construction vehicles, hauling of materials to and from the site, asphalt paving, and construction worker motor vehicle trips.

Through CalEEMod, Proposed Project GHG emissions throughout Project construction were calculated from off-road equipment usage, hauling vehicles, delivery, and worker trips to and from the site. The total GHG construction emissions over the approximately 24-month construction period of the Proposed Project would be approximately 974 metric tons of carbon dioxide (MT CO2e). As GHG emissions impact from construction activities would occur over

a relatively short time span, it would contribute a relatively small portion of the lifetime GHG emission impact of the Proposed Project. The total construction GHG emissions were divided by 30 to determine an annual construction emission rate to be amortized over the Proposed Project's first 30 years of operational life, consistent with CEQA analysis across the state. Amortized over a 30-year period, the Proposed Project is anticipated to emit approximately 32.47 metric tons of carbon dioxide per year (MT CO2e/year).

Operational Emissions

Operational emissions occur over the life of the Project. The Proposed Project will construct a 45-unit residential building with up to a maximum of 36 parking spaces on the site. The Proposed Project is expected to generate GHG emissions from area, energy, and mobile-source emissions as the site will generate vehicle trips from residents and employees. Area source emissions are based on the land use sizes, GHG emission factors for fuel combustion, and the global warming potential (GWP) values for the GHGs emitted. Electricity usage emissions are based on the land uses, default demand factors for the land use, GHG emission factors for the utility provider, and the GWP values of the GHGs emitted. Mobile-source GHG emissions are determined based on the Project's estimated annual VMT, which is calculated in CalEEMod based on the daily trip generation rates estimated through the City of Los Angeles Daily VMT Calculator prepared by Linscott Law and Greenspace. Waste and water emissions are derived from the anticipated water usage and wastewater generated based on the Project's proposed land uses and the associated water demand factors.

As stated above, the Project proposes a series of design features that will increase building efficiency. The model accounts for ENERGY STAR rated appliances, low-flow fixtures, and drought tolerant landscaping.

The estimated total net annual Project emissions, including operation emissions and amortized construction emissions from the Proposed Project and operational emissions from the existing site uses, are detailed in **Table IV.8-1, Proposed Project Greenhouse Gas Emissions**.

Table IV.8-1
Proposed Project Greenhouse Gas Emissions

Emissions Source	Metric Tons of Carbon Dioxide Equivalent (per year)
Amortized Construction	32.47
Area Sources	10.02
Energy Sources	102.06
Mobile Sources	171.56
Waste Sources	10.41
Water Sources	18.88
Total Proposed GHG Emissions	**345.39**
Total Existing GHG Emissions	**132.88**
Net GHG Emissions	**212.51**

Source: Impact Sciences, 2021.

As shown in **Table IV.8-1**, the Project's combined long-term net operational emissions and amortized construction emissions would be approximately 212.51 MT CO2e/year. However, Proposed Project significance is based on the Project's consistency with statewide and regional policies and plans to meet the state reduction goals set in SB 32, including CARB's 2017 Scoping Plan and SCAG's 2020 Connect SoCal RTP/SCS, see **GHG Impact B**.

b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

No Impact. The Proposed Project would have a significant impact with respect to GHG emissions and global climate change if it would substantially conflict with the provisions of § 15064.4(b) of the *State CEQA Guidelines*.

Pursuant to Appendix G of the *CEQA Guidelines*, a significant GHG impact is identified if the project could conflict with applicable GHG reduction plans, policies, or regulations. Development projects would be subject to complying with SB 32, and SCAG's Connect SoCal Plan. SB 32 is a statewide reduction goal aimed at reducing emissions to 40% below 1990 levels by 2030. CARB's 2017 Scoping Plan sets a framework for the State to meet the reduction targets of SB 32.

Consistency with the Final 2017 Scoping Plan Update

CARB issued the Final 2017 Scoping Plan Update in November 2017 and establishes emissions reduction strategies necessary to meet SB 32's 2030 reduction goals. **Table IV.8-2, Project Consistency with CARB 2017 Scoping Plan Measures** identifies the Scoping Plan policies that are applicable to the Proposed Project. As shown, the Proposed Project would be consistent with the Scoping Plan.

Table IV.8-2
Project Consistency with CARB 2017 Scoping Plan
Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
Implement SB 350 by 2030:	
• Increase the Renewables Portfolio Standard to 50 percent of retail sales by 2030 and grid reliability.	**Not Applicable.** The measure is not related to development projects but intended for energy providers.
• Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.	**Not Applicable.** This measure is directed towards policymakers, not development projects. However, the Proposed Project is required to meet CALGreen and Title 24 building standards by including measures designed to reduce energy consumption.
• Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in the IRPs to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly-owned utilities meet GHG emissions planning targets through a combination of measures as described in IRPs.	**Consistent.** The Proposed Project is required to adhere to the latest CALGreen and Title 24 building standards, which will result in a more efficient Project.
Implement Mobile Source Strategy (Cleaner Technology and Fuels):	**Not Applicable.** This measure is directed towards policymakers, not development projects.
• Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."	However, the Proposed Project is located 0.3 miles from the Hollywood/Vine B Line (Red) station. As a result, the Proposed Project will reduce VMT as a result of locating residents and job opportunities near a major transit line.
By 2019, develop pricing policies to support low-GHG transportation (e.g., low-emission vehicle zones for heavy duty, road use, parking pricing, transit discounts).	**Not Applicable.** This measure is directed towards policymakers, not development projects. However, the Proposed Project will provide housing and job opportunities near future Hollywood/Vine B Line (Red) station that will encourage transit use.

Strategy	Project Consistency
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	**Not Applicable.** This measure is directed towards CARB, CalRecycle, CDFA, SWRCB, and local air districts. However, the statewide policy goals of 75 percent of solid waste generated be source reduce, recycled, or composted by 2020 under AB 341. Since the Project will be operational after this year, the Project's waste collection service will be required to be compliant with this waste reduction.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	**Not Applicable.** This measure is directed towards policymakers, not development projects. However, the Proposed Project will be required to adhere to the latest CALGreen Building Standards and Title 24 which will reduce GHG emissions from energy use. Furthermore, the Proposed Project will be constructed near the Hollywood/Vine B Line (Red) station.
Implement SB 350 by 2030:	
• Increase the Renewables Portfolio Standard to 50 percent of retail sales by 2030 and grid reliability.	**Not Applicable.** The measure is not related to development projects but intended for energy providers. As such, the policy would not apply.
• Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.	**Not Applicable.** This measure is directed towards policymakers, not development projects. However, the Proposed Project is required to meet CALGreen building standards by including measures designed to reduce energy consumption. As such, the policy would not apply but the Project will reduce energy use,
• Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in the IRPs to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly-owned utilities meet GHG emissions planning targets through a combination of measures as described in IRPs.	**Consistent.** The Proposed Project is required to adhere to the latest CALGreen building Codes and Title 24, which will result in a more efficient project site, such as meeting certain water flow requirements in toilets, showerheads, and faucets as well as lighting standards. As such, the Project will reduce GHG emissions in the electricity sector.
Implement Mobile Source Strategy (Cleaner Technology and Fuels):	**Not Applicable.** This measure is directed towards policymakers, not development projects.
• Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."	However, the Proposed Project is located 0.25 miles from the Wilshire/La Brea D Line station that is expected to begin operations in 2023. As a result, the Proposed Project will reduce VMT as a result of locating residents and job opportunities near a major transit line. As such, while this policy would not apply, the Project would place residents and jobs near transit which will reduce VMT.

Strategy	Project Consistency
By 2019, develop pricing policies to support low-GHG transportation (e.g., low-emission vehicle zones for heavy duty, road use, parking pricing, transit discounts).	**Not Applicable.** This measure is directed towards policymakers, not development projects. However, the Proposed Project will provide housing and job opportunities near future Wilshire/La Brea D Metro Line station that will encourage transit use. As such, while this policy would not apply, the Project will encourage low GHG transportation.
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	**Not Applicable.** This measure is directed towards CARB, CalRecycle, CDFA, SWRCB, and local air districts, not development projects. However, the statewide policy goals of 75 percent of solid waste generated be source reduce, recycled, or composted by 2020 under AB 341. Since the Project will be operational after this year, the Project's waste collection service will be required to be compliant with this waste reduction. As such, while this policy would not apply to the Proposed Project, it will comply with all regulations.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	**Not Applicable.** This measure is directed towards policymakers, not development projects. However, the Proposed Project will be required to adhere to the latest CALGreen Building Standards and Title 24 which will reduce GHG emissions from energy use. Furthermore, the Proposed Project will be constructed near the future Wilshire/La Brea D Line Metro Station. As such, while this measure does not apply to the Proposed Project, it will be required to adhere to all building standards that will reduce GHG emissions across multiple sectors.

Source: Impact Sciences, 2021.
CARB. California's 2017 Climate Change Scoping Plan. Available online at: https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

Based on this evaluation, this analysis finds the Project would be consistent with all feasible and applicable strategies recommended in the 2017 Scoping Plan Update.

Consistency with SCAG's Connect SoCal Plan

At the regional level, SCAG's Connect SoCal Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) represent the region's Climate Action Plan that defines strategies for reducing GHGs. In order to assess the project's potential to conflict with the RTP/SCS, this section analyzes the Project's land use profile for consistency with those in the RTP/SCS. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's

RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals.

Table IV.8-3, **Project Consistency with SCAG's RTP/SCS,** demonstrates the Project's consistency with the Strategies set forth in the Connect SoCal Plan. The Project would also be consistent with the applicable strategies set forth in the RTP/SCS's "A Path to Greater Access, Mobility, & Sustainability" chapter. Therefore, the Project would be consistent with the GHG reduction related actions and strategies contained in Connect SoCal.

Table IV.8-3
Project Consistency with SCAG's RTP/SCS

Actions and Strategies	Consistency Analysis
Focus Growth Near Destinations & Mobility Options	
Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations	**Consistent:** The Proposed Project would construct 45 residential units near the Sunset Blvd./Wilcox Avenue bus station for Metro Bus Line 2 and the Hollywood Blvd./Wilcox Ave. bus station for Metro Bus Lines 217, 212, and 22 as well as the DASH Hollywood Clockwise Bus Line. In addition, the Project Site is located approximately 0.3 miles from the Hollywood/Vine B Line (Red) station. The Site is identified by SCAG as located within a High Quality Transit Area (HQTA).[1] As a result, by Project operation, the residents and employees will have access to a major transit stop. Moreover, the Proposed Project will include on-site secure bicycle parking that will promote active transportation.
Focus on job/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets	**Consistent:** The Proposed Project would construct residential space that will include market-rate and very low income housing opportunities approximately 0.3 miles from the Hollywood/Vine B Line (Red) station.
Plan for growth near transit investments and support implementation of first/last mile strategies	**Consistent:** The Proposed Project would construct 45 residential units near the Sunset Blvd./Wilcox Avenue bus station for Metro Bus Line 2 and the Hollywood Blvd./Wilcox Ave. bus station for Metro Bus Lines 217, 212, and 22 as well as the DASH Hollywood Clockwise Bus Line. In addition, the Project Site is located approximately 0.3 miles from the Hollywood/Vine B Line (Red) station. The Site is identified by SCAG as located within a High Quality Transit Area (HQTA).[1]

Actions and Strategies	Consistency Analysis
	Moreover, the Proposed Project will include on-site secure bicycle parking that will promote active transportation.
Focus Growth Near Destinations & Mobility Options	
Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses	**Consistent:** The Proposed Project would redevelop an existing storage building at the 1550 Wilcox Ave. site and a warehouse and office building at the 6422 Selma Ave. site in order to develop at 45 unit residential building with 6 units set aside for very low income households. The site is located near several existing bus lines (Metro Lines 2, 217, 212, and 222 and DASH Hollywood Circle Line) as well as the Hollywood/Vine B Line (Red) station. The proximity to public transit will facilitate transit use from residents and employees living or working on the site.
Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods	**Consistent:** The Proposed Project would redevelop an existing storage building at the 1550 Wilcox Ave. site and a warehouse and office building at the 6422 Selma Ave. site in order to develop at 45 unit residential building with 6 units set aside for very low income households. The site is located near several existing bus lines (Metro Lines 2, 217, 212, and 222 and DASH Hollywood Circle Line) as well as the Hollywood/Vine B Line (Red) station. The proximity to public transit will facilitate transit use from residents and employees living or working on the site.
Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations)	**Consistent:** The Proposed Project would construct 45 residential units near the Sunset Blvd./Wilcox Avenue bus station for Metro Bus Line 2 and the Hollywood Blvd./Wilcox Ave. bus station for Metro Bus Lines 217, 212, and 22 as well as the DASH Hollywood Clockwise Bus Line. In addition, the Project Site is located approximately 0.3 miles from the Hollywood/Vine B Line (Red) station. The Site is identified by SCAG as located within a High Quality Transit Area (HQTA).[1] Moreover, the Proposed Project will include on-site secure bicycle parking that will promote active transportation.
Promote Diverse Housing Crisis	
Preserve and rehabilitate affordable housing and prevent displacement	**Consistent:** The Proposed Project would redevelop an existing storage building at the 1550 Wilcox Ave. site and a warehouse and office building at the 6422 Selma Ave in order to construct 45 residential units with 6 units set aside for very low income households. As a result, the Proposed Project would not displace any affordable housing.
Identify opportunities for new workforce and affordable housing development	**Consistent:** The Proposed Project will set aside 15 percent of the residential units for very low income households.

Actions and Strategies	Consistency Analysis
Leverage Technology Innovations	
Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedications lanes, charging and parking/drop-off space	**Not Applicable:** This strategy is aimed at local government to promote shared bikes and scooters, electric vehicles, ride sharing and provide safe infrastructure such dedicated lanes, charging and parking/ drop-off space. The Proposed Project would not interfere with such policymaking.
Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	**Not Applicable:** This strategy is aimed at local government to identify ways to incorporate “micro-power grids.” The Proposed Project would not interfere with such policymaking.
Support Implementation of Sustainability Policies	
Pursue funding opportunities to support local sustainable development implementation projects that reduce GHG emissions	**Not Applicable:** While this strategy calls on local governments to adopt policies for sustainable infrastructure and development projects, the Proposed Project would not interfere with such policymaking.
Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations	**Not Applicable:** While this strategy calls on the state to adopt policies to new construction near transit corridors and stations, the Proposed Project would not interfere with such policymaking and would construct a residential development near the Hollywood/Vine Station of the Metro B Line (formerly the Red Line).
Support cities in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects	**Not Applicable:** While this strategy calls on cities to establish tax incentive or other value capture tools to finance sustainable infrastructure, the Proposed Project would not interfere with such policymaking.
Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies	**Not Applicable:** While this strategy calls on SCAG to work with local jurisdictions to identify ways to implement sustainable strategies, the Proposed Project would not interfere with such policymaking.
Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region	**Not Applicable:** While this strategy calls on planning organizations to promote resources and best practices in SCAG, the Proposed Project would not interfere with such policymaking.
Continue to support long range planning efforts by local jurisdictions	**Not Applicable:** While this strategy calls on local jurisdictions to support long range planning, the Proposed Project would not interfere with such policymaking.
Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	**Not Applicable:** While this strategy calls on local jurisdictions to provide educational opportunities on new tools and practices to promote the Sustainable Communities Strategy, the Proposed Project would not interfere with such policymaking.

Actions and Strategies	Consistency Analysis
Promote a Green Region	
Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards.	**Not Applicable:** While this strategy calls on local jurisdictions to support the development of local climate adaptation and hazard mitigation plans, the Project would not interfere with this goal.
Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.	**Not Applicable:** While this strategy calls on local governments to adopt policies for renewable energy production, the Proposed Project would not interfere with such policymaking.
Integrate local food production into the regional landscape	**Not Applicable:** While this strategy calls on local governments to integrate local food into the regional landscape, the Proposed Project would not interfere with such policymaking.
Promote more resource efficient development focused on conservation, recycling and reclamation	**Consistent.** The Proposed Project will be required to adhere to the latest CALGreen Building Codes and Title 24, which will result in a more efficient Project.
Preserve, enhance and restore regional wildlife connectivity	**Not Applicable:** The Proposed Project will be constructed in an existing urban setting. The Project would not interfere with this goal.
Reduce consumption of resource areas, including agricultural land	**Consistent**. The Proposed Project will be constructed in an existing urban setting and, as a result, will not consume any resource areas or agricultural land.
Identify ways to improve access to public park space	**Not Applicable.** While this strategy calls on local governments to improve access to public park space, the Proposed Project would not interfere with this goal.

Source: Impact Sciences, 2021.
SCAG. 2019. Connect SoCal – The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Chapter 3: A Path to Greater Access, Mobility, & Sustainability. Available online at: https://www.connectsocal.org/Documents/Draft/dConnectSoCal-03_Draft-Plan.pdf, accessed October 19, 2020.
1 SCAG. High Quality Transit Areas (HQTA) 2045 – SCAG Region. Available online at: https://gisdata-scag.opendata.arcgis.com/datasets/43e6fef395d041c09deaeb369a513ca1_1?geometry=-118.636%2C34.000%2C-118.026%2C34.199

Consistency with City of Los Angeles General Plan Air Quality Element

The Proposed Project would be consistent with the City's General Plan, specifically its Air Quality Element (see **Section IV-3**). While the Element did not explicitly address control of GHG emissions, global climate change, or resiliency objectives, it did identify several goals to reduce criteria pollutant emissions that would also work to reduce GHG emissions that contribute to climate change, see **Table IV.8-4, Consistency with the Air Quality Element.**

Table IV.8-4
Project Consistency with the Air Quality Element

Goal	Consistency Analysis
Good air quality and mobility in an environment of continued population growth and health economy.	**Consistent:** The Proposed Project would construct 45 residential units with 15 percent set aside for very low-income household. The site is located near the Hollywood/Vine Station Metro B Line (Red); the Hollywood Blvd./Wilcox Ave. Bus Station for Metro Bus Line 217, 212, and 222 and the DASH Hollywood; and the Sunset Blvd./Wilcox Ave. Bus Station for Metro Bus Line 2. The project site will also provide 39 long-term bicycle parking spots and five short-term bicycle parking spots. Therefore, by placing housing near transit and providing opportunities for alternative mobility options, the Proposed Project will help improve air quality and mobility by reducing the number of gas/diesel-fueled vehicles on the road.
Less reliance on single-occupant vehicles with fewer commute and non-work trips.	**Consistent:** The Proposed Project would construct 45 residential units with 15 percent set aside for very low-income household. The site is located near the Hollywood/Vine Station Metro B Line (Red); the Hollywood Blvd./Wilcox Ave. Bus Station for Metro Bus Line 217, 212, and 222 and the DASH Hollywood; and the Sunset Blvd./Wilcox Ave. Bus Station for Metro Bus Line 2. The project site will also provide 39 long-term bicycle parking spots and five short-term bicycle parking spots. Therefore, by placing housing near transit and providing opportunities for alternative mobility options, the Proposed Project will help improve air quality and mobility by reducing the number of gas/diesel-fueled vehicles on the road.
Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand management techniques.	**Consistent:** The Proposed Project would minimize congestion impacts in the region because of the Project Site's proximity to public transit.
Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.	**Consistent.** The Proposed Project would replace an existing warehouse and garage space with a residential infill project near public transit. The Site is identified by SCAG as located within a HQTA.[1] Therefore, the Proposed Project is within with the Element's focus on growing near transit facilities.
Energy efficiency through land use and transportation planning, the use of renewable resources and less polluting fuels, and the implementation of conservation measures including passive methods such as site orientation and free parking.	**Consistent.** The Proposed Project would replace an existing warehouse and garage space with a residential infill project near public transit that will reduce single vehicle trips to and from the project site. Furthermore, the Proposed Project will be required to be consistent with CALGreen and Title 24 standards.

Goal	Consistency Analysis
Citizen awareness of the linkages between personal behavior and air pollution, and participation in efforts to reduce air pollution.	**Not Applicable.** The goal is focused on City outreach and public education about personal behavior and its connection to air pollution. The Proposed Project would not interfere with this goal.

Source: Impact Sciences 2021.
City of Los Angeles. Air Quality Element. Available online at: https://planning.lacity.org/odocument/0ff9a9b0-0adf-49b4-8e07-0c16feea70bc/Air_Quality_Element.pdf

Consistency with City of Los Angeles Green New Deal

In 2019, the City of Los Angeles released the Green New Deal as an update to the City's 2015 Sustainable City pLAn (pLan). The City's Green New Deal is an expanded vision of the pLAn and aims to guide the City's transition to a more sustainable future. The Green New Deal sets forth a series of accelerated targets that will reduce GHG emissions. Many of these targets are not applicable at the project level, however, the Proposed Project will still further the overall goal where applicable, see **Table IV.8-5, Consistency with the City's Green New Deal**.

Table IV.8-5
Project Consistency with the City's Green New Deal

Targets	Consistency Analysis
Supply 55% renewable energy by 2025; 80% by 2036; and 100% by 2045.	**Not Applicable.** This measure is directed at energy providers to increase the amount of renewable energy created. The Proposed Project will not interfere with this target. The Proposed Project will comply with the required CALGreen and Title 24 building standards and the City of LA's Green Building Code. As part of the design, the Proposed Project will install Energy Star rated appliances, low-flow water fixtures, and drought-tolerant landscaping.
Source 70% of our water locally by 2035, and capture 150,000 acre feet per year of stormwater by 2035.	**Not Applicable.** This target is directed at water suppliers to increase the amount of local water provided. The Proposed Project would not interfere with this goal. The Proposed Project will install low-flow water fixtures and drought-tolerant landscaping to reduce local water demand.
Reduce building energy use per square foot for all types of buildings by 22% by 2035; 34% by 2035; and 44% by 2050.	**Consistent:** The Proposed Project is currently developed with a storage building and warehouse with associated office space. The storage building was constructed in 1925 and the warehouse was constructed in 1909. The Proposed Project will replace these land uses in order to construct a 45-unit residential building that will be required to adhere to the most recent building standards including CALGreen, Title 24, and the City's Green

Targets	Consistency Analysis
	Building Code. In addition, the Proposed Project will install low flow water fixtures and a drought tolerant landscape which will reduce energy use from water transport. As a result, the Proposed Project will result in a more efficient building per square foot than the existing uses.
Reduce Vehicle Miles Traveled per capita by at least 13% by 2025, 39% by 2035, and 45% by 2050.	**Consistent.** The Proposed Project would construct 45 residential units with 15 percent set aside for very low-income household. The site is located near the Hollywood/Vine Station Metro B Line (Red); the Hollywood Blvd./Wilcox Ave. Bus Station for Metro Bus Line 217, 212, and 222 and the DASH Hollywood; and the Sunset Blvd./Wilcox Ave. Bus Station for Metro Bus Line 2. The Project Site will also provide 39 long-term bicycle parking spots and five short-term bicycle parking spots. As a result, the Proposed Project will encourage active and public forms of transportation for residents, visitors, and employees which will reduce the amount of vehicle miles traveled.
Ensure 57% of new housing units are built within 1,500 feet of transit by 2035; and 75% by 2035.	**Consistent.** The Proposed Project site is located approximately 1,500 feet from the Hollywood/Vine Station Metro B Line (Red); approximately 750 feet from the Hollywood Blvd./Wilcox Ave. Bus Station for Metro Bus Line 217, 212, and 222 and the DASH Hollywood; and approximately 500 feet from the Sunset Blvd./Wilcox Ave. Bus Station for Metro Bus Line 2.
Increase the percentage of zero emission vehicles in the city by 25% by 2025; 80% by 2035; and 100% by 2050/	**Not Applicable.** This target is directed at the City of Los Angeles, not individual project. The Proposed Project would not interfere with implementation of this target.
Create 300,000 green jobs by 2035; and 400,000 by 2050	**Not Applicable.** This target is directed at the City of Los Angeles, not individual project. The Proposed Project would not interfere with implementation of this target.
Convert all city fleet vehicles to zero emission where technically feasible by 208.	**Not Applicable.** This target is directed at the City of Los Angeles, not individual project. The Proposed Project would not interfere with implementation of this target.
Reduce municipal GHG emissions 55% by 2025 and 65% by 2035 from 2008 baseline levels, reaching carbon neutral by 2045.	**Not Applicable.** This target is directed at the City of Los Angeles, not individual project. The Proposed Project would not interfere with implementation of this target.

Source: Impact Sciences, 2022.
City of Los Angeles. 2019. L.A.'s Green New Deal. Available online at: https://plan.lamayor.org/sites/default/files/pLAn_2019_final.pdf.

Conclusion

The Proposed Project would replace a commercial office building and storage building with a 45-unit residential development. The Site is located near the Hollywood/Vine Station Metro B Line (Red); the Hollywood Blvd./Wilcox Ave. Bus Station for Metro Bus Line 217, 212, and 222 and the DASH Hollywood; and the Sunset Blvd./Wilcox Ave. Bus Station for Metro Bus Line 2. As a result, future residents of the Proposed Project will have access to a major transit stop as well as multiple bus lines which will promote transit use and reduce the vehicle trips to and from the Project Site. Additionally, the Proposed Project will include on-site bicycle parking to further promote other forms of transportation. Furthermore, the Proposed Project will be constructed consistent with CALGreen Building Code and Title 24 which will reduce on-site GHG emissions from area and energy sources. Finally, the Project will include a series of design features that will increase water and energy efficiency including low-flow water fixtures, ENERGY STAR rated appliances, drought tolerant landscaping, and a high performance building envelope. For these reasons, the Proposed Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases and there would be no impact.

9. Hazards and Hazardous Materials

This section is in part based on the following reports, included as **Appendix E** of this SCEA:

- **Phase I Environmental Site Assessment**, 6422 Selma Avenue, Los Angeles, CA 90028, conducted by CBRE, Inc. Assessment and Consulting Services, September 2018.
- **Phase I Environmental Site Assessment**, 1550 North Wilcox Avenue, Los Angeles, CA 90028, conducted by IVI Assessment Services, Inc. September 2014.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

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

Less than Significant Impact. The Project does not involve the use or storage of hazardous substances other than the small amounts of pesticides, fertilizers and cleaning agents required for normal maintenance of the structure and landscaping. The Project must adhere to applicable zoning and fire regulations regarding the use and storage of any hazardous substances. A search using the California Department of Toxic Substances Control's data

management system indicated that there are no records of the site having been used for storage of hazardous materials.[80]

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

Less than Significant Impact. The Limited Phase I Environmental Site Assessments determined that there was a historic automotive garage that operated at the site from approximately 1913 through the 1980s, the Selma site was converted to commercial uses in the mid-1980s. It was also determined from the City Directories that a historic dry cleaner operated on the Wilcox site from approximately 1951 through at least 1967 but is no longer present. IVI conducted historical building permit research at the Los Angeles Department of Building and Safety concerning the former onsite dry cleaner in an effort to determine if dry cleaning was performed on-site or if this was a drop-off only establishment; however, the available historical permits reviewed contained no information regarding this former business.

A search using the California Department of Toxic Substances Control's Envirostor indicated that there are no open cases within the Project Site.[81] The Environmental Site Assessment Reports conducted by CBRE Inc., Inc. did not indicate that there are any underground storage tanks on the Project Site. Furthermore, the project does not involve hazardous materials. Therefore, there is no significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions, which could release hazardous materials.

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

No Impact. The closest schools are the Selma Street Elementary School and Hollywood High School, which are approximately 1,584 feet (0.3 miles) and 2,820 feet (0.53 miles) away, respectively. Thus, there are no schools within 0.25 miles of the Project site. Further, the project does not involve hazardous emissions or the handling of hazardous materials, substance, or waste; Therefore, the proposed project would have no hazardous material related impacts to schools.

80 Phase I Environmental Site Assessment, 6422 Selma Avenue, Los Angeles, CA 90028, conducted by CBRE, Inc. Assessment and Consulting Services, September 2018.

81 Phase I Environmental Site Assessment, 6422 Selma Avenue, Los Angeles, CA 90028, conducted by CBRE, Inc. Assessment and Consulting Services, September 2018; and Phase I Environmental Site Assessment, 1550 North Wilcox Avenue, Los Angeles, CA 90028, conducted by IVI Assessment Services, Inc. September 2014.

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

Less than Significant Impact. As previously discussed, the Limited Phase I Environmental Site Assessments determined that there was a historic automotive garage that operated at the site from approximately 1913 through the 1980s, the Selma site was converted to commercial uses in the mid-1980s. It was also determined from the City Directories that a historic dry cleaner operated on the Wilcox site from approximately 1951 through at least 1967 but is no longer present.

According to EnviroStor, there are no cleanup sites (either Federal Superfund, State Response, voluntary, school evaluation, school investigation, military evaluation, tiered permit, or corrective action), permitted sites (either operating, post-closure, or non-operating), LUFT (leaking underground fuel tanks) or SLICS (Spills, Leaks, Investigation, and Cleanup) on, in or under the Project Site.[82]

According to GeoTracker, there are no LUST sites, other cleanup sites, land disposal sites, military sites waste discharge requirement (WDR) sites, permitted UST facilities, monitoring wells, or California Department of Toxic Substance Control cleanup sites or hazardous materials permits on, in or under the Project Site.[83]

Therefore, the Site is not included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, therefore, would not create a significant hazard to the public or environment. Impacts are considered less than significant.

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

No Impact. A significant impact may occur if a project is located within two miles of a public airport, and subject to a safety hazard or within the vicinity of a private airstrip. Bob Hope

82 Phase I Environmental Site Assessment, 6422 Selma Avenue, Los Angeles, CA 90028, conducted by CBRE, Inc. Assessment and Consulting Services, September 2018; and Phase I Environmental Site Assessment, 1550 North Wilcox Avenue, Los Angeles, CA 90028, conducted by IVI Assessment Services, Inc. September 2014.

83 Phase I Environmental Site Assessment, 6422 Selma Avenue, Los Angeles, CA 90028, conducted by CBRE, Inc. Assessment and Consulting Services, September 2018; and Phase I Environmental Site Assessment, 1550 North Wilcox Avenue, Los Angeles, CA 90028, conducted by IVI Assessment Services, Inc. September 2014.

(Hollywood/Burbank Airport is approximately 7.9 miles north of the Project Site. The Project Site not located in the vicinity of a private airstrip. Therefore, no impact would occur.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. Neither the construction nor operation of the Proposed Project would require or result in modifications to any of the roadways that would impact emergency traffic. Construction of the Proposed Project could temporarily interfere with local and on-site emergency response. However, construction traffic would conform to all traffic work plan and access standards to allow adequate emergency access. Implementation of a Construction Management Plan, and compliance with access standards would reduce the potential for the impacts on haul routes, emergency response and access during construction of the Proposed Project.

In addition, the Applicant will submit a parking and driveway plan for review by the Los Angeles Fire Department (LAFD), the Bureau of Engineering (BOE) and the Los Angeles Department of Transportation (LADOT) to ensure compliance with all applicable code-required site access and circulation requirements, as well as code-required emergency access.

Therefore, demolition, construction and operation of the Proposed Project is not anticipated to significantly impair implementation of, or physically interfere with, any adopted or on-site emergency response or evacuation plans or a local, state, or federal agency's emergency evacuation plan, and the Proposed Project would have a less than significant impact with respect to interference with an adopted emergency response or evacuation plan.

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The Project Site is located in an urbanized area that does not contain any wildlands or urbanized areas intermixed with wildlands. The Project Site is not located within a designated Very High Fire Hazard Severity Zone or Fire Brush Clearance Zone.[84] In addition, the Project Site is surrounded by urban development and not adjacent to any wildlands. Therefore, the Proposed Project would not expose people or structures to a significant risk of loss, injury or death involving wild land fires, and the Project would have no associated impacts.

84 ZIMAS. LA City. Available online at: http://zimas.lacity.org/, accessed March 3, 2020.

10. Hydrology And Water Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less than Significant Impact. As part of Section 402 of the Clean Water Act, the United States Environmental Protection Agency (EPA) has established regulations under the National Pollution Discharge Elimination System (NPDES) program to control direct storm water discharges. In California, the SWRCB administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the RWQCB to preserve, protect, enhance, and restore water quality.

A project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in § 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the SWRCB. These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

As required under the NPDES, the Proposed Project would be responsible for the preparation of a Storm Water Pollution Prevention Plan (SWPPP) and implementation of BMPs to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. Implementation of SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the Proposed Project would not violate any water quality standards and discharge requirements, or otherwise substantially degrade water quality.

During the operation, the Proposed Project would be required to comply with the City of Los Angeles's Low Impact Development (LID) Ordinance (No. 181,899) that was adopted by the Los Angeles Board of Public Works on July 1, 2011 and by the Los Angeles City Council on September 27, 2011; it became effective on May 12, 2012.

The LID Ordinance applies to all development and redevelopment in the City of Los Angeles that requires a building permit. The Ordinance requires the preparation of a LID Plan and a

Standard Urban Stormwater Mitigation Plan (SUSMP) if necessary. The LID Ordinance requires projects to capture and treat the first ¾-inch of rainfall in accordance with established stormwater treatment priorities. Full compliance with the LID Plan, SUSMP, and implementation of design-related best management practices would ensure that the operation of the Proposed Project would not violate any water quality standards and discharge requirements or otherwise substantially degrade water quality. If required, any dewatering activities during construction shall comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032 National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit. The Proposed Project does not include any point-source discharge (discharge of polluted water from a single point such as a sewage-outflow pipe). Therefore, the Project would result in a less than significant impact to water quality and waste discharge during its construction and operation.

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less than Significant Impact. The Los Angeles Department of Water and Power (LADWP) is the water purveyor for the City. Water is supplied to the City from the Metropolitan Water District (MWD) (49 percent; Bay Delta 41 percent, Colorado River 8 percent), snowmelt from the Eastern Sierra Nevada Mountains via the Los Angeles Aqueduct (38 percent), local groundwater (11 percent), and recycled water (2 percent).[85] LADWP had water sales of 146 billion gallons in fiscal year (FY) 2018-19.[86] Over the last five years, groundwater, largely from the San Fernando Basin (SFB) has provided approximately 12 percent of the total water supply for Los Angeles. Groundwater levels in the City are maintained through an active process via spreading grounds and recharge basins found primarily in the San Fernando Valley.[87] The Project Site is currently developed with commercial buildings and associated parking and thus does not afford any opportunity for groundwater recharge activities.

85 Los Angeles Department of Water and Power. Facts and Figures – Water Supply Sources (5-year average) – Fiscal Year 2015-2019. Available online at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?_adf.ctrl-state=t6q7wu6ee_4&_afrLoop=1023653675697584

86 Los Angeles Department of Water and Power. Facts and Figures – Water Supply Sources (5-year average) – Fiscal Year 2015-2019. Available online at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?_adf.ctrl-state=t6q7wu6ee_4&_afrLoop=1023653675697584

87 Los Angeles Department of Water and Power. Urban Water Management Plan. 2020. Available online at: https://www.ladwp.com/cs/groups/ladwp/documents/pdf/mdaw/nzyy/~edisp/opladwpccb762836.pdf

The Project would be required to comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032, National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit. This will include submission of a Notice of Intent for coverage under the permit to the RWQCB at least 45 days prior to the start of dewatering and compliance with all applicable provisions in the permit, including water sampling, analysis, and reporting of dewatering-related discharges. Any groundwater extracted from the Project Site would need to be treated, if warranted, prior to being discharged into the sanitary sewer.

Therefore, the Proposed Project's potential impacts relating to a decrease in, or interference with groundwater supplies would be less than significant.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner, which would:

i. result in substantial erosion or siltation on-or off-site?

Less than Significant Impact. A significant impact would occur if the Proposed Project substantially altered the drainage pattern of the site or an existing stream or river, so that substantial erosion or siltation would result on- or off-site.

The Project Site is located in a highly urbanized are within the City of Los Angeles. There are no natural watercourses on the Project Site or in the vicinity of the Project Site. As stated previously, the Project Site is almost entirely covered by impervious surfaces and current stormwater runoff flows to the local storm drain system during a storm event.

The project would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction the Proposed Project. Further, the Project would be required to implement an LID Plan (during the Project's operation), which would reduce the amount of surface water runoff leaving the Project Site after a storm event. The LID Plan would require the implementation of stormwater best management practices to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period. Therefore, the Project would result in a less than significant impact in relation to surface water hydrology and would not result in substantial erosion or siltation on- or off-site.

ii. result in flooding on-or off-site?

Less than Significant Impact. The Project Site is currently developed, and the Proposed Project would not substantially change the site's drainage patterns and would not alter a discernable drainage course resulting in flooding. As discussed above, the Project would implement both a SWPPP and an LID Plan and would not substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or –off-site.

Since the Project would not involve alteration of a discernable watercourse and post-development runoff discharge rates are required to not exceed predevelopment rates, the Proposed Project would not have the potential to alter drainage patterns or increase runoff such that flooding would occur. Therefore, impacts would be less than significant.

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

Less than Significant Impact. The Project Site is generally flat and is currently occupied by existing commercial buildings. Project implementation would result in similar drainage patterns as existing conditions. As such, the amount of stormwater runoff from the Site is not expected to increase beyond current levels, and the Project is, therefore, not expected to exceed the capacity of existing or planned stormwater drainage systems.

During construction, the Applicant shall be required to implement all applicable and mandatory BMPs in accordance with the approved LID Plan and the SWPPP. When properly designed and implemented, these "good-housekeeping" practices of approving a LID plan and SWPPP are expected to reduce short-term construction-related impacts to a less than significant level.

Furthermore, the Project's operation would comply with water quality standards and wastewater discharge BMPs set forth by the City of Los Angeles, the SWRCB, and the Proposed Project's approved LID Plan. Compliance with existing regulations and the approved LID Plan would reduce the potential for the Proposed Project to exceed the capacity existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff impacts to a less than significant level.

iv. impede or redirect flood flows?

Less than Significant Impact. The drainage of surface water from the Project would be controlled by building regulations and would be directed towards the City's existing streets, storm drains, and catch basins. As discussed above, the Proposed Project would

implement both a SWPPP and an LID Plan and would not substantially increase the rate or amount of surface runoff. LID is a stormwater management strategy that seeks to mitigate the impacts of increases in runoff and stormwater pollution as close to its source as possible. LID comprises a set of site design approaches and Best Management Practices (BMPs) that promote the use of natural systems for infiltration, evapotranspiration, and use of stormwater. These LID practices can effectively remove nutrients, bacteria, and metals from stormwater while reducing the volume and intensity of stormwater flows.[88] The LID ordinance requires rainwater from a three-quarter inch rainstorm to be captured, infiltrated and/or used onsite at most developments and redevelopments where more than 500 square feet of hardscape is added.[89] As such, the Project would not impede or redirect flood flows and impacts are considered less than significant.

d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. The Project Site is not located within a coastal area, and no water bodies are on or adjacent to the Project Site that would impact future projects due to a seiche. The Project Site is not within a tsunami hazard area as mapped by the California Department of Conservation.[90] The Site is within an area of minimal flooding (Zone X) as defined by the Federal Emergency Management Agency.[91] Therefore, there would be no impact from of the release of pollutants due to inundation.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. As discussed above, the Proposed Project would be responsible for the preparation of a Storm Water Pollution Prevention Plan (SWPPP) and implementation of BMPs to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. Implementation of SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the

88 LA Sanitation. About LID. Available at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-wp/s-lsh-wwd-wp-lid/s-lsh-wwd-wp-lid-al?_adf.ctrl-state=1ctki2y16y_5&_afrLoop=13168358763091974#!

89 LA Sanitation. Low Impact Development 2 Sided Brochure. Available at: https://www.lacitysan.org/cs/groups/sg_sw/documents/document/y250/mde3/~edisp/cnt017123.pdf

90 California Department of Conservation. Tsunami Inundation Map. Available online at: https://www.conservation.ca.gov/cgs/tsunami/maps

91 Los Angeles County Department of Public Works. Flood Zone Determination Website. Available online at: https://pw.lacounty.gov/floodzone/

Proposed Project would not violate any water quality standards and discharge requirements, or otherwise substantially degrade water quality.

Therefore, the Project would comply with applicable water quality control plans. Additionally, the Project Site would be constructed on a site previously developed and would not substantially increase the amount of impervious surface. Therefore, implementation of the Proposed Project would not conflict with or obstruct implementation of any other water quality control plans or sustainable groundwater management plans, and there would be no impact.

11. Land Use and Planning

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

a. Physically divide an established community?

No Impact. A significant impact may occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community.

The Project would not physically divide an existing community, as the site is surrounded by existing residential and commercial development on all sides. The Project would be built on a site that already includes commercial development. Therefore, the Site is surrounded by similar development on all sides. No impact would result.

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less than Significant Impact. A significant impact may occur if a project is inconsistent with applicable land use plans or zoning designations and would cause adverse environmental effects, which these regulations are designed to avoid or mitigate.

The legal standard that governs consistency determinations is that a project must only be in "harmony" with the applicable land use plan to be consistent with that plan. (See Sequoyah Hills Homeowners Assn. v. City of Oakland (1993) 23 Cal.App.4th 704, 717-18 [upholding a city's determination that a subdivision project was consistent with the applicable general plan]). As the Court explained in Sequoyah, "state law does not require an exact match between a proposed subdivision and the applicable general plan." To be "consistent" with the general plan, a project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning, the project must be "in agreement or harmony with the applicable plan." (see also Greenebaum v. City of Los Angeles (1984) 153 Cal.App.3d 391, 406; San Franciscans Upholding the Downtown Plan, supra, 102 Cal.App.4th at p. 678.) Further, "[a]n action, program, or project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment." (Friends of Lagoon Valley v. City of Vacaville (2007) 154 Cal.App.4th 807, 817.) Courts also recognize that general plans "ordinarily do not state specific mandates or prohibitions," but instead provide "policies and set forth goals." (Friends of Lagoon Valley).

The following is a list of applicable land use plans, policies, and regulations:

- SCAG Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy)
- City of Los Angeles General Plan
- Hollywood Community Plan
- ZI-2452 Transit Priority Area in the City of Los Angeles
- Los Angeles Municipal Code

The Proposed Project is seeking the following discretionary approvals (collectively referred to as Project Entitlements):

- **Density Bonus,** pursuant to LAMC Section 12.22.A 25, for a project with 45 dwelling units including six (6) units (15%) for Very Low Income Households for a period of 55 years with

the following Incentives:

- **Additional Incentives – On-Menu**

  - **Yard/Setback**. A reduction in the required rear yard setback to allow eighteen feet and 5½ inches (18'-5½") in lieu of the 20-feet feet required for a fifteen-story building in C4-2D zone.

  - **Open Space.** A 19% reduction in the required open space to permit 6,456 square feet of common open space in lieu of the required 7,785 square feet.

- **Additional Incentives – Off-Menu**

  - **Floor Area Ratio.** An increase in Floor Area Ratio (FAR) to 4.5:1 in lieu of the permitted base FAR of 3.0:1 (pursuant to Ordinance No. 165,660), as permitted by LAMC 12.22.A.25(f)(4)(ii) to permit a total maximum Floor Area of 67,599 sq. ft.; and

- **Waiver of Development Standards**

  - **Yard/Setback.** A reduction in the required northly side yard setback to allow zero (0) feet in lieu of the seventeen (17) feet otherwise required for a fifteen-story building in C4-2D zone,

  - **Yard/Setback.** A reduction in the required westerly side yard setback, to allow zero (0) feet in lieu of the seventeen (17) feet otherwise required for a fifteen-story building in C4-2D zone.

  - **Yard/Setback.** A reduction in the required easterly side yard setback, to allow zero (0) feet in lieu of the sixteen (16) feet otherwise required for a fifteen-story building in C4-2D zone.

  - **Drive Aisle Reduction.** A reduction in drive aisle width to twenty-three feet and 5 inches (23'-5") in lieu of the required twenty-seven feet four inches (27'-4") feet, and the corresponding elimination of the 10" column clearance required for a reduced drive-aisle, as required by LAMC 12.21.A.5.

- Adoption of a **Sustainable Communities Environmental Assessment** (SCEA)**,** pursuant to SB 375, for a project within a High-Quality Transit Corridor.

- A **Hollywood Redevelopment Project Area (RPA)** administrative clearance.

- A **Lot Line Adjustment** (related case, currently filed under Case No. AA-2019-476-PMEX).[92]

The Proposed Project Entitlements would not change the Project Site's General Plan land use designation of Regional Center Commercial, or C4-2D zoning. Further, as discussed below, the Project would be substantially consistent with all of the applicable plans, policies, and regulations contained in regional and local plans. While the policies described below were generally not adopted for the purpose of avoiding or mitigating an environmental effect, an analysis of the Project's consistency with these policies has nevertheless been provided below, for informational purposes. Finally, as discussed throughout this SCEA, implementation of the Project would not result in any significant impacts. As such, the Project's impacts with respect to land use and planning would be less than significant.

Land Use Compatibility

The L.A. CEQA Thresholds Guide 2006[93] addresses land use compatibility as it relates to assessing impacts on surrounding land uses. Evaluating the significance of environmental impacts, i.e., physical impacts and changes to the environment, related to compatibility requires more than merely comparing the physical attributes of the proposed building to the physical attributes of buildings adjacent to the Project Site and in the surrounding area. A significant impact is not generated simply because a proposed building is different than some of the buildings or even many of the buildings in the surrounding area. For purposes of evaluating environmental impacts related to compatibility, it is useful to address the functional compatibility of the Proposed Project with its surrounding land uses. Functional compatibility is defined as the capacity for adjacent, yet dissimilar land uses to maintain and provide services, amenities, and/or environmental quality associated with such uses. Potentially significant functional land use compatibility impacts may be generated when a Proposed Project hinders the functional patterns of use and relationships associated with existing land uses. Patterns of use relate to the interaction and movement of people, goods, and/or information.

The physical compatibility of the Proposed Project with its environs is based on an analysis of proposed uses and improvements and their potential on-site and off-site impacts on traffic, noise, air quality, and aesthetics. These impacts, together with proposed mitigation measures,

92 Subsequent to Case No. AA-2019-476-PMEX, the properties located at 6422 W. Selma Avenue will have a resultant lot area of 15,022 square feet and the properties located at 1540-1552 N. Wilcox Avenue will have a resultant lot area of 14,501 square feet.

93 Available at: https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf

where applicable, are discussed in their respective sections of this SCEA. As such, this section focuses on the compatibility of the Proposed Project from a functional perspective.

SCAG 2020 RTP/SCS Connect SoCal

SCAG functions as the Metropolitan Planning Organization (MPO) for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The SCAG region encompasses a population exceeding 18 million persons in an area of more than 38,000 square miles. As the federally designated MPO, SCAG is mandated to research and create plans for transportation, growth management, and air quality. The 2020-2045 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with SB 375, improve public health, and meet the NAAQS as set forth by the Clean Air Act (CAA). As such, the 2020-2045 RTP/SCS contains a regional commitment for the broad deployment of zero- and near-zero-emission transportation technologies in the 2025-2045 timeframe and clear steps to move toward this objective. This is especially critical for the goods movement system. The development of a zero- or near-zero-emission freight transportation system is necessary to maintain economic growth in the region, to sustain quality of life, and to meet federal air quality requirements. The 2020-2045 RTP/SCS puts forth an aggressive strategy for technology development and deployment to achieve this objective. This strategy will have many co-benefits, including energy security, cost certainty, increased public support for infrastructure, GHG emissions reduction, and economic development. The 2020-2045 RTP/SCS includes a consideration of the economic impacts and opportunities provided by the transportation infrastructure plan set forth in the document, considering the economic and job creation impacts of the direct investment in transportation infrastructure, and also the efficiency gains in terms of worker and business economic productivity and goods movement. The 2020-2045 RTP/SCS provides a blueprint for improving quality of life for residents by providing more choices for where they will live, work, and play, and how they will move around. It is designed to promote safe, secure, and efficient transportation systems to provide improved access to opportunities, such as jobs, education, and healthcare. Its emphasis on transit and active transportation is designed to allow residents to lead a healthier, more active lifestyle. Its goal is to create jobs, ensure the region's economic competitiveness through strategic investments in the goods movement system, and improve environmental and health outcomes for its 22.5 million residents by 2045. **Table III-3, Consistency Analysis with Connect SoCal (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy),** included in **Section III** of this SCEA, analyses the Project's consistency with the goals and strategies of Connect SoCal RTP/SCS.

SCAQMD's Air Quality Management Plan

The Project Site is located within the South Coast Air Basin and within the jurisdiction of SCAQMD. In conjunction with SCAG, SCAQMD is responsible for formulating and implementing air pollution control strategies, including periodic updates to the AQMP, and guidance to local government about how to incorporate these strategies into their land use plans and decisions about development. SCAG is responsible for generating the socio-economic profiles and growth forecasts on which land use, transportation, and air quality management and implementation plans are based. The growth forecasts provide the socioeconomic data used to estimate vehicle trips and VMT. Emission estimates then can be forecast by SCAQMD based on these projected estimates. Reductions in emissions due to changes in the socio-economic profile of the region are an important way of taking account of changes in land use patterns. For example, changes in jobs/housing balance induced by changes in urban form and transit-oriented development induce changes in VMT by more closely linking housing to jobs. Thus, socio-economic growth forecasts are a key component to guide the Basin toward attainment of the NAAQS. The current AQMP establishes a comprehensive regional air pollution control program leading to the attainment of state and federal air quality standards in the Basin. In addition to setting minimum acceptable exposure standards for specified pollutants, the AQMP incorporates SCAG's growth management strategies that can be used to reduce vehicle trips and VMT, and hence air pollution. These include, for example, co-location of employment and housing, and mixed-use land patterns that allow the integration of residential and non-residential uses.[94]

As discussed above under "Air Quality," the Project would be consistent with the AQMP.

City of Los Angeles General Plan

The City's General Plan, adopted December 1996 and re-adopted August 2001, provides general guidance on land use issues for the entire City. The City's General Plan is a dynamic document consisting of 11 elements, including 10 Citywide elements (Air Quality Element, Conservation Element, Historic Preservation and Cultural Resources Element, Housing Element, Infrastructure Systems Element, Noise Element, Open Space Element, Public Facilities and Services Element, Safety Element, and Transportation Element) and the Land

94 2016 Air Quality Management Plan, Executive Summary; South Coast Air Quality Management District; https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-managementplan/final-2016-aqmp/executive-summary.pdf?sfvrsn=4

Use Element, which provides individual land use consistency plans for each of the City's 35 Community Plan Areas.[95]

Framework Element

The Framework Element of the General Plan serves as guide for the City's overall long-range growth and development policies and serves as a guide to update the community plans and the Citywide elements. The Citywide elements address functional topics that cross community boundaries, such as transportation, and address these topics in more detail than is appropriate in the Framework Element, which is the "umbrella document" that provides the direction and vision necessary to bring cohesion to the City's overall general plan. The Framework Element provides a conceptual relationship between land use and transportation and provides guidance for future updates to the various elements of the General Plan but does not supersede the more detailed community and specific plans. The Land Use chapter of the Framework Element contains Long Range Land Use Diagrams that depict the generalized distribution of centers, districts, and mixed-use boulevards throughout the City, but the community plans determine the specific land use designations. The Land Use Element of the General Plan is contained within 35 community plans. The Project Site is located in the Hollywood Community Plan Area, discussed below.

As discussed in **Table IV.11-1**, **City of Los Angeles Framework Element Consistency Analysis,** the Project would be substantially consistent with the Framework Element.

Table IV.11-1
City of Los Angeles
Framework Element Consistency Analysis

Objectives	Consistency Assessment
Land Use	
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	**Consistent.** The Proposed Project would develop multi-family residential and affordable units. Bringing housing, and lifestyle amenities to the Project site, immediately adjacent to multiple modes of public transportation, expanding the housing options for Hollywood residents.
Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.	**Consistent.** The Project Site is in an urbanized area within the City of Los Angeles. The Proposed Project would develop multi-family residential and affordable units within a High Quality Transit Area

95 City of Los Angeles. *General Plan Overview*. Available online at: https://planning.lacity.org/plans-policies/general-plan-overview.

Objectives	Consistency Assessment
	(HQTA) as defined by SCAG and a transit priority area as defined by SB 743, ideal locations to reduce reliance on vehicle transportation. The Project Site is located approximately 0.33 miles from the Hollywood/Vine Station of the Metro B Line (formerly the Red Line), and less than one-quarter mile from several Metro bus lines with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. The Proposed Project would provide residents, employees, and visitors with convenient access to public transit and opportunities for walking and biking. These location and design features of the Project will greatly reduce vehicle miles traveled and congestion and improve air quality, and the Project is therefore consistent with this Goal.
Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	**Consistent.** The Project Site is in an urbanized area within the City of Los Angeles. The Proposed Project would develop multi-family residential and affordable units, approximately 0.33 miles from the Hollywood/Vine Station of the Metro B Line (formerly the Red Line), and less than one-quarter mile from several Metro bus lines with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. The area of the Project Site is a HQTA as defined by SCAG and a transit priority area as defined by SB 743. The area is also designated as a Transit Priority Area in the City of Los Angeles and as a Regional Center Commercial area within the Hollywood Community Plan. The Project also will conserve existing neighborhoods by providing additional housing, as well as residential amenities, such as an on-site gym, and landscaped open space, promoting the overall health and sustainability for the future residents.
Objective 3.9: Reinforce existing and encourage new community centers, which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood and community activity, are compatible with adjacent neighborhoods, and are developed to be desirable places in which to live, work and visit, both in daytime and nighttime.	**Consistent.** The Project Site is in an urbanized area within the City of Los Angeles. The Proposed Project would develop multi-family residential and affordable units, within a HQTA as defined by SCAG and a transit priority area as defined by SB 743. The area is designated as a Transit Priority Area in the City of Los Angeles and as a Regional Center Commercial area within the Hollywood Community Plan. The Project is consistent and compatible with the adjacent neighborhood and will enhance it by providing additional housing, and resident amenities, as well as landscaped open space.
Objective 3.14: Provide land and supporting services for the retention of existing and attraction of new industries.	**Not Applicable.** While this strategy calls on the City to adopt policies for the retention of existing

Objectives	Consistency Assessment
	and attraction of new industries, the Proposed Project would not interfere with such policymaking.
Objective 3.16: Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.	**Consistent.** The existing development on the Project Site is a small commercial enterprise. The Proposed Project will replace that with a residential development that would provide 45 new housing units, bringing new residents to the area. The Project also will include other pedestrian-oriented amenities such as bicycle facilities, and a more open entrance portal that would enhance local pedestrian activity and experiences.
Housing	
Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.	**Consistent.** The Project Site is in an urbanized area within the City of Los Angeles. The Proposed Project would develop multi-family residential and affordable units within a HQTA as defined by SCAG and a transit priority area as defined by SB 743. The Project Site is located approximately 0.33 miles from the Hollywood/Vine Station of the Metro B Line (formerly the Red Line), and less than one-quarter mile from several Metro bus lines with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. The Proposed Project would provide residents, employees, and visitors with convenient access to public transit and opportunities for walking and biking. The location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this Goal.
Urban Form and Neighborhood Design	
Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community or the region.	**Consistent.** The Project Site is in an urbanized area within the City of Los Angeles. The Proposed Project would develop multi-family residential and affordable units within a HQTA as defined by SCAG and a transit priority area as defined by SB 743. The Project Site is located approximately 0.33 miles from the Hollywood/Vine Station of the Metro B Line (formerly the Red Line), and less than one-quarter mile from several Metro bus lines with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. The Proposed Project would provide residents, employees, and visitors with convenient access to public transit and opportunities for walking and biking. The location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this Goal.
Objective 5.8: Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community	**Consistent.** The Proposed Project is located in an area is designated as a Transit Priority Area in the City of Los Angeles and as Regional Center

Objectives	Consistency Assessment
centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.	Commercial within the Hollywood Community Plan. The existing development on the Project Site is a small commercial enterprise. The Proposed Project will replace that with a residential development that would prove 45 new housing units, bringing new residents to the area. The Project also will include other pedestrian-oriented amenities such as bicycle facilities, and a more open entrance portal that would enhance local pedestrian activity and experiences.

Source: City of Los Angeles General Plan Framework Element.

Hollywood Community Plan

The Site is designated Regional Center Commercial by the Hollywood Community Plan. The Project advances a number of specific goals and objectives of the Community Plan:

Housing. The intensity of residential land use in this Plan and the density of the population which can be accommodated thereon shall be limited in accordance with the following criteria:

1. **The adequacy of the existing and assured circulation and public transportation systems within the area;**

   Complies. As an infill development site, the property has outstanding access to community resources, particularly public transportation. The Project Site is located approximately 0.33 miles from the Hollywood/Vine Station of the Metro B Line (formerly the Red Line), and less than one-quarter mile from several Metro bus lines with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. The Proposed Project would provide residents, employees, and visitors with convenient access to public transit and opportunities for walking and biking. The location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this Goal.

2. **The availability of sewers, drainage facilities, fire protection services and facilities, and other public utilities;**

   Complies. As an infill development site, the property has existing connections to sewer and drainage facilities, and is served by Los Angeles Fire Department, Fire Station 27 (1327 Cole Avenue – 0.6 miles from Project Site) and the Los Angeles Police Department, Hollywood Division (1358 N. Wilcox Avenue – 0.3 miles from Project Site).

3. **The steepness of the topography of the various parts of the area, and the suitability of the geology of the area for development.**

   Complies. The Project Site is located on a flat site improved with existing commercial buildings and surrounding by other commercial and residential buildings and is therefore suitable for the development of multi-family residential uses. A full geotechnical study (refer to **Appendix D** of this SCEA) has been conducted on the site and no unsuitable conditions for development were noted.

4. **Additional low and moderate-income housing is needed in all parts of this Community. Density bonuses for provision of such housing through Government Code 65915 may be granted in the Low-Medium I or less restrictive residential categories.**

   Complies. The Proposed Project is in an area with existing commercial and residential uses and is surround by other medium- and high-density residential development. The Proposed Project is seeking a density bonus, pursuant to LAMC Section 12.22.A 25, for a project with 45 dwelling units including six units for Very Low Income Households for a period of 55 years, thus adding needed housing units in the Hollywood Community Plan Area.

As shown above, the proposed Project would be consistent with relevant goals and policies in the Hollywood Community Plan.

Transit Priority Area (ZI-2452)

In September 2013, the Governor signed into law Senate Bill (SB) 743 / Assembly Bill (AB) 744, which instituted changes to the California Environmental Quality Act (CEQA) when evaluating environmental impacts to projects located in areas served by transit. While the thrust of SB 743 addressed a major overhaul on how transportation impacts are evaluated under CEQA, it also limited the extent to which aesthetics and parking are defined as impacts under CEQA. Specifically, Section 21099 (d)(1) of the Public Resources Code (PRC) states that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if:

1. The project is a residential, mixed-use residential or employment center project, and
2. The project is located on an infill site within a transit priority area.

"Transit Priority Area" is defined as an area within one-half mile of a major transit stop that is existing or planned. A "major transit stop" is defined as a rail transit station, ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

The Project Site is located within a Transit Priority Area within the City of Los Angeles and would comply with applicable regulations. Transit Priority Areas are identified under Zoning Information File No. 2452 as an area within one half mile of a major transit stop that is existing or planned.[96] As previously stated, the Project Site is located approximately 0.33 miles from the Hollywood/Vine Station of the Metro B Line (formerly the Red Line), and less than one-quarter mile from several Metro bus lines with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. The Proposed Project would provide residents, employees, and visitors with convenient access to public transit and opportunities for walking and biking. As such, it is eligible as a Transit Priority Project.

Zoning Conformance

The entire Property is designated for Regional Center Commercial land uses by the Hollywood Community Plan. The Regional Center Commercial designation corresponds to the C2, C4, P, PB, RAS3, and RAS4 zones, thus the Property's C4-2D zone is consistent with the Community Plan. The C4 zone paired with a "2" height district allows for unlimited height and stories while the "D" Development Limitation (Ordinance No. 165,660) permits a base floor area ratio of 3:1.

The Property is also located within the boundaries of the Hollywood Redevelopment Project Area ("RPA"). The RPA (formerly CRA/LA) is intended to guide design and scale of commercial and residential buildings within Hollywood. The Property is located within the Regional Center area of the RPA and conforms to the letter and intent of the RPA with respect to the community's design priorities, FAR, and residential density.

96 Section 21064.3 of the Public resources code (PRC) defines a "major transit stop" as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. For purposes of Section 21099 of the PRC, a transit priority area also includes major transit stops in the City of Los Angeles (City) that are scheduled to be completed within the planning horizon of the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS). City of Los Angeles Department of City Planning, ZI No. 2452, https://pdf4pro.com/view/city-of-los-angeles-department-of-city-planning-zoning-44bd27.html.

Hollywood Redevelopment Project Area

The Hollywood Redevelopment Project Area (RPA), formerly CRA/LA, governs land uses within the boundaries of the Hollywood RPA plan, including residential Density, Floor Area Ratio, and permitted uses until expiration in 2028.

The Project qualifies as a "Project" under the RPA and requires an administrative clearance prior to entitlement application to confirm that the Project complies with the provisions therein. The Project complies with all provisions within the C4 zone and "Regional Center Commercial" designation under the plan.

Density Bonus

Pursuant to LAMC Section 12.22 A 25(c)(1) the Project qualifies under SB 1818 as a Density Bonus Project if 11 % of the units allowed by-right are reserved for Very Low Income households. The Project proposes to reserve six units, or 15 percent of the total units, for Very Low Income households and as such qualifies as a Density Bonus Project.

Additionally, as permitted by LAMC Section 12.22 A.25(g)(3), the Applicant is requesting two (2) on menu incentives, and one (1) off menu incentive that will facilitate the provision of affordable housing at the Property as follows: (a) an On-Menu Incentive for a reduction in the required rear yard setback to allow eighteen feet and 5½ inches (18'-5½") in lieu of the 20-feet feet required for a fifteen-story building in C4-2D zone, and an On-Menu Incentive for a 19% reduction in the required open space to permit 6,456 square feet of common open space in lieu of the required 7,785 square feet and; (b) an Off-Menu Incentive for an increase in Floor Area Ratio (FAR) to 4.5:1 in lieu of the permitted base FAR of 3.0:1 (pursuant to Ordinance No. 165,660), as permitted by LAMC 12.22.A.25(f)(4)(ii) to permit a maximum total Floor Area of 67,599 sq. ft..

Pursuant to LAMC Section 12.22 A.25(e)(2), in order to be eligible for any incentives, a Housing Development Project shall comply with the following criteria:

The Project complies with the following criteria required by Section 12.22.A.25(e)(2) of the LAMC for Housing Development Projects requesting on-menu incentives:

A. The façade of any portion of a building that abuts a street shall be articulated with a change of material or a break in plane, so that the façade is not a flat surface.

The City of Los Angeles Residential Design Guidelines indicate that projects should alternate different textures, colors, materials, and distinctive architectural treatments to add visual interest while avoiding dull and repetitive facades.

The architecture has been articulated through the varied use of building materials, changes in plane and architectural detailing. The building would be clad with a mix of wood, brick, glass and metal, reflecting the materials used in the existing buildings onsite and the historic Hollywood aesthetic.

The Proposed Project is located interior to the lot lines of the Property. Due to the preservation of a portion of an existing building on-site, the proposed site plan requires that the footprint of the building be completely within the bounds of the existing property lines and thus cannot abut a public street.

The building utilizes the existing Concept Arts building as reference for the materials and colors of the Project while fully incorporating it, through historic perseveration, into the vehicular and pedestrian entrance of the Project itself. The façade of the Concept Arts building will be retained and restored as part of the Project. Window openings and balconies punctuate the building's façade and activate the building's elevation at the upper floor levels.

B. All buildings must be oriented to the street by providing entrances, windows, architectural features and/or balconies on the front and along any street facing elevation.

As noted above, the Project is located interior to the lot lines of the property. The preservation of a portion of an existing building onsite requires that the Project provide entrances, windows, and other architectural features within the property lot lines. However, the Project, at 15 stories provides all open space, balconies, windows, and other architectural features in the orientation of the abutting public streets.

In retention of a portion of the Concept Arts building, the Project incorporates the existing façade and structure into a signature entrance to the Proposed Project, maintaining the historic automotive use of the building while providing a public street entrance to both residents and visitors. The vehicular entrance for the building from Selma Avenue and at grade parking level is located at the interior of the property and not visible from the street.

C. The Housing Development Project shall not involve a contributing structure in a designated Historic Preservation Overlay Zone (HPOZ) and shall not involve a structure that is a City of Los Angeles designated Historic-Cultural Monument (HCM).

The Project is *not* located within a designated Historic Preservation Overlay Zone, nor does it involve a structure or property that is designated as a City Historic-Cultural Monument. However, the Project does involve the preservation and retention of a non-designated resource, that will result in less than significant impacts, in concurrence with the Office of Historic Resources.

D. The Housing Development Project shall not be located on a substandard street in a Hillside Area or in a Very High Fire Hazard Severity Zone as established in Section 57.25.07 of the LAMC.

The Project is *not* located on a substandard street or in a Hillside Area of Very High Fire Severity Zone.

Pursuant to Section 12.22 A.25(c) of the LAMC, the Director shall approve a density bonus and requested incentives unless the Director finds that:

1. The Incentives/Waivers are not necessary to provide for affordable housing costs as defined in California Health and Safety Code Section 50052.5 or Section 50053 for rents for the affordable units.

The Proposed Project consists of the construction, use and maintenance of a 15-story, 180 foot and 5 inches (180'-5") high, multifamily residential dwelling building having 45 dwelling units with 6, or 15 percent of the base units, reserved for Very Low Income households. The maximum total floor area of the Project would be approximately 67,599 square feet, with a Floor Area Ratio (FAR) of 4.5:1. The Applicant is requesting a density bonus approval pursuant to LAMC 12.22 A.25 including an on-menu incentive for an increase in a side yard reduction, and off menu incentives for an increase in Floor Area Ratio and a side yard reduction.

- **On-Menu Incentive – Side and Rear Yard Reduction.** The subject request is for up to reduction in the required rear yard setback to allow eighteen feet and 5½ inches (18'-5½") in lieu of the 20-feet feet required for a fifteen-story building in C4-2D zone pursuant to the requirements of the LAMC. Granting the subject request for the

reduction in a side yard is permitted per LAMC and will allow for the provision of additional market-rate units, which will offset the cost of the inclusion of restricted affordable units. Additionally, the side yard reduction is required to accommodate the retention of the existing Concept Arts Building. Without the reduction, the required side and rear yards would limit the Project and prohibit the Applicant from providing a mixed-income housing project.

- **Off-Menu Incentive – Floor Area Ratio.** The subject request is for an Off-Menu Incentive for an increase in Floor Area Ratio to permit a maximum of 4.5:1, in lieu of the otherwise permitted 3.0:1 per the site's D Condition per Ordinance No. 164307-SA555. The Project Site is located in Height District 2 which in the C zone typically permits 6.0:1 FAR. Additionally, the Hollywood RPA permits projects in the Regional Center Commercial designation up to 4.5:1 FAR and thus the proposed Project complies with the RPA. Granting the subject request for the increase in FAR will allow for an expanded building envelope, and the provision of additional market-rate units, which will offset the cost of the inclusion of restricted affordable units. Additionally, the increase in FAR would allow for design efficiencies in the placement of corridors, vertical circulation elements and amenities, which would be a shared cost for the development of the project. Without the increase, the FAR limitation would limit the Project and prohibit the Applicant from providing a mixed-income housing project.

- **Waiver of Development Standards – Side Yard Reduction.** The subject request is to reduce the westerly and easterly side yards from 16 feet to 0 feet. As previously noted, the Project is located interior to all of the existing street frontages to preserve existing resources including the Gilbert Hotel, to remain as part of the Project. As such, the 0-foot side yard is required for a portion of the building in order to accommodate the Gilbert Hotel while providing sufficient access for any Los Angeles Fire Department required access. In the absence of this request, the additional area required to be utilized for a larger side yard would reduce the number of dwelling units and corresponding affordable units, as well as increase the cost of the Project. All of these factors would prohibit the Applicant from such a mixed-income housing project with amenities as proposed.

- **Waiver of Development Standards - Drive Aisle Reduction.** The subject request is to provide a reduced drive-aisle within the parking garage to accommodate the proposed parking, and also to eliminate the required 10" clearance around structural columns resulting from a drive-aisle reduction. In order to accommodate on-site

parking within a narrow site, the Project may provide parking with a stacker system that itself has different installation requirements than the underlying provision of the LAMC. The Project could not provide the proposed residential parking by conforming to underlying code requirements, which would result in a reduction in units, and a corresponding reduction in on-site affordable housing accommodations, and would prohibit the Applicant from such a mixed-income housing project with amenities as proposed.

2. **The Incentive/Waiver will have specific adverse impact upon public health and safety or the physical environment, or on any real property that is listed in the California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the specific adverse Impact without rendering the development unaffordable to Very Low, Low and Moderate Income households. Inconsistency with the zoning ordinance or the general plan land use designation shall not constitute a specific, adverse impact upon the public health or safety.**

   The Project proposes a 45-unit, mixed-income development within a developed, urban area along a commercial corridor improved with a mix of commercial and residential buildings proximate to public transit. While the Project involves the rehabilitation and reconstruction of a potentially eligible structure, the Project does *not* involve the demolition of a historic structure that was placed on a national, state, or local historic register prior to the submission of the application. Instead, the proposed Project involves a partial retention and refurbishment of a structure identified on Survey LA, for its significant contribution to the automotive history in Hollywood. The Historic Resources Assessment Report has been reviewed and approved by the Office of Historic Resources, who have concurred with the preservation plan proposed for the Project and have deemed no unavoidable significant impacts to historic resources. Therefore, there is no substantial evidence that the requested incentives and waiver of development standards will have a specific adverse impact on public health and safety.

3. **The incentives/waiver(s) or reduction(s) of development standard(s) are contrary to state or Federal law.**

   The requested incentives and waiver of development standards are solely related to the modification of required Floor Area Ratio and setback requirements. These modifications

are within purview of local and state density bonus law. There is no substantial evidence to show that the proposed incentives or waivers are contrary to state or federal law.

Based on the above information, the Project would be consistent with applicable plans, policies, regulations, and impacts would be less than significant.

12. Mineral Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The Project is located on a well-developed, built out section of the Hollywood Community Area within a commercial zone. The Conservation Element of the LA General Plan notes that the State Mining and Reclamation Act (SMARA) ensures against premature loss of minerals and protects sites threatened by development practices which might preclude future mineral extraction.[97] The Project Site has not been utilized for mineral extraction and is not located within an oil drilling district, state-designated oil filed or surface mining district, and there are no active mining operations on the project site or near the project vicinity. The Project Site is not within a Mineral Resource Zone (MRZ-2) - areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence.[98] Therefore, the Project will not result in an impact.

97 City of Los Angeles *General Plan*, "Conservation Element" (2001), *Mineral Resources Exhibit A*, January 2001. Available online at: https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf.

98 California Department of Conservation (2001); ESRI Streetmap USA (2008); Alta Planning + Design (2011).

b. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. As stated above, the proposed development is not located within an MRZ-2 Area. The Project Site is not identified as an important mineral resource recovery site on a local general plan, specific plan, or other land use plan. Therefore, no impacts would occur.

13. Noise

The following information is from the Noise and Vibration Technical Assessment which describes the existing noise and vibration environment of the proposed residential project at 6422 Selma Avenue in the City of Los Angeles, included as **Appendix F** to this SCEA.

Fundamentals of Noise and Vibration

Noise

Noise is usually defined as unwanted sound that is an undesirable byproduct of society's normal day-to-day activities. Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm, and/or when it has adverse effects on health. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB). The human ear does not respond uniformly to sounds at all frequencies. For example, the human ear is less sensitive to low and high frequencies than medium frequencies, which more closely correspond with human speech. In response to the sensitivity of the human ear to different frequencies, the A-weighted noise level (or scale), which corresponds better with people's subjective judgment of sound levels, has been developed. This A-weighted sound level, referenced in units of dB(A), is measured on a logarithmic scale such that a doubling of sound energy results in a 3 dB(A) increase in noise level. Typically, changes in a community noise level of less than 3 dB(A) are not noticed by the human ear.[99] Changes from 3 to 5 dB(A) may be noticed by some individuals who are sensitive to changes in noise. A greater than 5 dB(A) increase is readily noticeable, while the human ear perceives a 10 dB(A) increase in sound level to be a doubling of sound.

On the A-weighted scale, the range of human hearing extends from approximately 3 to 140 dB(A). **Table IV.13-1, A-Weighted Decibel Scale**, provides examples of A-weighted noise levels from common sources. Noise sources occur in two forms: (1) point sources, such as stationary equipment or individual motor vehicles; and (2) line sources, such as a roadway with a large

99 California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, 2013.

number of point sources (motor vehicles). Sound generated by a point source typically diminishes (attenuates) at a rate of 6 dB(A) for each doubling of distance from the source to the receptor at acoustically "hard" sites and 7.5 dB(A) at acoustically "soft" sites.[100] For example, if a noise source produces a noise level of 89 dB(A) at a reference distance of 50 feet, the noise level would be 83 dB(A) at a distance of 100 feet from the noise source, 77 dB(A) at a distance of 200 feet, and so on. Noise generated by a mobile source will decrease by approximately 3 dB(A) over hard surfaces and 4.5 dB(A) over soft surfaces for each doubling of distance.

Table IV.13-1
A-Weighted Decibel Scale

Typical A-Weighted Sound Levels	Sound Level (dB(A), Leq)
Threshold of Pain	140
Jet Takeoff at 100 Meters	125
Jackhammer at 15 Meters	95
Heavy Diesel Truck at 15 Meters	85
Conversation at 1 Meter	60
Soft Whisper at 2 Meters	35

Source: United States Occupational Safety & Health Administration, Noise and Hearing Conservation Technical Manual, 1999.

Sound levels also can be attenuated by man-made or natural barriers (e.g., sound walls, berms, ridges), as well as elevational differences. Noise is most audible when traveling by direct line-of-sight, an interrupted visual path between the noise source and noise receptor. Barriers, such as walls or buildings that break the line-of-sight between the source and the receiver, can greatly reduce noise levels from the source since sound can only reach the receiver by diffraction. Sound barriers can reduce sound levels by up to 20 dB(A) or more. However, if a barrier is not high or long enough to break the line-of-sight from the source to the receiver, its effectiveness is greatly reduced.

Solid walls and berms may reduce noise levels by 5 to 10 dB(A) depending on their height and distance relative to the noise source and the noise receptor.[101] Sound levels may also be attenuated 3 dB(A) by a first row of houses and 1.5 dB(A) for each additional row of houses.[102]

[100] Federal Highway Administration, *Highway Noise Fundamentals*, (1980) 97. Examples of "hard" or reflective sites include asphalt, concrete, and hard and sparsely vegetated soils. Examples of acoustically "soft" or absorptive sites include soft, sand, plowed farmland, grass, crops, heavy ground cover, etc.

[101] Federal Highway Administration, *Highway Noise Mitigation*, (1980) 18.

[102] California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol,* 2013.

Sound Rating Scales

Various rating scales approximate the human subjective assessment to the "loudness" or "noisiness" of a sound. Noise metrics have been developed to account for additional parameters, such as duration and cumulative effect of multiple events. Noise metrics are categorized as single event metrics and cumulative metrics, as summarized below.

In order to simplify the measurement and computation of sound loudness levels, frequency weighted networks have obtained wide acceptance. The A-weighted scale, discussed above, has become the most prominent of these scales and is widely used in community noise analysis. Its advantages are that it has shown good correlation with community response and is easily measured. The metrics used in this analysis are all based upon the dB(A) scale.

Equivalent Noise Level[103]

Equivalent Noise Level (Leq) is the sound level corresponding to a steady-state A-weighted sound level containing the same total energy as several single event noise exposure level events during a given sample period. Leq is the "acoustic energy" average noise level during the period of the sample. It is based on the observation that the potential for noise annoyance is dependent on the total acoustical energy content of the noise. The equivalent noise level is expressed in units of dB(A). Leq can be measured for any period, but is typically measured for 15 minutes, 1 hour, or 24 hours. Leq for a 1-hour period is used by the Federal Highway Administration (FHWA) for assessing highway noise impacts. Leq for 1 hour is referred to as the Hourly Noise Level (HNL) in the California Airport Noise Regulations and is used to develop Community Noise Equivalent Level values for aircraft operations. Construction noise levels and ambient noise measurements in this section use the Leq scale.

Community Noise Equivalent Level[104]

Community Noise Equivalent Level (CNEL) is a 24-hour, time-weighted energy average noise level based on the A-weighted decibel. It is a measure of the overall noise experienced during an entire day. The term "time-weighted" refers to the penalties attached to noise events occurring during certain sensitive periods. In the CNEL scale, 5 dB are added to measured noise levels occurring between the hours of 7:00 PM and 10:00 PM For measured noise levels occurring

103 Federal Highway Administration. Construction Noise Handbook: 2.0 Terminology. Available at: https://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/handbook02.cfm

104 Federal Highway Administration. Construction Noise Handbook: 2.0 Terminology. Available at: https://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/handbook02.cfm.

between the hours of 10:00 PM and 7:00 AM, 10 dB are added. These decibel adjustments are an attempt to account for the higher sensitivity to noise in the evening and nighttime hours and the expected lower ambient noise levels during these periods. Existing and projected future traffic noise levels in this section use the CNEL scale.

Day-Night Average Noise Level[105]

The day-night average sound level (Ldn) is another average noise level over a 24-hour period. Noise levels occurring between the hours of 10 PM and 7 AM are increased by 10 dB. This noise is weighted to take into account the decrease in community background noise of 10 dB(A) during this period. Noise levels measured using the Ldn scale are typically similar to CNEL measurements.

Adverse Effects of Noise Exposure[106]

Noise is known to have several adverse effects on humans, which has led to laws and standards being set to protect public health and safety, and to ensure compatibility between land uses and activities. Adverse effects of noise on people include hearing loss, communication interference, sleep interference, physiological responses, and annoyance. Each of these potential noise impacts on people is briefly discussed in the following narrative.

Hearing Loss

Hearing loss is generally not a community noise concern, even near a major airport or a major freeway. The potential for noise-induced hearing loss is more commonly associated with occupational noise exposures in heavy industry, very noisy work environments with long-term exposure, or certain very loud recreational activities (e.g., target shooting and motorcycle or car racing). The Occupational Safety and Health Administration (OSHA) identifies a noise exposure limit of 90 dB(A) for 8 hours per day to protect from hearing loss (higher limits are allowed for shorter duration exposures). Noise levels in neighborhoods, even in very noisy neighborhoods, are not sufficiently loud enough to cause hearing loss.

105 Federal Highway Administration. Construction Noise Handbook: 2.0 Terminology. Available at: https://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/handbook02.cfm.

106 Federal Highway Administration. Construction Noise Handbook: 3.0 Effects of Construction Noise. Available at: https://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/handbook03.cfm

Communication Interference

Communication interference is one of the primary concerns in environmental noise. Communication interference includes speech disturbance and intrusion with activities such as watching television. Noise can also interfere with communications such as within school classrooms. Normal conversational speech is in the range of 60 to 65 dB(A) and any noise in this range or louder may interfere with speech.

Sleep Interference

Noise can make it difficult to fall asleep, create momentary disturbances of natural sleep patterns by causing shifts from deep to lighter stages, and cause awakening. Noise may even cause awakening that a person may or may not be able to recall.

Physiological Responses

Physiological responses are those measurable effects of noise on people that are realized as changes in pulse rate, blood pressure, and other physical changes. Studies to determine whether exposure to high noise levels can adversely affect human health have concluded that, while a relationship between noise and health effects seems plausible, there is no empirical evidence of the relationship.

Annoyance

Annoyance is an individual characteristic and can vary widely from person to person. Noise that one person considers tolerable can be unbearable to another of equal hearing capability. The level of annoyance depends both on the characteristics of the noise (including loudness, frequency, time, and duration), and how much activity interference (such as speech interference and sleep interference) results from the noise. However, the level of annoyance is also a function of the attitude of the receiver. Personal sensitivity to noise varies widely. It has been estimated that 2% to 10% of the population is highly susceptible to annoyance from any noise not of their own making, while approximately 20% are unaffected by noise.[107] Attitudes may also be affected by the relationship between the person affected and the source of noise, and whether attempts have been made to abate the noise.

[107] Wayne County Airport Authority. *Background information on noise & its measurement, 2009.*

Vibration

Vibration consists of waves transmitted through solid material. Groundborne vibration propagates from a source through the ground to adjacent buildings by surface waves. Vibration may comprise a single pulse, a series of pulses, or a continuous oscillatory motion. The frequency of a vibrating object describes how rapidly it is oscillating and is measured in hertz (Hz). Most environmental vibrations consist of a composite, or "spectrum" of many frequencies, and are generally classified as broadband or random vibrations. The normal frequency range of most groundborne vibration that can be felt generally starts from a low frequency of less than one Hz to a high of about 200 Hz. Vibration is often measured in terms of the peak particle velocity (PPV) in inches per second (in/sec) when considering impacts on buildings or other structures, as PPV represents the maximum instantaneous peak of vibration that can stress buildings. Because it is a representation of acute vibration, PPV is often used to measure the temporary impacts of short-term construction activities that could instantaneously damage built structures. Vibration is often also measured by the Root Mean Squared (RMS) because it best correlates with human perception and response. Specifically, RMS represents "smoothed" vibration levels over an extended period of time and is often used to gauge the long-term chronic impact of a project's operation on the adjacent environment. RMS amplitude is the average of a signal's squared amplitude. It is most commonly measured in decibel notation (VdB).

Vibration energy attenuates as it travels through the ground, causing the vibration amplitude to decrease with distance away from the source. High frequency vibrations reduce much more rapidly than low frequencies, so that in the far-field from a source, the low frequencies tend to dominate. Soil properties also affect the propagation of vibration. When groundborne vibration interacts with a building, there is usually a ground-to-foundation coupling loss (i.e., the foundation of the structure does not move in sync with the ground vibration), but the vibration can also be amplified by the structural resonances of the walls and floors. Vibration in buildings is typically perceived as rattling of windows or items on shelves, or the motion of building surfaces. At high levels, vibration can result in damage to structures.

Manmade groundborne vibration is generally limited to areas within a few hundred feet of certain types of construction activities, especially pile driving. Road vehicles rarely create enough groundborne vibration to be perceptible to humans unless the road surface is poorly maintained and there are potholes or bumps. If traffic induces perceptible vibration in buildings, such as window rattling or shaking of small loose items (typically caused by heavy trucks in passing), then it is most likely an effect of low-frequency airborne noise or ground characteristics. Human

annoyance by vibration is related to the number and duration of events. The more events or the greater the duration, the more annoying it will be to humans.

Construction vibration damage criteria are assessed based on structural category (e.g., reinforced-concrete, steel, or timber). FTA guidelines consider 0.2 inch/sec PPV to be the significant impact level for non-engineered timber and masonry buildings. Structures or buildings constructed of reinforced concrete, steel, or timber have a vibration damage criterion of 0.5 inch/sec PPV pursuant to FTA guidelines.[108] The FTA Guidelines include a table showing the vibration damage criteria based on structural category and is presented below in **Table IV.13-2, Construction Vibration Damage Criteria.**

Table IV.13-2
Construction Vibration Damage Criteria

Building/Structural Category	PPV, in/sec
I. Reinforced-concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual. September 2018.

Noise Sensitive Receptors

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as natural parks and recreation areas, historic sites, and cemeteries are considered sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are also considered noise-sensitive land uses. Noise-sensitive receptors surrounding the project site include the Dream Hotel to the northeast of the Project Site across Selma Avenue, the Gilbert Hotel to the

[108] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual. September* 2018.

west adjacent to the Project Site along Wilcox Avenue, the Wilcox Hotel to the north of the Project Site.

Existing Conditions

A noise monitoring survey was completed to establish existing noise levels in the vicinity of the Project Site. Transportation noise is the main source of noise in urban environments, largely from the operation of internal combustion engines and frictional contact between vehicles and ground and air.[109] It should be noted that due to the Coronavirus pandemic, traffic volumes are likely lower than usual. Therefore, noise measurements that were conducted in February 2021 are likely lower than pre-pandemic conditions and therefore conservative measurements for the existing noise environment. **Figure IV.13-1, Noise Monitoring Locations,** maps the noise measurement locations relative to the project site. The existing average daily noise levels are presented in **Table IV.13-3, Ambient Sound-Level Readings.**

Table IV.13-3
Ambient Sound-Level Readings

Noise Measurement Location #	Street Address	dB(A) Leq
Location #1	6417 Selma Ave (Dream Hollywood Hotel)	75.8
Location #2	1622 Wilcox Ave (Mark Twain Hotel)	62.4
Location #3	1550 Wilcox Ave (Gilbert Hotel)	68.6
Location #4	6371 Selma Ave (commercial uses)	70.0

Source: Impact Sciences, Inc., February 2021

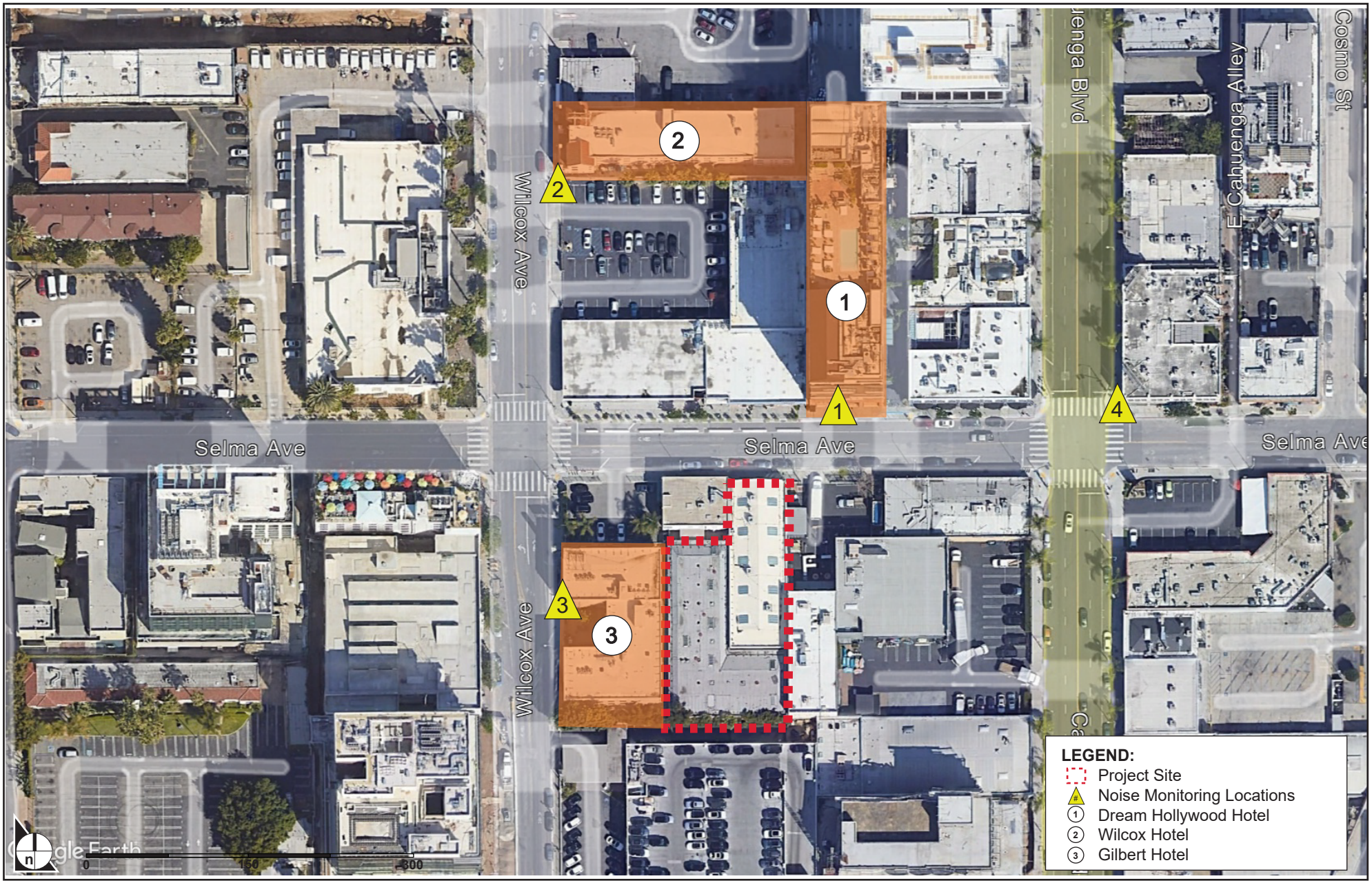
Vibration

The only sources of groundborne vibration in the Project Site vicinity are heavy-duty vehicles (e.g., refuse trucks, delivery trucks, and school buses) traveling on local roadways. Trucks and buses typically generate groundborne vibration velocity levels of around 63 VdB, and these levels

[109] World Health Organization, https://www.who.int/docstore/peh/noise/Comnoise-2.pdf accessed July 2, 2020.

could reach 72 VdB where trucks and buses pass over bumps in the road.[110] In terms of PPV levels, a heavy-duty vehicle traveling at a distance of 50 feet can result in a vibration level of approximately 0.001 inch per second.

110 California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, 2013.



SOURCE: Google Earth, 2022

FIGURE **IV.13-1**

IMPACT SCIENCES

Noise Monitoring Locations

1340.001•12/2022

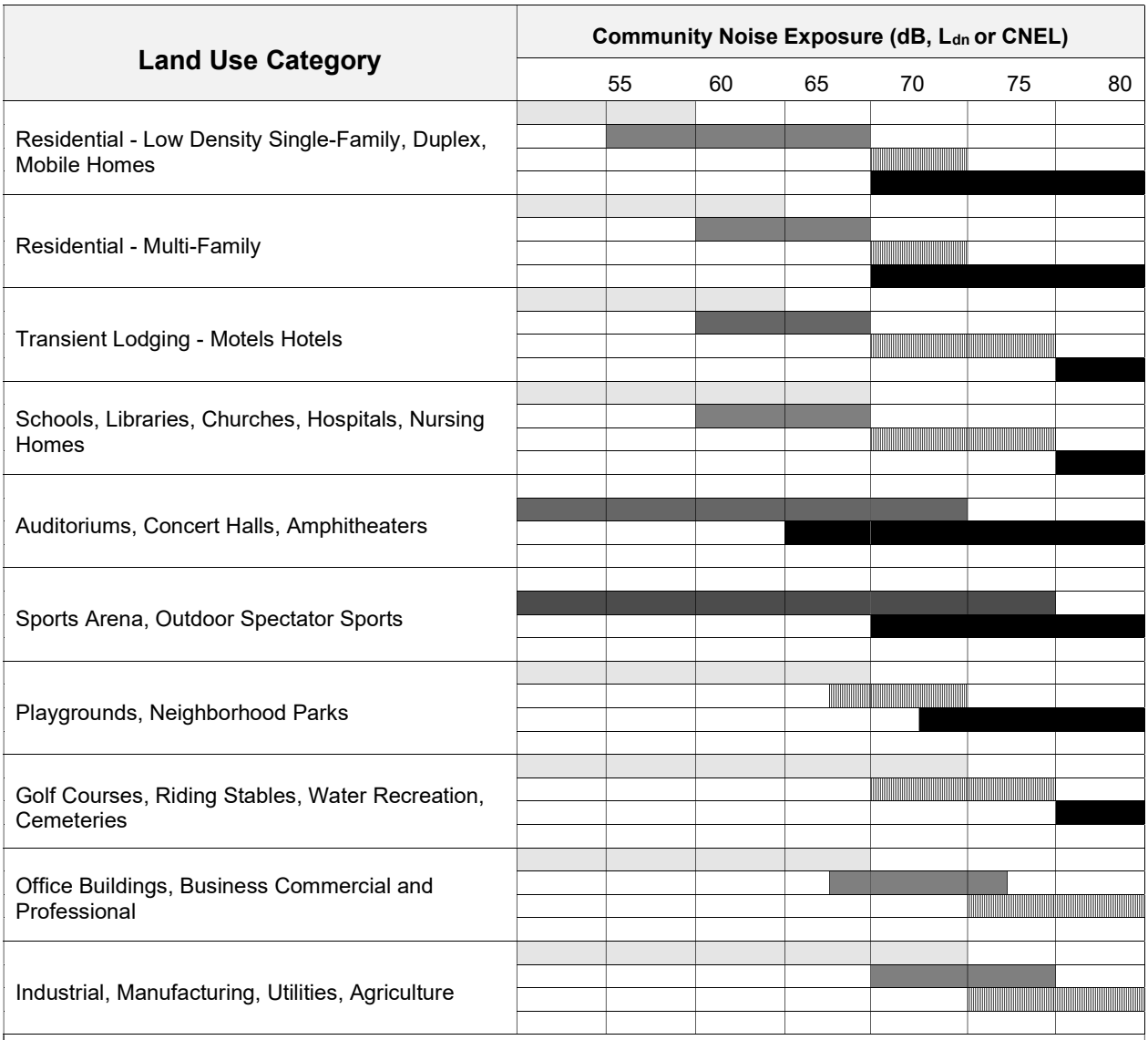
	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Construction noise impacts would be significant if the Project violates Section 41.40 of the LAMC, which prohibits construction activity from occurring between 9:00 PM and 7:00 AM Monday through Friday, and between 6:00 PM and 8:00 AM on Saturday. This is intended to protect persons occupying sleeping quarters in any hotel, apartment, or other place of residence. In addition, construction noise impacts would be significant if as indicated in LAMC Section 112.05, noise from construction equipment within 500 feet of a residential zone exceeds 75 A-weighted decibels (dBA) at a distance of 50 feet from the noise source. However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment. While the Project Site is not located within 500 feet of a residential zone, this analysis has conservatively applied this standard as there are hotels located in the vicinity.

Operational noise impacts would be significant if the ambient noise level measured at the property line of affected uses increases by 3 dB(A) CNEL to or within the “normally unacceptable” or “clearly unacceptable” category, or if the ambient noise level measured at the property line of affected uses increases by 5 dB(A) CNEL or more.

These “normally unacceptable” and “clearly unacceptable” categories refer to those outlined by the State’s noise and land-use compatibility chart, shown in **Table IV.13-4**.

Table IV.13-4
State of California Noise/Land Use Compatibility Matrix



Source: California Office of Planning and Research, General Plan Guidelines - Noise Element Guidelines (Appendix C), 2003.

a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less than Significant Impact with Mitigation Incorporated.

Construction Impacts

Temporary On-Site Construction Activity Noise

During all construction phases, noise-generating activities could occur at the Project site between the hours of 7:00 AM and 9:00 PM Monday through Friday, in accordance with Section 41.40(a) of the LAMC. On-site activities could include the use of heavy equipment such as excavators and loaders, as well as smaller equipment such as saws, hammers, and pneumatic tools.

Noises from demolition and grading activities are typically the foremost concern when evaluating a project's construction noise impacts, as these activities often require the use of heavy-duty, diesel-powered earthmoving equipment. The types of heavy equipment required for these activities may include excavators, bulldozers, front-end loaders, graders, backhoes, and scrapers.

For this Project, construction noise levels were estimated using the FHWA Roadway Construction Noise Model (RCNM) based on the Project's anticipated construction equipment identified in the Project's Air Quality and Greenhouse Gas Technical Report provided as **Appendix B** to the SCEA. The Project's peak estimated unmitigated construction noise levels are shown in **Table IV.13-5, Construction Noise Impacts at Off-Site Sensitive Receptors – Unmitigated,** and summarized below.

Table IV.13-5
Construction Noise Impacts at Off-Site Sensitive Receptors – Unmitigated

Receptor	Maximum Construction Noise Level (dB(A) L_{eq})	Existing Ambient Noise Level (dB(A) L_{eq})	A
Location #1 - 6417 Selma Ave (Dream Hollywood Hotel)	74.6	75.8	
Location #2 - 1622 Wilcox Ave (Mark Twain Hotel)	68.2	62.4	
Location #3 - 1550 Wilcox Ave (Gilbert Hotel)	84.2	68.6	

Receptor	Maximum Construction Noise Level (dB(A) L_{eq})	Existing Ambient Noise Level (dB(A) L_{eq})	A
Location #4 - 6371 Selma Ave (commercial uses)	69.2	70.0	

Source: Impact Sciences, Inc., December 2022

As stated previously, construction noise impacts would be significant if, as indicated in LAMC Section 112.05, noise from construction equipment within 500 feet of a residential zone exceeds 75 A-weighted decibels (dBA) at a distance of 50 feet from the noise source. However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment. Although the estimated unmitigated construction-related noise levels associated with the Project could exceed the noise standard of 75 dBA at 50 feet from the noise source as outlined in LAMC Section 112.05, the Project would implement all technically feasible reduction measures in compliance with the standards set forth in LAMC Section 112.05. Specifically, **Mitigation Measure NOI-1**, which requires the use of improved mufflers and silencers, would achieve an approximately 10 dBA reduction.[111] The Project would also implement additional techniques to reduce construction noise levels as required by the LAMC. For example, construction activities would be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels. Further, noise and groundborne vibration construction activities whose specific location on the site are flexible (e.g., operation of compressors or generators, cement mixing, and general truck idling) will be conducted as far as possible from the nearest noise- and vibration-sensitive land uses. However, given the fluid dynamics of a construction site, this analysis conservatively does not take any quantified reduction associated with these techniques. See **Table IV.13-5, Construction Impacts at Off-Site Sensitive Receptors (with Mitigation)**, below which illustrates the effectiveness of **Mitigation Measure NOI-1**. With the implementation of **Mitigation Measure NOI-1**, construction noise levels would be reduced in a manner consistent with the LAMC, and impacts would be less than significant.

[111] Based on information from the United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971. Per Table V, Noise Control For Construction Equipment therein, use of improved mufflers/silencers would achieve approximately 10 dBA reduction.

Mitigation Measure

MM-NOI-1: Noise-generating equipment operated at the Project Site shall be equipped with noise control devices, such as mufflers, lagging (enclosures for exhaust pipes), and/or motor enclosures capable of reducing construction equipment noise by 10 dBA. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.[112].

Table IV.13-6
Construction Noise Impacts at Off-Site Sensitive Receptors – with Mitigation

Receptor	Maximum Construction Noise Level (dB(A) L_{eq})	Existing Ambient Noise Level (dB(A) L_{eq})	Above LAMC 75 dB(A) Limit?
Location #1 - 6417 Selma Ave (Dream Hollywood Hotel)	64.6	75.8	No
Location #2 - 1622 Wilcox Ave (Mark Twain Hotel)	58.2	62.4	No
Location #3 - 1550 Wilcox Ave (Gilbert Hotel)	74.2	68.6	No
Location #4 - 6371 Selma Ave (commercial uses)	59.2	70.0	No

Source: Impact Sciences, Inc., December 2022

Temporary Off-Site Construction Activity Noise

Construction haul trucks would generate noise off-site during site demolition and would peak during grading. This would include removal of materials from the project site, base materials, and demolished materials. While this vehicle activity would increase ambient noise levels along the haul route, ambient noise levels would not be expected to significantly increase ambient noise levels by 3 dB(A) or greater at any noise sensitive land use. Studies have shown that a 3 dB(A) increase in sound level pressure is barely detectable by the human ear.

112 See United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971. Per Table V, Noise Control For Construction Equipment therein, use of improved mufflers/silencers would achieve approximately 10 dBA reduction.

A 3 dB(A) increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming that travel speeds and fleet mix remain constant.[113] While this vehicle activity would marginally increase ambient noise levels along the haul route, it would not be expected to significantly increase ambient noise levels by 5 dB(A) or greater at any noise sensitive land uses. A 3 dB(A) increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming that travel speeds and fleet mix remain constant.

Average daily traffic (ADT) counts from the City of Los Angeles Department of Transportation were used to estimate the existing traffic along Selma Avenue near the project site. Traffic counts indicate average daily traffic along Selma Avenue near the Project Site to be approximately 2,759 vehicles per day.[114]

The demolition phase for Project construction would average approximately 16 haul truck trips per day. Because haul trucks generate more noise than traditional passenger vehicles, a 19.1 passenger car equivalency (PCE) was used to convert haul truck trips to a reference level conversion to an equivalent number of passenger vehicles.[115] Therefore, 16 haul truck trips would account for approximately 305 PCE trips per day during the demolition phase. This would account for approximately 11.1 percent of the daily traffic that passes through Selma Avenue near the Project Site. Since it would take a doubling (i.e., a 100 percent increase) of roadway traffic volume to increase noise levels by 3 dB(A), the addition of haul trucks during Project construction would not increase traffic to levels capable of producing 3 dB(A) ambient noise increases.

Though the addition of haul trucks would alter the fleet mix of the Project haul route, their minimal addition to local roadways would not nearly double those roads' traffic volumes, let along augment their traffic to levels capable of producing 5 dB(A) ambient noise increases. As a result, off-site construction noise impacts related to haul trips would be considered less than significant.

113 California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Protocol.* September 2013.

114 City of Los Angeles Department of Transportation. May 2015. 2 Nu-Metrics Traffic Analyzer Study Computer Generated Summary Report. Available at: https://navigatela.lacity.org/dot/traffic_data/survey_data/selma.bet.wilcoxandschrader.eb.1.150521-num.pdf, accessed April 13, 2021.

115 Caltrans, Technical Noise Supplement Table 3-3, 2013.

Operational Impacts

Operational Traffic Noise

As discussed above, a 3 dB(A) increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming that travel speeds and fleet mix remain constant. A 3 dB(A) noise level increase is the minimum noise level increase required for a human to perceive a change in ambient noise.

Traffic volumes in the Project area were obtained from the Los Angeles Department of Transportation traffic count information. Traffic counts indicate average daily traffic along Selma Avenue near the Project Site to be approximately 2,759 vehicles per day.[116]

Trip generation information for the Proposed Project was added to average daily traffic volumes for to determine whether traffic increased enough to result in an audible noise level increase. The DOT Traffic Count shows that near the project site, Selma Avenue has a daily traffic volume of approximately 2,759 vehicles. The Project is estimated to have a net increase of 126 daily vehicle trips. An increase of 126 trips would account for approximately 4.6 percent of the average daily traffic volume near the Project Site. This volume is not nearly the doubling (i.e., 100 percent increase) of traffic volume required for a 3 dB(A) increase in noise. This increase in traffic volumes compared to current counts is not significant enough to cause an audible increase in traffic noise and impacts would be less than significant.

Operational Stationary Noise

Regulatory compliance with LAMC Sec.112.02 would ultimately ensure that noises from sources such as heating, air conditioning, and ventilation (HVAC) systems not increase ambient noise levels at neighboring occupied properties by more than 5 dB(A). Given this regulation, ambient noise levels, and the relatively quiet operation of modern HVAC systems, these on-site noise sources would not be capable of causing the ambient noise levels of nearby uses to increase by 3 dB(A) CNEL to or within their respective “normally unacceptable” or “clearly unacceptable” noise categories, or by 5 dB(A) or greater overall.

Parking noise typically generates noise levels of approximately 60 dB(A) at 50 feet. However, parking from the Project would occur on the first two levels of the residential building with the

116 City of Los Angeles Department of Transportation. May 2015. 2 Nu-Metrics Traffic Analyzer Study Computer Generated Summary Report. Available at: https://navigatela.lacity.org/dot/traffic_data/survey_data/selma.bet.wilcoxandschrader.eb.1.150521-num.pdf, accessed April 13, 2021.

driveway along Selma Avenue. Parking noise from within the structure would likely be inaudible, or at the very least considerably attenuated at nearby receptors. These parking noises would not exceed the normally acceptable level of noise identified in **Table IV.13-4, State of California Noise/Land Use Compatibility Matrix**. Therefore, parking noise would result in a less than significant impact.

b. Generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant with Mitigation Incorporated. The Federal Transit Administration provides ground-born vibration impact criteria with respect to building damage during construction activities. PPV, expressed in inches per second, is used to measure building vibration damage. Construction vibration damage criteria are assessed based on structural category (e.g., reinforced-concrete, steel, or timber). FTA guidelines consider 0.2 inch/sec PPV to be the significant impact level for non-engineered timber and masonry buildings. Structures or buildings constructed of reinforced concrete, steel, or timber have a vibration damage criterion of 0.5 inch/sec PPV pursuant to FTA guidelines.[117]

Groundborne vibration generated by construction activities associated with the proposed project would affect sensitive uses located in close proximity to the project site. **Table IV.13-7, Vibration Levels at Off-Site Sensitive Uses from Project Construction,** shows the estimated vibration velocities for nearby sensitive receptors.

[117] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual. September 2018.

Table IV.13-7
Vibration Levels at Off-Site Sensitive Uses from Project Construction

Sensitive Uses Off-Site	Distance to Project Site (ft.)	Receptor Significance Threshold PPV (in/sec)	Estimated PPV (in/sec)
Location #1 - 6417 Selma Ave (Dream Hollywood Hotel)	150	0.5	0.006
Location #2 - 1622 Wilcox Ave (Mark Twain Hotel)	315	0.2	0.002
Location #3 - 1550 Wilcox Ave (Gilbert Hotel)	10	0.2	0.352
Location #4 - 6371 Selma Ave (commercial uses)	280	0.5	0.002

Source: Impact Sciences, Inc. 2021

The vibration velocities predicted to occur at the nearest sensitive receptors at the Gilbert Hotel would be 0.352 in/sec PPV. It should be noted that this would be a worst-case scenario when potential heavy construction equipment would be located near the closest boundary to the Gilbert Hotel. Furthermore, construction equipment does not typically operate on the property line edge but is set back which would further reduce vibration impacts. Nevertheless, due to the close proximity of the Gilbert Hotel to the project site, **Mitigation Measure NOI-2** would be required to reduce potential construction vibration impacts on off-site receptors to a less than significant level.

Furthermore, the Historic Resources Assessment Report for the Proposed Project (included as **Appendix C** to this SCEA) noted that vibration impacts from Project construction could potentially impact the existing on-site structure (Baker Garage) at 6422 Selma Avenue, which is noted to be closely tied to both the history of early Hollywood and the development of the automobile in Los Angeles. **Mitigation Measure NOI-2** would ensure that vibration impacts to both off-site and on-site receptors are less than significant.

Mitigation Measure

MM-NOI-2: Prior to the start of construction, surveys shall be performed to document the conditions of the masonry of the remaining walls at 6422 Selma Avenue as

well as the Gilbert Hotel building. A structural monitoring program shall be implemented and recorded during construction to ensure that ground borne vibration levels do not exceed 0.12 inches per second, PPV. The structural monitoring plan shall include documentation, consisting of video and/or photographic documentation of accessible and visible areas on the exterior of the buildings. A historic architect (meeting the SOI's Professional Qualification Standards) or structural engineer with experience with historic masonry buildings shall establish baseline structural conditions of the building and prepare the shoring design. Additionally, a qualified acoustical engineer shall be retained to review the proposed construction equipment and develop and implement a vibration monitoring program capable of documenting the construction-related ground vibration levels at the Project site during demolition and excavation phases where heavy construction equipment (e.g., large bulldozer and drill rig) would be operating within 15 feet of the affected buildings.

The vibration monitoring system shall measure and continuously store the peak particle velocity (PPV) in inch/second. Vibration data shall be stored on a one-second interval. The system shall also be programmed for two preset velocity levels: a warning level of 0.07 inch/second (PPV) and a regulatory level of 0.12 inch/second (PPV). The system shall also provide real-time alert when the vibration levels exceed either of the two preset levels.

- In the event the warning level of 0.07 inch/second (PPV) is triggered, the contractor shall identify the source of vibration generation and provide steps to reduce the vibration level, including but not limited to halting/staggering concurrent activities and utilizing lower vibratory techniques.

- In the event the regulatory level of 0.12 inch/second (PPV) is triggered, the contractor shall halt the construction activities and visually inspect the Baker Garage for any damage. Results of the inspection must be logged. The contractor shall identify the source of vibration generation and provide steps to reduce the vibration level. Vibration measurement shall be made with the new construction method to verify that the vibration level is below the warning level of 0.07 inch/second (PPV). Construction activities may then restart.

- In the event damage occurs to historic finish materials due to construction vibration, such materials shall be repaired in consultation with a qualified preservation consultant.

The structure-monitoring program shall be submitted to the Department of Building and Safety and received into the case file for the associated discretionary action permitting the Project prior to initiating any construction activities.

Implementation of **Mitigation Measure NOI-2** would require the development of a vibration monitoring program. The program would include real time monitoring of vibration levels which would alert when vibration levels reach a warning level of 0.07 in./sec. PPV and a regulatory level of 0.12 in./sec. PPV. Therefore, vibration impacts associated with building damage due to construction activities would result in a less than significant impact with mitigation incorporated.

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

No Impact. The Project Site is not in the vicinity of a private airstrip or airport land use plan. Likewise, the project site is not located within an airport land use plan or within two miles of a public airport or public use airport. The nearest airport is the Bob Hope (Hollywood/Burbank) Airport located approximately 7.9 miles to the north of the Project Site. As such, the Project would not expose people residing or working in the Project area to excessive airport-related noise levels. No impact would occur from the Proposed Project and no further analysis is required.

14. Population and Housing

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of road or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

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

Less than Significant Impact. A significant impact would occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the project area that would otherwise not have occurred as rapidly or in as great a magnitude.

Construction Impacts

Construction job opportunities created as a result of the Project are not expected to result in any substantial population growth in the area. The work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Additionally, the construction workers would likely be supplied from the region's labor pool. Construction workers would not be likely to relocate their household as a consequence of working on the Project, and as such, significant housing or population impacts will not result from construction of the Project. Therefore, construction-related population growth impacts will be less than significant.

Operational Impacts

The Project Site is located in SCAG's City of Los Angeles Jurisdiction for growth forecasting. The most recent U.S. Census Bureau population estimates indicated a 2019 population of 3,979,576 for the City of Los Angeles.[118] According to SCAG's Connect SoCal 2020 RTP/SCS, the City of Los Angeles is expected to increase in population to 4,771,300 by the year 2045.[119] The average persons per household for the City of Los Angeles is 2.80 persons per household,[120] however, because all of the units in the proposed Project would be four-bedroom units, to be conservative, this analysis assumes a unit occupancy of 4.0 persons per household. Thus, the Proposed Project would include 45 multi-family units for an estimated population of approximately 180 residents, well within the expected population increase for the City.

As emphasized in many regional and local planning documents, including the City of Los Angeles General Plan Housing Element, the City is in need of new dwelling units to serve both the current population and the projected population. The Project Site does not currently provide housing but will add 45 housing units. As such, the Project, which is adding housing units, will not result in a net loss of housing inventory in the area. By developing new residential dwelling units, the Project would help to fulfill this demand and would be in line with the planned increases in population for the City of Los Angeles.

As analyzed above, the net new population and housing that would be generated by the Project would be within SCAG's population projections for the City of Los Angeles. Therefore, the Project would not induce substantial unplanned population or housing growth. Impacts related to population and housing would be less than significant.

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

No Impact. The Project Site does not contain any existing dwelling units. Therefore, the Proposed Project would not displace any residents or housing and would have no related impacts.

118 U.S. Census Bureau. 2021. Quickfacts. Available online at: https://www.census.gov/quickfacts/fact/table/losangelescitycalifornia,CA/PST045219

119 Southern California Association of Governments (SCAG). April 2020. Demographics and Growth Forecast Technical Report. Available online at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579

120 U.S. Census Bureau. 2021. Quickfacts. Available at: https://www.census.gov/quickfacts/fact/table/losangelescitycalifornia,CA/PST045219

15. Public Services

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:					
i)	Fire protection?	☐	☐	☒	☐
ii)	Police protection?	☐	☐	☒	☐
iii)	Schools?	☐	☐	☒	☐
iv)	Parks?	☐	☐	☒	☐
v)	Other public facilities (Libraries)?	☐	☐	☒	☐

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

i. Fire Protection?

Less Than Significant Impact. Consistent with the ruling of *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 and the requirements stated in the California Constitution Article XIII, § 35(a)(2), the obligation to provide adequate fire protection and emergency medical services is the responsibility of the City. A development project would have a significant impact on fire protection if it requires a new or expanded fire station to maintain service and that new or expanded facility resulted in adverse physical effects.

Construction

Construction activities associated with the Project may temporarily increase demand for fire protection and emergency medical services in the event of an emergency. This is due to construction activities which may cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources from machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings.

That noted, to comply with California Department of Industrial Relations (Cal-OSHA) and State and City Fire and Building Code requirements, construction managers and personnel would be trained in fire prevention and emergency response, and fire suppression equipment specific to construction would be maintained on-site.[121] This is to lessen reliance and not deplete resources from the local fire department. Project construction would comply with all applicable codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. Thus, in light of City and State regulations and code requirements that would, in part, require personnel to be trained in fire prevention and emergency response, maintenance of fire suppression equipment, and implementation of proper procedures for storage and handling of flammable materials, construction impacts on fire protection and emergency medical services would be less than significant.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response, by adding construction traffic to the street network and by necessitating partial lane closures during street improvements and utility installations. These impacts, while potentially adverse, would be less than significant for the following reasons:

- Construction activities are temporary in nature and do not create continuing risks;
- General “good housekeeping” procedures employed by the construction contractors and the work crews (e.g., maintaining mechanical equipment, proper storage of flammable materials, cleanup of spills of flammable liquid) would minimize these hazards; and

[121] California Department of Industrial Relations, Subchapter 4, Article 36: Fire and Protection Measures, https://www.dir.ca.gov/title8/1920.html.

- Partial lane closures would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

Impacts on traffic that could potentially affect emergency response are addressed through a Construction Traffic Management Plan (CTMP), which includes traffic management strategies for Project construction. Compliance with CTMPs is typically included as conditions of approval prior to issuance of construction permits for the approved project. The CTMP would outline and dictate how construction operations would be carried out and would identify specific actions to reduce effects on the surrounding community. The CTMP would be based on the nature and timing of specific construction activities and other projects in the vicinity. In addition to traffic, there are a number of factors that influence emergency response, including alarm transfer time, alarm answering and processing time, mobilization time, risk appraisal, geography, distance, traffic signals, and roadway characteristics. It is acknowledged that, even with the CTMP, the Project could incrementally increase traffic, which could potentially delay emergency response times. However, the Project's potential impacts are minimal given these other factors that influence emergency response time (alarm transfer, alarm answering and processing time, mobilization time, risk appraisal, geography, distance, traffic signals, and roadway characteristics).

Overall, construction is not considered to be a high-risk activity, and the LAFD is equipped and prepared to deal with construction-related traffic and fires should they occur. Due to the limited duration of construction activities and compliance with applicable codes, Project construction would not be expected to adversely impact firefighting and emergency services to the extent that there would be a need for new or expanded fire facilities in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. Therefore, impacts on fire protection services associated with construction of the Project would be less than significant.

Operation

Fire Flow

Prior to construction of the Project, the Water Operations Division of LADWP would perform a detailed fire-flow study at the time of permit review (Plan Check) in order to

ascertain whether further water system or site-specific improvements would be necessary. In addition, the LAFD would review the plans for compliance with applicable City Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, thereby ensuring that the Project would not create any undue fire hazard. Thus, fire flow to the Project Site would be adequate, and the associated impact would be less than significant.

Response Distance

LAFD's ability to provide adequate fire protection and emergency response services to a site is determined by the response distance and the degree to which emergency response vehicles can successfully navigate the given access ways and adjunct circulation system, which is largely dependent on roadway congestion along the response route. Section 57.09.07 of the LAMC requires land uses to include the installation of an automatic fire-sprinkler system should the type of land use exceed 1.5 miles.[122] The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. The site location is served by LAFD Fire Station 27, located at 1327 North Cole Avenue, about one-half mile away from the Project Site.[123] Therefore, this Project meets the standards outlined in LAMC Section 57.09.07.

Additionally, as stated previously, the Project would be required to comply with applicable City Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, and would be required to include features such as an emergency and standby power system, a fire command center, established emergency procedures, emergency stairways, automatic fire-extinguishing system, automatic smoke detection system, emergency voice/alarm communication system, manual alarm fire boxes, etc. Given the incorporation of fire sprinklers and other fire protection systems within the proposed building, Project impacts related to response distance would be less than significant.

Emergency Access

The LAFD would review Project plans for compliance with the Los Angeles Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection

122 LAMC Section 57.09.07

123 Los Angeles Fire Department, Find My Station. Available online at: https://www.lafd.org/fire-stations/station-results, accessed on November 15, 2021.

Association standards, thereby ensuring that the Project would not create any undue fire hazard. The Project would include an emergency response plan that would address the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, and locations of nearest hospitals and fire departments. Through compliance with applicable provisions of the Fire Code, Project impacts related to emergency access would be less than significant.

Conclusion

Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. If LAFD determines that new facilities are necessary at some point in the future, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under *CEQA Guidelines* §s 15301 or 15332 and would not be expected to result in significant impacts. Further analysis, including a specific location, would be speculative and beyond the scope of this document. Thus, the Project impacts on fire protection and emergency medical services would be less than significant.

ii. Police protection?

Less Than Significant Impact. The Project Site is served by the Los Angeles Police Department (LAPD) District 646 of the Hollywood Division,[124] which services the Argyle, Cahuenga Pass, East Hollywood, Hobart, Hollywood, Hollywood Hills, Hollywood/La Brea, Little Armenia, Los Feliz, Melrose District, Mount Olympus, Sierra Vista, Spaulding Square, Sunset Strip, Thai Town, and Vine/Willoughby communities.[125] The station is located at 1358 N. Wilcox Avenue, approximately 0.3 miles from Project Site.

Construction

Although there is the potential for Project construction to create an increase in demand for police protection services, the Project would provide security on the Project Site as needed and appropriate during the construction process. This security could include perimeter

[124] Los Angeles ZIMAS. Available online at: http://zimas.lacity.org/, accessed March 3, 2020.

[125] Los Angeles Police Department. Wilshire Community Police Station. Available online at: https://www.lapdonline.org/wilshire_community_police_station.

fencing, lighting, and security guards, thereby reducing the demand for LAPD services. The specific type and combination of construction site security features would depend on the phase of construction. The Project Applicant would install temporary construction fencing to secure the Project Site during the construction phase to ensure that valuable materials (e.g., building supplies and metals such as copper wiring), as well as construction equipment are not easily stolen or abused.

During construction, emergency response vehicles can use a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Lights and other identifying noises compel traffic to pull to the side where available to provide access through traffic. Although minor traffic delays due to potential lane closures could occur during construction, particularly during the construction of utilities and street improvements, impacts to police response times are considered to be less than significant for the following reasons:

- Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAPD;
- Construction impacts are temporary in nature and do not cause lasting effects; and
- Partial lane closures, if determined to be necessary, would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

Construction of the Project would not affect the LAPD's ability to respond to emergencies to the extent that there is no need for any additional new or expanded police facilities, in order to maintain acceptable service ratios, response times, or other performance objectives of the LAPD. For these reasons, Project construction impacts on police services would be less than significant.

Operation

The Project would include security features such as appropriate lighting in and around the Project Site and controlled access to the parking garage. The Project would include defensible spaces designed to reduce opportunity crimes and ensure safety and security. These measures would be to offset the increase in residents, employees and visitors as

a result of the Project. In addition, the lighting and landscaping design would ensure high visibility. The provision of on-site security features, coordination with LAPD, and incorporation of crime prevention features, would not require the provision of new or physically altered police stations in order to maintain acceptable service ratios or other performance objectives for police protection. Additionally, the Project would also contribute to the General Fund, a portion of which is allocated to the LAPD and other public services. Moreover, consistent with *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and potential impacts on public safety services are not an environmental impact that CEQA requires a project applicant to mitigate. Therefore, Project impacts related to police protection services would be less than significant.

Per department standards, the LAPD will determine if any additional crime prevention and security features would be available that are consistent with the development standards as applied to the design of the project. Any additional design features identified by the LAPD shall be incorporated into the project's final design and to the satisfaction of LAPD, prior to issuance of a Certificate of Occupancy for the project.

iii. Schools?

Less than Significant Impact. The Project Site is served by the Los Angeles Unified School District (LAUSD). A significant impact could occur if a project includes substantial employment or population growth that could generate a demand for school facilities which would exceed the capacity of LAUSD. Whether a project results in a significant impact on public schools is made with the following considerations:

1. Population increases resulting from the project, based on the net increase of residential units or square footage of nonresidential floor area;

2. Demand for school services anticipated at the time of project completion and occupancy compared to the expected level of service available, considering, as applicable, scheduled improvements to LAUSD services (facilities, equipment, and personnel) and the project's proportional contribution to the demand;

3. Whether (and to the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms,

major revisions to the school calendar (such as year-round sessions), or other actions that would create a temporary or permanent impact on the school(s); and

4. Whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

The Project area is currently served by one elementary school, one middle school, and one high school that is part of the LAUSD system.[126] Gardner Street Elementary is located at 7450 Hawthorn Avenue, approximately 1.2 miles from the Project Site. Hubert Howe Bancroft Middle School is located at 929 N Las Palmas Avenue, approximately 0.9 miles away, and Hollywood Senior High School is located at 1521 Highland Avenue approximately 0.6 miles away from the Project Site. All three schools are within a 10-minute drive to the Project site. This Project consists of 45 residential apartment units with 180 bedrooms, which as noted in Section 14 – Population and Housing – would translate to a population estimate of 180 people based on City of Los Angeles average of 4.0 persons per multi-family unit. Taking into consideration the possibility of children living in a four bedroom apartment, the potential increase of students for the area could be between 45 to 90 students, however given the anticipated occupancy of the residences by young co-habiting adults, the potential for school-age children living in the building is considered low. Given that the Project site is equally represented by one elementary, one middle school, and one high school, the potential impacts would be less than significant to school facilities.

Pursuant to the California Government Code § 65995,[127] the Project Applicant would be required to pay school fees established by LAUSD, payment of which in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, provide full and complete mitigation for any potential direct and indirect impacts to schools as a result of the Project. Therefore, Project impacts to school services would be less than significant.

iv. Parks?

Less than Significant Impact. A Project could result in a significant impact on local parks if the population increase as a result of the development disproportionally increases or

[126] Resident School Identifier, Los Angeles Unified School District. Available online at: https://rsi.lausd.net/ResidentSchoolIdentifier/, accessed on January 17, 2022.

[127] also known as SB 50 – the Leroy F. Greene School Facilities Act of 1998

reduces the demand for recreation and park services. However, this Project Site is served by several public parks and would not create a significant impact.

The Project is located approximately 0.7 miles from the nearest Los Angeles City park, Yucca Park,[128] which features basketball courts (lighted / outdoor), a children's play area, picnic tables, a soccer field (unlighted), benches, a synthetic field, and a computer lab. The site is also located about a mile from Carlton Way Park, which features a children's play area, and outdoor fitness equipment. The Yucca Community Center is co-located with Yucca Park which hosts multiple sports and fitness programs.

The population of Hollywood was approximately 195,709 persons in 2019, according to estimates by the Los Angeles Department of City Planning.[129] The proposed project is expected to generate at 180 residents based on 45 residential units,[130] and may result in a proportional increase in the use of local community parks.

The demand for parks and recreational facilities in the City is generally determined based on the number of residents a project would generate and the City's parkland acreage-to-population ratios are based on residential population and not employee population. The Los Angeles Citywide General Plan Framework Final EIR[131] identifies the City's standard long-range (minimum) ratios for parks to population. According to Section 2.14, Recreation and Open Space, of the Framework's Final EIR, the City's standard minimum ratio of parks to population is two acres per 1,000 residents for neighborhood parks and two acres per 1,000 residents for community parks, and four acres per 1,000 residents of combined neighborhood and community parks. LAMC Section 12.33 requires all new, non-exempt, residential dwelling units to dedicate land, pay a fee or provide a combination of land dedication and fee payment for the purpose of acquiring, expanding and improving park and recreational facilities for new residents,[132] with an exception made for affordable housing units. These fees are used to fund land acquisition and capital improvements. This Project is not requesting a zoning change and is a use allowed within this community.

128 City of Los Angeles Department of Recreation and Parks, Facility Map Locator, https://www.laparks.org/maplocator, accessed on March 30, 2021.

129 City of Los Angeles Department of City Planning, 2019 Hollywood Demographic Profile, available online at: https://planning.lacity.org/odocument/f12538f5-1aeb-41d9-a7d8-a7269fcb769b/standard_report2019_HOLLYWOOD_mail.pdf/

130 To be conservative, unit occupancy has been increased from the standard 2.80 persons per unit to 4.0 persons per unit.

131 City of Los Angeles, Los Angeles Citywide General Plan Framework Final EIR, June 1996.

132 Board Report No. 17-120. Board of Recreation and Park Commissioners. Approved May 17, 2017. Available online at: https://www.laparks.org/sites/default/files/pdf/commissioner/2017/may17/17-120.pdf.

Therefore, the Project would not lead to substantial physical deterioration of any recreational facilities and would have no related significant impacts.

The Public Recreation Plan, part of the Service Systems Element of the Los Angeles General Plan, provides standards for the provision of recreational facilities throughout the City including Local Recreation Standards.[133] The standard ratio of neighborhood and community parks to population is two acres per 1,000 residents within a 1- to 2-mile radius for neighborhood and community parks. The Project site is located within an urbanized area of the Hollywood community. There are nine parks and recreational facilities within a 5-mile radius of the Project.[134] It is estimated that development of the Project would result in an increase of at least 180 residents, which could increase the activity and frequency of use of these facilities. The Project includes on-site amenities intended to serve the recreational needs of on-site residents, including outdoor open space, a gym, and a roof deck. However, it assumed the future residents of the Project site would utilize recreation and park facilities in the surrounding area and generate additional demand for such amenities. Based on the standard parkland ratio goal of two acres per 1,000 residents, the Project would generate a need for approximately 0.36 acres of public parkland. This demand would be met through a combination of (1) on-site open space proposed within the Project discussed above, and (2) payment of applicable fees regarding the availability of existing park and recreation facilities within the area. LAMC Section 12.33 requires all new, non-exempt, residential dwelling units to dedicate land, pay a fee or provide a combination of land dedication and fee payment for the purpose of acquiring, expanding and improving park and recreational facilities for new residents,[135] with an exception made for affordable housing units. The Project would provide on-site open space and recreation facilities and be compliant with LAMC Section 12.33 in paying the requisite fees for new housing development. Therefore, impacts related to parks and recreational facilities would be less than significant.

v. Other public facilities?

Libraries

133 Public Recreation Plan. Services Systems Element of the LA General Plan. Available online at: https://planning.lacity.org/Code_Studies/GeneralElement/PublicRecreationPlan.pdf.

134 City of Los Angeles Department of Recreation and Parks. Facility Map Locator. Available online at: https://www.laparks.org/maplocator, accessed March 30, 2021.

135 Board Report No. 17-120. Board of Recreation and Park Commissioners. Approved May 17, 2017. Available online at: https://www.laparks.org/sites/default/files/pdf/commissioner/2017/may17/17-120.pdf.

Less than Significant Impact. A significant impact could occur if a project includes substantial employment or population growth whose demand would exceed the capacity available to serve the Project site.

Library facilities within two miles of a Project site are generally considered to be within the service area of a Project, and the nearest Los Angeles Public Library (LAPL) is the Memorial Branch Library, which is about a mile away from the Project site. The Project would introduce new residents to the site.

On March 8, 2011, City voters approved ballot Measure L, which amends the City Charter to incrementally increase the amount the City is required to dedicate annually from its General Fund to LAPL to an amount equal to 0.03 percent of the assessed value of all property in the City, and incrementally increase LAPL's responsibility for its direct and indirect costs until it pays for all of its direct and indirect costs. The measure was intended to provide neighborhood public libraries with additional funding to help restore library service hours, purchase books, and support library programs, subject to audits, using existing funds with no new taxes. Beginning in fiscal year 2014-2015 and thereafter, LAPL was to be responsible for payment of all of its direct and indirect costs.[136]

Library funding is now mandated under the City Charter to be funded from property taxes including those assessed against the Project, which would increase with the new development and be utilized for additional staff, books, electronic media, computers, and other library materials. Therefore, impacts to library facilities would be less than significant.

16. Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐

[136] Los Angeles Office of the City Clerk, Interdepartmental Correspondence and Attachments Regarding Measure L, website: http://clkrep.lacity.org/onlinedocs/2011/11-1100-S2_rpt_cao_11-16-10.pdf, accessed August 23, 2021.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which have an adverse physical effect on the environment?	☐	☐	☒	☐

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

Less Than Significant Impact. The Project site is located within an urbanized area of the Hollywood community. There are nine parks and recreational facilities within a 5-mile radius of the Project.[137] The Project is located approximately 0.7 miles from the nearest Los Angeles City Park, Yucca Park,[138] which features basketball courts (lighted / outdoor), a children's play area, picnic tables, a soccer field (unlighted), benches, a synthetic field, and a computer lab. The site is also located about a mile from Carlton Way Park, which features a children's play area, and outdoor fitness equipment. The Yucca Community Center is co-located with Yucca Park which hosts multiple sports and fitness programs.

The Project would lead to a population increase of approximately 180 people. The Applicant is proposing four outdoor terraces, on the ground floor, the 13th floor, the 14th floor, and the roof of the building, as well as ten communal balconies, for a total of 11,387 square feet of open space. The Project also proposes 345 square feet of indoor amenities (a gym) for recreational use. Therefore, the Project allows ample opportunity for onsite residents to enjoy outdoor recreation and facilities, and impacts to local parks would be less than significant.

LAMC Section 12.33 requires all new, non-exempt, residential dwelling units to dedicate land, pay a fee or provide a combination of land dedication and fee payment for the purpose of acquiring, expanding and improving park and recreational facilities for new residents,[139] with an exception made for affordable housing units. These fees are used to fund land acquisition and capital improvements. Given the number of available parks and recreation centers located near the Project Site, the dedication of land for open recreation space, and the requisite park

137 City of Los Angeles Department of Recreation and Parks. Facility Map Locator. Available online at: https://www.laparks.org/maplocator, accessed March 30, 2021.

138 City of Los Angeles Department of Recreation and Parks, Facility Map Locator, https://www.laparks.org/maplocator, accessed on March 30, 2021.

139 Board Report No. 17-120, Board of Recreation and Park Commissioners, Approved May 17, 2017. Available online at: https://www.laparks.org/sites/default/files/pdf/commissioner/2017/may17/17-120.pdf.

fees, the development itself would not lead to substantial physical deterioration of existing recreational facilities. Therefore, this project would have no related significant impacts.

b. Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

Less Than Significant Impact. As discussed above, the Project includes private recreational facilities for the residents of the Project, including outdoor terraces, balconies, and indoor amenities. These amenities would be within the footprint of the Project site and would not expand into public space nor affect available facilities. Therefore, the impacts to the environment would be less than significant.

17. Transportation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact. A project could result in a significant impact if it adversely affects an existing community plan, transportation ordinance or policy addressing transit and pedestrian facilities. This purpose of this Project is to provide much needed housing, including affordable housing, in a centrally located community near rapid transit. In accordance with a transportation assessment memorandum of understanding (MOU) with the City of Los Angeles Department of Transportation (LADOT) and supplemental traffic analysis, this Project

would not conflict with any existing plans and facilities. In fact, its design and proximity to a metro stop and multiple bus lines would be beneficial for residents and commuters. Refer to **Appendix G** of this SCEA.

The Project Site centrally located within the Hollywood Community Plan Area and is designated as a Transit Priority Area in the City of Los Angeles.[140] Transit Priority Areas are identified under Zoning Information File No. 2452 as an area within one half mile of a major transit stop that is existing or planned.[141]

The Site is served by the 2 Metro Local Line that stops at the corner of Wilcox Avenue and Sunset Boulevard approximately 0.16 miles from the Project Site. Additionally, there are several major bus routes running along Hollywood Boulevard, Highland Avenue, and Vine Street. Serviced by the 212 Metro Local Line, 210 Metro Local Line, 217 Metro Local Line, 222 Metro Local Line, Beachwood Canyon DASH Bus, Hollywood Clockwise DASH, Hollywood Counterclockwise DASH, and the Hollywood/DASH. The Project site is approximately 0.33 miles from the Hollywood/Vine Station of the Metro B Line (formerly the Red Line).

The Project also proposes a two-level parking garage to accommodate parking for residents. This Project therefore would not complicate existing parking issues along Selma Avenue or Wilcox Street.

As outlined in the analysis above, this Project meets the goals and policies of the Hollywood Community Plan. The purpose of this Project is to provide much needed housing near a transit stop; therefore, impacts would be less than significant.

b. Conflict or be inconsistent with *CEQA Guidelines* section 15064.3, subdivision (b)?

Less Than Significant Impact. A significant impact could occur if the Project were to result in substantial increases in traffic volumes in the vicinity of the Project exceeding the Los Angeles Department of Transportation's (LADOT) recommended level of service. *CEQA Guidelines* § 15064.3(b) outlines the criteria for analyzing transportation impacts. §

140 ZIMAS. LA City. Available online: http://zimas.lacity.org/, accessed March 1, 2021.

141 Section 21064.3 of the PRC (PRC) defines a "major transit stop" as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. For purposes of § 21099 of the PRC, a transit priority area also includes major transit stops in the City of Los Angeles (City) that are scheduled to be completed within the planning horizon of the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS). City of Los Angeles Department of City Planning. ZI No. 2452. Available online: https://pdf4pro.com/view/city-of-los-angeles-department-of-city-planning-zoning-44bd27.html.

15064.3(b)(1) – Land Use Projects - states that Vehicle Miles Traveled (VMT) exceeding an applicable threshold of significance may indicate a significant impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. In 2019, the City of Los Angeles - pursuant to SB 743 and the recent changes to § 15064.3 of the *State's CEQA Guidelines* - adopted VMT as the applicable criteria for determining transportation impacts under CEQA.[142] The current LADOT TAG provide instructions on preparing transportation assessments for land use proposal and defines the significant impact thresholds. The LADOT VMT Calculator tool measures project impacts in terms of Household VMT per Capita and Work VMT per Employee. DOT identified distinct thresholds for significant VMT impacts (which is 15% below APC criteria) for each of the seven Area Planning Commission (APC) areas in the City. This Project is located in the Central APC area, which following the following thresholds:

- Daily Household VMT per Capita: 6.0
- Daily Work VMT per Employee: 7.6

Currently, LADOT estimates 47 daily vehicle trips to the Project Site, with 349 vehicle miles traveled (VMT) daily. (See **Appendix G, Memorandum of Understanding**) CEQA analysis would be triggered by the threshold set by the City of Los Angeles, at which added VMT from a project would require environmental mitigation. A memorandum of understanding between the Applicant and the City's Department of Public Works that acknowledges the Transportation Assessment for the proposed Project would be prepared in accordance with LADOT's Transportation Assessment Guidelines was prepared in anticipation of the Project on February 18, 2021. The City's threshold for Daily VMT at Tier 2 is 250 trips. This Project would increase the level of service to the Project Site to 172 daily trips and 1,028 daily VMT.[143] This would equate to a net increase of 125 daily trips and 679 daily VMT, both of which fall below levels of significance for Tier 2 criteria. Therefore, given the projections of net daily trips, it was found this Project would not exceed thresholds and therefore not necessitate further VMT analysis.

142 City of Los Angeles Transportation Assessment Guidelines. Chapter 2. CEQA Analysis of Transportation Impacts. July 2019.

143 Transportation Assessment Memorandum of Understanding for the Proposed Residential Project Located at 6422 West Selma Avenue (PAR 2020-5614-VHCA/ADM-2020-5245-TOC). February 18, 2021.

The proposed Project is not projected to have Household nor Work VMT per Capita of exceeding the thresholds 15% below APC (6.0 per household and 7.6 for work),[144] therefore, this Project would not have a significant VMT impact on the Site nor the environment.

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

Less Than Significant Impact. A significant impact could occur if a project includes new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project site access or other features were designed in such a way as to create hazard conditions. The existing driveway on the Project site would be modified slightly to enable access and egress; however, the Project would not include any change in intersection or roadway design. Moreover, the Project would not include unusual or hazardous design features that are atypical to residential developments. Therefore, impacts would be less than significant.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. A significant impact could occur if the Project design would not provide emergency access meeting the requirements of the LA Fire Department, or in any other way threatened the ability of emergency vehicles to access and serve the Project site or adjacent uses. Development of the Project site may require temporary and/or partial street and sidewalk closures due to construction activities. Such closures would be coordinated with the City of Los Angeles Departments of Transportation, Buildings and Safety, and the Department of Public Works. Closures would not be expected to interfere with emergency response or evacuation plans. As described under Public Services, this Project would satisfy the emergency response requirements of the LAFD. No hazardous design features are included in the access design or site plan for the Project that could impede emergency access. Furthermore, the Project would be subject to site plan review by the LAFD and the LAPD to ensure that all access roads, driveways, and parking areas would remain accessible to emergency service vehicles. Because the Project would not be expected to result in inadequate emergency access, impacts would less than significant.

[144] City of Los Angeles VMT Calculator Version 1.3, generated February 2, 2021.

18. Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	☐	☒	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☒	☐	☐

a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Less Than Significant with Mitigation Incorporated.

A request for a search of the Sacred Lands File held by the California Native American Heritage Commission (NAHC) was made by ASM on July 17, 2020. This search was

undertaken to supplement the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System (CHRIS) records search to inquire as to whether resources important to local Native American groups may exist within the proposed Project area that may not appear within the CHRIS system. The NAHC response on July 21, 2020, was positive, stating that sites may be located within the Project area that may be impacted by the project. A list of five tribal contacts who may have interest in the Project area was provided with the NAHC response.[145] As such, archaeological monitoring of initial ground disturbance related to the Project, up to approximately 6-feet in depth or when a qualified archaeologist has recommended that the possibility of encountering archaeological material has been exhausted, is recommended as a mitigation measure.

Mitigation Measure

MM-TCR-1: Prior to commencing any ground disturbance activities at the Project site, the Applicant, or its successor, shall retain archeological monitors and tribal monitors that are qualified to identify subsurface tribal cultural resources. Ground disturbance activities shall include excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, auguring, backfilling, blasting, stripping topsoil or a similar activity at the project site. Any qualified tribal monitor(s) shall be approved by the Gabrieleno/Tongva San Gabriel Band of Mission Indians tribe. Any qualified archaeological monitor(s) shall be approved by the Department of City Planning, Office of Historic Resources ("OHR").

1. The qualified archeological and tribal monitors shall observe all ground disturbance activities on the project site at all times the ground disturbance activities are taking place. If ground disturbance activities are simultaneously occurring at multiple locations on the project site, an archeological and tribal monitor shall be assigned to each location where the ground disturbance activities are occurring. The on-site monitoring shall end when the ground disturbing activities are completed, or when the archaeological and tribal monitor both indicate that the site has a low potential for impacting tribal cultural resources.

[145] Native American Heritage Commission, correspondence dated April 20, 2021, refer to Appendix C, Appendix D.

2. Prior to commencing any ground disturbance activities, the archaeological monitor in consultation with the tribal monitor, shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in ground disturbance activities that provides information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during ground disturbance activities. In addition, workers will be shown examples of the types of resources that would require notification of the archaeological monitor and tribal monitor. The Applicant shall maintain on the Project site, for City inspection, documentation establishing the training was completed for all members of the construction crew involved in ground disturbance activities.

3. In the event that any subsurface objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be determined by a qualified archeologist, in consultation with a qualified tribal monitor, until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

4. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and OHR.

5. If OHR determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

6. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.

7. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in paragraphs 2 through 5 above.

8. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.

9. Notwithstanding paragraph 8 above, any information that the Department of City Planning, in consultation with the City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code, section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.

Incorporating this mitigation measure would reduce potential impacts to less than significant.

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

Less Than Significant with Mitigation Incorporated. There are no resources at the Project Site that have been determined by the City to be significant pursuant to the criteria set forth in Public Resources Code Section 5024.1. However, as described above, in light

of the positive result from the Sacred Lands File search there is the potential that previously undiscovered cultural resources could be uncovered during ground-disturbing activities. In the event that such resources are determined to be significant under PRC § 5024.1, the project could result in significant impacts to such resources, if the resource is disturbed, destroyed, or otherwise improperly treated. As such, **Mitigation Measure TCR-1** has set forth procedures to ensure that any finds that are exposed during construction activities for the proposed project are properly handled and treated. Upon incorporation of **Mitigation Measure TCR-1**, impacts to tribal cultural resources would be less than significant.

19. Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact.

Water

Like most projects in the City of Los Angeles, water services for this Project would be provided by the Los Angeles Department of Water and Power (LADWP). LADWP is the primary provider of water and electric services for the City of Los Angeles, servicing more than four million customers in 473 square miles through an intricate network of more than 7,000 miles of pipes.[146] This Project Site is centrally located in the City of Los Angeles within the Hollywood Community Plan Area and is being served by the existing LADWP system of water lines.

The Proposed Project consists of 45 residential units and 3,245 square feet of support/office space, and as a result would increase the demand for water services. The following table provides an estimate of how much water would be needed to sustain this Project upon completion.

Table IV.19-1
Project Water Use[147]

Land Use	Size	Usage Rate (gallons per day)	Water Use (gallons per day)
Existing			
Office Space	6,500 sf	144 gpd/1,000 sf	936
		Subtotal	**936**

146 Los Angeles Department of Water and Power, Facts & Figures, accessed on February 18, 2021, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?_adf.ctrl-state=yvd8gvrjg_4&_afrLoop=19640900766831.

147 Estimated water demand is generated using the water demand rates and methodology described in the City of Los Angeles, Department of Public Works, Bureau of Sanitation Sewer Generation Rates (2012)). The proposed development land uses will conform to Water-Efficiency Requirements Ordinance No. 180822, 2013 California Plumbing Code, 2013 California Green Building Code (CALGreen), 2014 Los Angeles Plumbing Code, and 2014 Los Angeles Green Building Code.

Proposed			
4-bedroom	45 units	276 gpd/unit	12,420
Landscaping[148]	1,946 sf	39.7 gpd/1,000 sf	80
Office/Support	3,245 sf	144 gpd/1,000 sf	475
		Subtotal	**12,975**
		Net New Water Use	**12,039**

Source: Impact Sciences, Inc. 2022

The Applicant would also comply with the City of Los Angeles' Low Impact Development Ordinances (City Ordinance No. 181,899 and No.183,833) and is recommended to implement Best Management Practices (BMPs) that have stormwater recharge or reuse benefits for the entire Project.

The 2015 Urban Water Management Plan (UWMP) was adopted in June 2016, and projects a demand of 611,800 AFY in 2020 and 644,700 AFY in 2025.[149] The UWMP forecasts water demand by estimating baseline water consumption by use (single-family, multi-family, commercial/government, industrial), then by adjusting for projected changes in socioeconomic variables (including personal income, family size, conservation effects) and projected growth of different uses based on SCAG's 2012 RTP.[150] The 2012 RTP models local and regional population, housing supply and jobs using a model accounting for job availability by wage and sector and demographic trends (including household size, birth and death rates, migration patterns and life expectancy).[151] Neither the UWMP forecasts, nor the 2012 RTP include parcel level zoning and land use designation as an input. The Project does not materially alter socioeconomic variables or projected growth by use. Any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, LA aqueduct) is offset with Metropolitan Water District (MWD) purchases to rise to the level of demand. The UWMP demonstrates adequate capacity currently and future capacity to accommodate City growth into which the Project would easily fit, as the Project does not propose any changes to the land use or zoning designations for the Project Site. Further, the Project does not propose any changes to the zoning or land use designation for the Project Site.

148 The Project meets the required 25% provided outdoor common open space. The Project's landscape plans reflect usage of low water vegetation. Found Residences, Los Angeles, January 29, 2021.

149 2015 Urban Water Management Plan, Los Angeles, pg. ES-23.

150 2015 Urban Water Management Plan, Los Angeles, pgs. 1-12.

151 SCAG, 2012 Regional Transportation Plan Growth Forecast Report, pgs 2-10.

As shown on **Table IV.19-1**, the Project would demand an increase of approximately 12,039 gallons of water per day (or 0.012 mgd). This total does not take any credit for any proposed sustainable and water conservation features of the Project. As provided in the Project Description, the Project includes numerous sustainable features aimed at increasing energy efficiency, reducing GHG emissions and water demand. The Project would be designed in line with the California Green Building Code for sustainability. The Project is being designed to promote more sustainable buildings by minimizing impacts on the environment and increasing greenspace. With the remaining capacity of approximately 50 to 150 mgd, the Los Angeles Aqueduct Filtration Plant (LAAFP) would have adequate capacity to serve the Project's projected demand for treatment of 0.012 mgd. Therefore, impacts related to water use and treatment would be less than significant and the Project would be adequately served by existing treatment facilities.

Wastewater

The Los Angeles Bureau of Sanitation would provide sewer service to the proposed Project area. Sewage from the Project Site would be conveyed through existing infrastructure and deposited at the Hyperion Treatment Plant (HTP). The HTP treats an average daily flow of 362 million gallons per day (mgd) and has the capacity to treat 450 mgd.[152] This equals a remaining capacity of 88 mgd of wastewater able to be treated at the HTP.

As shown in **Table IV.19-2**, the Project is estimated to generate a net total of approximately 11,574 gallons per day (or 0.012 million gallons per day) of wastewater. With a remaining daily capacity of 88 mgd, the HTP would have adequate capacity to serve the Project's projected 0.012 mgd generation. Further, as stated above, the Project does not propose any changes to the zoning or land use designation for the Project Site, and therefore, the wastewater generation for the Project was accounted for within City and regional estimates. Furthermore, the Project Applicant would be required to implement applicable LA Green Building Code requirements that would further reduce wastewater flow. The Project is being designed to promote more sustainable buildings by minimizing impacts on the environment and increasing greenspace. Therefore, impacts related to wastewater treatment would be less than significant, and the Project would be adequately served by the City's wastewater facilities. As part of the Project's permit process, the City would conduct further detailed gauging and evaluation to identify specific sewer connection points. If additional sewer line

[152] City of Los Angeles Department of Public Works, Bureau of Sanitation, "Wastewater System Fact Sheet" (2014).

capacity is needed to serve the Project, the Project Applicant would be required to install adequately sized sewer lines.

Thus, sewer infrastructure would be adequate to accommodate the Project. Therefore, impacts related to wastewater service would be less than significant.

Table IV.19-2
Project Wastewater Generation

Land Use	Size	Generation Rate (gallons per day)	Total Wastewater Generation (gallons per day)
Existing			
Office Space	6,500 sf	120 gpd/1,000 sf	780
		Subtotal	**780**
Proposed			
4-bedroom	45 units	266 gpd/unit	11,970
Office/Support	3,245 sf	120 gpd/1,000 sf	384
		Subtotal	**12,354**
		Net New Wastewater Generation	**11,574**

Source: Impact Sciences, Inc. 2022

Stormwater

The Project Site is located within the Ballona Creek urban watershed[153] in a developed area of Los Angeles served by LA Sanitation. Therefore, this Project would be subject to the policies of the Watershed Protection Program, which employs a multi-pronged approach to ensure the City of Los Angeles is in compliance with regulations and reduce the amount of pollution flowing into and through regional waterways.[154] One such regulation includes the LID Ordinance. The primary purpose of the LID Ordinance is to ensure development projects mitigate runoff in a manner that captures rainwater and removes pollutants while reducing the volume and intensity of stormwater flows. The Stormwater LID Ordinance requires LID measures be incorporated into the design of all development and redevelopment projects that

153 Los Angeles Geohub. *Watersheds*. Available online at: https://geohub.lacity.org/datasets/watersheds?geometry=-118.375%2C34.025%2C-118.370%2C34.027.

154 Watershed Protection. LA Sanitation – City of Los Angeles. Available online at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-wp?_afrLoop=2799911397528235&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=nqhx0d7oj_299#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D2799911397528235%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dnqhx0d7oj_303.

have a land disturbance activity and add, create or replace 500 square feet or more of impervious area. As such, this Project would be subject to LID measures by:

- Reducing stormwater/urban runoff while improving water quality;
- Promoting rainwater harvesting;
- Reducing offsite runoff and providing increased groundwater recharge;
- Reducing erosion and hydrologic impacts downstream; and
- Enhancing the recreational and aesthetic values in our communities.[155]

Further, as detailed above in Hydrology, the Project is required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ[156] as well as NPDES Construction General Permit and a SWPPP would be prepared and implemented for the Proposed Project in compliance with the requirements of the NPDES Permit. The SWPPP would identify construction BMPs to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

Electric power, Natural gas, and Telecommunications

The Project Site is located in a developed, urbanized portion of Los Angeles that is served by existing electric power, natural gas, and telecommunications services. Electricity would be provided by LADWP. In the context of the greater Los Angeles service area and the growth forecasts used by utility service providers, the Project would not be a substantial source of new unplanned demand for electrical, gas or telecommunications services (Refer to Section 6. 'Energy' above). New connections for the Project would be coordinated with the appropriate service providers. Any trenching or other excavation within the public right of way would also be coordinated with the City Department of Public Works.

Based on the survey and existing Los Angeles records, there are existing utility lines that run around the perimeter of the property. The Applicant is proposing to connect to water and wastewater lines in Selma Avenue to accommodate the development. The Project would not

155 Watershed Protection. Ordinance and History. LA Sanitation – City of Los Angeles. Available online at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-wp/s-lsh-wwd-wp-lid/s-lsh-wwd-wp-lid-oh?_adf.ctrl-state=nqhx0d7oj_380&_afrLoop=2800477855450270#!.

156 Watershed Protection, General Construction Activity Stormwater Permit. LA Sanitation – City of Los Angeles. Available online at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-wp/s-lsh-wwd-wp-ec/s-lsh-wwd-wp-ec-rm?_afrLoop=2802032421121765&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=nqhx0d7oj_1068#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D2802032421121765%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dnqhx0d7oj_1072.

require relocation of electrical, gas, or telecommunications facilities, the relocation of which could cause significant environmental effects. Therefore, impacts to water, wastewater, stormwater, and other utilities would be less than significant.

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. Refer to 'a' above. As shown in **Table IV.19-1** under projected water use, the Project would result in an increase of approximately 12,039 gallons per day in water consumption. The Project does not materially alter socioeconomic variables or projected growth by use. Any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, LA aqueduct) is offset with Metropolitan Water District (MWD) purchases to rise to the level of demand. The UWMP demonstrates adequate capacity currently and future capacity to accommodate City growth into which the Project would easily fit, as the Project does not propose any changes to the land use or zoning designations for the Project Site. Therefore, the impact would be less than significant.

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

Less Than Significant Impact. Refer to '19 a' above. With a remaining daily capacity of 88 mgd, the HTP would have adequate capacity to serve the Project's projected 0.0012 mgd generation. Further, as stated above, the Project does not propose any changes to the zoning or land use designation for the Project Site, and therefore, the wastewater generation for the Project was accounted for within City and regional estimates.

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. A significant impact would occur if a project were to increase solid waste generation to such a degree that the existing and projected landfill capacity would not be enough to accommodate the additional solid waste. A project is determined to result in a significant impact on solid waste when: 1) considering the amount of projected waste generation during construction and operation of the project; 2) the need for additional solid waste facilities to adequately handle project-generated waste; and 3) whether the project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE), the Solid Waste Management Policy Plan (SWMPP), or the Framework Element of the Curbside Recycling Program.

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout the County of Los Angeles. While the Bureau of Sanitation provides waste collection services to single-family and some small multifamily developments, private haulers provide waste collection services for most multifamily residential and commercial developments within the City. Solid waste transported by both public and private haulers is recycled, reused, and transformed at a waste-to-energy facility, or disposed of at a landfill. The County's Public Works Department prepares an annual report on solid waste management in the County in order to help meet long-term needs and maintain adequate capacity. Landfills within the County are categorized as either Class III or unclassified landfills. Non-hazardous municipal solid waste is disposed in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in unclassified landfills.[157] Ten Class III landfills and one unclassified landfill with solid waste facility permits are located within Los Angeles County.[158] Of the ten Class III landfills in Los Angeles County, five Class III landfills are open to the City of Los Angeles.[159] The Class III landfills have an estimated remaining capacity of 167.58 million tons, with 149.77 million tons open to the City. The unclassified landfill serving the County is Azusa Land Reclamation with an estimated 55.71 million tons of remaining capacity.[160]

Pursuant to the requirements of Senate Bill 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of nonhazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City.

As shown in **Table IV.19-3**, **Project Construction Solid Waste Generation,** after accounting for mandatory recycling, the Project would result in approximately 121 tons of construction

157 Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

158 The ten Class III landfills within Los Angeles County include: Antelope Valley, Burbank, Calabasas, Chiquita Canyon, Lancaster, Pebbly Beach, San Clemente, Savage Canyon, Scholl Canyon, and Sunshine Canyon City/County. The total number of Class III landfills within Los Angeles County excludes the Puente Hills Landfill, which closed on October 31, 2013. The unclassified landfill within the Los Angeles County is the Azusa Land Reclamation facility.

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

160 County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2017 Annual Report, April 2019.

waste. Given the remaining permitted capacity the Azusa Land Reclamation facility, which is approximately 55.71 million tons, as well as the remaining 149.77 million tons of capacity at the Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

Table IV.19-3
Project Construction Solid Waste Generation

Land Use	Quantity	Generation Rate (lbs/sf)	Total (tons)
Construction Waste			
Residential	67,599 sf	4.05	137
Office/Ancillary	25,770 sf	3.92	51
		Subtotal	**188**
Demolition Waste			
Commercial Structures	16,445 sf	36	296
Total for Construction and Demolition Waste			**484**
Total after 75-Percent Recycling			**121**

Note:

sf = square feet lbs = pounds 1 ton = 2,000 pounds

Rate: U.S. Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, June 1998, Table 3, Table 4 and Table 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types

Source: Impact Sciences, 2022

Table IV.19-4
Project Operational Solid Waste Generation

Land Use	Quantity	Generation Rate[a, b]	Total (tons)
Existing Conditions			
Commercial Structure	6,500 sf / 10 emp	2.98 tons/emp/yr	29.80
		Existing Subtotal	**29.80**
Proposed Project			
Residential	45 du	2.23 tons/du/yr	100.35
		Project Subtotal	**100.35**
		Total Net Increase	**70.55**

Note:

sf = square feet du = dwelling unit emp = employee lbs = pounds 1 ton = 2,000 pounds.

a Commercial employee generation = 0.00271/sf. Employee Generation Rates from LOS Angeles Unified School District Developer Fee Justification Study, March 2017, Table 14

b Non-residential yearly solid waste generation factors are from City of Los Angeles Bureau of Sanitation, City Waste Characterization and Quantification Study, Table 4, July 2002 Residential rates are from LA CEQA Thresholds Guide

Source: Impact Sciences, 2022

As shown in **Table IV.19-4, Project Operational Solid Waste Generation,** the Project would generate approximately 100.35 tons per year of solid waste. This would be an increase of approximately 70.55 tons per year in on-site solid waste generation over the exiting uses of approximately 29.80 tons per year. This 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 LA franchising system, 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.[161]

161 The Zero Waste LA Franchise System would divide the City into 11 zones and designate a single trash hauler for each zone. Source: LA Sanitation, "Zero Waste LA—Franchise." Available online at: www.lacitysan.org/san/faces/ home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lshwwd-s-zwlaf;jsessionid=nJABd_CcLHL4DCOkGSCJWv1buV9atyQtoUkP50TwYHe5jczy6OaK!782088041!NONE?_afrLoop=17071741526736871&_afrWindowMode=0&_afrWindowId=null#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D17071741526736871%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dge1mehnju_4

The Project solid waste disposal would represent approximately 0.002 of a percent of the City's annual solid waste disposal quantity, based on the 2017 disposal of approximately 3.2 million tons. The Project solid waste disposal would represent approximately 0.00004 percent of the estimated remaining Class III landfill capacity of 149.77 million tons available to the City of Los Angeles.

Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste that would be generated by the construction and operation of the Project. Therefore, impacts would be less than significant.

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. A significant impact could occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The Project would generate solid waste that is typical of residential buildings and would comply with all federal, State, and local statutes and regulations regarding proper disposal. Impacts would be less than significant.

20. Wildfire

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project Site is located in a highly urbanized and built out commercial and residential area surrounded by existing roadways, transportation rails and other urban infrastructure. The Site is not located within or near the vicinity of a Very High Fire Hazard Severity Zone (VHFHSZ).[162] The City of Los Angeles Fire Department (LAFD) identifies the Kenneth Hahn State Recreation Area, Griffith Park and the Hollywood Hills as areas of VHFHSZ. The Project Site is located approximately 1.4 miles southeast of the Hollywood Hills, approximately 1.6 miles southwest of Griffith Park, and 7.0 miles northeast of Kenneth Hahn State Recreation Area. The City of Los Angeles Emergency Operations Plan – Evacuation Annex identifies the LAFD as the lead in conducting evacuations for brush fires.[163] The Evacuation Annex's objectives include providing a concept of operations to support evacuation procedures including transportation resources. Preparedness is key in successful evacuations, and in this case, it is important residents have the ability to leave the Project Site quickly and safely through a number of transportation means available to them. The Site is surrounded on all sides by existing buildings and infrastructure including roadways. A major freeway (U.S. 101) and several major throughfares serve the Project Site, providing ready access to residents and employees of the proposed Project. Therefore, due to the Project's

162 The Very High Fire Hazard Severity Zone (or "Zone") was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone." The "Zone" was carefully determined according to California State Law. Los Angeles Fire Department, Fire-Zone, https://www.lafd.org/fire-zone.

163 City of Los Angeles Evacuation Annex 2018. Available online at: https://emergency.lacity.org/sites/g/files/wph496/f/Evacuation%20Annex%202018.pdf

distance from VHFHSZ and ability for residents and employees to evacuate in the event of a fire there would be no impact.

b. Due to slope, prevailing winds, and other factors exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. As stated above, the Project is located three miles from VHFHSZ to the northeast and to the south of the Site. However, the Project Site itself is leveled due to urban infrastructure and development and does not have wildlands or natural habitat that could exacerbate an ongoing fire. The Site is also served by LAFD Fire Station 27, located at 1327 North Cole Avenue, about one-half mile away from the Project Site.[164] Therefore, given the leveled urbanized location of the Project Site and the Fire Station nearby, the probability of a brush fire spreading significantly beyond the identified VHFHSZ area is insignificant and there would be no impact.

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The Project Site is located within an urbanized area of the City and does not include wildlands nor high fire terrain. The Site is surrounded on all sides by existing buildings and infrastructure including roadways. Moreover, Interstate Highway 101, approximately 0.4 miles east of the Site, along with the major thoroughfares Hollywood Boulevard, Sunset Boulevard and Cahuenga Boulevard would provide ready access to residents of the proposed Project. Therefore, no impacts would occur.

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project Site is a level/flat area of the Hollywood Community Plan Area in a highly urbanized section of Los Angeles. The risk of wildfire or the resulting runoff and drainage changes as a result of a wildfire would not exist because any wildfire that could potentially occur would be at the Hollywood Hills/Griffith Park to the north and northeast, not on the Project Site itself. Therefore, there would be no impact.

164 Los Angeles Fire Department, Find My Station. Available online at: https://www.lafd.org/fire-stations/station-results, accessed on November 15, 2021.

21. Mandatory Findings of Significance

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

Less Than Significant with Mitigation Incorporated. As discussed under **Biological Resources,** the Project would not impact any endangered fauna or flora. Further, because of the highly urbanized nature of the Project Site and the surrounding area, construction and operation of the Proposed Project would not impact any habitat of a fish or wildlife species at the Project Site or the surrounding area, the Project would not impact the habitat or population level of fish or wildlife species, nor would it threaten a plant or animal community, nor impact the range of a rare or endangered plant or animal.

As discussed in **Section IV.5, Cultural Resources,** and **Section IV.7, Geology and Soils**, potential impacts related to historical, archaeological, and paleontological resources would be less than significant following the implementation of the regulatory compliance and mitigation measures.

Therefore, the Project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.

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

Less Than Significant with Mitigation Incorporated. The potential for cumulative impacts occurs when the independent impacts of the Project are combined with impacts from other developments to result in impacts that are greater than those of this Project alone. Located within the vicinity of the Project Site are other past, current, and reasonably foreseeable projects whose development, in conjunction with that of the Project, may contribute to potential cumulative impacts. However, based on the preceding discussions, which consider cumulative conditions/impacts, no unmitigatable significant impacts were identified for the

environmental resources identified in this SCEA. The Proposed Project would not result in any unmitigated significant impacts pursuant to the topics analyzed in the above Environmental Checklist, and therefore cumulative impacts would be less than significant with recommended mitigations incorporated.

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

Less Than Significant with Mitigation Incorporated. A significant impact could occur if a project has the potential to result in significant impacts. As identified throughout this SCEA, the Proposed Project would have no unmitigatable significant impacts that would cause substantial adverse effects to human beings directly or indirectly. Any potentially significant impacts would be reduced to less than significant levels through the implementation of the applicable of the recommended mitigation measures. Therefore, this impact would be less than significant with mitigation incorporated.

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