

VI. Other CEQA Considerations

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1. Significant Unavoidable Impacts

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

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

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

a. On-Site Construction Noise

As discussed in Section IV.H, Noise, of this Draft EIR, the estimated on-site noise levels during all stages of Project construction would be below the significance threshold at receptors R4, R5, and R6. However, estimated construction-related noise would exceed the significance threshold at receptor locations R1 through R3, R7 through R9, by a range of 3 dBA at the uses represented by receptor location R9 to up to 28.3 dBA at the uses represented by receptor location R2. In addition, the estimated noise levels due to overlapping construction activities would exceed the significance thresholds at off-site receptor locations R1 through R3, R7 through R9, by a range of 5.4 dBA at the uses represented by receptor location R9 to up to 31.1 dBA at the uses represented by receptor location R2. Furthermore, the estimated noise levels due to the mat foundation pour would exceed the significance thresholds at off-site receptor locations R1 through R3 and R7

through R9 during the nighttime hours, by a range of 2.5 dBA at receptor location R9 to up to 34.7 dBA at receptor location R2.

Implementation of Mitigation Measure NOI-MM-1 (installation of temporary sound barriers) would reduce the noise generated by on-site construction activities at the off-site sensitive uses by a minimum of 20 dBA at the sensitive uses adjacent to the Project Site to the south and west (receptor locations R1, R2, R3, and R7), and by 9 dBA and 6 dBA at receptor locations R8 and R9, respectively. However, the estimated noise levels at receptor locations R1, R2, R3, and R7 would still exceed the 5-dBA significance threshold with the temporary sound barriers, as the temporary sound barrier would reach a maximum noise reduction of 20 dBA. In addition, the temporary sound barriers would not be effective in reducing the construction-related noise levels for the upper levels of the multi-story residential buildings located along the south side of the Project Site, represented by receptor locations R1 and R7. Furthermore, the estimated construction-related noise levels due to overlapping construction activities at receptor locations R1 through R3 and R7 through R9 would continue to exceed the 5-dBA significance threshold with implementation of Mitigation Measure NOI-MM-1. Therefore, there are no feasible mitigation measures to further reduce the construction noise at receptor locations R1, R2, R3, and R7 to below the significance threshold, or to further reduce the construction noise due to overlapping construction. **Therefore, construction noise impacts associated with on-site noise sources would be significant and unavoidable.**

Construction-related noise levels from the related projects would be intermittent and temporary, and it is anticipated that, as with the Project, the related projects would comply with the construction hours and other relevant provisions set forth in the LAMC. Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures (e.g., providing temporary noise barriers) for each individual related project and compliance with locally adopted and enforced noise ordinances. However, as detailed in Section IV.H, Noise, of this Draft EIR, there would be potential cumulative noise impacts at the nearby sensitive uses (e.g., residential uses) located in proximity to the Project Site and Related Project Nos. 7 and 14, in the event of concurrent construction activities. Because the Project would have a significant and unavoidable impact related to on-site construction noise, the Project's contribution to construction noise impacts would be cumulatively considerable. Beyond temporary noise barriers, there are no other physical mitigation measures that may be feasible. **Therefore, cumulative construction noise impacts associated with on-site noise sources would be significant and unavoidable.**

b. Off-Site Construction Noise

As discussed in Section IV.H, Noise, of this Draft EIR, the concrete mat foundation pour could occur during the nighttime hours, if permitted by the Executive Director of the

Board of Police Commissioners. The estimated noise levels due to concrete trucks along Sunset Boulevard and Gower Street (66.5 dBA L_{eq}) would increase the nighttime ambient noise level by 1.1 dBA and 4.7 dBA, respectively, and would be below the 5-dBA significance threshold. However, the estimated noise levels due to concrete trucks along Hollywood Boulevard (68.1 dBA L_{eq}) would increase the nighttime ambient noise level (64.4 dBA L_{eq}) by 5.2 dBA L_{eq} , which would exceed the 5-dBA significance threshold of 69.4 dBA L_{eq} by 0.2 dBA. There are no feasible mitigation measures that could be implemented to reduce this short-term impact because conventional mitigation measures, such as providing temporary noise barrier walls to reduce the off-site construction truck traffic noise impacts, would not be feasible as the barriers would obstruct the access and visibility to the properties along the anticipated haul routes. **Therefore, the Project's construction noise impact associated with off-site construction traffic (during the nighttime concrete mat foundation pour) would be significant and unavoidable.**

Cumulative noise impacts associated with off-site construction trucks from the Project and other related projects could occur along Hollywood Boulevard, Gower Street, and Sunset Boulevard. Conventional mitigation measures, such as providing temporary noise barrier walls to reduce the off-site construction truck traffic noise impacts, would not be feasible as the barriers would obstruct the access and visibility to the properties along the anticipated truck routes. There are no other feasible mitigation measures to reduce the temporary significant noise impacts associated with the cumulative off-site construction trucks. **Therefore, cumulative construction noise impacts associated with off-site construction traffic would be significant and unavoidable.**

c. On-Site Construction Vibration (Human Annoyance)

As analyzed in Section IV.H, Noise, of this Draft EIR, per FTA guidance, the significance criteria for human annoyance are 72 VdB for residential, hotel, and theater uses (receptor locations R1, and R4 through R9), 75 VdB for school uses (receptor location R2), and 65 VdB for recording studio uses (receptor location R3), assuming there is a minimum of 70 vibration events occurring during a typical construction day. The estimated ground-borne vibration levels from construction equipment would be below the significance criteria for human annoyance at offsite sensitive receptor locations R4, R5, R6, R8, and R9. The estimated ground-borne vibration levels at receptor locations R1, R2, R3, and R7, would exceed the 75 VdB significance threshold at receptor location R2, the 65 VdB significance threshold at receptor location R3, and the 72 VdB significance threshold at receptor locations R1 and R7.

Mitigation measures considered to reduce vibration impacts from construction activities with respect to human annoyance included the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must be very deep

and long to be effective, is cost prohibitive for temporary applications, such as construction, and is considered infeasible.¹ Additionally, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate groundborne vibration from the excavation equipment. Furthermore, it would not be feasible to install a wave barrier along the public roadways for the off-site construction vibration impacts, as an open trench would block access to and from the sensitive receptor locations. In addition, the applicant does not have a right to construct a wave barrier on properties they do not own; consequently, the wave barrier would need to be installed on the public sidewalk, which the City would not permit due to disruption of streets and sidewalks. As such, there are no feasible mitigation measures to reduce the potential vibration human annoyance impacts. **Therefore, Project-level vibration impacts from on-site construction activities with respect to human annoyance would be significant and unavoidable.**

With respect to cumulative impacts, Related Project No. 7, is approximately 170 feet west of the Project Site and is located approximately 70 feet from the nearest sensitive receptor (receptor location R3). Receptor location R3 would be exposed to vibration levels from both the Project and Related Project No. 7, which would exceed the significance threshold with concurrent construction. Therefore, the Project would contribute to a cumulative construction vibration impact with respect to human annoyance associated with on-site construction. There are no feasible mitigation measures to reduce the potential vibration human annoyance impacts associated with on-site construction. **As such, cumulative impacts from on-site construction activities with respect to human annoyance would be significant and unavoidable.**

d. Off-Site Construction Vibration (Human Annoyance)

As discussed in Section IV.H, Noise, of this Draft EIR, the estimated vibration levels generated by construction trucks traveling along the anticipated haul route were assumed to be within 20 feet of the sensitive uses (i.e., residential, hotel, recording studios uses) along Hollywood Boulevard, Gower Street, and Sunset Boulevard. As previously discussed, per FTA guidance, the significance criterion for human annoyance is 72 VdB for residential uses. The temporary vibration levels could reach approximately 74.9 VdB periodically as trucks pass sensitive receptors along the anticipated haul route(s) at a distance of 20 feet. As described above, it would not be technically feasible to install a wave barrier along the public roadways for the off-site construction vibration impacts. **Therefore, Project-level vibration impacts from off-site construction activities with respect to human annoyance would be significant and unavoidable.**

¹ Caltrans, *Transportation- and Construction-Induced Vibration Guidance Manual*, June 2004.

With respect to cumulative impacts, as Related Project No. 3, Related Project No. 4, Related Project No. 7, and Related Project No. 13 could use similar trucks and the same haul route(s) as the Project, it is anticipated that construction trucks would generate similar vibration levels along Hollywood Boulevard, Gower Street, and Sunset Boulevard. As analyzed above, there are sensitive uses (i.e., residential, hotel, recording studios) along Hollywood Boulevard, Gower Street, and Sunset Boulevard, where temporary vibration levels could reach 74.9 VdB as the trucks pass by within 20 feet of the sensitive receptors. Therefore, to the extent that Related Project No. 3, Related Project No. 4, Related Project No. 7, and Related Project No. 13 use the same haul route as the Project, potential cumulative vibration impacts with respect to human annoyance associated with temporary and intermittent vibration from haul trucks used by the Project and related Projects would be potentially significant. There are no feasible mitigation measures to reduce the potential vibration human annoyance impacts associated with off-site construction. **As such, cumulative impacts from off-site construction activities with respect to human annoyance would be significant and unavoidable.**

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

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

As provided in Section II, Project Description, of this Draft EIR, the underlying purpose of the Project is to redevelop an underutilized site with a high-density, mixed-use, transit- and pedestrian-oriented development that provides a mix of new housing opportunities that are integrated with commercial and office uses that provide new employment and commercial opportunities for the surrounding community. The underlying purpose and objectives of the Project are closely tied to the goals and objectives of the Hollywood Community Plan and the Hollywood Redevelopment Plan, which supports the objectives and policies of applicable larger-scale regional and local land use plans, including the City's General Plan Framework Element (Framework Element) and the Southern California Association of Government's (SCAG's) 2020–2045 Regional Transportation Plan/Sustainability Communities Strategy Connect SoCal (2020–2045 RTP/SCS).

The Project would support objectives and policies of the City's General Plan Framework Element. In particular, the Project, as well as development of the proposed uses in an area with convenient access to public transit and opportunities for walking and biking,

would promote an improved quality of life by facilitating a reduction of vehicle trips and vehicle miles traveled (Objective 3.2). The Project would further promote the City's goals, objectives, and policies of the Framework Element's Housing Chapter through siting new multi-family housing in proximity to transit stations, including the Hollywood/Vine station of the Metro B (Red) Line, located approximately 0.3 miles west of the Project Site, and several Metro bus lines along Hollywood Boulevard as well as DASH Hollywood. The Project would also promote the City's goals, objectives, and policies of the Framework Element's Urban Form and Neighborhood Design Chapter through enhancing the livability of all neighborhoods by upgrading the quality of the built environment with a new mixed-use development within an existing underutilized site that would include multi-family residential uses (350 units), office uses, retail uses, and restaurant uses. Furthermore, the Project would improve the quality of the public realm by incorporating a combination of both publicly accessible and private on-site open space amenities. The Project would provide common open space at the ground level that would be publicly accessible during daytime hours in the form of gardens, courtyards, and terraces. Additionally, the Project would support the City's goals, objectives, and policies of the General Plan Housing Element by contributing to a more sustainable neighborhood that has mixed-income housing, jobs, amenities, services, and transit by providing a variety of housing types (i.e., studio, one-, two-, and three-bedroom units) at a variety of income levels and in an area that is pedestrian-friendly and served by public transit. Lastly, the Project would promote the City's goals, objectives, and policies of the Framework Element's Economic Development Chapter through establishing a balance of land uses inclusive of residential, office, restaurant, and retail uses in an area well-served by public transit, which would help contribute to the employment base of the Community Plan area, help meet the needs of local residents, and foster continued economic investment.

The Project would also meet the applicable objectives and policies that support the goals of the Hollywood Community Plan. Specifically, the Project would not conflict with the City's objective to provide adequate supporting public services and utilities, to coordinate the phasing of public facilities with private development, and to encourage open space and parks in both local neighborhoods and in high density areas. The Project would not require the construction of public services facilities, the construction of which would cause significant environmental impacts. In addition, the utilities serving the Project Site would have capacity to serve the Project. Furthermore, the Project would include a total of 42,602 square feet of open space, including 23,526 square feet of publicly accessible privately owned open space and 19,076 square feet of private open space. The primary public open space amenity would be a landscaped and paved central plaza along Hollywood Boulevard, which would include access to retail, outdoor dining, and terrace stairs that provide additional gathering space as well as access to a landscaped upper plaza and residential garden walk which. The Project's proposed open space areas would reduce the potential for additional demand to be placed on public parks and open space in high density areas. Furthermore, the Project's proximity to existing transit infrastructure, provision of bicycle parking spaces, and design features that promote walkability would ensure compatibility with the existing transportation and circulation

system, which would support the Community Plan's objective to encourage the expansion and improvement of public transportation service.

As previously mentioned, the Project Site is located within the Hollywood Redevelopment Project area. The Project would meet the relevant goals and objectives of the Redevelopment Plan. Specifically, the Project would support criteria 1 (promote community revitalization), criteria 3 (be compatible with the adjacent residential uses and neighborhood), and criteria 4 (include neighborhood oriented uses such as professional offices, institutional uses, food markets, laundries, dry cleaners, pharmacies and other neighborhood retail or service businesses) of Section 506.1 of the Hollywood Redevelopment Plan. The Project would meet these criteria as it would replace the existing uses within an underutilized site with a new 501,185-square-foot mixed-use development that would include new multi-family residential, office, retail, and restaurant floor area across multiple structures that would be integrated with public and private open space. The area surrounding the Project Site is highly urbanized and includes a mix of low- to mid-rise buildings containing a variety of uses, including a myriad of dining, entertainment, commercial, and residential uses. The Project would introduce land uses that would be compatible with the surrounding commercial and residential uses. Furthermore, the Project would support Goal 12 of the Redevelopment Plan by promoting the use of public transportation and a reduction in VMT by concentrating new development in a designated TPA. Specifically, the Project's mix of high-density residential uses, office space, and commercial uses located in an area with a variety of public transit options, including the Metro B Line Hollywood/Vine Station would reduce VMT and encourage the development of a sustainable transportation system. The Project would also provide bicycle parking for employees, residents, and visitors, thereby promoting the use of alternative modes of transportation.

The Project would also support the goals of the 2020–2045 RTP/SCS. Specifically, the Project would support the goals of the 2020–2045 RTP/SCS to improve mobility, accessibility, reliability, and travel safety for people and goods as well as reducing GHG emissions as the Project is a mixed-use development inclusive of residential, office, retail, and restaurant uses located in an area that is well served by a variety of public transit options along Hollywood Boulevard. Transit options include the Hollywood/Vine station of the Metro B (Red) Line, located approximately 0.3 miles west of the Project Site, and several Metro bus lines along Hollywood Boulevard as well as DASH Hollywood. In addition, the Project would include 42 short-term bicycle parking spaces on the ground level and 202 long-term bicycle parking spaces located within the subterranean parking garage. Locker rooms and showers would also be provided beside the long-term bicycle parking area, and bike racks would be provided on all frontages of the Project Site. Pedestrian access to the Project Site would be provided at several access points around the perimeter of the Project Site, including along Hollywood Boulevard, Carlton Way, and Gower Street. The three primary buildings would provide entry lobbies, restaurant, and retail spaces at the ground level to invite

pedestrians into the Project Site. The Project would also incorporate pedestrian safety features along all driveways as well as designated drop-off areas to minimize pedestrian-vehicular conflicts. As such, the Project would promote the goal of the 2020–2045 RTP/SCS to maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and walking and biking, and thereby improve the environment and health of nearby residents by supporting low and zero emission modes of transportation.

Furthermore, as detailed in Section V, Alternatives, of this Draft EIR, other than the No Project Alternative, none of the alternatives would eliminate all of the Project's significant and unavoidable impacts. In addition, the No Project Alternative would not achieve the Project's underlying purpose to redevelop an underutilized site with a high-density, mixed-use, transit- and pedestrian-oriented development that provides a mix of new housing opportunities that are integrated with commercial and office uses that provide new employment and commercial opportunities for the surrounding community, or the associated project objectives. As discussed in detail in Section V, Alternatives, of this Draft EIR, the environmentally superior alternative, Alternative 3 (Reduced Development Alternative) would not eliminate the Project's significant and unavoidable construction- and operations-related noise and vibration impacts. In addition, Alternative 3 would not fully meet the underlying purpose of the Project to redevelop an underutilized site with a high-density, mixed-use, transit- and pedestrian-oriented development.

Based on the above, the Project reflects a development that is consistent with: the overall vision of the Hollywood Community Plan, the Hollywood Redevelopment Plan, the City's Framework Element; and SCAG's 2020–2045 RTP/SCS. Additionally, the Project's significant and unavoidable noise and vibration impacts would only occur during temporary and periodic construction activities, similar to those occurring at development sites in urban areas, particularly within infill locations. As such, the benefits of the Project, as outlined above, would outweigh the effects of the significant and unavoidable impacts of the Project. Furthermore, as detailed in Section V, Alternatives, of this Draft EIR, no feasible alternative was identified that would eliminate all of the Project's significant and unavoidable impacts.

3. Significant Irreversible Environmental Changes

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

uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

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

a. Building Materials and Solid Waste

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

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

b. Water

Consumption of water during construction and operation of the Project is addressed in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR. As evaluated therein, given the temporary nature of construction activities, the short-term and intermittent water use during construction of the Project would be less than the net new water consumption estimated for the Project at buildout, and such water demand during construction would be offset by the removal of the existing uses on the Project Site. During operation, the estimated water demand for the Project would not exceed the available

supplies projected by the City of Los Angeles Department of Water and Power (LADWP), as confirmed by the Water Supply Assessment prepared by LADWP for the Project and included as Appendix L of this Draft EIR. In addition, the Project would implement Project Design Feature WAT-PDF-1, which includes water conservation measures in excess of code requirements, including but not limited to high efficiency faucets and shower heads; California Friendly® plants or native plants; drip/subsurface irrigation, and proper hydro-zoned irrigation. Thus, as evaluated in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, while Project construction and operation would result in some irreversible consumption of water, the Project would not result in a significant impact related to water supply.

c. Energy Consumption

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

During operation, the Project's increase in electricity demand would be within the anticipated service capabilities of LADWP and the Southern California Gas Company (SoCalGas), respectively. In addition, as discussed in Section IV.C, Energy, of this Draft EIR, the Project would comply with energy conservation policies and plans relevant to the Project, including the All Electric Building Ordinance (Ordinance No. 187,714), California Title 24 energy standards, including the CALGreen Code, the City of Los Angeles Green Building Code, City of Los Angeles Green New Deal, and the 2020–2045 RTP/SCS. Such requirements of Title 24 and the City's Green Building Code include specific lighting requirements to conserve energy, window glazing to reflect heat, enhanced insulation to reduce heating and ventilation energy usage, and enhanced air filtration. The Project would implement these measures as required by the applicable code. The 2022 Title 24 Standards ensure that builders use the most energy efficient and energy conserving technologies and

construction practices. The Project would implement measures to comply with Title 24 energy efficiency requirements, including Project Design Features GHG-PDF-1 and WAT-PDF-1, as discussed above and included in Section IV.E, Greenhouse Gas Emissions, and Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, respectively.

Therefore, based on the above, the Project would not cause the wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F of the CEQA Guidelines. In addition, Project operations would not conflict with adopted energy conservation plans. Refer to Section IV.C, Energy, of this Draft EIR, for further analysis regarding the Project's consumption of energy resources.

d. Environmental Hazards

The Project's potential use of hazardous materials is evaluated in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR. As discussed therein, during demolition, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners could be used, handled, and stored on the Project Site. During operation, the Project would use potentially hazardous materials typical of those used in residential and commercial developments. The use, handling, storage, and disposal of these materials could increase the potential for hazardous materials releases and, subsequently, the exposure of people and the environment to hazardous materials. However, all potentially hazardous materials would be used and disposed of in accordance with applicable federal, state, and local requirements and hazardous materials management protocols, including each hazardous material manufacturers' manufacturers' specifications and instructions, and regulations aimed at establishing specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials, thereby reducing the risk of hazardous materials use. Therefore, it is not expected that the Project would cause irreversible damage from environmental accidents associated with the use of typical, potentially hazardous materials.

e. Conclusion

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

concluded to be less than significant, and the limited use of nonrenewable resources that would be required by Project construction and operation is justified.

4. Growth-Inducing Impacts

CEQA Guidelines Section 15126.2(e) requires that growth-inducing impacts of a project be considered in a Draft EIR. Growth-inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant that, for example, may allow for more construction in service areas). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, thus requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also require a discussion of the characteristics of projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Finally, the CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.

a. Population

As discussed in Section II, Project Description, of this Draft EIR, the Project would develop 350 residential units. Based on generation factors from the LADOT's Vehicle Miles Traveled (VMT) Calculator, the Project's residential units would generate approximately 827 residents.² According to SCAG's 2020–2045 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2023 is approximately 4,135,955 persons.³ As projected by the 2020–2045 RTP/SCS, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,309,231 persons in 2029, the projected buildout year of the Project.⁴ Therefore, the projected population growth between 2023 and 2029 is

² LADOT and Los Angeles Department of City Planning, *City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020*. The Multi-Family Residential factor of 2.25 persons per unit is applied to the 306 market-rate units ($306 * 2.25 = 689$ persons). The Affordable Housing - Family Residential factor of 3.14 persons per unit is applied to the 44 affordable housing units ($44 * 3.14 = 138$ persons). Accounting for both market-rate and affordable housing units, the Project would produce an estimated total of 827 persons ($689 + 138 = 827$).

³ SCAG. 2020–2045 RTP/SCS, *Demographics and Growth Forecast Appendix, Table 14, p. 35*. Based on a linear interpolation of SCAG's population data for 2016 (3,933,800) and 2045 (4,771,300). The 2023 value is extrapolated from 2016 and 2045 values: $[(4,771,300 - 3,933,800) \div 29] * 7 + 3,933,800 = \sim 4,135,955$.

⁴ SCAG. 2020–2045 RTP/SCS, *Demographics and Growth Forecast Appendix, Table 14, p. 35*. The 2029 value is extrapolated from 2016 and 2045 values: $[(4,771,300 - 3,933,800) \div 29] * 13 + 3,933,800 =$ (Footnote continued on next page)

approximately 173,276 persons. The estimated 827 new residents generated by the Project would represent approximately 0.48 percent of the population growth forecasted by SCAG's 2020–2045 RTP/SCS in the City of Los Angeles Subregion between 2023 and 2029. Therefore, the Project's residents would be well within SCAG's population projections in the 2020–2045 RTP/SCS for the Subregion and would not result in a significant direct growth-inducing impact.

b. Employment

The Project would have the potential to generate indirect population growth in the vicinity of the Project Site as a result of the employment opportunities generated by the Project. During construction, the Project would create temporary construction-related jobs. However, the work requirements of most construction projects are highly specialized such that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, construction workers would not be expected to relocate to the Project vicinity as a direct consequence of working on the Project. Therefore, given the availability of construction workers, the Project would not be considered growth-inducing from a short-term employment perspective. Rather, the Project would provide a public benefit by providing new employment opportunities during the construction period.

Based on employee generation factors from the LADOT's VMT calculator, the Project is estimated to generate approximately 532 net new employees on the Project Site.⁵ According to SCAG's 2020–2045 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2023 is approximately 1,917,721 employees.⁶ In 2029, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,977,224 employees.⁷ Therefore, the projected employment growth between

~ 4,309,231. The projected population growth between 2023 and 2029 is approximately 173,276 (4,309,231 – 4,135,955 = 173,276).

⁵ LADOT and Los Angeles Department of City Planning (DCP), *City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020*. The existing commercial uses to be removed produce approximately 64 employees (commercial 31,833 square feet * 0.002). The Project would produce 600 employees (office 136,000 square feet * 0.004 = 544) + (retail 18,004 square feet * 0.002 = 36) + (restaurant 4,038 square feet * 0.004 = 16). Therefore, the Project would produce approximately 532 net new employees.

⁶ SCAG. *2020–2045 RTP/SCS, Demographics and Growth Forecast Appendix, Table 14, p. 35*. Based on a linear interpolation of SCAG's employment data for 2016 (1,848,300) and 2045 (2,135,900). The 2023 value is extrapolated from 2016 and 2045 values: $[(2,135,900 - 1,848,300) \div 29] * 7 + 1,848,300 = \sim 1,917,721$.

⁷ SCAG. *2020–2045 RTP/SCS, Demographics and Growth Forecast Appendix, Table 14, p. 35*. Based on a linear interpolation of SCAG's employment data for 2016 (1,848,300) and 2045 (2,135,900). The 2029 value is extrapolated from 2016 and 2045 values: $[(2,135,900 - 1,848,300) \div 29] * 13 + 1,848,300 = \sim 1,977,224$.

2023 and 2029 is approximately 59,504 employees. The Project's estimated 532 employees would constitute approximately 0.9 percent of the employment growth forecasted between 2023 and 2029. Therefore, the Project would not cause an exceedance of SCAG's employment projections contained in the 2020–2045 RTP/SCS.

In addition, the proposed office, restaurant, and retail uses would include a range of full-time and part-time positions that are typically filled by persons already residing in the vicinity of the workplace, and who generally do not relocate their households due to such employment opportunities. Therefore, given that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Although it is possible that some of the employment opportunities offered by the Project would be filled by persons moving into the surrounding area, which could increase demand for housing, it is anticipated that most of this demand would be filled by then-existing vacancies in the housing market and others by any new residential developments that may occur in the vicinity of the Project Site. As such, the Project's office, restaurant, and retail uses would be unlikely to create an indirect demand for additional housing or households in the area.

c. Utility Infrastructure Improvements

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

d. Conclusion

Overall, the Project would be consistent with the growth forecast for the City of Los Angeles Subregion and would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of VMT. In addition, the Project would not require any major roadway improvements nor would the Project open any large undeveloped areas for new use. Any access improvements would be limited to driveways necessary to provide immediate access to the Project Site and to improve safety and walkability. Therefore, direct and indirect growth-inducing impacts would be less than significant.

5. Potential Secondary Effects of Mitigation Measures

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

a. Cultural Resources (Archaeological Resources)

Mitigation Measure CUL-MM-1 requires that, prior to any ground-disturbing activities on the Project Site, the Project Applicant shall retain a Qualified Archaeologist who meets the Secretary of the Interior’s Professional Qualifications Standards for Archaeology and the Society for California Archaeology’s qualifications for a principal investigator. The Archaeological Monitor shall monitor ground-disturbing activities to identify, record, and evaluate the significance of any archaeological finds during Project construction. If an archaeological resource is discovered, work in the immediate vicinity of the find shall temporarily stop until the Qualified Archaeologist evaluates the significance in accordance with CEQA Guidelines Section 15064.5(a) and PRC 21083.2(g). After archaeological monitoring is completed, the Qualified Archaeologist shall prepare a technical report describing all work performed. The draft report shall be submitted to the City for review. The final draft of the report shall be submitted to the SCCIC.

Mitigation Measure CUL-MM-1 represents procedural actions that would not affect the physical environment and would be beneficial in protecting cultural resources that could potentially be encountered on-site. As such, implementation of Mitigation Measure CUL-MM-1 would not result in adverse secondary impacts.

b. Geology and Soils (Paleontological Resources)

Mitigation Measure GEO-MM-1 requires the Project Applicant to retain a Qualified Paleontologist, who meets or exceeds the SVP (2010) definition, to carry out all regulatory compliance measures and protocols related to paleontological resources. The Qualified Paleontologist shall obtain a curatorial arrangement with a qualified repository (e.g., NHMLA) prior to construction in the event of significant paleontological resource discoveries during construction.

Mitigation Measure GEO-MM-2 requires the Qualified Paleontologist to develop Worker Environmental Awareness Program training to educate the construction crew on the legal requirements for preserving fossil resources, as well as the procedures to follow in the event of a fossil discovery. This training program shall be given to the crew before ground-disturbing work commences and shall include handouts to be given to new workers as needed.

Mitigation Measure GEO-MM-3 requires that full-time monitoring shall occur during ground-disturbing activities at depths greater than 11 feet below ground surface that have the potential to impact previously undisturbed sediments of high paleontological sensitivity, including late Pleistocene old fan deposits, Unit4 (Qof4). Monitoring shall be conducted by a qualified paleontological monitor who meets the standards of the SVP (2010) and who shall be supervised by the Qualified Paleontologist.

Mitigation Measure GEO-MM-4 requires that, upon conclusion of ground-disturbing activities, the Qualified Paleontologist overseeing paleontological monitoring shall prepare a final monitoring report that documents the paleontological monitoring efforts for the Project and describes any paleontological resources discoveries observed and/or recorded during the life of the Project. If paleontological resources are curated, the final monitoring report and any associated data pertinent to the curated specimen(s) shall be submitted to the designated repository. A copy of the final monitoring report shall be filed with the Department of City Planning.

These mitigation measures represent procedural actions that would not affect the physical environment and would be beneficial in protecting paleontological resources that could potentially be encountered on-site. As such, implementation of these mitigation measures would not result in adverse secondary impacts.

c. Hazards and Hazardous Materials

Mitigation Measure HAZ-MM-1 requires the Applicant to retain a qualified environmental consultant to prepare a Soil Management Plan (SMP), which shall be submitted to the City of Los Angeles Department of Building and Safety for review and approval prior to the commencement of soil disturbance activities. The SMP shall be implemented during soil disturbance activities to ensure that contaminated soils are properly identified, excavated, managed, transported, and disposed of off-site. Mitigation Measure HAZ-MM-1 would specifically avoid secondary impacts by requiring appropriate handling of any contaminated soil. As such, implementation of Mitigation Measure HAZ-MM-1 would not result in adverse secondary impacts.

d. Noise

Mitigation Measure NOI-MM-1 requires temporary and impermeable sound barriers to be installed during construction along the southern, western, and eastern property lines of the Project Site. The noise and vibration from installation of the temporary sound barrier would be short-term and would be required to comply with the City's noise regulations. In addition, upon completion of construction, the temporary sound barrier would be removed. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

Mitigation Measure NOI-MM-2 requires that prior to the start of construction, the Applicant retain a qualified structural engineer to visit the commercial buildings adjacent to the Project Site to inspect and document the physical condition of the structures' readily-visible features. Also prior to construction, the Applicant would be required to retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a vibration monitoring program capable of recording and documenting the construction-related ground vibration levels at the property line of the commercial and the historic apartment building adjacent to the Project Site during demolition and grading/excavation phases. The vibration monitoring system shall continuously measure and store the peak particle velocity (PPV) in inch/second. The system shall also be programmed for two preset velocity levels: a warning level of 0.25 PPV and a regulatory level of 0.3 PPV. The system shall also provide real-time alert when the vibration levels exceed the two preset levels. In addition, this mitigation measure would not result in physical changes to the environment. As such, implementation of this mitigation measure would not result in significant secondary impacts

6. Effects Not Found to Be Significant

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

transportation (emergency access); solid waste; and wildfire. A summary of the analysis provided in Appendix A for these issue areas is provided below.

a. Aesthetics

As detailed in the Initial Study, pursuant to PRC Section 21099, the Project is a mixed-use residential project that would be located on an infill site within a TPA. Therefore, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment and therefore do not have to be evaluated under CEQA. Therefore, as concluded in the Initial Study, impacts would be less than significant.

b. Agriculture and Forestry Resources

The Project Site is located in an urbanized area of the City of Los Angeles and is currently occupied by Toyota of Hollywood and associated structures. The Project Site and surrounding area are not zoned for agricultural or forest uses, and no agricultural or forest lands occur onsite or in the vicinity of the Project Site. Therefore, as concluded in the Initial Study, no impacts to agriculture and forestry resources would occur.

c. Air Quality (Odors)

No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people.

With respect to Project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses. In addition, on-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control and, therefore, would not result in substantially adverse odor impacts.

In addition, the construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403 regarding visible emissions violations. In particular, SCAQMD Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material, which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have

a natural tendency to cause, injury or damage to business or property. Therefore, with compliance with existing regulatory requirements, the Project would not create odors that would adversely affect a substantial number of people.

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

d. Biological Resources

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

As discussed above, landscaping within the Project Site is limited. There are a total of 33 trees within and surrounding the Project Site, including 15 on-site trees and 18 street trees. None of the on-site or off-site trees are considered to be protected by the City of Los Angeles Protected Tree and Shrubs Ordinance. As part of the Project, the 15-existing on-site trees and 18 street trees would be removed to accommodate development of the Project. On-site trees to be removed would be replaced at a 1:1 ratio and street trees would be replaced on a 2:1 basis in accordance with the Bureau of Street Services, Urban Forestry Division's requirements.

The Project would comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish and

Game Code Section 3503 states that “[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.” In accordance with the Migratory Bird Treaty Act and California Fish and Game Code, tree removal activities associated with the Project would take place outside of the nesting season (February 1–August 31), to the extent feasible. Should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and is based on the professional judgement of the monitoring biologist, in coordination with the CDFW. With compliance with the Migratory Bird Treaty Act, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

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

e. Cultural Resources (Historical Resources and Human Remains)

With regard to historical resources, as detailed in the Historical Resources Assessment report included as Appendix IS-2 of the Initial Study, the Project Site is not eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, and/or as a local (City of Los Angeles) Historic-Cultural Monument (HCM) or Historic Preservation Overlay Zone (HPOZ). Therefore, the Project would not directly affect any onsite historical resources. With regard to surrounding historical resources, there is one designated historical resource individually listed in the California register, and three eligible historical resources that were all identified in the survey of the CRA-LA’s Hollywood Redevelopment Project Area (2020). Specifically, the one designated historical resource is the Hawaii Theatre (now Salvation Army Tabernacle), a former theater building located at 5941 W. Hollywood Boulevard, across the street and slightly to the east of the Project Site. The resource was formally determined to be eligible for listing in the National Register in 1994 through the Section 106 process, and by virtue of this determination it was listed in the California Register with the California Historical Resource Status Code of 2S2. The three eligible historical resources include 1622 Gower Street (Celia Kreutzer Apartments), 5939 W. Hollywood Boulevard (Palms Grill), and 5951 W. Hollywood Boulevard (Florentine Gardens). The historical resources located in the vicinity of the Project Site would retain their current status and would not be affected by the Project in a manner that would alter their significance and designation as historical resources. As such, the Project would not directly impact any historical resources located in the vicinity of the Project Site. Therefore, as concluded in the Initial Study, the Project would not cause a substantial

adverse change in the significance of a historical resource and impacts would be less than significant.

With regard to human remains, the Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. Nevertheless, as the Project would require excavation at depths greater than those that have previously occurred on site, the potential exists to uncover existing but undiscovered human remains. If human remains are discovered during Project construction, work in the immediate vicinity of the construction area would be halted, and the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determines the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the most likely descendent. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. Therefore, as concluded in the Initial Study, due to the low potential that any human remains are located on the Project Site and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, the Project's impact related to human remains would be less than significant.

f. Geology and Soils

The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone or within a City-designated Fault Rupture Study Area, and no known active faults underlie the Project Site. As discussed in the Preliminary Geotechnical Report included as Appendix IS-3 of the Initial Study, the closest active fault to the Project Site is the Hollywood Fault, which is located approximately 0.1 miles northwest of the Project Site. As such, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone as mapped by CGS or within a Preliminary Fault Rupture Study Area as designated by the City. In addition, based on a geologic review of the Project Site, there is no indication of the presence of active surface faulting within the Project Site. Furthermore, while the Project would involve excavation for the subterranean parking levels, the proposed development would not involve mining operations or deep excavation into the earth, which could create unstable seismic conditions or stresses in the Earth's crust. Therefore, the Project's impacts associated with surface rupture from a known earthquake fault would be less than significant.

In addition, the Project would be constructed in accordance with the most current Los Angeles Building Code which incorporates current seismic design provisions of the California Building Code with City amendments. The California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be required to comply with the plan review and permitting requirements of the labs, including the recommendations provided in a comprehensive design level geotechnical investigation for the Project to be approved by LADBS. As such, the Initial Study concluded that impacts related to strong seismic ground shaking would be less than significant.

The Project Site is not located in an area that has been identified by the State or the City of Los Angeles as being potentially susceptible to liquefaction. As such, as concluded in the Initial Study, impacts associated with liquefaction would be less than significant.

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

Development of the Project would require grading, excavation, and other construction activities that have the potential to disturb existing soils within the Project Site and expose these soils to rainfall and wind during construction, thereby potentially resulting in soil erosion. This potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities during Project construction. Specifically, all grading activities would require grading permits from the City of Los Angeles Department of Building and Safety (LADBS), which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of LAMC Chapter IX, Article 1, which addresses grading, excavations, and fills. Furthermore, the Project would be required to comply with the City's LID ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Therefore, as determined in the Initial Study, with compliance with applicable regulatory requirements, impacts related to substantial soil erosion or the loss of topsoil would be less than significant.

Regarding unstable geologic units, as indicated above, the Project would not be subject to or exacerbate liquefaction (including lateral spreading) or landslides. As discussed in the Preliminary Geotechnical Report, the Project Site is not mapped within any oil field boundaries. The nearest plugged oil well is located approximately 2,600 feet southwest of the Project Site. In addition, because there is no large-scale extraction of groundwater, gas,

oil or geothermal energy at the Project Site or in the general vicinity of the Project Site, there is no potential for ground subsidence due to withdrawal of fluid or gas at the Project Site. Lastly, as discussed in the Preliminary Geotechnical Report, the alluvial soils encountered in the borings drilled at the site were stiff and/or dense, did not contain water soluble elements, and would not be susceptible to collapse. Therefore, as concluded in the Initial Study, the Project would not cause a geologic unit or soil to become unstable, and impacts would be less than significant. Also with regard to geologic stability, it is noted that the Project Site is located within the Los Angeles County Metropolitan Transportation Authority (Metro) Right-of-Way pursuant to City Zoning Information No. 1117 (ZI-1117). ZI No. 1117 requires consultation with Metro prior to the issuance of any building permit for projects within 100 feet of Metro-owned rail or bus rapid transit right-of-way. The Project Applicant met with representatives from Metro on October 19, 2022 to introduce the Project and discuss the coordination process with Metro. One of Metro's primary concerns is the impact of additional surcharge placed on the ground above or adjacent to their tunnels. Metro provided information about their planned tunnel locations to inform the structural development of the Project and avoid impacts to Metro tunnels. Further coordination between Metro is anticipated during the Building & Safety review process for the Project.

As provided in the Preliminary Geotechnical Report, the on-site geological materials are in the low to medium expansive potential range. Project design and construction would comply with all applicable requirements of the LADBS for a site with underlying expansive soils. Such requirements may include excavation and replacement of upper soils (for any expansive soils at the street level), deepening of foundations, cement treatment, and/or moisture conditioning of the upper soils. The Project would include grading and excavation for the subterranean parking, which would extend to a maximum depth of 40 feet below ground surface, except for the construction of Building C within the Carlton Lot which would require excavation to a depth of 20 feet to 25 feet. As such, soils underlying the Project Site would be removed to at least a minimum of 20 feet below ground surface. The Project would also incorporate ground improvements within the Carlton Lot to reduce settlement and impacts associated with expansive soils. In addition, other specific requirements would be determined as part of review and approval of the site-specific design-level geotechnical investigation by LADBS. Therefore, as concluded in the Initial Study, through removal of existing underlying soils as well as compliance with regulatory requirements, potential impacts associated with expansive soils would be less than significant.

The Project Site is located within a community served by existing wastewater infrastructure and the Project's wastewater demand would be accommodated by connections to the existing wastewater infrastructure. As such, the Initial Study concluded that the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems.

g. Hazards and Hazardous Materials (Hazards Near Schools, Airport, Airstrip, and Wildfires)

The nearest school to the Project Site is Grant Elementary, located approximately 0.45 miles northeast of the Project Site. Although the Project would have the potential to emit and would involve the handling of hazardous materials, particularly during construction activities, all such activities involving the handling and disposal of hazardous materials and wastes would occur in compliance with all applicable federal, State, and local requirements concerning the handling and disposal of hazardous waste. Therefore, with compliance with relevant regulations and requirements, the Project would not create a significant hazard to nearby schools, and impacts regarding the Project's emission or handling of hazardous materials and wastes would be less than significant.

The Project Site is not located within 2 miles of an airport or within an airport planning area and would not have the potential to result in a safety hazard or excessive noise for people residing or working near an airport. Therefore, as concluded in the Initial Study, no impacts would occur.

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

The Project Site is located in an urbanized area without any wildlands in the vicinity. In addition, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone. Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety, and the proposed uses would not create a fire hazard that has the potential to exacerbate wildfire risks. Therefore, as concluded in the Initial Study, no impacts would occur.

h. Hydrology and Water Quality

Construction activities for the Project could cause exposed and stockpiled soils to be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as the construction area would be greater than one acre, the Project would

be required to obtain coverage under the NPDES General Construction stormwater permit. In accordance with the requirements of this permit, the Project would implement a site-specific Stormwater Pollution Prevention Plan (SWPPP) adhering to the California Stormwater Quality Association Best Management Practices (BMP) Handbook. The SWPPP would set forth BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC) that require necessary measures, plans, and inspections to reduce sedimentation and erosion. With implementation of regulatory compliance requirements including site-specific BMPs set forth in the SWPPP required to comply with NPDES program requirements under federal and state law and City grading permit regulations, construction of the Project would not result in discharge that would violate any water quality standard or waste discharge requirements or otherwise substantially degrade surface water quality. Therefore, as concluded in the Initial Study, impacts to surface water quality during construction of the Project would be less than significant.

During operation, anticipated and potential pollutants generated by the Project include sediment, nutrients, pesticides, metals, pathogens, and oil grease. Under Section 3.1.3 of the LID manual, post-construction stormwater runoff from new projects must be infiltrated, evapotranspired, captured and used, and/or treated through high efficiency BMPs onsite for the volume of water produced by the 85th percentile storm event. The Project would incorporate appropriate LID BMPs in accordance with the City's LID Ordinance intended to control and treat stormwater runoff in compliance with LID. As the Project Site currently discharges without any means of treatment, implementation of LID BMPs as part of the Project would improve existing site conditions. Therefore, with the implementation of LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. Impacts to surface water quality during operation of the Project would be less than significant.

As discussed in the Hydrology and Water Resources Technical Report, included as Appendix IS-4 of the Initial Study, groundwater was encountered at depths of 82 and 89 feet below ground surface. Construction activities for the Project would include excavations approximately 40 feet below ground surface for the proposed subterranean parking garage. As the Project's proposed excavation would not be deeper than the historic high groundwater elevation, temporary dewatering is not expected during construction. If groundwater is encountered during construction, temporary pumps and filtration would be used in compliance with all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations. In addition, during on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would therefore require proper management and disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials released into groundwater.

Compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste, would reduce the potential for the construction of the Project to release contaminants that could percolate into groundwater. In addition, as there are no groundwater production wells or public water supply wells within 1 mile of the Project Site, construction activities would not be anticipated to affect existing wells. As such, construction of the Project would not result in discharges that would violate any water quality standard or waste discharge requirement associated with groundwater protection. Therefore, construction-related impacts on groundwater quality would be less than significant.

Operational activities which could affect groundwater quality include hazardous material spills and leaking underground storage tanks. As discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, no underground storage tanks are known to be currently operated or will be operated by the Project. Compliance with all applicable existing regulations at the Project Site regarding the handling and potentially required cleanup of hazardous materials would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. Furthermore, operation of the Project would not require extraction from the groundwater supply based on the depth of excavation for the proposed uses and depth of groundwater below the Project Site. Additionally, the Project does not involve drilling to or through a clean or contaminated aquifer. Therefore, Project operations would not result in violations of any water quality standards or waste discharge requirements or otherwise substantially degrade groundwater quality, and impacts on groundwater quality during operation would be less than significant.

With regard to groundwater recharge, under existing conditions, the Project Site is approximately 100 percent impervious. With implementation of the Project, the Project Site is expected to maintain the overall percentage of impervious area from the current condition of the Project Site. As such, the potential for groundwater recharge during Project operations would remain minimal. Furthermore, the Project's BMPs would control stormwater runoff with no increase in runoff resulting from the Project. The Project would not include the installation of water supply wells and there are no existing wells or spreading ground within 1 mile of the Project Site. Therefore, as concluded in the Initial Study, the Project would not interfere substantially with groundwater recharge such that groundwater management would be impeded, and impacts would be less than significant.

Construction activities for the Project have the potential to temporarily alter existing drainage patterns and flows of the Project Site by exposing underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. However, as discussed above, the Project would implement a SWPPP that specifies BMPs and erosion control

measures to be used during construction to manage runoff flows and prevent pollution. These BMPs would be designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. In addition, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. As previously discussed, the Project Site is currently approximately 100 percent impervious. With implementation of the Project, the Project Site would maintain the overall percentage of impervious area. Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project proposes to include infiltration as established by the LID manual. Therefore, with implementation of BMPs the Project would not increase the rate of or amount of surface runoff in a manner which would result in flooding on- or off-site. Impacts would be less than significant.

The Project Site is not located within a 100-year flood hazard area as mapped by FEMA or by the City. However, the Project Site is mapped within an inundation area for the Hollywood Reservoir, which is held by the Mulholland Dam. The Mulholland Dam is a LADWP dam located in the Hollywood Hills. The Mulholland Dam was built in 1924 and designed to hold 2.5 billion gallons of water. Dam safety regulations are the primary means of reducing damage or injury due to inundation occurring from dam failure. The California Division of Safety of Dams regulates the siting, design, construction, and periodic review of all dams in the State. In addition, LADWP operates the dams and mitigates the potential for overflow and seiche hazard through control of water levels and dam wall height. These measures include seismic retrofits and other related dam improvements completed under the requirements of the 1972 State Dam Safety Act. In addition, the City's Local Hazard Mitigation Plan, which was adopted in January 2018, provides a list of existing programs, proposed activities and specific projects that may assist the City of Los Angeles in reducing risk and preventing loss of life and property damage from natural and human-caused hazards, including dam failure. The Hazard Mitigation Plan evaluation of dam failure vulnerability classifies dam failure as a moderate risk rating. Therefore, the risk of flooding from a tsunami, inundation by a seiche or dam failure is considered low. Impacts would be less than significant.

Furthermore, with compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Therefore, the Initial Study concluded that impacts would be less than significant.

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

The Project Site is located within the highly urbanized Hollywood Community Plan area and is currently occupied by Toyota of Hollywood. The area surrounding the Project

Site is highly urbanized and includes a mix of low- to mid-rise buildings containing a variety of uses. Land uses immediately surrounding the Project Site include a hotel to the east; surface parking and commercial uses to the east; residential and commercial uses to the south; and commercial uses to the north. On the northeast side of the Project Site is a two-story strip mall. A one-story apartment building resides directly east of the Project Site. The Project proposes the development of new residential uses, commercial office uses, and retail uses. These uses would be consistent with other developments located adjacent to and in the general vicinity of the Project Site. Additionally, all proposed development would occur within the boundaries of the Project Site and would not include the closure of any surrounding travel routes. Furthermore, the Project does not propose a freeway or other large infrastructure that could divide the existing surrounding community. Access to all surrounding properties would continue to be available upon buildout of the Project. Therefore, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than significant.

j. Mineral Resources

No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone or Surface Mining District where significant mineral deposits are known to be present or within a mineral producing area as classified by the California Geologic Survey. The Project Site is also not located within a City-designated oil field or oil drilling area. Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. Therefore, the initial study concluded that no impacts related to mineral resources would occur.

k. Noise (Airport and Airstrip)

The Project Site is not located within the vicinity of a private airstrip or airport land use plan. The closest private airstrip or airport is Bob Hope Airport, which is located approximately 7.9 miles north of the Project Site. Given the distance between the Project Site and the nearest airport, the Project would not expose people residing or working in the Project area to excessive noise levels. Therefore, no impact would occur.

l. Population and Housing

The Project would develop 350 residential units. Applying the factor for residential uses included in the City's VMT Calculator Documentation of 2.25 residents per unit, the development of 306 residential units would result in the increase of approximately

689 residents.⁸ In addition, applying the City's VMT Calculator Documentation factor for affordable housing of 3.14 persons per unit for the Project's 44 affordable housing units would result in the increase of approximately 138 persons.⁹ Therefore, the Project would result in a net residential population of 827.¹⁰ The estimated 827 residents generated by the Project would represent approximately 0.48 percent of the population growth forecasted by SCAG in the City of Los Angeles between 2023 and 2029.¹¹ Furthermore, the Project does not include the extension of roads or other infrastructure that would indirectly induce substantial population growth in the area. Therefore, the Project's residents would be within SCAG's population projection for the City of Los Angeles Subregion.

According to the 2020–2045 RTP/SCS, the forecasted number of households for the City of Los Angeles in 2023 is approximately 1,469,828 households. In 2029, the projected occupancy year of the Project, the City of Los Angeles is anticipated to have approximately 1,557,966 households. Therefore, the projected household growth in the City between 2023 and 2029 is approximately 88,138 households. The Project would add a total of 350 residential units. No existing residential units are located on the Project Site. Therefore, the Project's 350 residential units would constitute approximately 0.4 percent of the housing growth forecasted between 2023 and 2029. Therefore, the Project's housing units would be within SCAG's housing projection for the City of Los Angeles.

Based on employee generation factors from the City of Los Angeles Department of Transportation (LADOT)'s Vehicle Miles Traveled Calculator, the Project is estimated to generate 532 net new employees to the Project Site.^{12,13} According to SCAG's 2020–2045 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2023 is

⁸ LADOT and Los Angeles Department of City Planning, *City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020*. The Multi-Family Residential factor of 2.25 persons per unit is applied to the 306 market-rate units ($306 * 2.25 = 689$ persons).

⁹ LADOT and Los Angeles Department of City Planning, *City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020*. The Affordable Housing - Family Residential factor of 3.14 persons per unit is applied to the 44 affordable housing units ($44 * 3.14 = 138$ persons).

¹⁰ Accounting for both market-rate and affordable housing units, the Project would produce an estimated total of 827 persons ($689 + 138 = 827$).

¹¹ $827 \div 173,276 = 0.0047$

¹² LADOT and Los Angeles Department of City Planning (DCP), *City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020*. The existing commercial uses to be removed produce approximately 64 employees (commercial 31,833 square feet * 0.002). The Project would produce 600 employees (office 136,000 square feet * 0.004 = 544) + (retail 18,004 square feet * 0.002 = 36) + (restaurant 4,038 square feet * 0.004 = 16). Therefore, the Project would produce approximately 532 net new employees.

¹³ The existing occupied uses to be removed include commercial uses, including Toyota of Hollywood as well as low rise buildings and parking areas.

approximately 1,917,721 employees.¹⁴ In 2029, the projected buildout year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,977,224 employees.¹⁵ Therefore, the projected employment growth in the City between 2023 and 2029 based on SCAG's 2020–2045 RTP/SCS is approximately 59,504 employees. Thus, the Project's estimated 532 net new employees would constitute 0.9 percent of the employment growth forecasted between 2023 and 2029. Therefore, the Project would not cause an exceedance of SCAG's employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities.

As analyzed above, the net new population and housing that would be generated by the Project would be within SCAG's population and housing projections for the City of Los Angeles Subregion. Therefore, as concluded in the Initial Study, the Project would not induce substantial population or housing growth. Impacts related to population and housing would be less than significant.

The Project Site is currently developed as an automotive dealership for Toyota and includes a showroom, parts storage structure, auto repair facility with five service bays, and surface parking. No housing currently exists on the Project Site. Accordingly, the Project would not displace any existing persons or housing, or require the construction of replacement housing elsewhere. Therefore, the Initial Study concluded no impacts related to displacement of people or housing would occur.

m. Public Services

(1) Schools

The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). The Project Site is currently served by one elementary school (Grant Elementary), one middle school (Joseph Le Conte Middle School), and one high school (Hollywood Senior High School). As previously discussed, the Project includes the construction of 350 residential units. Based on LAUSD Student Generation Rates, the Project would generate approximately 252 new students consisting of 138 elementary school students, 38 middle school students, and 76 high school students. The Project would replace

¹⁴ SCAG. 2020–2045 RTP/SCS, *Demographics and Growth Forecast Appendix, Table 14, p. 35*. Based on a linear interpolation of SCAG's employment data for 2016 (1,848,300) and 2045 (2,135,900). The 2023 value is extrapolated from 2016 and 2045 values: $[(2,135,900 - 1,848,300) \div 29] * 7 + 1,848,300 = \sim 1,917,721$.

¹⁵ SCAG. 2020–2045 RTP/SCS, *Demographics and Growth Forecast Appendix, Table 14, p. 35*. Based on a linear interpolation of SCAG's employment data for 2016 (1,848,300) and 2045 (2,135,900). The 2029 value is extrapolated from 2016 and 2045 values: $[(2,135,900 - 1,848,300) \div 29] * 13 + 1,848,300 = \sim 1,977,224$.

the approximately 31,833-square-foot existing automotive dealership and surface parking on the Project Site. Using the applicable LAUSD student generation rates, the existing uses to be removed would generate approximately nine students consisting of five elementary school students, one middle school student, and three high school students. Thus, when accounting for the removal of the existing uses, the Project would result in a net increase of 243 students consisting of 133 elementary school students, 37 middle school students, and 76 high school students. Pursuant to SB 50, the Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of the Project's building permit. LAUSD collects development fees for new construction within its district boundaries. Pursuant to Government Code Section 65995, the payment of these fees fully addresses Project-related school impacts. Thus, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (i.e., schools), need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools. Therefore, as concluded in the Initial Study, impact related to schools would be less than significant.

(2) Parks

Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. Nearby public parks and recreational facilities within an approximate 2-mile radius include Carlton Way Park (0.12 miles south); Seily Rodriguez Park (0.69 miles south); Selma Park (0.70 miles west); Yucca Park and Yucca Community Center (0.86 miles west); De Longpre Park (0.91 miles southwest); La Mirada Park (0.93 miles southeast); Barnsdall Art Park (1.52 miles east); Runyon Canyon Park (1.64 miles northwest); and Burns (Robert L) Park (1.80 miles south). The Project would provide common open space at the ground level that could be publicly accessible during daytime hours in the form of gardens, courtyards, and terraces. The publicly accessible open space proposed to be provided within the Project Site would total 23,526 square feet. In addition, the Project would include 19,076 square feet of private open space. Due to the amount, variety, and availability of the proposed open space and recreational amenities, it is anticipated that Project residents would generally utilize on-site open space to meet their recreational needs. Thus, while the Project's residents would be expected to utilize off-site public parks and recreational facilities to some degree, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Similarly, while the Project's commercial component would result in a demand for parks and recreational facilities, the Project also includes publicly accessible open space, which would be available for use by other users of the Project Site. Furthermore, it is expected that employees of the commercial uses would prefer to use parks and recreational facilities near their place of residence when not at the Project Site. Additionally, the Project would comply with the City's Parks Dedication and Fee Update Ordinance

(Ordinance No. 184,505) for the provision of open space and to dedicate land and/or pay in-lieu fees for parks and recreational facilities. Therefore, as concluded in the Initial Study, impacts related to parks would be less than significant.

(3) Libraries

The Project area is served by existing LAPL facilities within the Hollywood Community Plan Area, including the Frances Howard Goldwyn–Hollywood Regional Library located 0.6 miles west of the Project Site. The new residential population generated by the Project may result in additional demand for library services provided by the LAPL. However, while the new residents generated by the Project would be anticipated to make use of the various libraries serving the Project Site, not all residents would use the library or travel to the same library. Additionally, the Project's residential units would be equipped to allow individual internet service, which provides information and research capabilities that studies have shown to reduce demand at physical library locations. The LAPL also provides access to a variety of web-based collections, reducing the demand for physical library locations. Furthermore, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, and business tax, etc.) that could be applied toward the provision of new library facilities and related staffing for any one of the libraries serving the Project Site and vicinity, as deemed appropriate. The Project's revenue to the General Fund would help offset the Project-related increase in demand for library services. Therefore, as concluded in the Initial Study, impacts related to libraries would be less than significant.

n. Recreation

As discussed above, public parks and recreational facilities within an approximate 2-mile radius include Carlton Way Park (0.12 miles south); Seily Rodriguez Park (0.69 miles south); Selma Park (0.70 miles west); Yucca Park and Yucca Community Center (0.86 miles west); De Longpre Park (0.91 miles southwest); La Mirada Park (0.93 miles southeast); Barnsdall Art Park (1.52 miles east); Runyon Canyon Park (1.64 miles northwest); and Burns (Robert L) Park (1.80 miles south). As previously discussed, while the population increase associated with the Project could generate additional demand for parks and recreational facilities in the vicinity of the Project Site, the Project would comply with the City's requirements, including LAMC Section 12.33 for the payment of park fees. In addition, the Project would comply with applicable open-space requirements with respect to the Project's residential component. As discussed above, the Project would provide common open space at the ground level that could be publicly accessible during daytime hours in the form of gardens, courtyards, and terraces. The common open space proposed to be provided within the Project Site would total 42,602 square feet, pursuant to the requirements of the LAMC. Due to the amount, variety, and availability of the proposed open space and recreational amenities provided within the Project Site it is anticipated that Project residents and employees would often utilize on-site open space and common areas to meet their

recreational needs. Thus, while the Project's residents would be expected to utilize off-site public parks and recreational facilities to some degree, the Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. In addition, pursuant to Section 12.33 of the LAMC, the Applicant would be required to comply with applicable park fee requirements with regard to the residential component of the Project, which could be used to increase recreational opportunities for project residents and improve existing parks, both of which would reduce the Project residents' use of existing parks and recreational facilities and/or address any deterioration of those facilities. Therefore, as concluded in the Initial Study, the impact on parks and recreational facilities would be less than significant.

o. Transportation (Emergency Access)

With respect to emergency access, while it is expected that the majority of construction activities for the Project would primarily be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access (refer to Project Design Feature TR-PDF-1 in Section IV.J, Transportation, of this Draft EIR). With regard to operation, the Project does not propose the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from the surrounding streets. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. Therefore, the Project would not result in inadequate emergency access, and impacts would be less than significant.

p. Utilities and Service Systems (Stormwater, Telecommunication Facilities, and Solid Waste)

(1) Stormwater Drainage

As discussed above, a comparison of the pre- and post-Project peak flow rates indicates a decrease in stormwater runoff from the Project Site from 10.44 cubic feet per second under existing conditions to 9.69 cubic feet per second with the implementation of the Project. In addition, the BMPs implemented as part of the Project would control stormwater runoff and ultimately reduce or eliminate the discharge of potential pollutants from stormwater runoff. Therefore, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. As such, the Project would not require or result in the relocation or construction of new or expanded storm water drainage.

(2) Telecommunications

With regard to telecommunications infrastructure, the Project would require construction of new on-site telecommunications infrastructure to serve the new buildings and potential upgrades and/or relocation of existing telecommunications infrastructure. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. Such activities could involve temporary closure of portions of sidewalks or travel lanes. However, the Project would implement a Construction Traffic Management Plan pursuant to Project Design Feature TR-PDF-1, which would ensure safe pedestrian access, as well as emergency vehicle access and safe vehicle travel in general, to reduce any temporary pedestrian and traffic impacts occurring as a result of construction activities. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration (i.e., months) and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution with minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers and the City, as applicable. Therefore, as concluded in the Initial Study, impacts to telecommunications facilities would be less than significant.

(3) Solid Waste

Pursuant to the requirements of Senate Bill (SB) 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. In addition, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, is disposed of in inert waste landfills. The permitted inert waste landfill serving the County is Azusa Land Reclamation. After accounting for mandatory recycling, the Project would result in approximately 883 tons of construction and demolition waste. This amount of construction and debris waste would represent approximately 0.001 percent of the Azusa Land Reclamation Landfill's remaining disposal capacity of 64.64 million tons. As such, the Azusa Land Reclamation landfill, the County's inert waste landfill, would be able to accommodate waste from the Project's construction activities.

Upon full buildout, the Project would generate approximately 1,001 net tons of solid waste per year. The estimated amount of solid waste is conservative because the waste

generation factors do not account for recycling or other waste diversion measures, such as AB 939 which requires California cities, counties, and approved regional solid waste management agencies responsible for enacting plans and implementing programs to divert 50 percent of their solid waste away from landfills; compliance with AB 341, which requires California commercial enterprises and public entities that generate four or more cubic yards per week of waste to adopt recycling practices; and does not include implementation of the City's recycLA franchising system. The Project's estimated solid waste disposal of 1,001 net tons per year represents approximately 0.008 percent of the remaining capacity (132.58 million tons) at the County's Class III landfills that serve the City. The Project's estimated solid waste generation would therefore represent a nominal percentage of the remaining daily disposal capacity of the County's Class III landfills.

The Project would also be consistent with applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size. The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. As concluded in the Initial Study, the Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts related to regulatory compliance would be less than significant.

q. Wildfire

The Project Site is located in an urbanized area and is developed with relatively flat topography. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated Wildfire Severity Zone. In addition, there is no accumulation of dry vegetation within the Project Site to fuel wildfires, or wildlands or steep slopes located in the vicinity of the Project Site or frequent strong wind events to exacerbate wildfires. Therefore, as concluded in the Initial Study, no impacts related to the following would occur: (1) the impairment of an adopted emergency response plan or emergency evaluation plan related to wildfire; (2) the exposure of Project occupants to pollutant concentrations from a wildfire; (3) the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or (4) the exposure of people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes.