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

JUSTIFICATION TO SUPPORT A CATEGORICAL EXEMPTION

1666 N. VERMONT AVENUE PROJECT

DIR-2019-6738-SPPA-SPP-TOC-SPR-HCA-M1 and ENV-2024-359-CE

Project Address: 1642-1666 N. Vermont Avenue, 4646-4650 W. Prospect Avenue, 4685-4697 W. Hollywood Boulevard, Los Angeles, CA 90027

Community Plan Area: Hollywood

Council District: 4 – Nithya Raman

Project Description: The Project Site occupies 28,006 square feet of lot area (0.64 acres) with approximately 1,412 square feet of street vacation area, resulting in 29,418 square feet of gross lot area (0.68 acres) and is currently developed with two commercial structures and a surface parking lot. The Proposed Project includes demolition of the existing two commercial structures and site clearing of the surface parking lot for the construction, use, and maintenance of an 86-foot-tall, seven-story mixed-use residential and commercial building with a total of 139 residential dwelling units and up to 20,240 square feet of ground-floor commercial space ("Proposed Project"). The Proposed Project would include 59 studio units, 61 one-bedroom units, and 19 two-bedroom units, 12 percent (17 units) of which would be reserved as On-Site Restricted Affordable Units: 16 units would be reserved at the Extremely Low Income level and one unit would be reserved at the Moderate Income level. The Proposed Project has a total combined floor area of 126,770 square feet, consisting of 106,530 square feet of residential floor area and 20,240 square feet of ground-floor commercial space, resulting in a floor area ratio of 4.31:1. Three levels of subterranean parking would be provided in a parking garage underneath the mixed-use building. The Proposed Project would provide a total of 145 vehicle parking spaces and 130 bicycle parking spaces. The Proposed Project would provide 11,070 square feet of total open space (with 7,170 square feet of common open space and 3,900 square feet of private open space). The Proposed Project would require a total of approximately 35,950 cubic yards of soil export to be hauled off-site for the building foundations and subterranean levels. The proposed haul route for transporting soil to the Azusa Land Reclamation facility would travel north on N. Vermont Avenue to Los Feliz Boulevard, east on Los Feliz Boulevard to the I-5 Freeway on-ramp. Inbound haul trips would exit the I-5 Freeway at Los Feliz Boulevard, proceed west on Los Feliz Boulevard to N. Vermont Avenue, southbound to the Project Site. The Proposed Project assumes a worst-case scenario of removing all four (4) street trees, in the event of changes to the right-of-way improvement plans after approval of the environmental clearance. However, this environmental analysis does not authorize the removal of any street trees without prior approval of Urban Forestry, in compliance with LAMC Sections 62.169 and 62.170 and their applicable findings.

PREPARED FOR:
The City of Los Angeles
Department of City Planning

PREPARED BY:
Parker Environmental Consultants, LLC

APPLICANTS:
Hollywood 26 Real Estate LLC and Vermont 26 Real Estate, LLC

April 2024

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CLASS 32 CATEGORICAL EXEMPTION

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1.0 Project Description

A. Project Summary

The Project Site is currently developed with two existing single-story commercial structures including a car wash totaling 8,000 square feet, a restaurant totaling 300 square feet, and an associated surface parking lot. The Applicants propose the demolition of the two existing commercial structures and surface parking lot for the construction, use, and maintenance of a seven-story mixed-used residential and commercial building with a total of 139 multi-family residential units and up to 20,240 square feet of commercial[1] space at the ground level ("Proposed Project"). The Proposed Project would include 59 studio units, 61 one-bedroom units, and 19 two-bedroom units, 12 percent (17 units) of which would be reserved as On-Site Restricted Affordable Units: 16 units would be reserved at the Extremely Low Income level and one unit would be reserved at the Moderate Income level. The Proposed Project has a total combined floor area of 126,770 square feet, consisting of 106,530 square feet of residential floor area and 20,240 square feet of ground-floor commercial space, resulting in a floor area ratio of 4.31:1. Three levels of subterranean parking would be provided in a subterranean parking garage underneath the mixed-use building. A total of 145 vehicle parking spaces would be provided: 104 residential parking spaces would be provided within three subterranean parking levels and a total of 41 commercial parking spaces would be provided within one subterranean parking level. The Proposed Project would provide a total of 130 bicycle parking spaces. The Proposed Project would include 11,070 square feet of common open space (including 7,170 square feet of common open space and 3,900 square feet of private open space).

The Applicants are requesting the following discretionary approvals:

1) Pursuant to **LAMC Section 11.5.7.C**, a Specific Plan Project Permit Compliance Review in the SNAP.

    a. The Applicants are also requesting permission to utilize the alternative Noise Control option discussed in the Section V.20 of the SNAP Development Standards and Design Guidelines.

2) Pursuant to **LAMC Section 12.22.A.31**, the Applicants request permission to utilize Base Incentives and two Additional Incentives defined by the TOC Guidelines to construct a maximum of 139 dwelling units in an Eligible Housing Development. The site's location qualifies it for Tier 4 level TOC approval. This application requests the use of the following incentives:

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[1] *To provide a conservative analysis, this Categorical Exemption characterizes the commercial space as a Grocery Store use. With the exception of the traffic report, which calculates the project's vehicle miles traveled (VMT) based on the total gross building floor area (i.e., 22,800 gsf) of the grocery store component, all references to the size of the project is based on the floor area as defined in the Los Angeles Municipal Code (LAMC), Section 12.03.*

a. Base Incentives, Section VI of the TOC Guidelines:

   i. Section VI.1.a.iv: Permitting an 80% increase in the allowable density from an allowable base density of 77 units to 139 units.

   ii. Section VI.1.b.iv.: Permitting a 45% increase in the allowable FAR in Subarea C of the SNAP, from an allowable base FAR of 3.0:1 to 4.35:1.

   iii. Section VI.2.a.ii: Permitting no required parking for residential units in an Eligible Housing in Tier 4.

b. Additional Incentives, Section VII of the TOC Guidelines:

   i. Section VII.1.b.ii: Permitting a 25% decrease in required open space.

   ii. Section VII.1.g.iii: Permitting a height increase up to 33 feet above the 75-foot limitation. The Applicants are requesting 11 additional feet to permit an 86-foot-tall building.

3) Pursuant to **LAMC Section 16.05**, the Applicants request the approval of Site Plan Review findings for a development project which creates, or results in, an increase of 50 or more dwelling units.

4) Pursuant to the **City of Los Angeles Charter Section 558(a)5**, the Applicants request a street vacation of approximately 1,412 square feet of area within the public right-of-way located along N. Vermont Avenue between Hollywood Boulevard and Prospect Avenue, along the western border of the Project Site.

In addition, pursuant to various sections of the LAMC, the Applicants will also request various ministerial administrative approvals and permits from the Los Angeles Department of Building and Safety and other municipal agencies for project construction actions, including but not limited to the following: demolition permits, grading and excavation permits, foundation and building permits, temporary street closure permits, haul route permit, street tree removals, and sign permits.

B. Environmental Setting

1. Project Location

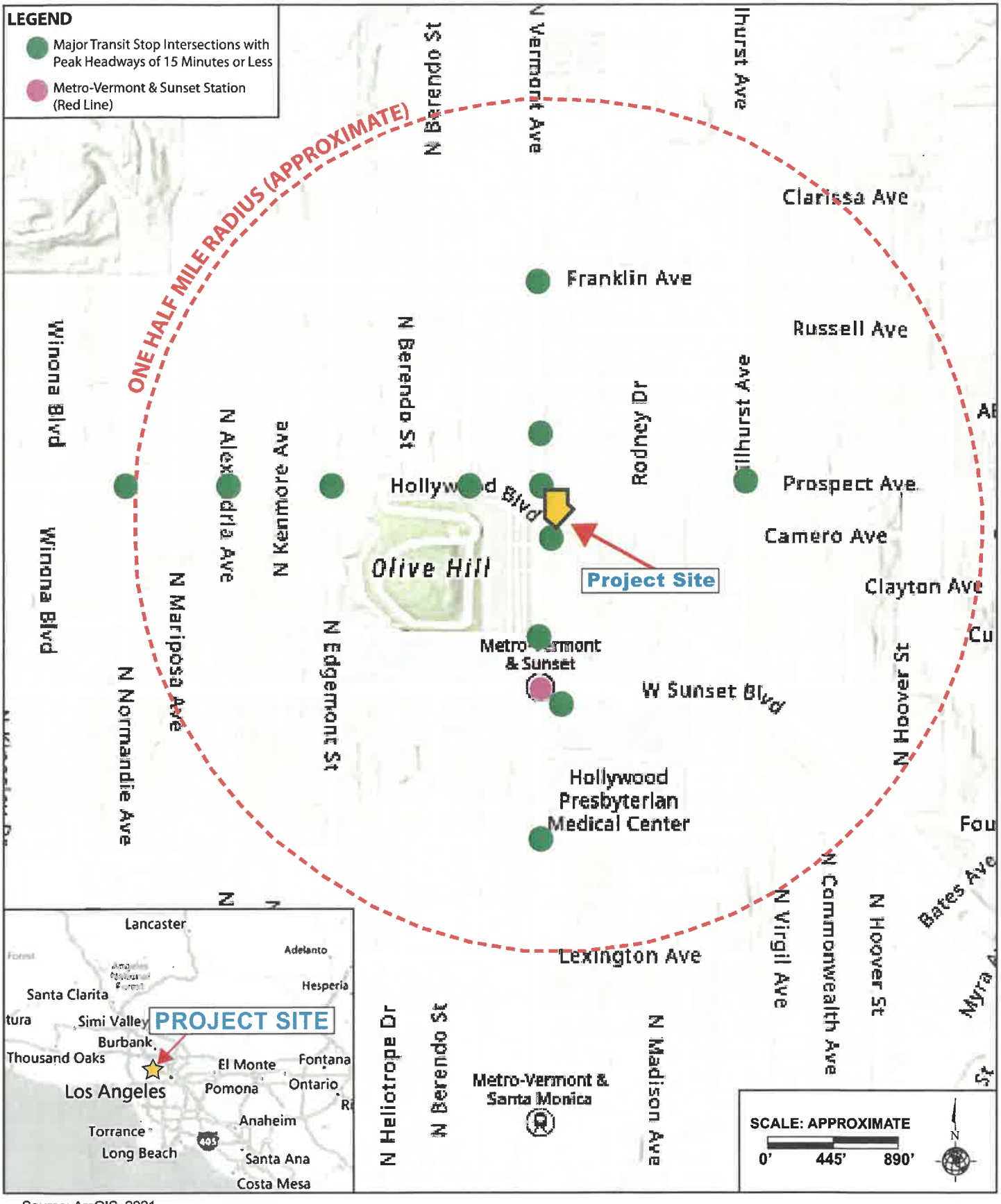
The Project Site is located in the Hollywood Community Plan ("Community Plan") area within the City of Los Angeles. The Project Site's location within the City of Los Angeles and the greater Los Angeles region is depicted in Figure 1, Project Location Map. The Project Site encompasses three parcels and includes approximately 28,006 square feet of lot area, with approximately 1,412 square feet of vacation area, resulting in 29,418 square feet of gross lot area (0.68 acres). The Project Site's property addresses, Assessor's Parcel Number (APN), land use, and lot area are summarized in Table 1.1, Summary of Project Site, below.

The Project Site is generally bound by Prospect Avenue to the north; N. Vermont Avenue to the west; Hollywood Boulevard and a two-story commercial building and a surface parking lot to the south; and a public alleyway and multi-family residential to the east. The Proposed Project includes an application to vacate the public right-of-way with the City of Los Angeles Bureau of Engineering (BOE VAC - E1401364). The area includes approximately 1,412 square feet of vacation area located along N. Vermont Avenue between Hollywood Boulevard and Prospect Avenue, along the western border of the Project Site. (See Figure 2, below).

Table 1.1
Summary of Project Site

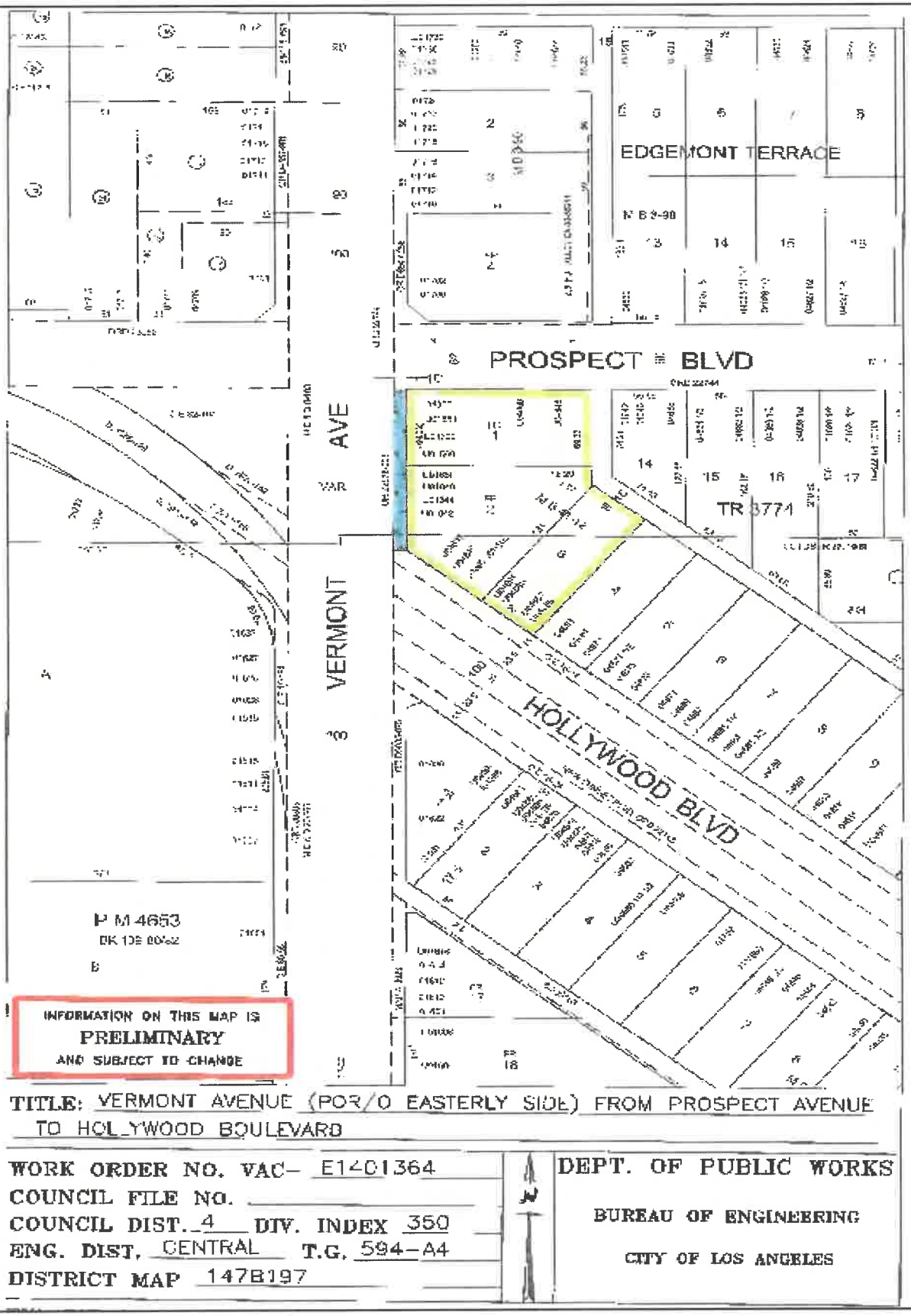
Address	APN	Existing Land Use	Lot Area (square feet)
4646 W. Prospect Avenue 1660 N. Vermont Avenue 1666 N. Vermont Avenue 1664 N. Vermont Avenue 1662 N. Vermont Avenue 4650 W. Prospect Avenue 4697 W. Hollywood Boulevard 4695 W. Hollywood Boulevard 4693 W. Hollywood Boulevard 1650 N. Vermont Avenue 1646 N. Vermont Avenue 1642 N. Vermont Avenue 1644 N. Vermont Avenue 4691 W. Hollywood Boulevard 4689 W. Hollywood Boulevard 4687 W. Hollywood Boulevard 4685 W. Hollywood Boulevard	5542-001-022	Restaurant/ Car Wash	28,006 sf
		Lot Area Subtotal	*28,006 sf*
		Vacation Area	*1,412 sf*
		Total Gross Area	29,418 sf
Sources: City of Los Angeles Department of City Planning, Zone Information and Map Access System, website: http://zimas.lacity.org/, accessed December 2023.			

Primary vehicular access to the Project Site is provided by the Hollywood Freeway (also referred to as "US-101"). The Hollywood Freeway generally runs in a north-south direction approximately 1.5 miles to the west and south of the Project Site. Local street access is provided by the grid roadway system surrounding the Project Site. Vermont Avenue, which borders the Project Site to the west, is a two-way street providing two travel lanes in each direction and is classified as a "Modified Avenue II" in the City's Mobility Plan along the Project Site frontage, but changes to an "Avenue I" south of Hollywood Boulevard. Hollywood Boulevard, which borders the Project Site to the southwest, is a two-way street providing two travel lanes in each direction and is classified as an "Avenue I" in the City's Mobility Plan. Prospect Avenue, which borders the Project Site to the north, currently provides one travel lane in each direction and is classified as a "Local Street" in the City's Mobility Plan. Street parking is provided along Prospect Avenue with restrictions.



Source: ArcGIS, 2021.

Figure 1
Project Location Map



Source: City of Los Angeles, Department of Public Works, Bureau of Engineering.

Figure 2
Vacation of Public Right of Way

Transit Priority Area

In 2013, the State of California enacted Senate Bill 743 (SB 743), which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Public Resources Code Section 21099 defines a "transit priority area" as an area within one-half mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." Public Resources Code Section 21064.3 defines "Major Transit Stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Public Resources Code Section 21061.3 defines an "Infill Site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses.

The Project Site is an infill site within a Transit Priority Area as defined by California Environmental Quality Act (CEQA).[2] The Los Angeles Metropolitan Transportation Authority (Metro) and Los Angeles Department of Transportation (LADOT) operate multiple bus lines with multiple bus stops within walking distance from the Project Site. In the vicinity of the Project Site, bus stops are primarily located along Vermont Avenue and Hollywood Boulevard. Bus lines that operate in the Project Site area include, but are not limited to, Metro 180/181, Metro 204, Metro 206, LADOT DASH – Hollywood, and LADOT DASH Observatory/Los Feliz Route, and regional/commuter lines (Metro RapidBus 754 and Metro RapidBus 780).

Additionally, the closest Metro Station to the Project Site is the Vermont / Sunset Metro Station, located within 0.25 mile (walking distance) from the Project Site. The Vermont / Sunset Metro Station is serviced by the Metro B Line. The Metro B Line provides service between the community of North Hollywood and Union Station in downtown Los Angeles. The Metro B Line provides access to other subway lines that connect to other parts of the City and to the greater Los Angeles metropolitan area.

The Project Site is also situated within easy walking distance to retail, restaurants, entertainment, and other commercial businesses located in the Hollywood area.

2. Existing Conditions

2.1 Zoning and Land Use Designations

Figure 3, Zoning and General Plan Land Use Designations, shows the existing and proposed zonings and land use designations on the Project Site and in the surrounding area. The Hollywood Community Plan designates the entirety of the Project Site for Highway Oriented

[2] *Public Resources Code Sections 21061.3 And 21099. See Also City Of Los Angeles, Department Of City Planning, City Of Los Angeles Zoning Information And Map Access System (ZIMAS), Parcel Profile Report, Website: Www.Zimas.Lacity.Org, Accessed December 2023.*

Commercial land uses corresponding to the C2 Zone. The entirety of the Project Site is zoned C2-1D, thus, the zoning of the Project Site is consistent with the existing land use designation. The Project Site is located in Height District No. 1, which does not limit building height for the C2 zone but generally limits floor area to an FAR of 1.5:1. The "D" limitation indicates that the Project Site is governed by the Vermont/Western Transit Oriented District Specific Plan, which supersedes the FAR limitation in the LAMC, allowing the maximum FAR of 3:1. The Project Site is also located within a Transit Priority Area (ZI-2452) and the Los Angeles State Enterprise Zone (ZI-2374).

2.1.1 Hollywood Community Plan

The Project Site is located within the Hollywood Community Plan area of the City of Los Angeles. The Community Plan is "intended to promote an arrangement of land use, circulation, and services which will encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the Community, within the larger framework of the City; guide the development, betterment, and change of the Community to meet the existing and anticipated needs and conditions; balance growth and stability; reflect economic potentials and limits, land development and other trends; and protect investment to the extent reasonable and feasible." [3]

2.1.2 Vermont/Western Transit Oriented District Specific Plan ("SNAP")

As stated above, the Project Site is located in the Vermont/Western Transit Oriented District Specific Plan ("SNAP")[4] area (Ordinance No. 173,749), which became effective March 1, 2001. (See Figure 4, Vermont/Western Transit Oriented District Specific Plan Map, below). As shown in Figure 4, the Project Site is located in Subarea C: Community Center in the Specific Plan. The Community Center subarea is located along major commercial corridors. The SNAP allows a maximum height of 75 feet and a maximum FAR of 3:1 for development in Subarea C. Wherever the SNAP contains provisions that conflict with the provisions of the LAMC, the SNAP's provisions shall prevail and supersede the LAMC.

2.1.3 Transit-Oriented Communities Affordable Housing Incentive Area

The Project Site is also located in a Tier 4 area of the City's Transit-Oriented Communities Affordable Housing Incentive Area. The Proposed Project would adhere to the City's Transit-Oriented Communities Affordable Housing Incentive Program Guidelines ("TOC Guidelines"), effective September 22, 2017, and revised February 26, 2018. The TOC Guidelines permit increased residential density as well as increased height, FAR, and other deviations from the planning and zoning regulations of the LAMC as well as the SNAP, provided that a development contains a requisite amount of deed-restricted affordable housing.

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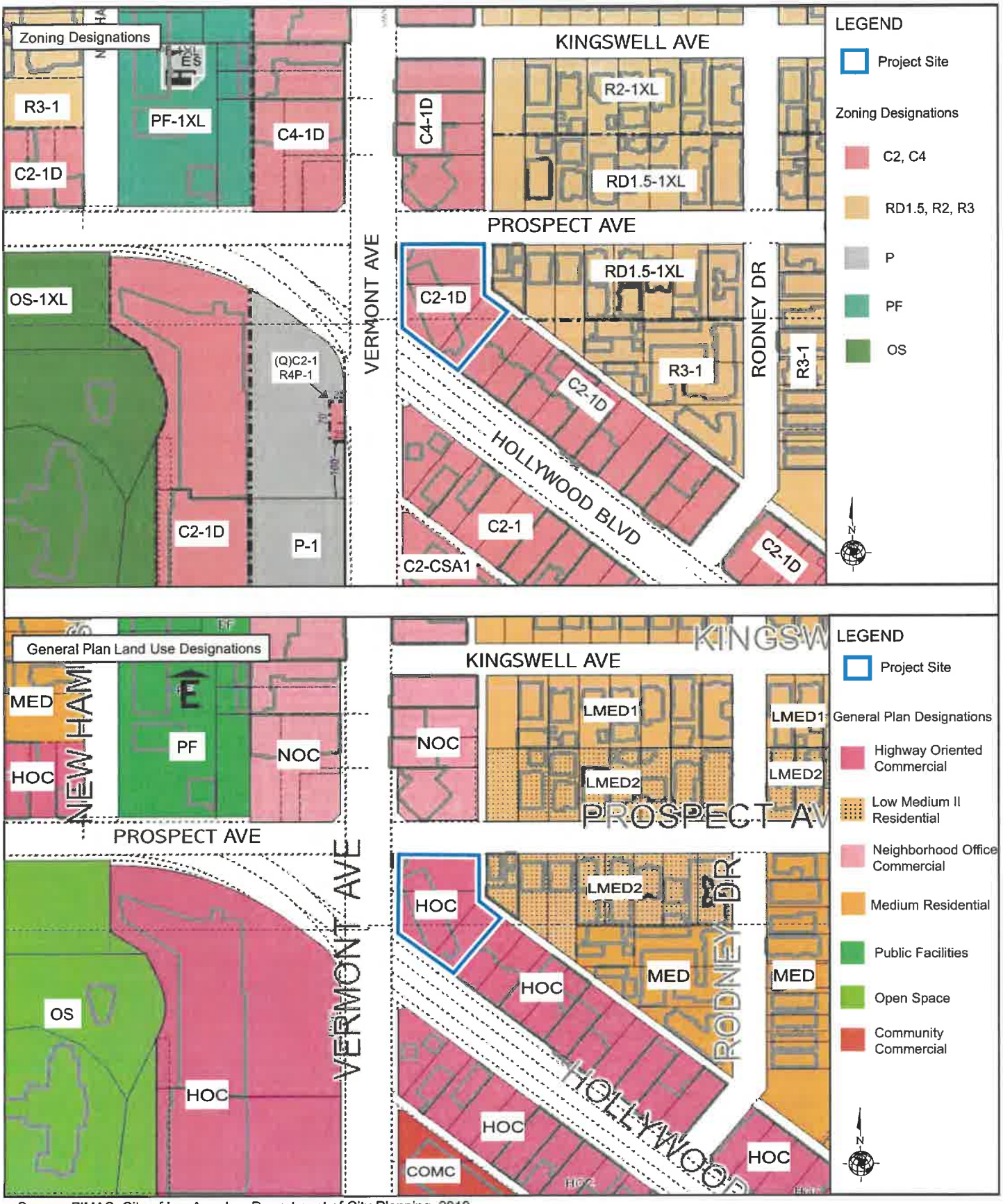
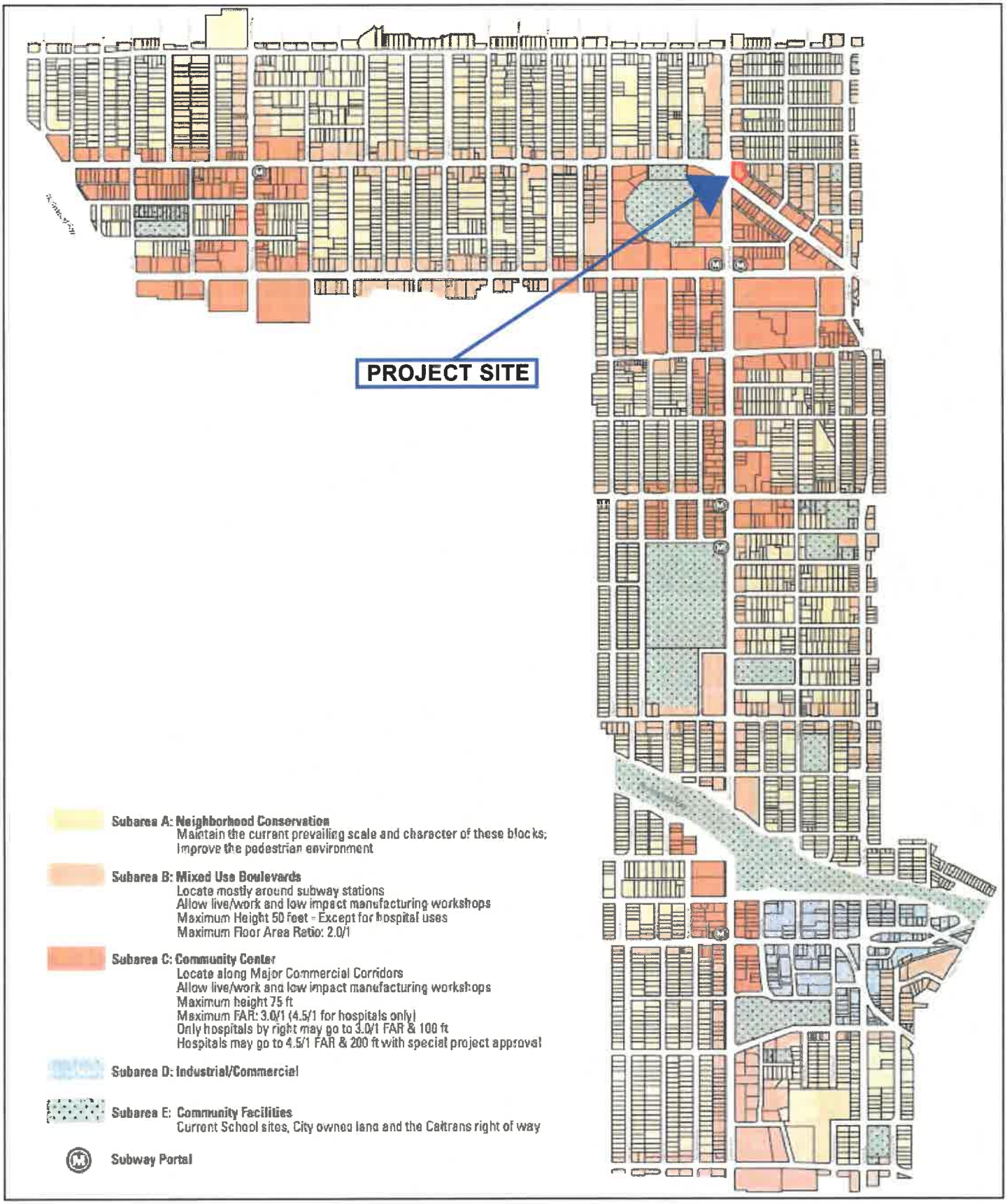
[3] *City Of Los Angeles Department Of City Planning, Hollywood Community Plan (Pg. HO-1).*

[4] *The Vermont/Western Transit Oriented District Specific Plan Is Also Known As The Station Neighborhood Area Plan Or "SNAP." These Terms Can Be Used Interchangeably And Refer To The Same Set Of Guidelines.*



Source: ZIMAS, City of Los Angeles, Department of City Planning, 2019.

Figure 3
Zoning and General Plan Land Use Designations



Source: City of Los Angeles, Department of City Planning, Vermont/Western Transit Oriented District Specific Plan, Subarea C, Map No. 1, January 23, 2001.

Figure 4
Vermont/Western Transit Oriented District Specific Plan Map
Subarea C: Community Center

2.2 Existing Site Conditions

Figure 5, Aerial Photograph of the Project Site and Surrounding Land Uses, shows an aerial view of the Project Site and identifies the photograph locations for the Project Site and surrounding land use photographs shown in Figure 6, Photographs of the Project Site.

The Project Site is currently developed with two existing single-story commercial buildings including a car wash totaling 8,000 square feet, a restaurant totaling 300 square feet, and an associated surface parking lot. There are two vehicle driveways located along the south side of Prospect Avenue that provide access to the Project Site. The Project Site contains ornamental landscaping and vegetation along N. Vermont Avenue and Hollywood Boulevard. There are four non-protected street trees adjacent to the Project Site on the public right-of-way and no trees on the Project Site. None of the street trees are protected trees species as defined under the City's Protected Tree Ordinance (LAMC Section 17.02), and are not proposed to be removed. However, the Proposed Project assumes a worst-case scenario of removing all street trees, in the event of changes to the right-of-way improvement plans after approval of the environmental clearance. This environmental analysis does not authorize the removal of any street trees without prior approval of Urban Forestry, in compliance with LAMC Sections 62.169 and 62.170 and their applicable findings.

3. Surrounding Land Uses

As shown in Figure 3, the Project Site is in a commercially and residentially zoned area, and properties surrounding the Project Site are zoned C2-1D with a General Plan land use designation of Highway Oriented Commercial, RD1.5-1XL with a General Plan land use designation of Low Medium II Residential, C4-1D zone with a General Plan land use designation of Neighborhood Office Commercial, or (Q)C2-1 with a General Plan land use designation of Highway Oriented Commercial. The properties surrounding the Project Site include a mix of commercial uses (including retail, restaurants and banks), multi-family residential, and surface parking lots. These land uses range in height from one- to two-stories above grade. Photographs of the land uses immediately surrounding the Project Site are provided in Figure 7. Below is a description of the existing conditions in the surrounding area.

North: Prospect Avenue abuts the Project Site to the north. Across Prospect Avenue is a one-story commercial building consisting of a Starbucks and a US Bank, with an associated surface parking lot. Further north and northwest, along Vermont Avenue, is a commercial corridor that contains a variety of retail, restaurant, and commercial land uses. These properties are zoned C4-1D with a General Plan land use designation of Neighborhood Office Commercial. Properties to the northeast of the Project Site, across Prospect Avenue, include multi-family residential buildings, which are zoned RD1.5-1XL with a General Plan land use designation of Low Medium II Residential. Refer to Figure 7, View 11.

West: The intersection of N. Vermont Avenue and Hollywood Boulevard abuts the Project Site to the west. The Barnsdall Square Shopping Center is located across the intersection of N. Vermont Avenue and Hollywood Boulevard. This property is a single-story commercial plaza including retail and restaurant land uses, a grocery store, and surface

parking fronting N. Vermont Avenue and Hollywood Boulevard. This commercial plaza is zoned C2-1D, P-1, and (Q)C2-1 with a General Plan land use designation of Highway Oriented Commercial. Refer to Figure 7, View 8.

East: An approximate 15-foot public alley abuts the Project Site to the east. The alley extends southeast from Prospect Avenue to Rodney Drive. Refer to Figure 6, Views 5 and 6. Further east, past the alley, are multi-family residential buildings. These residential buildings are zoned RD1.5-1XL with a General Plan land use designation of Low Medium II Residential. Refer to Figure 7, View 12.

South: Abutting the Project Site to the south is Hollywood Boulevard and a two-story commercial building and associated surface parking lot. Further south, along Hollywood Boulevard, is a commercial corridor that contains a variety of retail, restaurant, institutional land uses, and surface parking lots. These properties are zoned C2-1D and C2-1, and have a General Plan land use designation of Highway Oriented Commercial Refer to Figure 7, View 9.

Source: Google Earth, Aerial View, 2019.

Figure 5
Aerial Photograph of the Project Site and Surrounding Land Uses

View 1: On the southeast corner of Hollywood Blvd and N. Vermont Ave, looking north at the Project Site.

View 2: On the southwest corner of Hollywood Blvd and N. Vermont Ave, looking northeast at the Project Site.

View 3: On the west side of Vermont Ave, in the pocket park, looking east at the Project Site.

View 4: On the north side of Prospect Ave, adjacent to the alleyway, looking southwest at the Project Site.

View 5: On the south side of Prospect Ave, looking south at the eastern border of the Project Site and public alleyway.

View 6: In the alleyway adjacent to the southeast corner of the Project Site, looking northwest at the Project Site.

Source: Parker Environmental Consultants, October 16, 2019.

Figure 6
Photographs of the Project Site
Views 1-6

View 7: On the north side of Hollywood Blvd, looking southeast at the commercial properties south and southeast of the Project Site.

View 8: On the northeast corner of Hollywood Blvd and N. Vermont Ave, looking southwest at the commercial properties southwest of the Project Site.

View 9: On the southeast corner of Hollywood Blvd and N. Vermont Ave, looking east at the commercial properties southeast of the Project Site.

View 10: On the east side of N. Vermont Ave, looking northwest at the commercial properties northwest of the Project Site.

View 11: On the south side of Prospect Ave, adjacent to the alleyway, looking northwest at the commercial properties north of the Project Site.

View 12: On the north side of Prospect Ave, looking southeast at the residential properties east of the Project Site, adjacent to the alleyway.

Source: Parker Environmental Consultants, October 16, 2019.

Figure 7
Photographs of the Surrounding Land Uses
Views 7-12

C. Description of Project

1. Project Overview

The Project Site is currently developed with two existing single-story commercial structures including a car wash totaling 8,000 square feet, a restaurant totaling 300 square feet, and an associated surface parking lot. Hollywood 26 Real Estate LLC and Vermont 26 Real Estate, LLC (the "Applicants") propose demolition of two existing commercial structures and surface parking lot for the construction, use, and maintenance of a seven-story mixed-used residential and commercial building with a total of 139 multi-family residential units and up to 20,240 square feet of commercial space at the ground level ("Proposed Project"). The Proposed Project would include 59 studio units, 61 one-bedroom units, and 19 two-bedroom units, 12 percent (17 units) of which would be reserved as On-Site Restricted Affordable Units: 16 units would be reserved at the Extremely Low Income level and one unit would be reserved at the Moderate Income level. The Proposed Project has a total combined floor area of 126,770 square feet, consisting of 106,530 square feet of residential floor area and 20,240 square feet of ground-floor commercial space, resulting in a floor area ratio of 4.31:1. Three levels of subterranean parking would be provided in a subterranean parking garage underneath the mixed-use building. A total of 145 vehicle parking spaces would be provided: 104 residential parking spaces would be provided within three subterranean parking levels and a total of 41 commercial parking spaces would be provided within one subterranean parking level. The Proposed Project would provide a total of 130 bicycle parking spaces. The Proposed Project would include 11,070 square feet of open space (including 7,170 square feet of common open space and 3,900 square feet of private open space). A summary of the Proposed Project is provided in Table 1.2, Proposed Development Program, below. The plan layout of the Proposed Project is depicted in Figure 8, Site Plan – Residential and Figure 9, Site Plan - Commercial. The floor plans are illustrated in Figures 10 through 17.

Table 1.2
Proposed Development Program

Land Uses	Quantity (dwelling unit)	Proposed Floor Area (square feet)
Residential		
Studio	59	106,530 sf [a]
One-bedroom	61	
Two-bedroom	19	
Commercial		
Market	--	20,240 sf
TOTAL:	**139 du**	**126,770 sf [b] (4.31:1 FAR)**

Notes:

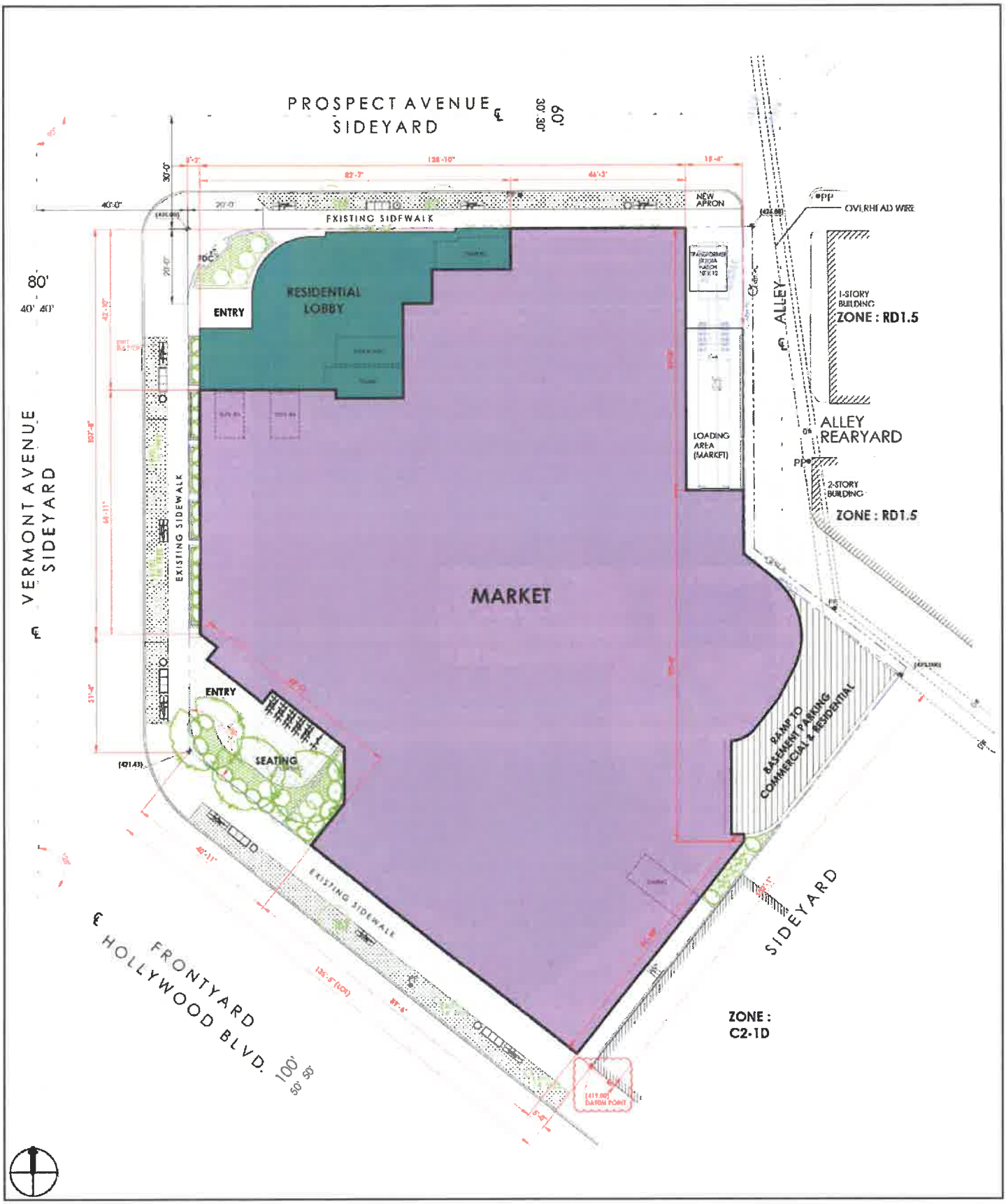
[a] *Residential floor area includes common areas, interior lobby and recreational amenity areas, and interior spaces within the proposed dwelling units.*

[b] *Pursuant to the definition of the term "floor area" in LAMC Section 12.03, structured parking areas are excluded from the floor area calculations for purposes of calculating floor area ratio (FAR). The Proposed Project includes three levels below grade and on the ground floor that is not counted towards the FAR.*

Source: Safai Architects, October 12, 2023.

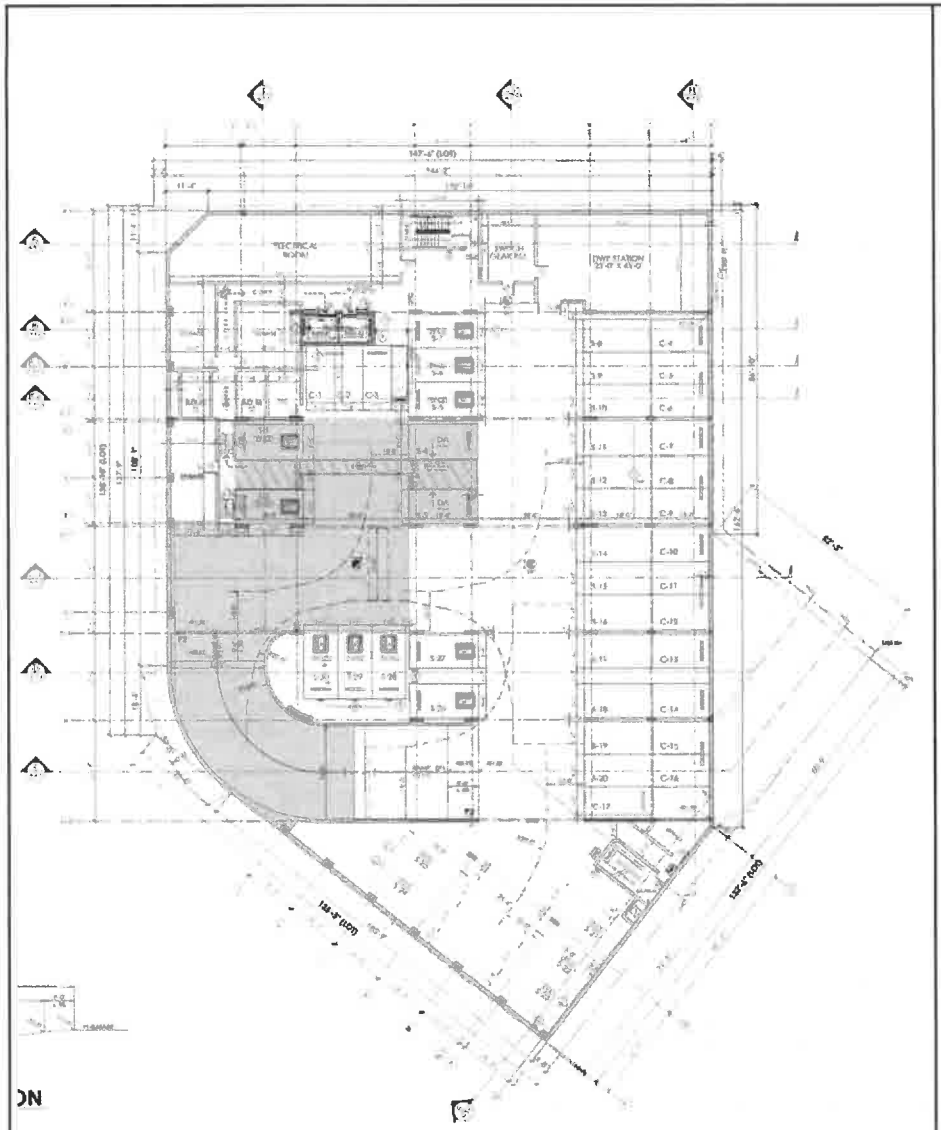
Source: Safai Architects, October 12, 2023.

Figure 8
Site Plan - Residential

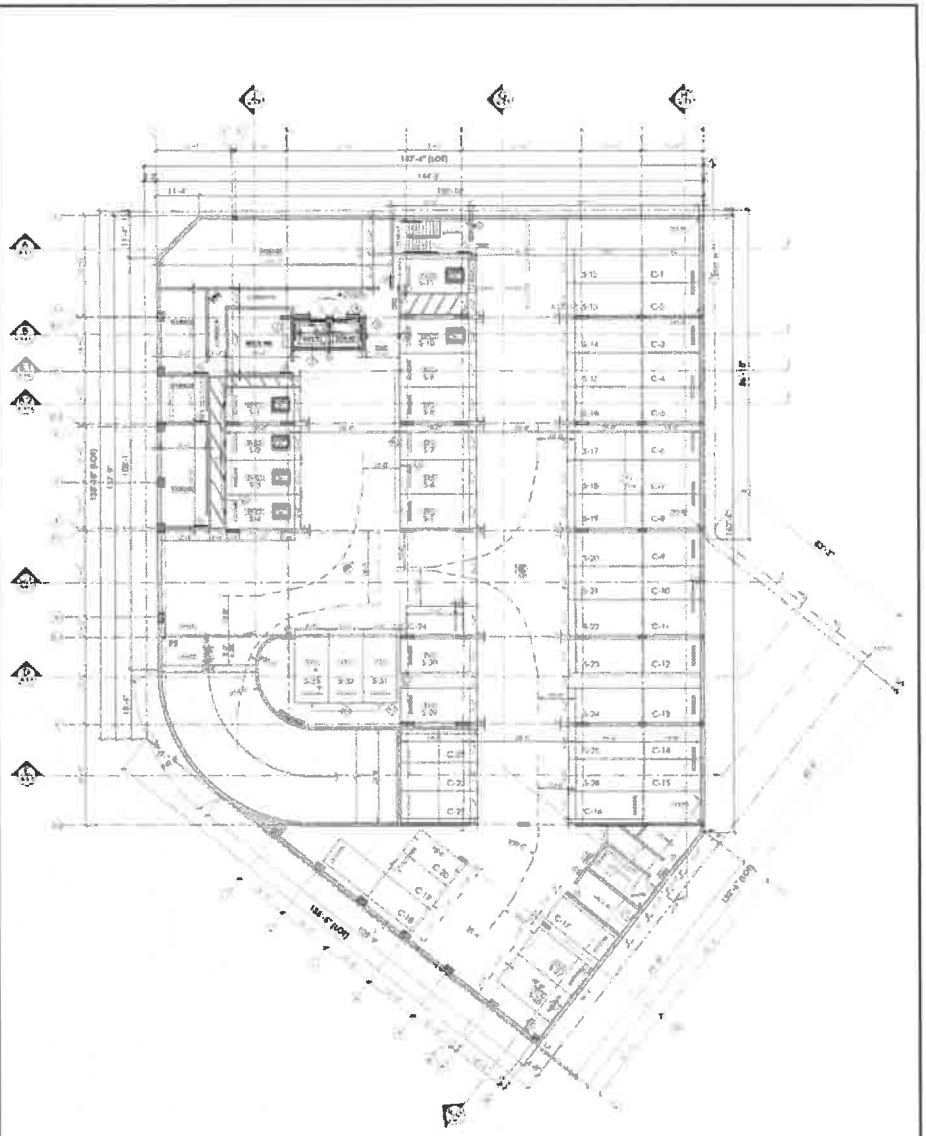


Source: Safai Architects, October 12, 2023.

Figure 9
Site Plan - Commercial



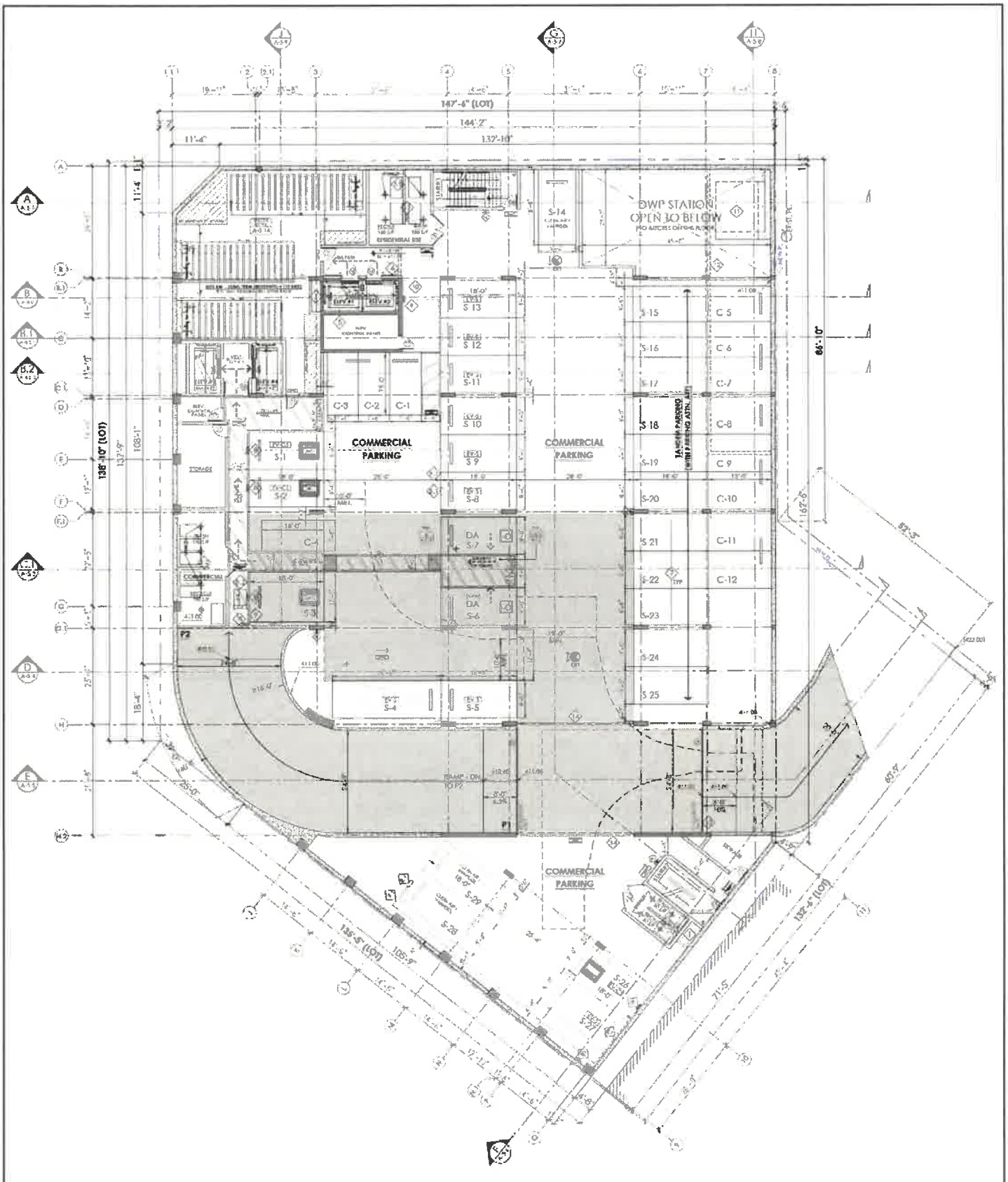
Parking Garage Floor Plan - Level P2



Parking Garage Floor Plan - Level P3

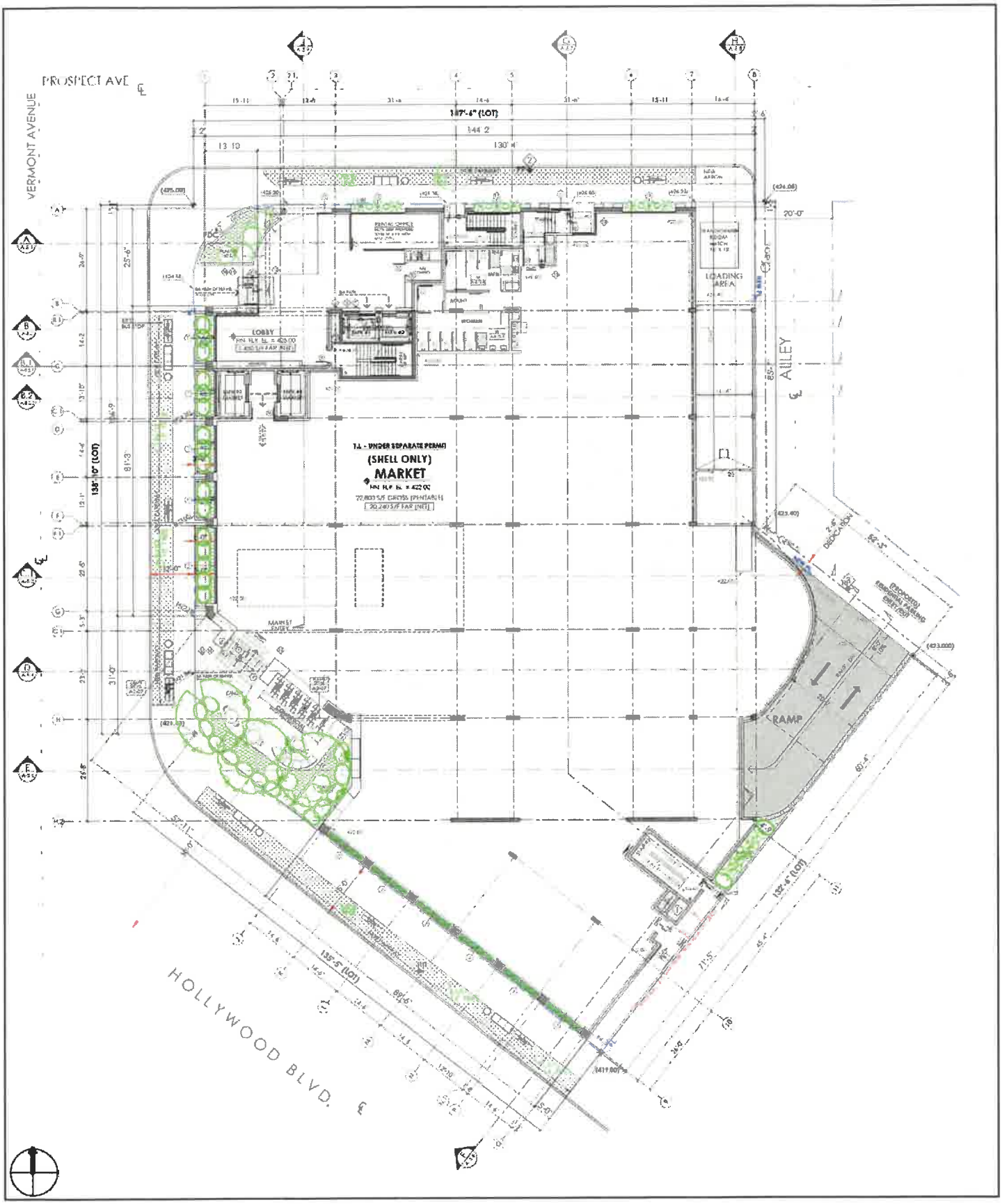
Source: Safai Architects, Inc., October 12, 2023.

Figure 10
Parking Garage Floor Plans Level P2 and P3



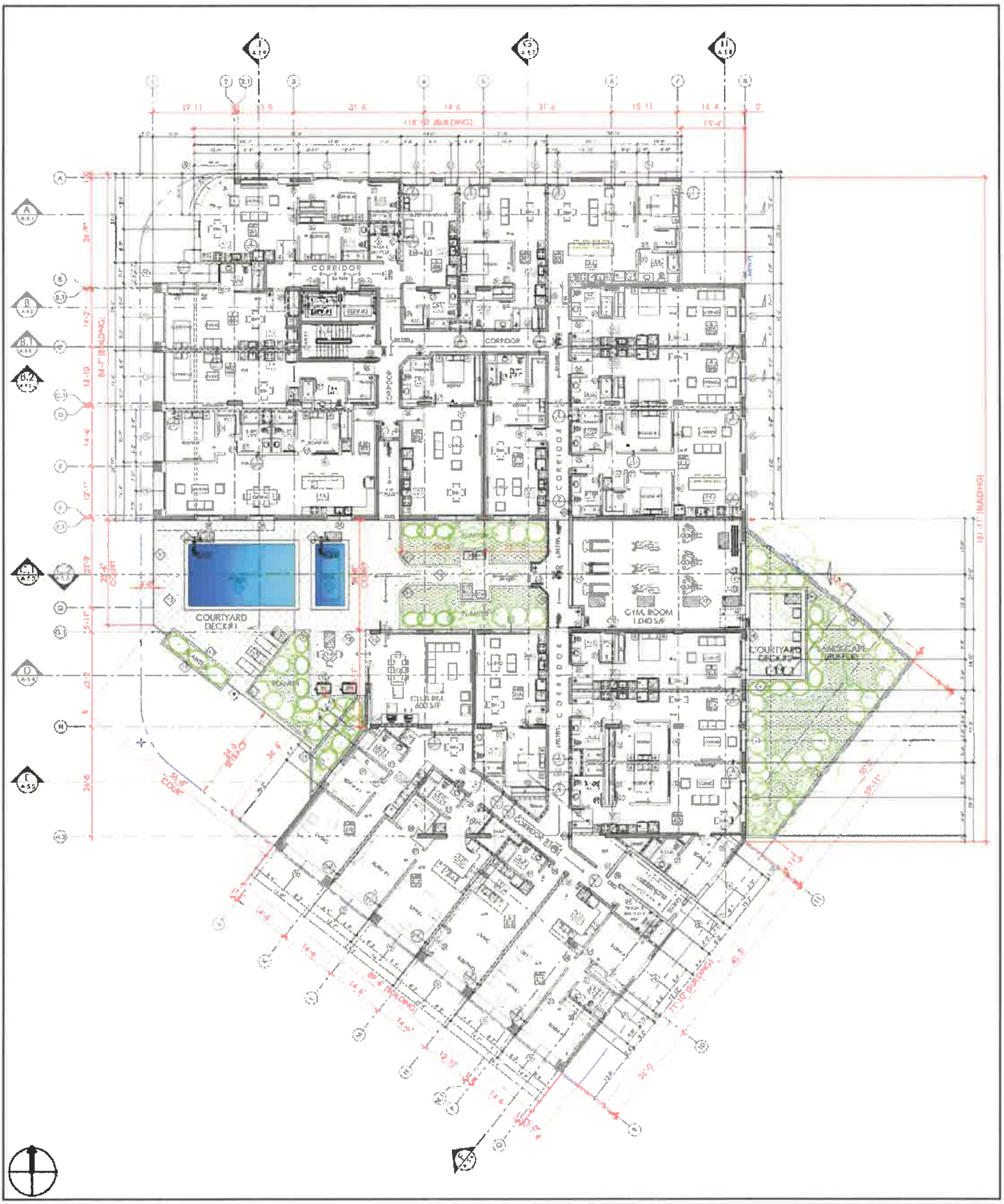
Source: Safai Architects, October 12, 2023.

Figure 11
Parking Garage Floor Plan
Level P1



Source: Safai Architects, October 12, 2023.

Figure 12
1st Floor Plan

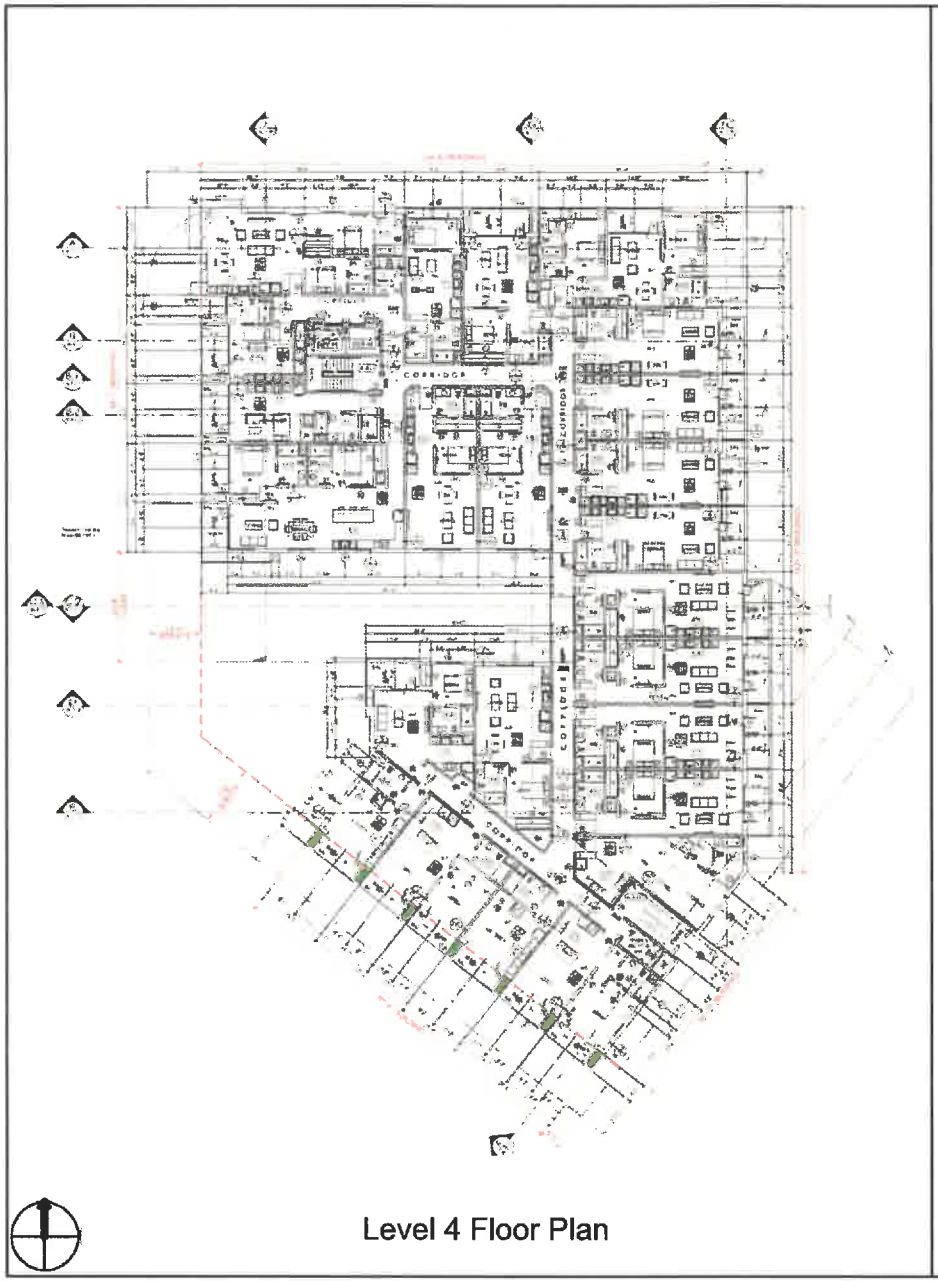


Source: Safai Architects, October 12, 2023.

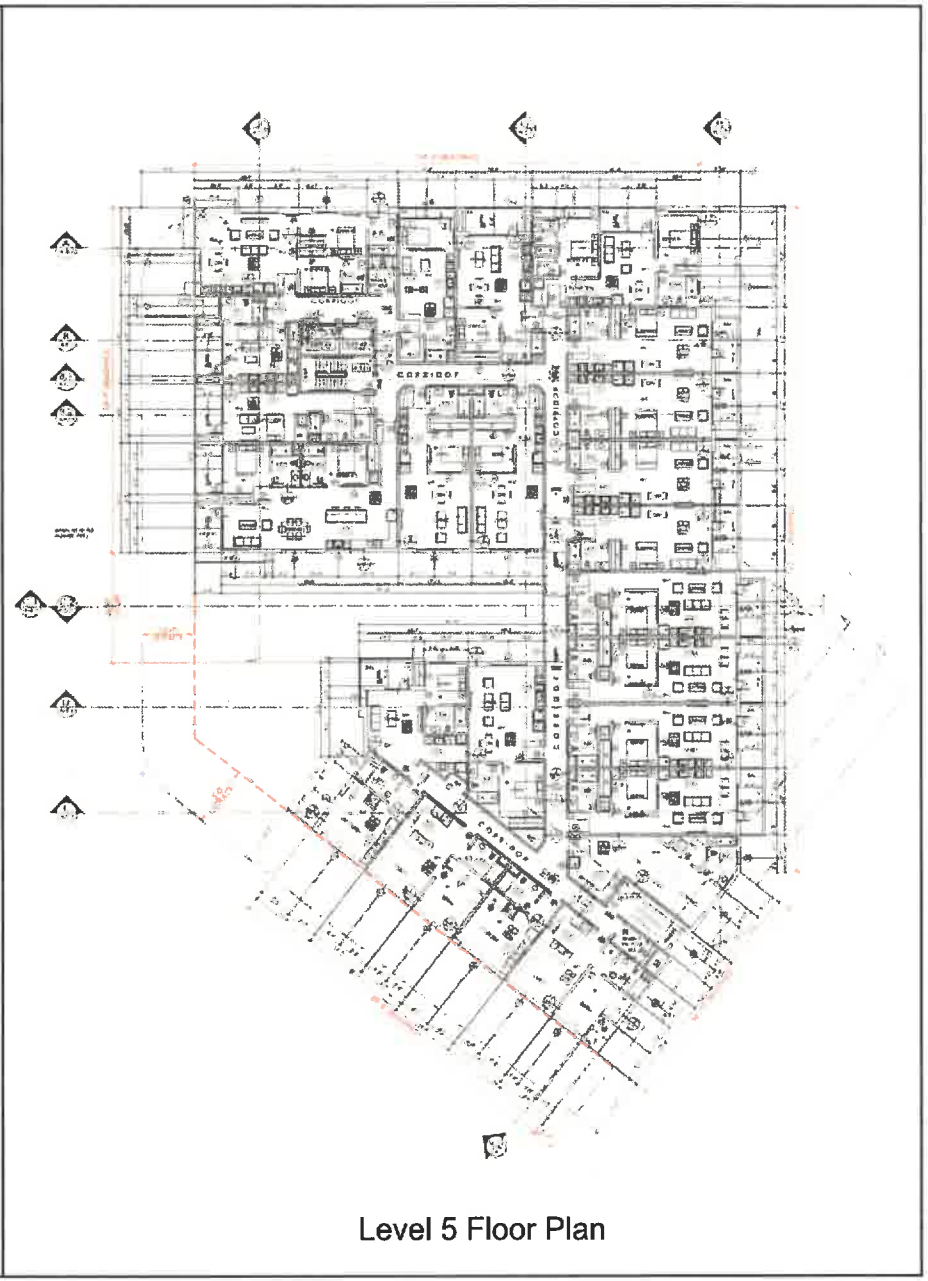
Figure 13
2nd Floor Plan

Source: Safai Architects, October 12, 2023.

Figure 14
3rd Floor Plan



Level 4 Floor Plan



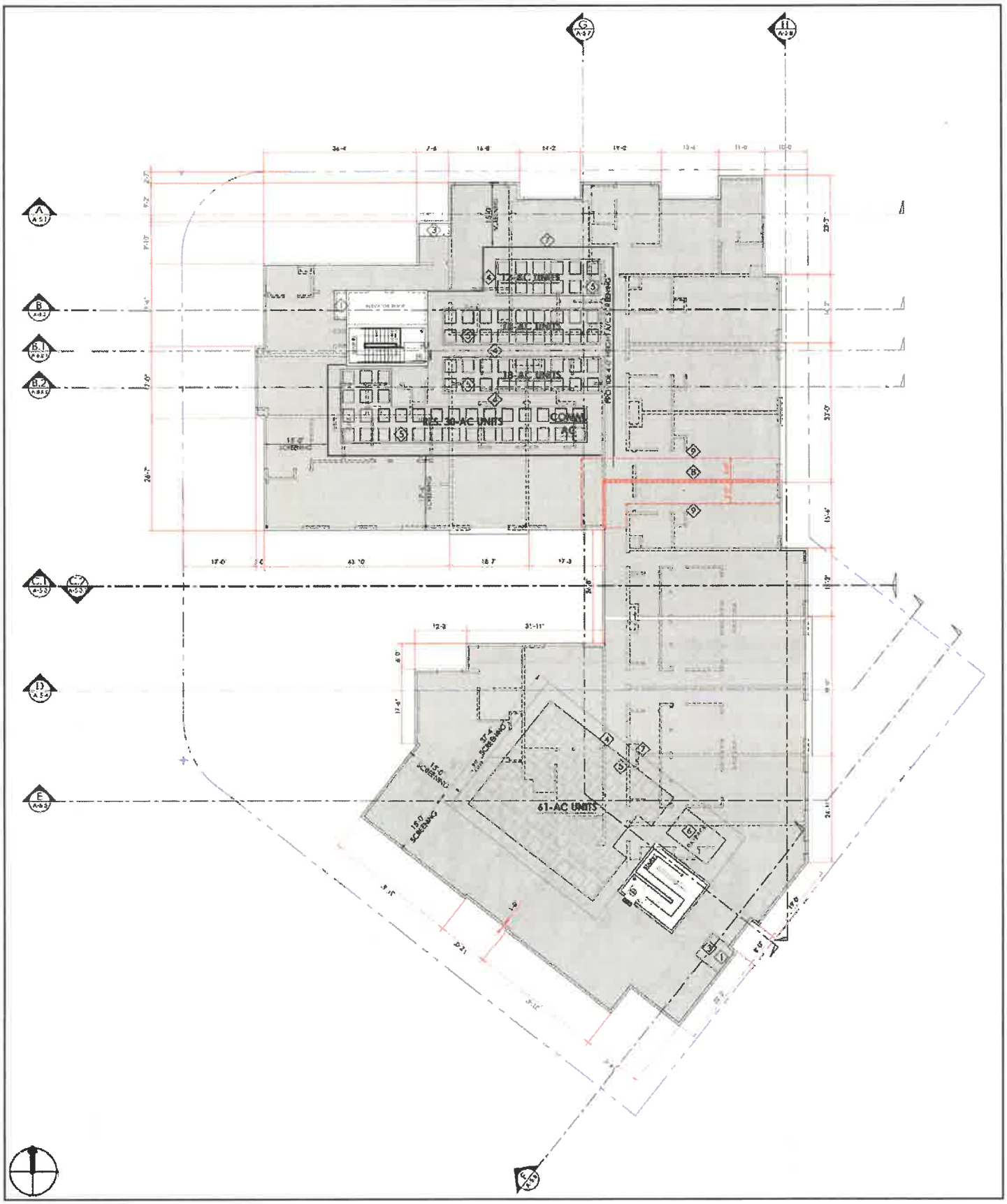
Level 5 Floor Plan

Source: Safai Architects, Inc., October 12, 2023.

Figure 15
Level 4 and Level 5 Floor Plans

Source: Safai Architects, Inc., October 12, 2023.

Figure 16
Level 6 and Level 7 Floor Plans



Source: Safai Architects, October 12, 2023.

Figure 17
Roof Level Floor Plan

Residential Uses

As shown in Table 1.2, above, the Proposed Project would include up to 139 residential units. The unit mix would include 59 studio units, 61 one-bedroom units, 19 two-bedroom units. Twelve percent (17 units) of the total number of units would be reserved as affordable units: 16 units at the "Extremely Low Income" level and one unit at the "Moderate Income" level. The proposed building would include a residential lobby located on the ground floor. Additional residential amenity space would be located on the second floor and the roof deck of the seven-story structure. The residential floor area totals approximately 106,530 square feet.

Commercial Uses

As shown in Table 1.2, above, the Proposed Project would include up to 20,240 square feet of commercial uses. The commercial uses will be located on the ground floor of the proposed building.

2. Floor Area

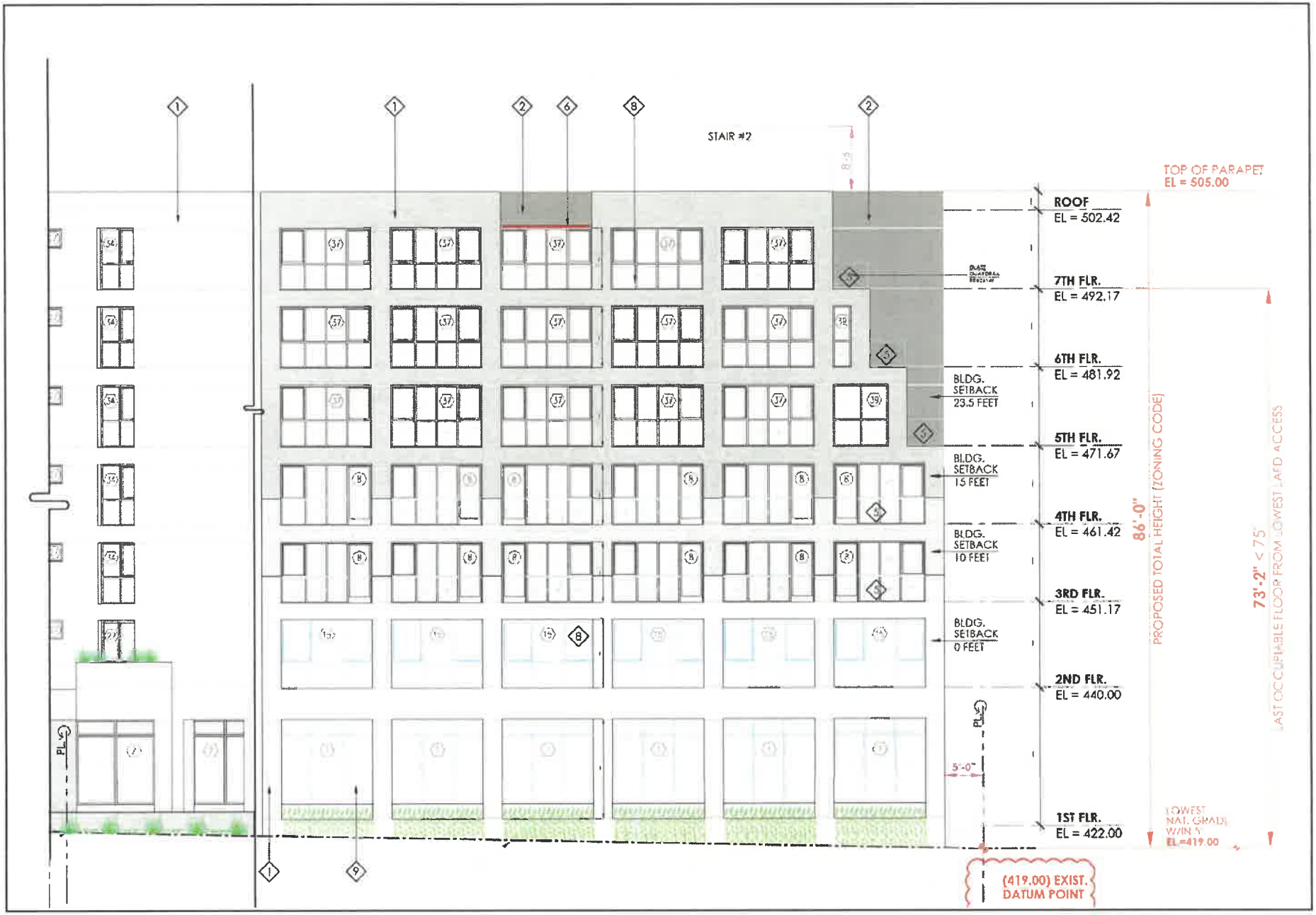
The Project Site includes a lot area of 28,006 square feet, with approximately 1,412 square feet of vacation area, resulting in 29,418 square feet of buildable lot area. The Project Site is located in Height District No. 1, which does not limit building height for the C2 zone but generally limits floor area to an FAR of 1.5:1. However the "D" limitation clarifies that the Project Site is governed by the Vermont/Western Transit Oriented District Specific Plan, which supersedes the FAR limitation in the LAMC. Pursuant to the SNAP, the maximum FAR for a mixed-use project shall not exceed 3:1. Commercial uses in a mixed-use project shall be limited to a maximum FAR of 1.5. The Project Site consists of 29,418 square feet of buildable lot area, allowing for 88,255 square feet of floor area pursuant to the SNAP. The Applicants are requesting a Base Incentive under the TOC Guidelines to permit a 45 percent increase in the allowable FAR in Subarea C of the SNAP, from an allowable base FAR of 3:1 to 4.35:1. The Proposed Project would include 126,770 square feet of floor area with an approximate FAR of 4.31:1.

3. Building Height

The Project Site is located in Height District No. 1, which does not limit building height for the C2 zone. Pursuant to the SNAP, the maximum height of any building for a mixed-use project shall not exceed 75 feet. The Applicants are requesting an Additional Incentive under the TOC Guidelines to permit a height increase of up to 33 feet in height, allowing a maximum height of 108 feet above grade. With approval of the height incentive per the TOC Guidelines, the proposed building height would be 86 feet above grade at the top of the parapet. Illustrations depicting the building sections of the Proposed Project are provided in Figures 18 through 22.

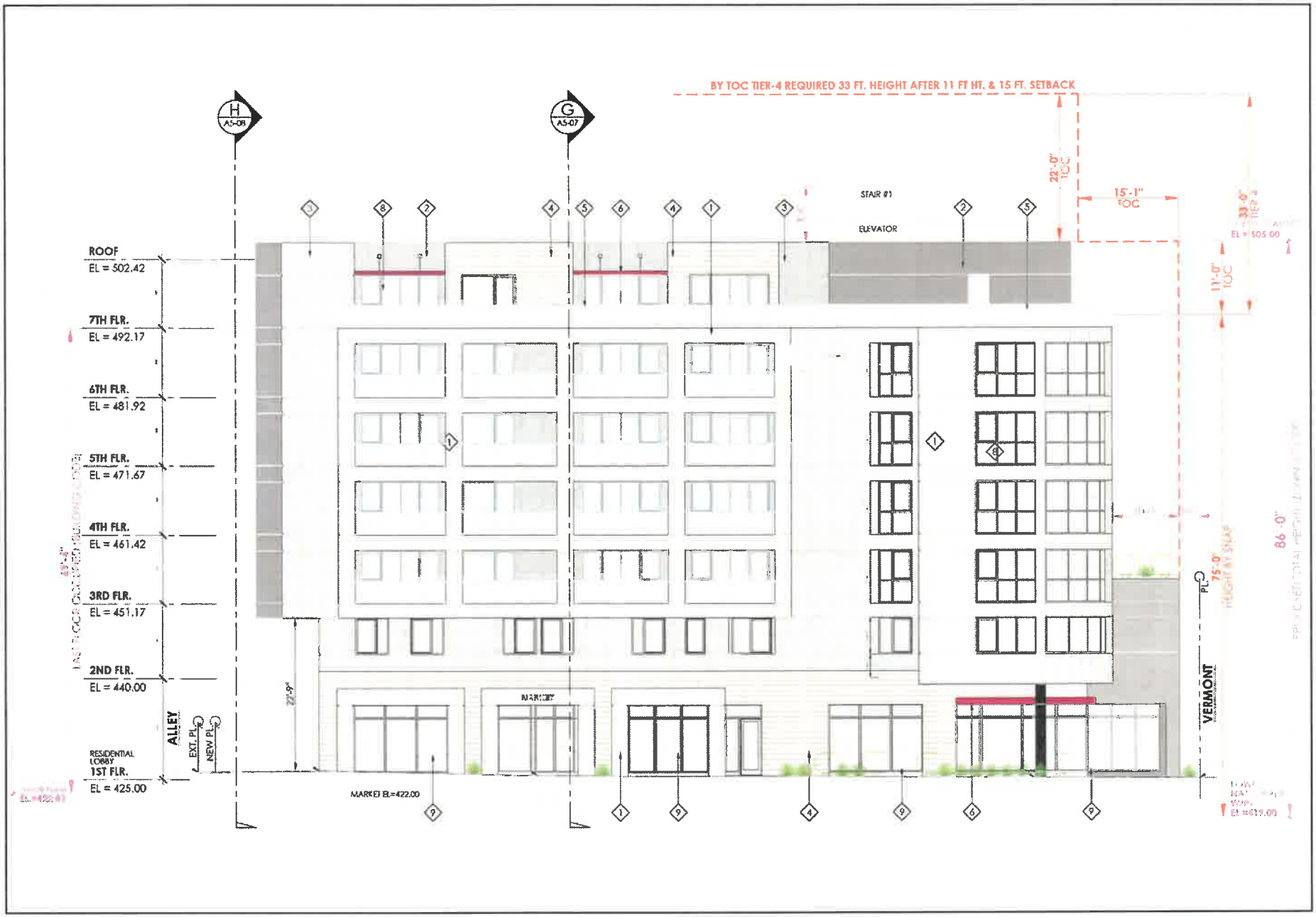
Source: Safai Architects, October 12, 2023.

Figure 18
West Elevation - Vermont Street



Source: Safai Architects, October 12, 2023.

Figure 19
Southwest Elevation - Hollywood Boulevard

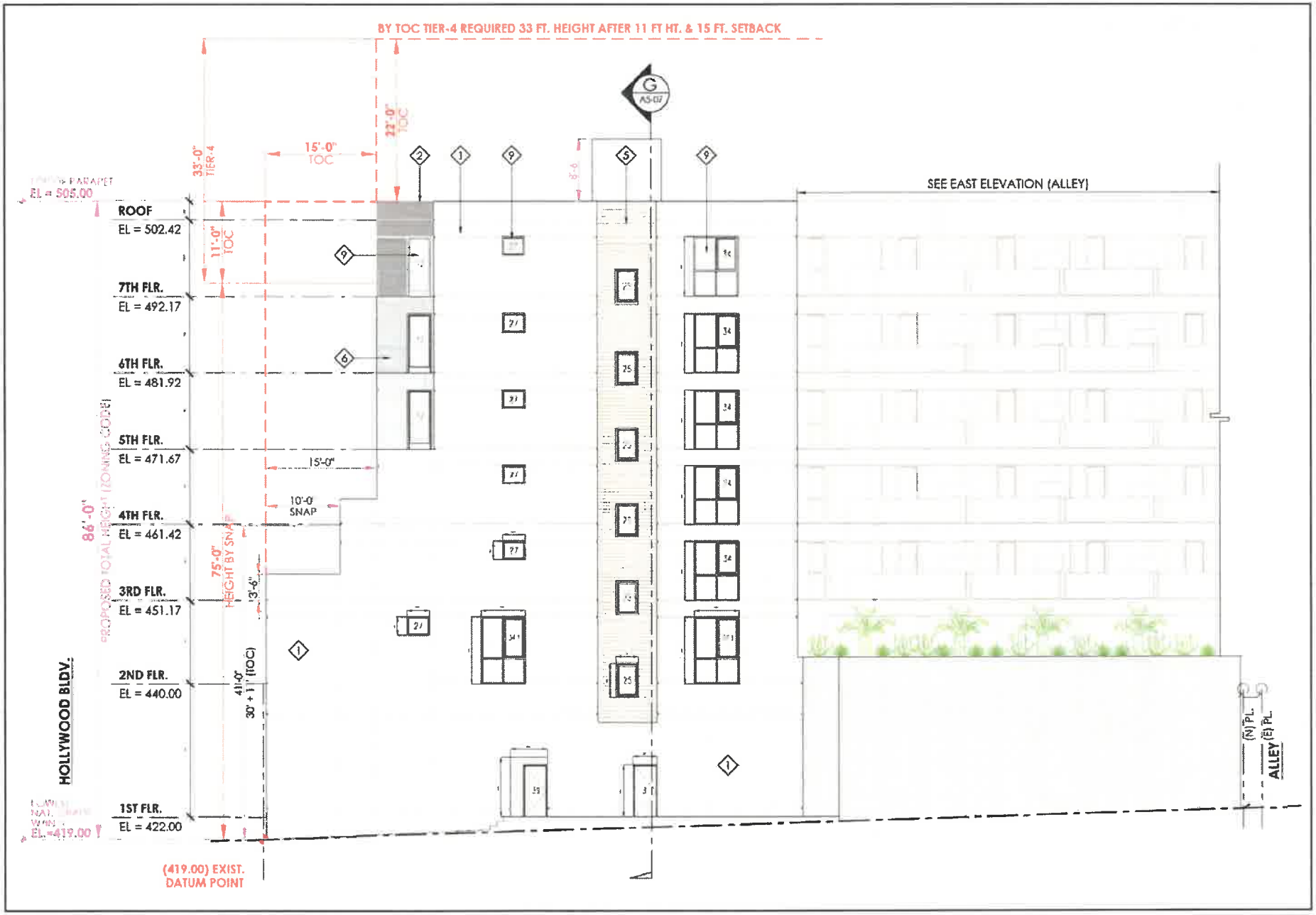


Source: Safai Architects, October 12, 2023.

Figure 20
North Elevation - Prospect Avenue

Source: Safai Architects, October 12, 2023.

Figure 21
East Elevation - Alley



Source: Safai Architects, October 12, 2023.

Figure 22
South Elevation

Building Stepbacks

Pursuant to the SNAP Development Standards and Design Guidelines, no portion of any structure located in Subarea C shall exceed more than 30 feet with 15 feet of the front property line. All buildings with a property line fronting on a major highway, including Hollywood Boulevard, Sunset Boulevard, Santa Monica Boulevard and Vermont Avenue, shall set the second floor back from the first floor frontage at least ten feet. The Proposed Project has frontage on both Vermont Avenue and Hollywood Boulevard and is therefore required to provide stepbacks along Vermont Avenue and Hollywood Boulevard.

4. Setbacks

Pursuant to Section 9.H of the SNAP, no front, side, or back yard shall be required for the development of any commercial or residential project on any lot within Subarea C. Therefore, the Proposed Project would adhere to the setback limitations of the SNAP.

5. Density

Pursuant to the LAMC Section 12.14.C, portions of buildings erected and used for residential purposes shall conform to the density requirements of the R4 Zone. Pursuant to LAMC Section 12.22.C.16, the area of one-half of the alley may be included for purposes of calculating density. As such, residential uses on the Project Site are limited to one dwelling unit per 400 square feet, or approximately 77[5] dwelling units for the Project Site based on an area of 30,412 square feet (29,418 square feet of lot area plus 994 square feet of one-half the alleyway). The Applicants are requesting a Base Incentive under the TOC Guidelines to permit an 80 percent increase in the allowable density from an allowable base density of 77 units to 139 units. The Proposed Project would provide 139 dwelling units, which is consistent with on-site density requirements pursuant to the LAMC and TOC Guidelines.

6. Design and Architecture

The Proposed Project consists of the construction of a seven-story mixed-use residential and commercial building. The Proposed Project will incorporate subtle design improvements such as windows, lighting, and landscaping to activate the street frontage. The Proposed Project would be designed with modern architectural materials, such as smooth stucco, metal panels, and fiberglass.

7. Open Space and Landscaping

The open space requirements and amount of open space proposed for the Proposed Project are summarized in Table 1.3, Summary of Required and Proposed Open Space Areas, below. Pursuant to the LAMC, the Proposed Project would be required to provide 100 square feet of open space for each residential dwelling unit with less than three habitable rooms (studio units and one-bedroom units) and 125 square feet of open space for each residential dwelling unit with three habitable rooms (two-bedroom units). As such, the total amount of open space required by

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[5] *Pursuant To Section V.2(A) Of The Transit Oriented Communities Guidelines Any Numbers Regarding Parking, Number Of Units (Including Base Density), Number Of Affordable Units, Or Number Of Replacement Housing Units That Result In A Fraction Shall Be Rounded Up To The Next Whole Number.*

the LAMC is approximately 14,375 square feet. The Applicants are requesting an Additional Incentive under the TOC Guidelines to permit a 25 percent decrease in required open space. As such, the Proposed Project would be required to provide 10,781 square feet of open space. The Proposed Project would provide 11,070 square feet of open space, which includes 7,170 square feet of common open space distributed among a gym, club room, two courtyards, sky lounge, and 3,900 square feet of private open space balconies. Figure 23 illustrates the landscape and open space areas for the Proposed Project.

As part of the open space requirements, the residential component of the Proposed Project requires planting trees at a rate of one tree for every four dwelling units for a total of 35 required trees. Thirty-five (35) trees are proposed on-site, which is consistent with LAMC requirements.

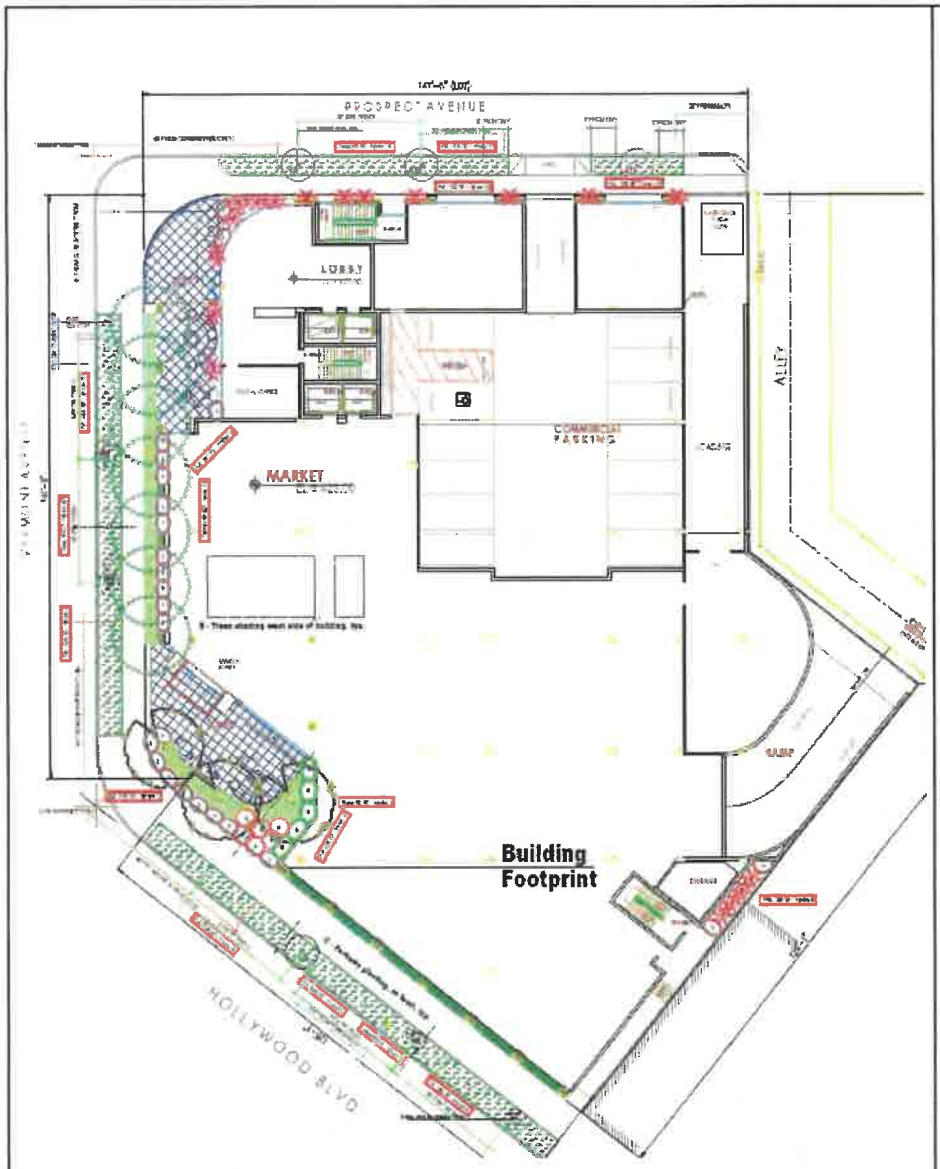
Table 1.3
Summary of Required and Proposed Open Space Areas

LAMC Open Space Requirements	**Dwelling Units**	**Open Space (square feet)**
Less than 3 Habitable Rooms (100 sf/du) [a]	120	12,000
Equal to 3 Habitable Rooms (125 sf/du) [b]	19	2,375
Subtotal:		***14,375***
Reduction allowed per TOC Guidelines (25%): [c]		*(3,594)*
TOTAL:		**10,781 sf**
Proposed Open Space	**Open Space (square feet)**	
Courtyard #1	3,420	
Courtyard #2	1,250	
Sky Lounge	860	
2nd Floor Gym	1,040	
Club Room	600	
Private Balconies	3,900	
TOTAL:	**11,070 sf**	

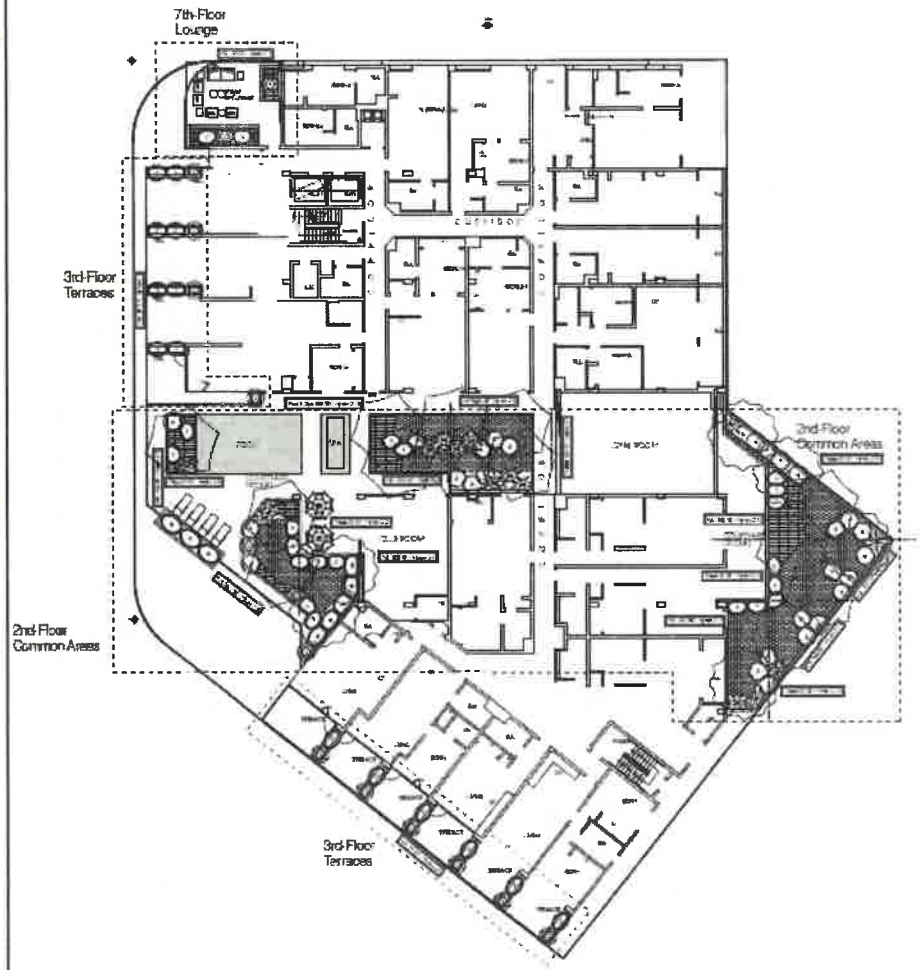
Notes: sf = square feet
[a] *Includes studio and one-bedroom units.*
[b] *Includes two-bedroom units.*
[c] *As an additional incentive pursuant to the TOC Guidelines for Tier 4, the Proposed Project would be requesting a 25% decrease in required open space.*
Source: Safai Architects, October 12, 2023.

8. Access, Circulation, and Parking

Parking for the Proposed Project would be provided in a three-level subterranean parking garage for residents and commercial parking spaces. Vehicular access to the subterranean level parking structure would be provided via one full-access driveway along the west side of the public alley.



Level 1 Landscape Plan



Level 2 Landscape Plan

Source: Harmony Gardens Inc., August 30, 2021

Figure 23
Level 1 and Level 2 Landscape Plans

Vehicle Parking

The Proposed Project meets all of the criteria of a Transit Oriented Infill Project pursuant to SB 743. SB 743, now codified as law under Public resources Code 21099 provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Accordingly, the Proposed Project's parking impacts shall not be considered significant impacts on the environment as a matter of law under Public Resources Code Section 21099. The following discussion is therefore provided for zoning consistency purposes only.

Parking for the Proposed Project's new mixed-use residential and commercial building would be provided in three levels of subterranean parking enclosed within the mixed-use building. One full access driveway off of the west side of the public alley would provide access to the subterranean level residential and commercial parking.

The SNAP sets a minimum and maximum requirement for residential parking stalls provided, as well as a guest parking requirement, which reads as the following:

- **Minimum Standards:** The minimum number of parking spaces required shall be provided at the following ratios: at least one (1) parking space for each dwelling unit having fewer than three habitable rooms, and at least one and one-half (1 ½) parking spaces for each dwelling unit having three or more habitable rooms, in addition to at least one quarter (¼) parking space for each dwelling unit as guest parking.

- **Maximum Standards:** The maximum number of parking spaces provided shall be limited to the following ratios: a maximum of one (1) parking space for each dwelling unit having fewer than three habitable rooms, a maximum of one and one-half (1 ½) parking spaces for each dwelling unit having three habitable rooms, a maximum of two (2) parking spaces for each dwelling unit having more than three habitable rooms, and a maximum of one-half (½) parking space for each dwelling unit as guest parking.

- **Guest Parking:** Guest parking spaces for residential uses in mixed-use projects, as set forth above, shall be provided through shared use of required commercial parking spaces.

With respect to required commercial parking, the maximum number of off-street parking spaces which may be provided shall be limited to two (2) parking spaces for each 1,000 square feet of combined floor area of commercial uses contained within all buildings on a lot. Thus, the Proposed Project would be required to provide 41 commercial parking spaces.

As shown in Table 1.4, below, the Proposed Project would be required to provide a maximum of 189 residential parking spaces based on the Residential Standards per the SNAP. The Applicants are requesting a Base Incentive under the TOC Guidelines to permit no required parking for residential units in a Tier 4 Eligible Housing Development. As such, the Proposed Project would not be required to provide any residential parking spaces or guest parking spaces. The Proposed Project would provide 104 residential spaces and 41 commercial parking spaces in the three-level subterranean parking garage.

Table 1.4
Summary of Required and Proposed Vehicle Parking Spaces

Description	Quantity	Parking Required	
		Rate	Spaces
Residential Required			
Less than Three Habitable Rooms	59 du	1 stall per unit	59
Three Habitable Rooms	61 du	1.5 stalls per unit	92
More than Three Habitable Rooms	19 du	2 stalls per units	38
		Maximum SNAP Required:	189
Tier 4 TOC Base Incentive [a]	139 du	0	0
		Total Required Residential Parking:	***0***
Commercial Required			
Market	20,240 sf	1 stall per 500 sf	41
		Total Required Commercial Parking:	***41***
Total On-Site Parking Proposed			
		Residential	***104***
		Commercial	***41***
		TOTAL	**145**

Notes: sf = square feet; du = dwelling unit
[a] *The Proposed Project is requesting a Base Incentive under the TOC Guidelines to permit no required parking for residential units in a Tier 4 Eligible Housing Development. The incentive would also eliminate guest parking requirements per SNAP.*
Source: Safai Architects, October 12, 2023.

Bicycle Parking

The Proposed Project would provide on-site bicycle parking in bicycle storage spaces located in the first subterranean parking level. As required by Section 9.E.2 of the SNAP, one-half (½) parking space is required per dwelling unit, and for Projects with non-residential uses, regardless of the underlying zone, one parking space for every 1,000 square feet of non-residential floor area for the first 10,000 square feet of floor area is required, and one bicycle parking space for every additional 10,000 square feet of floor area. As shown in Table 1.5, below, the Proposed Project is required to supply 70 residential bicycle parking spaces and 11 commercial bicycle parking spaces, for a total of 81 bicycle parking spaces. Additionally, pursuant to the SNAP Development Standards and Design Guidelines Streetscape Element, projects located along Vermont Avenue or Hollywood Boulevard shall conform to the standards and design intentions for improvement of the public right of way contained in the Streetscape Plans. As such, the Proposed Project is required to provide one bicycle parking rack per 50 feet of street frontage along Vermont Avenue, Hollywood Boulevard, and Prospect Avenue. Vermont Avenue contains 140 linear feet of street frontage and would require three bicycle racks, Hollywood Boulevard contains 135 linear feet of street frontage and would require three bicycle racks, and Prospect Avenue contains 150 linear feet of street frontage and would require three bicycle racks, for a total of nine Streetscape Element required bicycle racks. The Proposed Project is required to provide a total of 81 bicycle spaces on-site and nine bicycle racks. The Project proposes to provide 130 bicycle spaces, including 121 spaces and nine bicycle racks. Thus, the Proposed Project would be consistent with the SNAP requirements for bicycle parking.

Table 1.5
Summary of Required and Proposed Bicycle Parking Spaces

Description	Rate	Total Spaces Required
Residential [a]		
139 units	0.5 per unit	70
Commercial [a]		
10,000 sf	1 per 1,000 sf for the first 10,000 sf	10
10,240 sf	1 per every additional 10,000 sf	1.02
	Subtotal Required Commercial Spaces:	*11*
	Total Required Bicycle Parking Spaces:	***81***
SNAP Streetscape Element Bicycle Racks		
Prospect Avenue	1 per 50 feet of street frontage	3
Vermont Avenue	1 per 50 feet of street frontage	2.8
Hollywood Boulevard	1 per 50 feet of street frontage	2.7
	Total Required Bicycle Racks:	***9***
	Total Bicycle Parking Spaces Required:	**90**
	Total Bicycle Parking Spaces Proposed:	**130**

Notes: sf = square feet
[a] *Per SNAP Section 9.E.2*
Source: Safai Architects, October 12, 2023.

9. Lighting and Signage

Exterior lighting features within the Proposed Project would consist of low-level illuminated pedestrian walkways and lighting within common open space areas and outdoor courtyards. On site signage would include site identity and wayfinding signs in accordance with the LAMC.

10. Site Security

Security for the Proposed Project would be provided via site planning and secured access points of entry. The plans for the Proposed Project would incorporate design guidelines for semi-public and private spaces, which may include but not be limited to access control to the building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of building entrances in high-foot traffic areas.

11. Sustainability Features

The Proposed Project would also be required to comply with the L.A. Green Building Code. The L.A. Green Building Code, effective January 1, 2023, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The L.A. Green Building Code contains both mandatory and voluntary green building measures to conserve energy. Among many requirements, the L.A. Green Building Code requires projects to achieve a 20 percent reduction in wastewater generation. Ten percent of the proposed parking spaces would include electric-vehicle (EV) charging stations, and 30 percent of the parking spaces would be provided as EV-ready parking stalls. Therefore, compliance with Title 24 of the California Administrative Code and the L.A. Green Building Code would reduce the Proposed Project's energy consumption.

12. Anticipated Construction Schedule

For purposes of analyzing impacts associated with air quality, this analysis assumes a Project construction schedule of approximately 18 months, with final buildout occurring in 2025. Construction activities would include four main steps: (1) demolition/site clearing; (2) grading/excavation; (3) building construction; and (4) architectural coatings/finishings. All construction activities would be performed in accordance with all applicable state and federal laws and City codes and policies with respect to building construction and activities. As provided in LAMC Section 41.40, the permissible hours of construction within the City are 7:00 A.M. to 9:00 P.M. Monday through Friday, and between 8:00 A.M. and 6:00 P.M. on any Saturday or national holiday. No construction activities are permitted on Sundays. The Proposed Project would comply with these restrictions.

Demolition/Site Clearing Phase

This phase would include the demolition of two commercial structures. In addition, this phase may include the removal of walls, fences, and associated debris. The demolition/site preparation phase would be completed in approximately one month.

Grading/Excavation Phase

After the completion of the demolition phase, the grading phase for the Proposed Project would occur for approximately three months and would involve excavation of up to 35,950 cubic yards of soil to be hauled off-site. This phase would also involve grading to ensure the proper base and slope for the building foundations.

Building Construction Phase

The building construction phase consists of above grade structures and is expected to occur for approximately 11 months. The building construction phase includes the construction of the proposed building, connection of utilities to the buildings, building foundations, laying irrigation for landscaping, and landscaping the Project Site.

Finishing/Architectural Coating Phase

The finishing/architectural coating phase is expected to occur over approximately three months. During this phase, interior cabinets and lighting fixtures would be installed, interior and exterior wall finishings and paint would be applied, and windows, doors, cabinetry, and appliances would be installed.

Temporary Right-of-Way Encroachment

Construction activities may necessitate temporary lane closures on N. Vermont Avenue, Hollywood Boulevard, or Prospect Avenue adjacent to the Project Site on an intermittent basis for utility relocations/hook-ups, delivery of materials, and other construction activities as may be required. However, site deliveries and the staging of all equipment and materials would be organized in the most efficient manner possible on-site to reduce any temporary impacts to the neighborhood and surrounding traffic. Traffic lane and right-of-way closures, including sidewalks, if required, would be properly permitted by the City agencies and would conform to City standards.

To address the impacts of traffic congestions, the Proposed Project would prepare a detailed Construction Management Plan to be submitted to LADOT for review and approval in accordance with the LAMC prior to the start of any construction work. The plans shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. All construction related traffic shall be restricted to off-peak hours. In accordance with City policy, pedestrian routes on N. Vermont Avenue, Hollywood Boulevard, and Prospect Avenue fronting the Project Site will be maintained and protected from the active construction site. Temporary detours would be coordinated with the City on an as needed basis.

Unless stated otherwise, all construction activities would be performed in accordance with all applicable state and federal laws and City codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 A.M. to 9:00 P.M. Monday through Friday, and between 8:00 A.M. and 6:00 P.M. on any Saturday or national holiday. The Department of City Planning further restricts the hours of construction in residential areas to 6:00 P.M. on weekdays. No construction activities are permitted on Sundays. The Proposed Project would comply with these restrictions.

Haul Route

Approximately 8,300 square feet of building floor area would be demolished, and approximately 87,595 square feet of surface parking would be removed on the Project Site. The Proposed Project is anticipated to generate approximately 1,091 tons of construction and demolition debris before source reduction and recycling efforts. As mentioned previously, the Proposed Project would involve excavation of up to 35,950 cubic yards of soil to be hauled off-site. The Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. Under the requirements of the hauler's AB 939 Compliance Permit from the Bureau of Sanitation, all construction and demolition debris would be delivered to a Certified Construction and Demolition Waste Processing Facility.

All construction and demolition debris would be recycled to the maximum extent feasible. Demolition debris and soil materials from the Project Site that cannot be recycled or diverted would be hauled to the Azusa Land Reclamation facility. For purposes of analyzing the construction-related impacts, it is anticipated that the soil export would involve haul trucks with up to a 14 cubic yard hauling capacity. All truck staging would either occur on-site or at designated off-site locations and radioed into the site to be filled. The anticipated haul route for transporting soil to the Azusa Land Reclamation facility would travel north on N. Vermont Avenue to Los Feliz Boulevard, east on Los Feliz Boulevard to the I-5 Freeway on-ramp. Inbound haul trips would exit the I-5 Freeway at Los Feliz Boulevard, proceed west on Los Feliz Boulevard to N. Vermont Avenue southbound to the Project Site.

Hauling hours are anticipated to be 7:00 AM to 4:00 PM, Monday through Friday. The haul route for the Project will be subject to final approval by the Los Angeles Department of Building and Safety. Trucks are expected to be staged on-site or in the roadway, where parking and travel lanes would be temporarily closed.

D. Requested Permits and Approvals

The list below includes the anticipated requests for approval of the Proposed Project. The discretionary entitlements, reviews, permits and approvals required to implement the Proposed Project include, but are not necessarily limited to, the following:

1) Pursuant to **LAMC Section 11.5.7.C**, a Specific Plan Project Permit Compliance Review in the SNAP.

    a. The Applicants are also requesting permission to utilize the alternative Noise Control option discussed in the Section V.20 of the SNAP Development Standards and Design Guidelines.

2) Pursuant to **LAMC Section 12.22.A.31**, the Applicants request permission to utilize Base Incentives and two Additional Incentives defined by the TOC Guidelines to construct a maximum of 139 dwelling units in an Eligible Housing Development. The site's location qualifies it for Tier 4 level TOC approval. This application requests the use of the following incentives:

    a. Base Incentives, Section VI of the TOC Guidelines:

        iii. Section VI.1.a.iv: Permitting an 80% increase in the allowable density from an allowable base density of 77 units to 139 units.

        iv. Section VI.1.b.iv.: Permitting a 45% increase in the allowable FAR in Subarea C of the SNAP, from an allowable base FAR of 3.0:1 to 4.35:1.

        v. Section VI.2.a.ii: Permitting no required parking for residential units in an Eligible Housing in Tier 4.

    b. Additional Incentives, Section VII of the TOC Guidelines:

        vi. Section VII.1.b.ii: Permitting a 25% decrease in required open space.

        vii. Section VII.1.g.iii: Permitting a height increase up to 33 feet above the 75-foot limitation. The Applicants are requesting 11 additional feet to permit an 86-foot-tall building.

3) Pursuant to **LAMC Section 16.05**, the Applicants request the approval of Site Plan Review findings for a development project which creates, or results in, an increase of 50 or more dwelling units.

4) Pursuant to the **City of Los Angeles Charter Section 558(a)5**, the Applicants request a street vacation of approximately 1,412 square feet of area within the public right-of-way located along N. Vermont Avenue between Hollywood Boulevard and Prospect Avenue, along the western border of the Project Site.

Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, demolition permits, grading and excavation permits, foundation and building permits, temporary street closure permits, haul route permit, street tree removals, and sign permits.

2.0 Evaluation of Class 32 Criteria

Every discretionary action requires environmental review pursuant to CEQA. However, the CEQA Guidelines (Sections 15300 to 15332) include a list of classes of projects, which have been determined to not have a significant effect on the environment, known as Categorical Exemptions. If a project falls within one of these classes, it is exempt from the provisions of CEQA, and no further environmental review is required. The Class 32 "Infill" Categorical Exemption (CEQA Guideline Section 15332), hereafter referred to as the Class 32 Exemption, exempts infill development within urbanized areas if it meets certain criteria. The class consists of infill projects that are consistent with the local General Plan and Zoning requirements. This class is not intended for projects that would result in any significant traffic, noise, air quality, or water quality impacts. It may apply to residential, commercial, industrial, and/or mixed-use projects. As supported by the information presented herein, the Proposed Project falls under the Class 32 Exemption.

A Class 32 Exemption applies to a project characterized as in-fill development meeting the conditions described below:

a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.

c) The project site has no value as habitat for endangered, rare or threatened species.

d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

e) The site can be adequately served by all required utilities and public services.

As presented herein, the Proposed Project qualifies for a Class 32 Infill Development Project under the CEQA (P.R.C. 21000-21189.2), and the State CEQA Guidelines (C.C.R. Title 14, Division 6, Chapter 3, 15000-15387). The Proposed Project meets all of the criteria necessary to qualify for a CEQA Exemption as a Class 32 (Infill Development Project) pursuant to CEQA Guideline Section 15332, respectively, and none of the exceptions section set forth in CEQA Guidelines Section 15300.2 apply. Therefore, no further environmental analysis is warranted.

A. Supporting Analysis for a Class 32 Categorical Exemption

Consistent with the State CEQA Guidelines and the Department of City Planning's policies for implementing CEQA, the following assessment provides substantial evidence to support the determination that the Proposed Project meets the above criteria, pursuant to the Class 32 (Infill Development) requirements as set forth in Section 15332 of the State CEQA Guidelines.

a) The Proposed Project is consistent with the applicable General Plan designation and all applicable General Plan policies as well as with applicable zoning designation and regulations.

A significant impact may occur if a project is inconsistent with applicable land use plans or zoning designations adopted for the purpose of avoiding mitigating an environmental effect. Plan inconsistencies in and of themselves are not a significant impact on the environment under CEQA. CEQA recognizes only direct physical changes or reasonably foreseeable indirect physical changes in the environment.[6] As such, the analysis below only addresses those policies that have the potential to result in physical impacts to the environment.

The Project Site is subject to the zoning codes and design regulations of the Los Angeles Municipal Code (LAMC). The Project Site is also located within the Vermont/Western Transit Oriented District Specific Plan area, the East Hollywood/Beverly-Normandie Earthquake Disaster Assistance Project area, and the Los Angeles State Enterprise Zone (the Employment and Economic Incentive Program Area). The Project Site is also designated as a Transit Priority Area per the Department of City Planning's Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA and is located in a Tier 4 Transit-Oriented Communities ("TOC") Affordable Housing Incentive Area, all of which are intended to guide local land use decisions and development patterns.

Transit Priority Area (SB 743)

As previously described in the Project Description section above, the Project Site is designated as a Transit Priority Area, set forth by SB 743, and is located within ½-mile of numerous bus lines with headways of 15 minutes or less during AM and PM peak hours. As such, the Proposed Project's aesthetic and parking impacts shall not be considered significant impacts and is eligible for parking reductions and other incentives offered for transit oriented district projects.

Zoning Designations and Regulations

Development within the City is guided by the City of Los Angeles Planning and Zoning Code (LAMC, Chapter 1, Articles 1-9), which governs land use through specific development and design standards (i.e., allowable uses, density, building height, building setbacks, etc.) for individual properties. The Project Site is also located in the Vermont/Western Transit Oriented District Specific Plan ("SNAP" or "Specific Plan") area (Ordinance No. 173,749), which became effective March 1, 2001, and amended August 5, 2020 (Ordinance 186,735). The SNAP serves several purposes to improve the quality of life, development, economy, and circulation within the Specific Plan area. The regulations of the SNAP are in addition to those set forth in the Planning and Zoning provisions of Chapter 1 of the Los Angeles Municipal Code (LAMC), and any other relevant ordinance, and do not convey any rights not otherwise granted under such other provisions, except as specifically provided. Wherever the Specific Plan contains provisions which require or permit greater or lesser setbacks, street dedications, open space, densities, heights, uses,

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6 *See Guidelines Section 15064(D)-(E).*

parking, or other controls on development than would be allowed or required pursuant to the provisions contained in Chapter 1 of the LAMC, the Specific Plan shall prevail and supersede the applicable provisions of the LAMC.[7]

As discussed below, the SNAP supersedes some development requirements of the LAMC. The following paragraphs discuss the requirements for the Project Site that are limited by the SNAP and the LAMC.

Land Use

The Project Site is zoned C2-1D with a General Plan land use designation of Highway Oriented Commercial. Residential uses permitted in the R4 Zone by Section 12.11 of the LAMC and commercial uses permitted in C4 Commercial Zone of Section 12.16 of the LAMC are permitted in Subarea Section C (Community Center) of the SNAP. The Proposed Project would construct a seven-story residential and commercial mixed-use development. Mixed-use developments that include residential and commercial uses are permitted by the SNAP. Therefore, the Proposed Project would conform to the allowable land uses pursuant to the LAMC and SNAP.

Floor Area Ratio

The Project Site is located in Height District No. 1, which does not limit building height for the C2 zone but generally limits floor area to an FAR of 1.5:1. However the "D" limitation clarifies that the Project Site is governed by the Vermont/Western Transit Oriented District Specific Plan, which supersedes the FAR limitation in the LAMC. Pursuant to the SNAP, the maximum FAR for a mixed-use project shall not exceed 3:1. Commercial uses in a mixed-use project shall be limited to a maximum FAR of 1.5. The Project Site consists of 29,418 square feet of buildable lot area, allowing for 88,255 square feet of floor area pursuant to the SNAP. The Applicants are requesting a Base Incentive under the TOC Guidelines to permit a 45 percent increase in the allowable FAR in Subarea C of the SNAP, from an allowable base FAR of 3:1 to 4.35:1.The Proposed Project would include a total of 126,770 square feet of floor area with an approximate FAR of 4.31:1. Therefore, with approval of its discretionary requests, the Proposed Project would comply with the FAR provisions allowed by the SNAP and TOC Guidelines.

Density

Pursuant to the LAMC Section 12.14.C, portions of buildings erected and used for residential purposes shall conform to the density requirements of the R4 Zone. Pursuant to LAMC Section 12.22.C.16, the area of one-half of the alley may be included for purposes of calculating density. As such, residential uses on the Project Site are limited to one dwelling unit per 400 square feet, or approximately 77 dwelling units for the Project Site based on a lot area of 30,412 square feet (29,418 square feet of lot area plus 994 square feet of one-half the alleyway). The Applicants are requesting a Base Incentive under the TOC Guidelines to permit an 80 percent increase in the allowable density from an allowable base density of 77 units to 139 units. The Proposed Project

[7] *City Of Los Angeles, Vermont/Western Transit Oriented District Specific Plan, Ordinance No. 173,749, March 1, 2001, Website: Https://Planning.Lacity.Org/Odocument/8f138536-Bd70-4eaf-Bfff-0c021bb72d48/Vermontwesterntod.Pdf, Accessed October 2023.*

would provide 139 dwelling units, which is consistent with on-site density requirements pursuant to the LAMC and TOC Guidelines.

Height

As stated previously, the Project Site is located in Height District No. 1, which does not limit building height for the C2 zone. Pursuant to the SNAP, the maximum height of any building for a mixed-use project shall not exceed 75 feet. The Applicants are requesting an Additional Incentive under the TOC Guidelines to permit a height increase of up to 33 feet in overall height allowing up to 108 feet above grade. With approval of the height incentive per the TOC Guidelines, the proposed building height would be 86 feet above grade at the top of the roof level. As such, with approval of the discretionary requests, the Proposed Project would be consistent with the height provisions of the SNAP and TOC Guidelines.

Stepbacks

Pursuant to the SNAP Development Standards and Design Guidelines, no portion of any structure located in Subarea C shall exceed more than 30 feet with 15 feet of the front property line. All buildings with a property line fronting on a major highway, including Hollywood Boulevard, Sunset Boulevard, Santa Monica Boulevard and Vermont Avenue, shall set the second floor back from the first floor frontage at least ten feet. The Proposed Project has frontage on both Vermont Avenue and Hollywood Boulevard and is therefore required to provide stepbacks along Vermont Avenue and Hollywood Boulevard. The Proposed Project is required a minimum stepback volume of 128,056 cubic feet along Hollywood Boulevard and a minimum stepback volume of 133,889 cubic feet along Vermont Avenue. The Proposed Project would provide a stepback volume of 170,746 cubic feet along Hollywood Boulevard and a stepback volume of 498,050 cubic feet along Vermont Avenue. Therefore, the Proposed Project would be consistent with the stepback requirements of the SNAP.

Setbacks

Pursuant to Pursuant to Section 9.H of the SNAP, no front, side or back yard shall be required for the development of any commercial or residential project on any lot within Subarea C. Therefore, the Proposed Project would adhere to the setback limitations of the SNAP.

Vehicle Parking

As discussed previously, the Proposed Project meets all of the criteria of a Transit Oriented Infill Project pursuant to SB 743. SB 743, now codified as law under Public resources Code 21099 provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Accordingly, the Proposed Project's parking impacts shall not be considered significant impacts on the environment as a matter of law under Public Resources Code Section 21099. The following discussion is therefore provided for zoning consistency purposes only.

Parking for the Proposed Project's new mixed-use residential and commercial building would be provided in three levels of subterranean parking and at-grade parking enclosed within the mixed-

use building. One full access driveway off of the west side of the public alley would provide access to the subterranean level residential parking.

The SNAP sets a minimum and maximum requirement for residential parking stalls provided, as well as a guest parking requirement, which reads as the following:

- **Minimum Standards:** The minimum number of parking spaces required shall be provided at the following ratios: at least one (1) parking space for each dwelling unit having fewer than three habitable rooms, and at least one and one-half (1 ½) parking spaces for each dwelling unit having three or more habitable rooms, in addition to at least one quarter (¼) parking space for each dwelling unit as guest parking.
- **Maximum Standards:** The maximum number of parking spaces provided shall be limited to the following ratios: a maximum of one (1) parking space for each dwelling unit having fewer than three habitable rooms, a maximum of one and one-half (1 ½) parking spaces for each dwelling unit having three habitable rooms, a maximum of two (2) parking spaces for each dwelling unit having more than three habitable rooms, and a maximum of one-half (½) parking space for each dwelling unit as guest parking.
- **Guest Parking:** Guest parking spaces for residential uses in mixed-use projects, as set forth above, shall be provided through shared use of required commercial parking spaces.

With respect to required commercial parking, the maximum number of off-street parking spaces which may be provided shall be limited to two (2) parking spaces for each 1,000 square feet of combined floor area of commercial uses contained within all buildings on a lot. The Proposed Project would be required to provide a maximum of 190 residential parking spaces. The Applicants are requesting a Base Incentive under the TOC Guidelines to permit no required parking for residential units in a Tier 4 Eligible Housing Development. As such, the Proposed Project would not be required to provide any residential parking spaces, and the Proposed Project would be required to provide a minimum of 41 commercial parking spaces. The Proposed Project would provide 104 residential spaces in the three-level subterranean parking garage and 41 commercial parking spaces within the first subterranean parking level. Therefore, the Proposed Project would conform to the vehicle parking requirements in the SNAP and TOC Guidelines.

Bicycle Parking

The Proposed Project would provide on-site bicycle parking in bicycle storage spaces located in the first subterranean parking level. As required by Section 9.E.2 of the SNAP, one-half (½) parking space is required per dwelling unit, and for Projects with non-residential uses, regardless of the underlying zone, one parking space for every 1,000 square feet of non-residential floor area for the first 10,000 square feet of floor area is required, and one bicycle parking space for every additional 10,000 square feet of floor area. The Proposed Project is required to supply 70 residential bicycle parking spaces and 11 commercial bicycle parking spaces, for a total of 81 bicycle parking spaces. Additionally, pursuant to the SNAP Development Standards and Design Guidelines Streetscape Element, projects located along Vermont Avenue or Hollywood Boulevard shall conform to the standards and design intentions for improvement of the public right of way contained in the Streetscape Plans. As such, the Proposed Project is required to provide one bicycle rack per 50 feet of street frontage along Vermont Avenue, Hollywood Boulevard, and Prospect Avenue. Vermont Avenue contains 140 linear feet of street frontage and would require three bicycle racks; Hollywood Boulevard contains 135 linear feet of street frontage and would require three bicycle racks; and Prospect Avenue contains 150 linear feet of street frontage and

would require three bicycle racks, for a total of nine Streetscape Element required bicycle racks. The Proposed Project is required to provide a total of 81 bicycle parking spaces and nine bicycle racks. The Project proposes to provide 130 bicycle parking spaces, including 121 bicycle parking spaces and nine bicycle racks. Thus, the Proposed Project would be consistent with the SNAP requirements for bicycle parking.

Open Space

Pursuant to the LAMC, the Proposed Project would be required to provide 100 square feet of open space for each residential dwelling unit with less than three habitable rooms (studio units and one-bedroom units) and 125 square feet of open space for each residential dwelling unit with three habitable rooms (two-bedroom units). As such, the total amount of open space required by the LAMC is approximately 14,375 square feet. The Applicants are requesting an Additional Incentive under the TOC Guidelines to permit a 25 percent decrease in required open space. As such, the Proposed Project would be required to provide 10,781 square feet of open space. The Proposed Project would provide 11,070 square feet of open space, which includes 7,170 square feet of common open space distributed among a gym, club room, two courtyards, and sky lounge and 3,900 square feet of private open space balconies. As part of the open space requirements, the residential component of the Proposed Project requires planting trees at a rate of one tree for every four dwelling units for a total of 35 required trees. Thirty-five (35) trees are proposed on-site, which is consistent with LAMC requirements. Thus, the Proposed Project would be consistent with the open space requirements of the LAMC.

Hollywood Community Plan

The Project Site is located within the Hollywood Community Plan Area (CPA). Therefore, development activity on-site is subject to the land use regulations of the Hollywood Community Plan (Community Plan). The Community Plan provides goals and objectives to establish an official guide to the future development of the Hollywood Community. As described in the Community Plan, the purpose of the plan is to promote an arrangement of land use, circulation, and services which will encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the Community within the larger framework of the City. The Proposed Project, which would provide a mixed use multi-family residential and commercial development in an underutilized Project Site, would conform to the objectives identified in the Community Plan.

The Proposed Project would provide a maximum of 139 dwelling units (consisting of 59 studio units, 61 one-bedroom units, and 19 two-bedroom units) and approximately 20,240 square feet of ground-floor commercial uses. The Proposed Project would provide a total of 145 automobile parking spaces and 130 bicycle spaces. The Proposed Project would provide a variety of on-site amenities, which may include but is not limited to, a fitness center, swimming pool/spa, courtyard areas, lounge, and roof deck. A detailed analysis of the consistency of the Proposed Project with the applicable goals and policies of the Hollywood Community Plan is presented in Table 2.1, below.

Table 2.1
Project Consistency Analysis with Applicable Goals and Policies of the Hollywood Community Plan for Residential and Commercial Land Uses

Goal / Policy	Project Consistency Analysis
Residential	
Goal LU1: Complete, livable and quality residential neighborhoods that provide a variety of housing types, densities, forms, and designs and a mix of uses and services that support the needs of residents throughout Hollywood.	**No Conflict.** The Proposed Project is consistent with the zoning and General Plan land use designation on the Project Site and corresponds with overall City development goals. The Proposed Project would be consistent with the applicable design policies within the Hollywood Community Plan Area. Along with the Hollywood Community Plan, the Proposed Project is located within the Vermont/Western Station Neighborhood Specific Plan area and a Transit Priority Area. The Proposed Project addresses the City's housing goals of increasing and diversifying the City's housing stock and providing increased housing opportunities. The Proposed Project's residential dwelling units would be available to all persons without discrimination. Development of the Proposed Project would further be guided by the LAMC. Additionally, the Proposed Project would provide adequate open space, vehicle parking, and bicycle parking. The Proposed Project would incorporate safety features such as nighttime security lighting, a closed-circuit security camera system, and well-lit secure parking facilities that would support this goal by providing a safe, secure, and high-quality residential development in the Hollywood community. The Proposed Project is consistent with the requirements for development within a Transit Priority Area. The Project Site's location supports the Community Plan's goal of developing Hollywood as a major center for population, employment, retail services, and entertainment by providing a multi-family residential and commercial mixed-use building. As such, the Proposed Project would not conflict with this goal.
Policy LU1.1 Neighborhood Character. Maintain the distinguishing characteristics of Hollywood's residential neighborhoods with respect to lot size, topography, housing scale and landscaping, to protect the character of existing stable neighborhoods from new, out-of-scale development.	**No Conflict.** The Proposed Project would construct a mixed-use multi-family residential and commercial building on a site currently developed with two commercial buildings. The Proposed Project would develop the Project Site in a manner that would be visually compatible with the surrounding residential uses and provide neighborhood-serving commercial uses. The Proposed Project would also be developed to comply with the design standards and guidelines of the SNAP. Therefore, the Proposed Project would enhance the character of the surrounding residential and commercial area. Thus, the Proposed Project would not conflict with this policy.
Policy LU1.2 Adequate housing and services. Provide housing that accommodates households of all sizes, as well as integrates safe and convenient access to schools, parks, and other amenities and services.	**No Conflict.** The Proposed Project's dwelling units would be of different sizes and configurations (studios, one-bedroom, and two-bedroom units) and would be available at range of market and affordable rates. The Proposed Project would increase the housing choices available in the City of Los Angeles. The Project Site would also front the commercial corridors of Vermont Avenue and Hollywood Boulevard, which provides a variety of commercial uses and services to future residents and employees. As discussed in more detail below, the Proposed Project would be adequately served by schools and parks. Furthermore, the Proposed Project

	would provide open space for its residents and guests. Thus, the Proposed Project would not conflict with this policy.
Policy LU1.3 Neighborhood transitions. Assure smooth transitions in scale, form, and character, by regulating the setback, stepbacks, rear elevations, and backyard landscaping of new development where neighborhoods of differing housing type and density abut one another.	**No Conflict.** The Proposed Project is located in a commercial zone. Since the Proposed Project is a mixed-use development, it would provide a smooth transition between the commercial land uses fronting Vermont Avenue and Hollywood Boulevard and the residential land uses fronting Prospect Avenue. The Proposed Project would be guided by the SNAP, which sets standards for transitional height and stepbacks in order to improve development within the Specific Plan area. Thus, the Proposed Project would not conflict with this policy.
Goal LU4: Multi-family residential neighborhoods that are well-designed, safe, provide amenities for residents, and exhibit the architectural characteristics and qualities that distinguish Hollywood neighborhoods.	**No Conflict.** The Proposed Project would develop the Project Site in a manner that would be visually compatible with the surrounding residential neighborhood and provide neighborhood-serving commercia uses to future and existing residents. The Proposed Project would be designed in accordance with LAFD and LAPD requirements to ensure safety and security on-site and in the surrounding areas. Furthermore, the Proposed Project would provide open space for its residents and guests. Therefore, the Proposed Project would enhance the character of the surrounding residential and commercial area. Thus, the Proposed Project would not conflict with this goal.
Policy LU4.1 Context-sensitive housing. Encourage multi-family housing development within neighborhoods designated for higher density multi-family residential.	**No Conflict.** The Proposed Project includes a seven-story mixed use multi-family residential and ground-floor commercial land uses in a C2 zone. The Proposed Project would increase the housing stock in Hollywood area by providing centrally located studios, one- and two-bedroom residential dwelling units. In addition, 17 proposed residential units would be reserved at the "extremely low income" and "moderate income" levels. With approval of the TOC Guidelines incentives, the Proposed Project would be allowed the density proposed in a C2 zone. Thus, the Proposed Project would not conflict with this policy.
Policy LU4.3 Compatibility with adjacent development. Seek a high degree of architectural compatibility, parking design configuration, and landscaping for new and infill development to protect the character and scale of existing multi-family residential neighborhoods.	**No Conflict.** The Proposed Project involves a mixed-use multi-family residential and commercial development in an area characterized by residential, commercial, retail, and entertainment land uses. The Proposed Project would be designed and landscaped in accordance with the design guidelines of the SNAP in a manner that would be visually compatible with the surrounding residential uses. The Proposed Project would provide landscaping and enclosed parking. Thus, the Proposed Project would not conflict with this policy.
Policy LU4.4 Design guidelines. Recommend that new multi-family residential development be designed in accordance with the adopted citywide residential design guidelines and provide amenities such as on-site open space, recreational, and community-serving facilities.	**No Conflict.** As mentioned above, the Proposed Project would be designed and landscaped in accordance with the design guidelines of the SNAP in a manner that would be visually compatible with the surrounding residential uses. The Proposed Project would also provide open space in a gym, club room, two courtyards, sky lounge, and private balconies with amenities to serve its residents and guests. Additionally, the Proposed Project would include neighborhood-serving commercial space to serve its existing and future residents. Thus, the Proposed Project would not conflict with this policy.
Goal LU5: Multi-family residential neighborhoods that provide a range of	**No Conflict.** As mentioned previously, the Proposed Project would increase the housing stock in Hollywood area by

housing opportunities at a variety of price points including affordable housing, through a mix of ownership and rental units.	providing centrally located studios, one-bedroom, and two-bedroom residential dwelling units. In addition, of the proposed residential units, 17 units would be reserved as affordable housing units. All proposed residential units would be available to all persons without discrimination and available at both market rates and affordable rates, thus contributing to the range of housing choices available in the Hollywood area of Los Angeles for all income levels. Therefore, the Proposed Project would ensure that housing opportunities are accessible to all residents with a variety of price points. Thus, the Proposed Project would not conflict with this goal.
Policy LU5.1 Individual choice and affordability. Provide a variety of rental and ownership housing opportunities for households of all income levels, sizes, and needs, including middle income and workforce populations.	**No Conflict.** As mentioned above, of the 139 proposed residential units, 17 units would be reserved at the "extremely low income" and "moderate income" levels. All proposed residential units would be available to all persons without discrimination and available at both market rates and affordable rates, thus contributing to the range of housing choices available in the Hollywood area of Los Angeles for all income levels. Thus, the Proposed Project would not conflict with this policy.
Policy LU5.3 Housing for families. Promote family-friendly projects that include more bedrooms suitable for larger families.	**No Conflict.** The Proposed Project would include studios, one-bedroom, and two-bedroom residential dwelling units, which would be suitable for larger families. Thus, the Proposed Project would not conflict with this policy.
Policy LU5.4 Mixed-income neighborhoods. Promote the distribution of mixed-income housing opportunities throughout the Plan area to avoid the over-concentration of low-income housing.	**No Conflict.** As mentioned previously, of the 139 proposed residential units, 17 units would be reserved at the "extremely low income" and "moderate income" levels. All proposed residential units would be available to all persons without discrimination and available at both market rates and affordable rates, thus contributing to the range of housing choices available in the Hollywood area of Los Angeles for all income levels. Thus, the Proposed Project would not conflict with this policy.
Policy LU5.5 Affordable housing and transit. Encourage affordable housing near transit.	**No Conflict.** The Proposed Project would include 17 dwelling units that would be reserved at the "extremely low income" and "moderate income" levels. The Metro and LADOT Transit operates multiple bus lines with multiple bus stops within walking distance from the Project Site. In the vicinity of the Project Site, bus stops are primarily located along Vermont Avenue and Hollywood Boulevard. Therefore, the project Site is adequately served by nearby transit. Thus, the Proposed Project would not conflict with this policy.
Policy LU5.11 Address diverse resident needs. Provide for the preservation of existing housing stock and for the development of new housing to meet the diverse economic and physical needs of existing residents and the projected population of the Community Plan Area to the year 2040.	**No Conflict.** The Proposed Project would be consistent with the existing zone (C2-1D) on the Project Site. The Proposed Project would replace commercial development with 139 new apartments units. The Proposed Project is anticipated to result in 327 new residents. The addition of approximately 327 permanent residents would be consistent with SCAG's population growth projections for the City of Los Angeles. As such, the proposed multi-family development would help accommodate Hollywood's population and activities. The Proposed Project would increase the housing stock in the Hollywood area. Thus, the Proposed Project would not conflict with this policy.

Policy LU5.14 Minimize displacement. Decrease displacement of current residents and strive for a no net loss of covenanted affordable housing units, including those protected by the Rent Stabilization Ordinance.	**No Conflict.** The existing Project Site is developed with two commercial buildings. The Proposed Project would not displace any existing residents and would overall increase the housing stock and affordable housing units in the Hollywood area. Thus, the Proposed Project would not conflict with this policy.
Commercial	
Goal LU6: Neighborhoods with local serving businesses that provide employment opportunities, community services, and amenities, and sustain unique scale, block patterns, and cultural design elements.	**No Conflict.** The Proposed Project would provide new ground-floor commercial floor area. The Proposed Project would provide new opportunities for new businesses or the expansion or relocation of existing businesses; thus, increasing business opportunities in the area. The Proposed Project would provide new businesses in the mixed-use neighborhood. The Proposed Project would foster new business and employment opportunities and potential customers, which would support this goal. Thus, the Proposed Project would not conflict with this goal.
Policy LU6.2 Maintain walkability. Apply pedestrian-oriented design to new projects and encourage pedestrian first design guidelines to maintain walkable commercial neighborhoods.	**No Conflict.** The Proposed Project involves the construction of an seven-story mixed-use building, which includes multi-family residential units and commercial/retail space fronting Vermont Avenue and Hollywood Boulevard. The Proposed Project would be designed to comply with the LAMC and to promote a pedestrian-oriented environment. The Project Site is in walking distance to many services, employment opportunities, and retail spaces. Additionally, the Project Site is located in a transit-oriented area and is in close proximity to numerous bus routes and future rail routes along Vermont Avenue, Hollywood Boulevard, and Santa Monica Boulevard. Thus, the Proposed Project would not conflict with this policy.
Policy LU6.3 Pedestrian amenities. Provide pedestrian amenities that make walking convenient, safe and practical, like benches, pedestrian paths, lighting, and street trees to activity centers. Encourage projects to incorporate such features.	**No Conflict.** The Proposed Project would implement design measures such as nighttime security lighting, a closed circuit security camera system, and well-lit secure parking facilities. Additionally, the Proposed Project would include an enhanced pedestrian walkway by including benches and street streets along Vermont Avenue and Hollywood Boulevard. Thus, the Proposed Project would not conflict with this policy.
Policy LU6.4 Activated ground floors. Encourage activated ground floors to support pedestrian activity along key corridors.	**No Conflict.** The Proposed Project would promote a pedestrian-oriented corridor along Vermont Avenue and Hollywood Boulevard by including landscaping, street trees, and the primary entrance to the ground-floor commercial. Additionally, the vehicle driveway would be located along the adjacent alleyway so as not to disrupt the pedestrian walkways along Vermont Avenue and Hollywood Boulevard. Thus, the Proposed Project would not conflict with this policy.
Policy LU6.6 Neighborhood design features. Support new and infill development that evokes the distinct architectural and site design features of the neighborhood. Seek compatibility to protect the existing character and scale.	**No Conflict.** The Proposed Project would be designed and landscaped in accordance with the design guidelines of the SNAP in a manner that would be visually compatible with the surrounding commercial uses. Therefore, the Proposed Project would enhance the character of the surrounding residential and commercial area. Thus, the Proposed Project would not conflict with this policy.
Policy LU6.8 Neighborhood transitions. Encourage smooth transitions in scale, form, and character by regulating the setback, stepbacks, rear elevations, and landscaping	**No Conflict.** The Proposed Project is located in a commercial zone. Since the Proposed Project is a mixed-use development, it would provide a smooth transition between the commercial land uses fronting Vermont Avenue

of new development adjacent to residential districts.	and Hollywood Boulevard and the residential land uses fronting Prospect Avenue. The Proposed Project would be guided by the SNAP, which sets standards for transitional height and stepbacks in order to improve development within the Specific Plan area. Thus, the Proposed Project would not conflict with this policy.
Policy LU6.9 Neighborhood retail. Protect small, neighborhood-serving retail in residential districts with high pedestrian activity.	**No Conflict.** The Proposed Project would provide new commercial floor area on the ground level. Pedestrian access would be provided from Vermont Avenue and Hollywood Boulevard, which are identified as commercial corridors. Therefore, the neighborhood-serving retail would be located in a high pedestrian area. Thus, the Proposed Project would not conflict with this policy.
Policy LU6.10 Small business retail space. Encourage mixed-use and commercial developments to provide retail spaces conducive to community-serving small businesses and business incubation.	**No Conflict.** The Proposed Project involves the construction of a mixed-use building with ground-floor commercial/retail space fronting Vermont Avenue and Hollywood Boulevard. Although no specific businesses are known at this time except the commercial space would be market space, the Proposed Project would be open to all businesses that would aim to be community-serving. Thus, the Proposed Project would not conflict with this policy.
Policy LU6.11 Support neighborhood establishments. Support existing neighborhood stores (i.e. mom-and-pop establishments) that support the needs of local residents, are compatible with the neighborhood and create a stable economic environment.	**No Conflict.** Although no specific businesses are known at this time, the Proposed Project's proposed market space would be open to all businesses that would aim to be community-serving and support the needs of the local residents. Thus, the Proposed Project would not conflict with this policy.
Policy LU6.12 Local employment. Ensure that neighborhoods are well connected to adjacent employment areas that provide services, amenities, and employment opportunities to the local community.	**No Conflict.** The Proposed Project would include ground-floor commercial space that would front Vermont Avenue and Hollywood Boulevard. Additionally, the Project Site is within close proximity to many services, job opportunities, and transit. The Project Site is in walking distance to many services, employment opportunities and retail spaces along Vermont Avenue and Hollywood Boulevard. Therefore, the Proposed Project would provide new opportunities for new businesses or the expansion or relocation of existing businesses; thus, increasing business and employment opportunities in the area. Thus, the Proposed Project would not conflict with this policy.
Goal LU7: Strong and competitive commercial districts that are aesthetically appealing, pedestrian-oriented, easily accessible and serve the needs and enhance the character of the community.	**No Conflict.** The Proposed Project would include ground-floor commercial space that would front Vermont Avenue and Hollywood Boulevard, which are identified as commercial corridors. The Proposed Project would promote a pedestrian-oriented corridor along Vermont Avenue and Hollywood Boulevard by including landscaping, street trees, and the primary entrance to the ground-floor commercial. Additionally, the Proposed Project would be designed and landscaped in accordance with the design guidelines of the SNAP in a manner that would be visually compatible with the surrounding commercial uses. Thus, the Proposed Project would not conflict with this goal.
Policy LU7.3 SNAP. Evaluate the Vermont-Western Station Neighborhood Area Plan (SNAP), a transit-oriented plan in East Hollywood, which plans for development around Metro rail stations and protects residential neighborhoods.	**No Conflict.** The Proposed Project would transform two commercial buildings into a mixed-use building with multi-family residential and ground-floor commercial. The Proposed Project would be compliant with the development standards and design guidelines of the LAMC and the SNAP. Therefore, the Proposed Project would be designed

	and landscaped in accordance with the design guidelines of the SNAP in a manner that would be visually compatible with the surrounding commercial uses. Thus, the Proposed Project would not conflict with this policy.
Policy LU7.4 Pedestrian-friendly building design. Encourage building designs that create interesting, safe, and welcoming walking environments on streets with high pedestrian activity. Utilize the Citywide Urban Design Guidelines to promote pedestrian-oriented retail with transparent facades to allow visibility of commercial uses.	**No Conflict.** The Proposed Project would promote a pedestrian-oriented corridor along Vermont Avenue and Hollywood Boulevard by including landscaping, street trees, and the primary entrance to the ground-floor commercial. Additionally, the vehicle driveway would be located along the adjacent alleyway so as not to disrupt the pedestrian walkways along Vermont Avenue and Hollywood Boulevard. Additionally, the Proposed Project would be designed and landscaped in accordance with the design guidelines of the SNAP in a manner that would welcome walking environments and promote pedestrian-oriented retail. Thus, the Proposed Project would not conflict with this policy.
Policy LU7.6 Pedestrian-oriented land uses. Promote pedestrian-friendly land uses along streets with high pedestrian activity and retain uses, such as performing arts theaters and restaurants, which support pedestrian activity.	**No Conflict.** The Proposed Project's ground-floor retail would be oriented towards Vermont Avenue and Hollywood Boulevard, which contains high pedestrian activity. Thus, the Proposed Project would not conflict with this policy.
Source: City of Los Angeles, Department of City Planning, Hollywood Community Plan, August 2021; and Parker Environmental Consultants, 2023.	

The Proposed Project would thus be consistent with the applicable goals and policies of the Community Plan. As such, impacts related to the consistency with the applicable land use and planning policies in the Hollywood Community Plan would be less than significant.

Los Angeles State Enterprise Zone (ZI-2374)

The Proposed Project is also located in the Los Angeles State Enterprise Zone or the ZI No. 2374 Enterprise Zone / Employment and Economic Incentive Program Area (EZ). EZs are specific geographic areas under the Enterprise Zone Act Program or Employment and Economic Incentive Act Program with the goal to "provide economic incentives to stimulate local investment and employment though tax and regulation relief and improvement of public services." Except for the Downtown Business District parking area described in Section 12.21A4(i), projects within the Enterprise Zone, may utilize a lower parking ratio for commercial office, business, retail, restaurant, bar and related uses, trade schools, or research and development buildings thus increasing the buildable area of the parcel which is critical in older areas of the City where parcels are small. Required vehicle parking for the commercial portion of the property is being provided according to the provisions of the Vermont/Western Station Neighborhood Area Specific Plan, and not the Los Angeles State Enterprise Zone. Therefore, this overlay does not directly affect the Proposed Project, and no further analysis is required.

As discussed above, the Proposed Project would not conflict with applicable zoning and development standards, including those set forth in the LAMC, the SNAP, and the Hollywood Community Plan.

b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.

As shown in Figure 5, Aerial Photograph of the Project Site and Surrounding Land Uses (*attached*), the Project Site is located in the City of Los Angeles, in an urbanized area of the Hollywood Community Plan area and is entirely surrounded by urban land uses. The Project Site encompasses three parcels and is identified by the following County of Los Angeles APN: 5542-001-022. The Project Site encompasses approximately 29,418 gross square feet of lot area (0.68 acres). The Project Site is surrounded by a mix of multi-family residential apartments, commercial/retail buildings, banks, and restaurants. Therefore, the Project Site is less than five acres and surrounded by urban uses.

c) The Project Site has no value as habitat for endangered, rare or threatened species.

The Project Site is located in a highly urbanized area within the City of Los Angeles. As shown in Figure 5, Aerial Photograph of the Project Site and Surrounding Land Uses, the Project Site and the surrounding area are fully developed with urban infrastructure and do not contain any significant areas of natural open space or areas of significant biological resource value. The Project Site is developed with established commercial uses and paved surface parking lot. Vegetation on the Project Site is limited to shrubs, vegetation, and ornamental landscaping. The on-site vegetation would be removed during construction; however, these types of vegetation or shrubs are not protected trees. Additionally, there are four street trees along the public right-of-way fronting Vermont Street and Hollywood Boulevard (two Indian Laurel fig trees and two African fern pine trees), which are owned and maintained by the City. These trees are not proposed for removal and would be maintained and preserved during construction. However, the Proposed Project assumes a worst-case scenario of removing all street trees, in the event of changes to the right-of-way improvement plans after approval of the environmental clearance. Prior to any work on the adjacent public right-of-way, the Applicants will be required to obtain approved plans from the Department of Public Works. As there currently is no approved right-of-way improvement plan and for purposes of conservative analysis under CEQA, Planning has analyzed the worst-case potential for removal of all street trees. Note that street trees and protected trees shall not be removed without prior approval of the Board of Public Works/Urban Forestry (BPW) under LAMC Sections 62.161 - 62.171. At the time of preparation of this environmental document, no approvals have been given for any tree removals on-site or in the right-of-way by BPW. The City has required a Tree Report to identify all protected trees/shrubs on the project site and all street trees in the adjacent public right-of-way. The Project proposes to remove no protected trees, no protected shrubs, and up to four street trees assuming a worst-case scenario.

According to the U.S. Fish and Wildlife Service (USFWS) Threatened & Endangered Species Active Critical Habitat Report, no candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or the USFWS have been recorded or exist on the Project Site. Additionally, the USFWS's IPaC database identified one threatened species (coastal California gnatcatcher) and one proposed threatened species (southwestern pond turtle) that occur within the broader project locale, but

indicated that the Project Site is located outside of the designated critical habitat for these species (*see Attachment 6 to this Categorical Exemption*).

The Proposed Project would result in the removal of shrubs and vegetation on the Project Site, which are ornamental in nature. While the removal of non-protected trees would not be considered a significant impact under CEQA, the removal of trees has the potential to impact nesting bird species if they are present at the time of tree removal. Nesting birds are protected under the Federal Migratory Bird Treaty Act (MBTA) *(Title 16, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 20)* and Section 3503 of the California Department of Fish and Game Code. In compliance with these regulatory requirements, the Proposed Project would avoid tree removal activities during the breeding season and/or follow other regulatory guidelines to ensure that the trees proposed for removal are not occupied by nesting birds. Therefore, the Project Site has no value as habitat for endangered, rare, or threatened species, and the Proposed Project would have no impact on any sensitive species or habitat.

d) Approval of the Proposed Project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

Traffic/Transportation

Operational Traffic Impacts

California Senate Bill 743 ("SB 743"), which went into effect in January 2014, requires the Governor's Office of Planning and Research to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis shifts from driver delay, which is typically measured by traffic level of service ("LOS"), to a new measurement, vehicle miles traveled ("VMT"), that addresses the state's goals on reduction of greenhouse gas ("GHG") emissions, creation of a multi-modal transportation network, and promotion of compact, mixed-use development patterns. In August 2019, the City of Los Angeles adopted the CEQA Transportation Analysis Guidelines (TAG) Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The City's TAG establishes VMT as the City's formal method of evaluating a project's transportation impacts under CEQA.

The following assessment is based on the Supplemental Traffic Evaluation for the 1666 North Vermont Avenue Mixed-Use Project, prepared by Overland Traffic Consultants, Inc., dated December 2023. A prior Traffic Assessment, dated January 2020, was reviewed and approved by LADOT on June 30, 2020 (DOT Case No. CEN 19-48526), follows the recently adopted City of Los Angeles Transportation Assessment Guidelines (TAG) (July 2019) and concludes that the Project will not conflict with City plans, policies, ordinances and programs, will not result in a significant VMT impact, will not substantially increase hazards due to a geometric design feature. Furthermore, as noted below, the Proposed Project would not result in inadequate emergency access. Therefore, a "less than significant" determination can be made as related to the CEQA analysis. A summary of the Traffic Analysis's CEQA related findings are presented below. For the non-CEQA components of the traffic analysis, see Attachment 3. The prior Traffic Assessment and LADOT's approval letter is provided in Attachment 3. Since that time, LADOT has provided a new TAG dated August 2022. These guidelines refine the queries and layout of the

Transportation Assessment but do not alter the CEQA Thresholds. The following section incorporates the findings in the prior Transportation Assessment and reconsideration of any new potential transportation impacts provided in the Supplemental Transportation Evaluation.

Screening Criteria

Pursuant to the City's TAG, if the Project requires a discretionary action, and the answer is "yes" to any of the following questions, further analysis is required to assess whether the Proposed Project would conflict with adopted City plans, programs, ordinances, or policies.

- Would the project generate a net increase of 250 or more daily vehicle trips?

Yes, using the VMT calculator for screening purposes (without credits for project components such as internal or transit trips), the Proposed Project will generate 2,114 net vehicle trips without any TDM strategies.

- Is the project proposing to, or required to make any voluntary or required, modifications to the public right-of-way (i.e., street dedications, reconfigurations of curb line, etc.)?

Yes, pursuant to the Mobility Element street standards, a 2-foot, 6-inch dedication and widening would be required along the alley. One driveway will be closed on Prospect Avenue. The second Prospect Avenue driveway (near the easterly property line) will have a driveway apron used for commercial access with adjacent loading dock access. No additional dedication or street widening is required for Prospect Avenue, Vermont Avenue, or Hollywood Boulevard.

- Is the project on a lot that is 0.5-acre (21,750 square feet) or more in total gross area, or is the project's frontage along a street classified as an Avenue or Boulevard (as designated in the Mobility Plan 2035) with 250 linear feet or more, or is the project's building frontage encompassing an entire block along a street classified as an Avenue or Boulevard (as designated in Mobility Plan 2035)?

Yes, the Project Site is over 0.5-acre with approximately 0.68 acres (29,418 square feet). Yes, 250 linear feet or more of Project frontage is along an Avenue or Boulevard. The Project frontage of Prospect Avenue is designated as a local street which is not applicable, Hollywood Boulevard is designated an Avenue I roadway, and Vermont Avenue is designated as a Modified Avenue II in the Mobility Plan 2035. The Project's Hollywood Boulevard frontage is approximately 130 feet in length and 170 feet in length along Vermont Avenue. A total of 300 feet of Project frontage is along an Avenue as designated in the Mobility Plan 2035.

Based on the above Screening Criteria, a full VMT analysis is required.

Threshold T-1: Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities?

A Project that generally conforms with and does not obstruct the City's development policies will be generally considered consistent. A list of these element standards has been provided in the LADOT TAG. In addition, the City has provided a list of questions that are to be answered yes or

no to determine a conflict. If a vacation of public right-of-way or relief from required street dedication is sought as part of the Project, an assessment is required as to whether the right-of-way is necessary to serve a long-term mobility needed.

The listed City documents that establish the regulatory framework and questions to determine project applicability to plans, policies and programs is provided in Appendix G with the VMT Calculation sheets. It has been found that the construction of the proposed Project is within conformance and consistent with standards adopted by the City's transportation plans and policies for all travel modes. The Project will not preclude the City's implementation of any adopted policy and/or program. No street dedications are required along Prospect Avenue, Hollywood Boulevard, or Vermont Avenue. A 2-foot, 6-inch widening of the alley will be required and implemented. Vermont Avenue is identified as a High Injury Network roadway in the Mobility Plan 2035. Currently this roadway has continental crosswalks for greater pedestrian visibility along the north and south legs of Vermont at Prospect Avenue and north and south legs of Hollywood Boulevard. the project is along the corner of Prospect Avenue, Vermont Avenue, and Hollywood Boulevard. There will be no driveways on Vermont Avenue or Hollywood Boulevard. One driveway is proposed on Prospect Avenue near the eastern property line away from the intersection. A vacation of public right of way is proposed on the west side of the Project Site. This vacation is land that is currently not used by the public and not needed for future roadway plans. This proposed vacation is being processed through a separate request through the Bureau of Engineering, Department of Public Works (BOE VAC - E1401364).

As required by LADOT, the Proposed Project would be consistent with the Mobility Plan 2035, Plan for Healthy LA, Land Use Element of the General Plan, Coastal Transportation Corridor Specific Plan, Los Angeles Municipal Code (LAMC) 12.21A.16 Bicycle Parking, LAMC Section 12.26J TDM Ordinance, LAMC Section 12.37 Waivers (none requested), Vision Zero Action Plan, Vision Zero Corridor Plan, and Citywide Design Guidelines. Thus, the Proposed Project would not conflict with key City Planning documents.

Threshold T-2.1: For a land use project, would the project conflict or be inconsistent with CEQA guidelines section 15064.3, subdivision (b)(1)?

The intent of this threshold is to assess whether a land use project causes substantial vehicle miles traveled. LADOT has developed the following screening and impact criteria:

- T-2.1-1: Would the land use project generate a net increase of 250 or more daily vehicle trips?

Yes, using the VMT calculator for screening purposes, the Proposed Project will generate 2,114 net vehicle trips without any TDM strategies that are part of the project.

- T-2.1-2: Would the project generate a net increase in daily VMT?

Yes, using the VMT calculator version 1.4, the new mixed-use project would generate a net increase of 13,044 additional household VMT. TDM strategies are not considered in the VMT Project screening criteria.

In addition to the above screening criteria, the portion of, or the entirety of a project that contains small-scale of local serving retail uses are assumed to have less than significant VMT impacts. If the answer to the following question is no, then that portion of the project meets the screening criteria, and a no impact determination can be made for the portion of the project that contains retail uses. However, if the retail project is part of a larger mixed-use project, then the remaining portion of the project may be subject to further analysis in accordance with the above screening criteria. Projects that include retail uses in excess of the screening criteria would need to evaluate the entirety of the project's VMT, as specified in Subsection 2.2.4 of the TAG.

- If the project includes retail uses, does the portion of the project that contains retail uses exceed a net 50,000 square feet?

No, the Project proposes 20,240 square feet of commercial grocery store.

- Would the Project or Plan located within a one-half mile of a fixed-rail or fixed-guideway transit station replace an existing number of residential units with a smaller number of residential uses?

The Project is approximately 1,000 feet (less than ¼ mile) of the Vermont/Sunset Metro B Line station, but will not replace residential uses with a smaller number of residential uses. The current land uses on the site are a commercial car wash and restaurant. There are no existing residential land uses on the Project Site.

Impact Criteria and Methodology

LADOT has identified thresholds for significant VMT impacts for each of the 7 Area Planning Commission (APC) sub-areas. The Project's VMT are compared against the City's threshold goals for household VMT per capita and work VMT per employee to evaluate the significance of the VMT increases.

For development projects, the proposed project will have a potential VMT impact if the project meets the following:

- For residential projects, the project would generate household VMT per capita exceeding 15% below the existing average household VMT per capita for the APC area in which the project is located.

The Proposed Project is located in the Central APC sub-area which limits daily household VMT per capita to a threshold of 6.0 and a daily work VMT per employee threshold of 7.6 (15% below the existing VMT for the Central APC).

In addition to the above screening criteria, the portion of, or the entirety of a project that contains small-scale (less than 50,000 sf) of local serving retail uses (including grocery store)/restaurant uses are assumed to have less than significant VMT impacts and a no impact determination can be made for the small scale retail/restaurant portion of the mixed-use project. Therefore, only the Proposed Project's residential daily household VMT per capita is considered for the Central APC threshold criteria.

Summary of Project VMT Analysis

The daily vehicle trips and VMT expected to be generated by the Project were forecast using Version 1.4 of the City's VMT Calculator tool. Copies of the detailed City of Los Angeles VMT Calculator worksheets for the Proposed Project are contained in Attachment 3. As indicated in the summary VMT Calculator worksheet, the Project is forecast to generate the following:

- The estimated daily household VMT per capita for the Project's residential land use component is 4.1, which is less than the Central APC significance threshold of 6.0 VMT per capita.

The Applicants will comply with existing applicable City ordinances (e.g., the City's existing TDM Ordinance, referred to in the LAMC Section 12.26.J) and the other requirements per the City's Municipal Code. As described in further detail in the Traffic Assessment, the following TDM strategies will be included as part of the Proposed Project:

- Unbundle Parking – This strategy unbundles the parking costs from the property costs, requiring those who wish to produce parking spaces to do so at an additional cost from the property cost. The strategy assumes the parking cost is set by the VMT calculator to be a minimum of $200 per month and paid by the vehicle owners/drivers.
- Reduced Parking Supply – This strategy changes the on-site parking supply to provide less than the amount of vehicle parking required by direct application of the LAMC without consideration of parking reduction mechanisms permitted in the code. Permitted reductions in parking supply could utilize parking reduction mechanisms such as TOC, Density Bonus, Bike Parking ordinance, or locating in an Enterprise Zone or Specific Plan area. Reductions in parking supply could also include reductions in parting requirements due to variances sought by a project. This strategy is appropriate for use in all land-use contexts and all types of development and applies to all trip types.
- Bike Parking – Projects providing short-term and long-term bicycle parking spaces in accordance with LAMC Section 12.21A.16 qualify for this measure.

Based on the above VMT analysis, the Proposed Project would not exceed the City's VMT threshold and does not conflict with, nor would it be inconsistent with, CEQA Guidelines Section 15064.3 subdivision (b).

Thus, based on the above analyses, the Project is not expected to result in a significant VMT impact, and impacts would be less than significant.

Threshold T-2.2: Would the project include the addition of through traffic lanes on existing or new highways including general purpose lanes, high-occupancy vehicle lanes, peak period lanes, auxiliary lanes, and lanes through-grade separated interchanges (except managed lanes, transit lanes, and auxiliary lanes of less than one mile in length designed to improve roadway safety)?

No, the Proposed Project will not include the addition of any traffic lanes.

Threshold T-3: Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Impacts regarding the potential increase of hazards due to a geometric design feature generally relate to the design of access points to and from the Project Site, and may include safety, operational, or capacity impacts. Impacts can be related to vehicle conflicts as well as to operational delays caused by vehicles slowing and/or queuing to access a project site. If the Proposed Project requires a discretionary action, and the answer is "yes" to either of the following questions, further analysis is required to assess whether the Proposed Project would result in impacts due to geometric design hazards or incompatible uses:

- Is the project proposing new driveways, or introducing new vehicle access to the property from the public right-of-way?

Yes, currently there are no driveways to/from the Project Site from the alley. The Project is proposing one new driveway off the alley along the east side of the Project Site. Currently the Project Site has two driveways on Prospect Avenue. The Proposed Project will close one driveway and retain the second (more easterly) driveway on Prospect Avenue. No Project driveways exist or are proposed on Vermont Avenue or Hollywood Boulevard.

- Is the project proposing to, or required to make any voluntary or required, modifications to the public right-of-way (i.e., street dedications, reconfigurations of curb line, etc.)?

Yes, pursuant to the Mobility Element street standards, a 2-foot, 6-inch dedication and widening would be required for the alley adjacent to the Project Site. No additional dedication or street widening is required for Prospect Avenue, Vermont Avenue, or Hollywood Boulevard.

The Project does not involve any design features that are unusual for the area or any incompatible uses. Changes to the Project Site access by moving one driveway from Prospect Avenue to the alley, would improve roadway conditions. Thus, there are no deficiencies apparent in the Project Site access plans which would be considered significant. This determination considers the following factors:

1. The proposed alley dedication will increase alley width from 15 to 17.5 feet providing for an improved and safer driving environment if the 2-foot, 6-inch widening of the alley is not required.
2. The project is removing one existing driveway from Prospect Avenue and providing a driveway from an existing alley, thereby improving street movement of vehicles and pedestrians.
3. No new driveways will be introduced on Vermont Avenue, a Modified Avenue II and designated as part of the High Injury Network System or Hollywood Boulevard, an Avenue I roadway and designated as part of the City of Los Angeles High Injury Network System.
4. The site is a corner lot, and the proposed access is proposed from an ally and from Prospect Avenue, a local street, and placed as far as possible from the Vermont Avenue and Prospect Avenue intersection.

Threshold T-4: Would the project result in Inadequate Emergency Access?

The Proposed Project would result in less than significant impacts on site access and local roadways during construction activities. Construction of the Proposed Project would not result in the closure of two or more travel lanes, would not relocate existing bus transit stops or routes, and would not impede emergency access. The Proposed Project is located on Vermont Avenue, which is designated as a Modified Avenue II roadway and is included in the Transit Enhanced Network and Pedestrian Enhanced Network. The Proposed Project is also located on Hollywood Boulevard which is designated as an Avenue I and is included in the Transit Enhanced Network and Pedestrian Enhanced Network. The Metro transit stop for Route 180/181 is adjacent to the Project Site on Vermont Avenue, south of Prospect Avenue.

Signs would be posted advising pedestrians of temporary sidewalk closures and would provide alternative routes. The following LADOT Regulatory Compliance Measures would be implemented: (1) a construction work site traffic control plan would be submitted to LADOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of construction activity should any lane closure(s) be proposed; and (2) the Project Applicants would also prepare a detailed Construction Staging and Traffic Management Plan ("CSTMP"), which includes any applicable street/lane/sidewalk closure information, a detour plan, haul rote(s), and a staging plan. Therefore, it can be determined that the Project will not result in inadequate emergency access during construction.

Operationally, the Proposed Project would result in a less than significant impact upon emergency access. As noted in the Non-CEQA portion of the Transportation Assessment, existing and future traffic volumes have been developed to analyze future traffic conditions after completion of the Proposed Project. The Proposed Project's traffic affect has been calculated by adding the Project traffic volumes to the existing traffic and future cumulative traffic volume with updated cumulative projects and a study year of 2022. As concluded in the Transportation Assessment, no significant circulation or access deficiencies were identified for the Proposed Project, and impacts to inadequate emergency access would be less than significant.

Noise

Construction Noise Impacts

For purposes of determining the Proposed Project's construction noise impacts, a significant impact would occur if the Proposed Project is not in compliance with LAMC Chapter XI, Article 2, Section 112.04, 112.05, and 41.40. LAMC Section 112.05 provides that between the hours of 7:00 A.M. and 10:00 P.M., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding 75 dBA at a distance of 50 feet therefrom. Under this standard, the Applicants must at minimum demonstrate compliance with LAMC Section 112.05. Further, in compliance with LAMC Section 112.04, this analysis addresses whether construction activities would exceed existing ambient exterior noise levels by 5 dBA (hourly L_{eq}) or more in residential areas. If necessary, features to reduce noise to below-threshold levels (75 dBA) and below a 5-dBA ambient noise increase can be incorporated into the project design to ensure regulatory compliance.

For purposes of evaluating the Proposed Project's construction and operational noise impacts, the following regulatory compliance measures and construction project design features would be incorporated into the Proposed Project's construction activities. These features and control measures are consistent with the noise management procedures and regulations of the LAMC and Noise Element of the General Plan.

Los Angeles Municipal Code

The LAMC contains a number of regulations that would apply to the Proposed Project's temporary construction activities and long-term operations. Section 41.40(a) would prohibit Project construction activities from occurring between the hours of 9:00 P.M. and 7:00 A.M., Monday through Friday. Subdivision (c), below, would further prohibit such activities from occurring before 8:00 A.M. or after 6:00 P.M. on any Saturday, or on any Sunday or national holiday.

SEC.41.40. Noise Due to Construction, Excavation Work—When Prohibited

No person shall, between the hours of 9:00 P.M. and 7:00 A.M. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power drive drill, riveting machine, excavator or any other machine, tool, device, or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified. Any person who knowingly and willfully violates the foregoing provision shall be deemed guilty of a misdemeanor punishable as elsewhere provided in this Code.

SEC 112.05 Maximum Noise Level of Powered Equipment or Powered Hand Tools

Between the hours of 7:00 A.M. and 10:00 P.M., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet therefrom:

(a) 75 dBA for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;

(b) 75 dBA for powered equipment of 20 HP or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;

(c) 65 dBA for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors.

Said noise limitations shall not apply where compliance therewith is technically infeasible. The burden of proving that compliance is technically infeasible shall be upon the person or persons charged with a violation of this section. Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment.

SEC. 112.04 Powered Equipment Intended for Repetitive Use in Residential Areas and Other Machinery, Equipment, and Devices.

Except as to the equipment and operations specifically mentioned and related elsewhere in this Chapter or for emergency work as that term is defined in Section 111.01(d), and except as to aircraft, tow tractors, aircraft auxiliary power units, trains and motor vehicles in their respective operations governed by State or federal regulations, no person shall operate or cause to be operated any machinery, equipment, tools, or other mechanical or electrical device, or engage in any other activity in such manner as to create any noise which would cause the noise level on the premises of any other occupied property, or, if a condominium, apartment house, duplex, or attached business, within any adjoining unit, to exceed the ambient noise level by more than five (5) decibels.

SEC.112.02. Air Conditioning, Refrigeration, Heating, Plumbing, Filtering Equipment

It shall be unlawful for any person, within any zone of the city, to operate any air conditioning, refrigeration or heating equipment for any residence or other structure or to operate any pumping, filtering, or heating equipment for any pool or reservoir in such manner as to create any noise which would cause the noise level on the premises of any other occupied property … to exceed the ambient noise level by more than five decibels.

Ordinance No. 178,048

The City of Los Angeles Building Regulations Ordinance No. 178,048 requires a construction site notice to be posted on site that includes the job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the Site, and City telephone numbers where violations can be reported. This notice is required to be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

SEC. 116.01. Loud, Unnecessary, And Unusual Noise

Notwithstanding any other provisions of this chapter and in addition thereto, it shall be unlawful for any person to willfully make or continue, or cause to be made or continued, any loud, unnecessary, and unusual noise which disturbs the peace or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area. The standard which may be considered in determining whether a violation of the provisions of this section exists may include, but not

be limited to, the following: (a) The level of noise; (b) Whether the nature of the noise is usual or unusual; (c) Whether the origin of the noise is natural or unnatural; (d)The level and intensity of the background noise, if any; (e) The proximity of the noise to residential sleeping facilities; (f) The nature and zoning of the area within which the noise emanates; (g) The density of the inhabitation of the area within which the noise emanates; (h) The time of the day and night the noise occurs; (i) The duration of the noise; (j) Whether the noise is recurrent, intermittent, or constant; and (k) Whether the noise is produced by a commercial or noncommercial activity.

Project Design Features

In addition to the above regulatory requirements and in furtherance of complying with the provisions set forth in LAMC Section 112.05, above, the Applicants will incorporate the following voluntary features into the construction work plans:

- Construction and demolition shall be restricted to the hours of 7:00 A.M. to 6:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday.
- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The project contractor shall use power construction equipment with noise shielding and muffling devices.
- The project contractor will erect a temporary noise-attenuating sound barrier along the perimeter of the Project Site. The sound wall will be a minimum of 8 feet in height to block the line-of-sight of construction equipment and off-site receptors at the ground level. Localized and portable sound enclosures, such as Echo Barrier Outdoor noise barrier/absorbers, would also be used and doubled layered to significantly reduce noise from construction equipment. The sound barrier shall include sound absorbing material capable of achieving a minimum of 20-dBA reduction in sound level.
- During any jackhammering and structural framing, the project contractor shall utilize temporary portable acoustic barriers, partitions, or acoustic blankets to effectively block the line-of-sight between noise producing equipment and the adjacent residential land uses for purposes of ensuring noise levels at the adjacent residential land uses does not exceed 75 dBA L_{eq} over the ambient noise levels.

A summary of the construction and operational noise impacts is discussed below. Calculation worksheets are provided in Attachment 4. With respect to demonstrating compliance with LAMC Sections 112.04 and 112.05, Table 2.3, below, provides the estimated construction noise levels at the nearby sensitive receptors based on distance attenuation and sound attenuation resulting from the use of noise shielding devices and the installation of a temporary sound wall along the perimeter of the Project Site.

Construction Noise

Construction of the Proposed Project would require the use of heavy equipment for demolition/site clearing, grading/excavation, building construction, and architectural coatings. During each

construction phase there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity. Table 2.2 identifies the representative noise levels for the two loudest types of construction equipment anticipated to be used for the Proposed Project,[8] including estimated usage factors found in the U.S. Department of Transportation, Federal Highway Administration, Roadway Construction Noise Model. The noise levels listed in Table 2.2, below, represent the A-weighted maximum sound level (L_{max}), measured at a distance of 50 feet from the construction equipment.

Table 2.2
Noise Data for Selected Construction Equipment

Construction Phases	Two Loudest Construction Equipment per Phase	Estimated Usage Factor %	Actual Measures Noise Level at 50 Feet (dBA L_{max})
Demolition/Site Clearing	Concrete/Industrial Saws (1)	20	90
	Dozer (1)	40	82
Grading/Excavation	Concrete/Industrial Saws (1)	20	90
	Dozer (1)	40	82
Building Construction	Crane (1)	16	81
	Generator (1)	50	81
Architectural Coating	Air Compressors (2)	40	78

Note:
Pursuant to the procedures from the Federal Transit Administration's Transit Noise and Vibration Impact Assessment Manual for a quantitative construction noise assessment, the noise levels for the two loudest pieces of construction equipment were calculated from the center of the Project Site and the respective distance to each sensitive receptor.
Source: FHWA, Roadway Construction Noise Model, Construction Noise Prediction, (at Table 1 CA/T Equipment noise emissions and acoustical usage factors database, January 2006.

It should be noted that not all construction noise equipment would be utilized concurrently during each phase and the location and spacing of heavy construction equipment and machinery would vary over the course of construction. Mobile equipment moves around the construction site with power applied in cyclic fashion (bulldozers, loaders), or to and from the site (trucks). Because the precise numbers and locations of equipment operating at the same time are not known, this analysis follows the recommended procedures contained in the Federal Transit Administrations Transit Noise and Vibration Impact Assessment Manual for a quantitative construction noise assessment. Pursuant to these procedures, the noise levels for the two loudest pieces of construction equipment were calculated from the center of the Project Site and the respective distance to each sensitive receptor.

Sensitive receptors identified within 500 feet of the Project Site include:

1) Multi-family residences east and northeast of the Project Site;
2) Los Feliz Elementary School;
3) Chabad of Greater Los Feliz.

[8] *Based On The Construction Equipment Identified In The Caleemod Worksheets For The Air Quality And Greenhouse Gas Emissions Models Presented In Attachment 5 Of This Categorical Exemption.*

Refer to Figure 1 of Attachment 4 for locations of these sensitive receptors.

As noted above, temporary noise barriers would be installed along the Project Site's property lines to block the line-of-sight between the noise sources and surrounding sensitive receptors. The construction of a temporary ¾ inch plywood noise barrier and noise barrier/absorbers would be capable of attenuating the noise level by approximately 20 dBA. Additionally, noise control efforts to limit the construction activities to permissible hours of construction, incorporate noise shielding devices such as sound mufflers and echo barriers, and operate machinery in a manner that reduces noise levels (i.e., not operating several pieces of equipment simultaneously if possible) would be effective in reducing noise impacts. Localized and portable sound enclosures would also be used, to significantly reduce noise from these types of equipment. Products such as Echo Barrier Outdoor noise barrier/absorbers can provide a 10 to 20 dBA noise reduction or more if the barrier is doubled up (see product data specifications included in Attachment 4).

Pursuant to LAMC Chapter IV, Article 1, Section 41.40, exterior demolition and construction activities that generate noise are prohibited between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday and federal holidays. Demolition and construction are prohibited on Sundays. The construction activities associated with the Proposed Project would comply with these LAMC requirements. Additionally, permissible hours of construction would be limited to the hours of 7:00 A.M. to 6:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday.

Further, the Applicants would be required to post informational signage providing contact information to report complaints regarding excessive noise. Additionally, the Applicants would be required to provide courtesy notifications to adjacent business owners and residences a minimum of two weeks prior to commencement of construction. The City of Los Angeles Building Regulations Ordinance No. 178,048 requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the Project Site, and City telephone numbers where violations can be reported. The notice is required to be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public. With incorporation of the project design features, as described above, and regulatory compliance measures, affected residents and business owners would be provided advanced notice of potential noise impacts and opportunities to comment on construction noise.

As shown in Table 2.3, Estimated Exterior Construction Noise at Nearest Sensitive Receptors, the ambient exterior noise levels would range from 38.6 dBA to 60.5 dBA with the application of the Project Design Features listed above. As such, construction noise levels would not exceed 75 dBA at a distance of 50 feet from the Project Site (in compliance with LAMC 112.05) and would not exceed ambient noise levels by more than 5-dBA at any of the sensitive receptors (in compliance with LAMC 112.04). As such, temporary construction-related noise impacts would be considered less than significant in accordance with City requirements and standards.

Table 2.3
Estimated Exterior Construction Noise Levels at Nearest Sensitive Receptors

ID [1]	Ambient Noise (dBA L_{eq}) [2]	Noise Level Impact (dBA L_{eq}) by Phase [3]				Maximum Construction Noise Level	Construction Noise Threshold (dBA L_{eq})	Significant Noise Impact? (Yes/No)
		Demolition	Grading	Building Construction	Arch Coatings			
1	64.6	60.5	60.5	54.6	53.4	60.5	69.5	No
2	65.5	48.6	48.6	42.7	41.5	48.6	70.5	No
3	68.3	45.8	44.8	39.8	38.6	45.8	73.3	No

Notes:
[1] *ID refers to the sensitive receptor locations identified in Figure 1, Noise Monitoring and Sensitive Receptor Location Map, of Attachment 4.*
[2] *Daytime noise levels are based on actual noise measurements taken at the Project Site vicinity. Ambient noise levels measured represent noise for similar and nearby land use types.*
[3] *Calculations based on the loudest two pieces of heavy construction equipment specific to each phase.*
Source: Parker Environmental Consultants, LLC, (see Attachment 4, Noise Calculations Worksheets).

Operation

Mechanical/HVAC Equipment

As part of the Proposed Project, new mechanical equipment, HVAC units, and exhaust fans would be installed on the roof of the proposed structure. However, the operation of this equipment would be similar to the existing HVAC equipment currently on the Project Site. Further, the design and placement of HVAC units and exhaust fans would be required to comply with the regulations under Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Thus, the on-site equipment would be designed and located such that they would be appropriately shielded and fitted with noise muffling devices to reduce operational noise levels. Thus, operational noise impacts from HVAC equipment would be less than significant.

Parking Structure Noise

Parking structures generate noise from vehicle engines, tires squealing, doors closing, car alarms, and people talking. Noise levels within the parking structures would fluctuate based on the types of simultaneous noise sources and the overall level of activity within the garage. The three subterranean parking levels would be completely enclosed, and noise levels would be completely insulated within subterranean levels. Therefore, it is not anticipated that the garage level would significantly impact nearby sensitive receptors, and accordingly, the parking structure would have a less than significant impact to nearby sensitive receptors.

Outdoor Courtyards

The Proposed Project would include two courtyards on the 2nd floor totaling approximately 4,670 square feet of common outdoor open space and 860 square feet of common outdoor open space on the 7th floor sky lounge. It is anticipated that there would not be any amplified music or speakers

on the outdoor courtyards; however, occupancy and use of these courtyards may increase ambient noise levels in the Project Site vicinity. There is no objective criterion for analyzing unamplified human voices within the LAMC. The only applicable criteria the LAMC code provides is that the Proposed Project shall adhere to LAMC Section 116.01, which states that it shall be unlawful for any person to willfully make or continue, or cause to be made or continued, any loud, unnecessary, and unusual noise which disturbs the peace or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area. It is not expected that the intended use (i.e., only up to a few people having a conversation, relaxing, or enjoying the outdoors) would violate the prohibition of "loud, unnecessary and unusual noise" criteria. Additionally, the *Office of Planning and Research* identifies the following criteria to evaluate a project's operational noise impacts: any 5 dBA or greater noise increase. Therefore, a 5-dBA increase in ambient noise levels is the threshold utilized when analyzing the impacts from the outdoor courtyards.

Based on the size of the outdoor open space areas and the type of amenities provided, it is conservatively anticipated that this area could accommodate up to 50 square feet per person, resulting in 95 people on the 2nd floor courtyards and 18 people on the 7th floor sky lounge. For purposes of estimating noise from people congregating in these areas, reference noise levels of 65 dBA and 62 dBA (L_{eq} at a distance of 3.3 feet) for a male and a female speaking in a raised voice, respectively, were used to analyze noise from the use of these outdoor open space areas. Assuming 94 individuals occupy the 2nd floor outdoor common open space and 18 individuals occupy the 7th floor outdoor common open space at one time, and up to 50 percent of the people (half of which would be male and the other half female) would be talking at the same time, the noise levels would be approximately 80.5 dBA L_{eq} within the 2nd floor and 73.3 dBA L_{eq} within the 7th floor. This would result in a combined noise level of 81.2 dBA L_{eq} at the building. When factoring in the distance to nearby sensitive receptors, the combined noise level would be 56.0 dBA L_{eq} at a reference distance of 50 feet.[9] Based on the ambient noise levels recorded in the surround area (*Attachment 4, Figure 1*), the Proposed Project would not increase ambient noise levels by more than 5 dBA from the open space with full capacities; additionally, due to the nature of the use, it is unlikely that the Proposed Project would operate at such full capacity often or for a prolonged period of time. As such, noise from the common open space areas would be less than significant.

Roadway Noise

With respect to traffic noise impacts, in order for a new noise source to be audible, there would need to be a 3 dBA or greater CNEL noise increase. According to the *L.A. CEQA Thresholds Guide,* the traffic volume on any given roadway would need to double in order for a 3-dBA increase in ambient noise to occur.

[9] *Formulas Provided By Caltrans Technical Noise Supplement, April 2020. See Noise Calculation Worksheets In Attachment 4.*

LADOT performed on-peak commute hour traffic counts at the nearest intersection of Vermont Avenue and Prospect Avenue in 2018.[10] This intersection experienced a total of 12,311 vehicles during commute hours of 7:00 to 9:45 AM and 3:00 to 5:45 PM. Based on the VMT Analysis completed for the Proposed Project, the Proposed Project would result in an approximate net increase of 1,896 daily vehicle trips. Accounting for a 1% ambient annual trip increase plus 1,896 daily trips from the Proposed Project, this intersection roadway segment would experience approximately 15,095 trips during peak commute hours for the year 2025. This is based on a conservative estimate, assuming that all of the Proposed Project trips would utilize this intersection, and assuming that all trips would occur during the peak hours. Therefore, the generation of 1,896 trips is not anticipated to double the amount of peak hour traffic volumes along any of the nearby roadway segments or intersections. As such, increased mobile source noise from the Proposed Project's increase in traffic would be less than 3 dBA, and operational noise impacts due to roadway noise would be less than significant.

Composite Noise Levels

When viewed together, on-site noise sources associated with the Proposed Project would include mechanical HVAC equipment, outdoor courtyard activities, and the parking structures. Due to the nature of the Proposed Project's land uses, the Proposed Project would not result in significantly loud sources of operational noise since residential uses typically operate at relatively low levels of noise. As discussed above, the mechanical HVAC equipment, outdoor open space, and parking structures would not result in significant noise impacts. Therefore, the Proposed Project would not increase ambient noise levels by 5 dB, and a less than significant impact would occur.

Air Quality

Construction Emissions

With respect to air quality during the construction phases, the Proposed Project would be required to comply with all applicable City, regional, state, and federal regulatory compliance measures from agencies including, but not limited to, the City of Los Angeles, the Southern California Air Quality Management District (SCAQMD), and the California Code of Regulations. As required by CEQA, the Proposed Project's construction emissions were quantified utilizing the California Emissions Estimator Model (CalEEMod *Version 2022.1.1.21*), as recommended by the SCAQMD. Table 2.4, below, identifies daily emissions that are estimated to occur on peak construction days for each phase of the Proposed Project's construction.

This analysis assumes a Project construction schedule of approximately 18 months, with final buildout occurring in 2025. Construction activities associated with the Proposed Project would be undertaken in four main steps: (1) demolition/site clearing, (2) grading/excavation, (3) building construction, and (4) architectural coatings/finishings. The Proposed Project would require up to

[10] *City Of Los Angeles, Navigatela, Turning Movement Count, Vermont Avenue And Prospect Avenue, Https://Navigatela.Lacity.Org/Dot/Traffic_Data/Manual_Counts/VERMONT.PROSPECT.181211.MAN .Pdf, Accessed December 2023.*

1,091 tons of demolition debris and 35,950 cubic yards of soil export to be hauled off-site, using haul trucks with a 14 cy capacity.

As shown in Table 2.4, below, construction-related daily emissions associated with the Proposed Project would not exceed any regional SCAQMD significance thresholds for criteria pollutants during the construction phases. These calculations assume that appropriate dust control measures would be implemented as part of the Proposed Project during each phase of development, as required and regulated by SCAQMD Rule 403 – Fugitive Dust.

Table 2.4
Estimated Peak Daily Construction Emissions

Emission Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
2024	2.04	25.7	23.7	0.08	5.35	2.40
2025	13.6	12.8	24.4	0.03	2.52	0.91
Maximum Daily Construction Emissions:	**13.6**	**25.7**	**24.4**	**0.08**	**5.35**	**2.40**
SCAQMD Daily Significance Thresholds:	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust and Rule 1113 – Architectural Coatings. The interface on CalEEMod (Version 2022.1.1.21) lists these rules under the "Mitigation" tab, when they are actually required rules by the SCAQMD. The term "Mitigation" in CalEEMod is defined differently than "Mitigation Measures" in this Categorical Exemption. The model does not allow for these regulatory measures to be implemented in the "unmitigated project" impact scenario. As such, the values that appear under the "Mitigated" results columns are reflective of the Proposed Project impacts that are compliant with required regulations. Source: CalEEMod 2022.1.1.21, Calculation sheets are provided in Attachment 5 to this Categorical Exemption.

Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. As such, construction-related emissions associated with the Proposed Project are not expected to exceed significance thresholds for criteria pollutants and hazardous substances. Further, all grading and earthwork activities would be conducted in accordance with applicable City, regional, state, and federal regulatory compliance measures. As such, construction of the Proposed Project would not result in the accidental release of hazardous pollutants. Therefore, temporary constructed-related air quality

impacts related to criteria pollutants and hazardous substances would be considered less than significant.

Localized Construction Emissions

The SCAQMD has developed localized significance thresholds (LSTs) that are based on the amount of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. These localized thresholds apply to projects that are less than or equal to five acres in size and are only applicable to the following criteria pollutants: NO_x, CO, PM_{10}, and $PM_{2.5}$. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standards and are developed based on the ambient concentrations of that pollutant for each source receptor areas (SRA). For PM_{10}, the LSTs were derived based on requirements in SCAQMD Rule 403 — Fugitive Dust. For $PM_{2.5}$, the LSTs were derived based on a general ratio of $PM_{2.5}$ to PM_{10} for both fugitive dust and combustion emissions.

LSTs are provided for each of SCAQMD's 38 source receptor areas ("SRA") at various distances from the source of emissions. The Project Site is located within SRA 1. The nearest sensitive receptors that could potentially be subject to localized air quality impacts associated with construction of the Proposed Project include the residential buildings to the east and northeast of the Project Site and Los Feliz Elementary School. Given the proximity of these sensitive receptors to the Project Site, and pursuant to SCAQMD guidance, the LSTs with receptors located within 25 meters (82.02 feet) are used to address the potential localized air quality impacts associated with the construction-related NO_X, CO, PM_{10}, and $PM_{2.5}$ emissions for each construction phase.

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations especially during the demolition and grading phases. However, as shown in Table 2.5, Localized On-Site Peak Daily Construction Emissions, peak daily emissions generated within the Project Site during construction activities for each phase would not exceed the applicable construction LSTs for an approximate one-acre site in SRA 1.

The localized air quality calculations assume that appropriate dust control measures would be implemented as part of the Proposed Project during each phase of development, as required by SCAQMD Rule 403 - Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. Therefore, with compliance with SCAQMD Rule 403, localized air quality impacts from construction activities on the off-site sensitive receptors would be less than significant.

Table 2.5
Localized On-Site Peak Daily Construction Emissions

Construction Phase [a]	Total On-site Emissions (Pounds per Day)			
	NO_x [b]	CO	PM_{10}	$PM_{2.5}$
Demolition/Site Clearing	15.6	16.0	0.9	0.65
Grading/Excavation	14.9	15.3	2.73	1.61
Building Construction	11.5	14.3	0.50	0.46
Architectural Coatings	4.98	6.11	0.12	0.11
SCAQMD Localized Thresholds [c]	**74**	**680**	**5**	**3**
Potentially Significant Impact?	***No***	***No***	***No***	***No***

Notes:
[a] *The localized thresholds for all phases are based on a receptor distance of 25 meters in SCAQMD's SRA 1 for a Project Site of one acre.*
[b] *The localized thresholds listed for NO_x in this table takes into consideration the gradual conversion of NO_x to NO_2, and are provided in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD. As discussed previously, the analysis of localized air quality impacts associated with NO_x emissions is focused on NO_2 levels as they are associated with adverse health effects.*
[c] *SCAQMD, Final LST Methodology Document, Appendix C – Mass Rate LST Look-Up Tables, October 21, 2009, and Sample Construction Scenarios for Projects Less than Five Acres in Size, Appendix K.*
Source: CalEEMod 2022.1.1.21, Calculation sheets are provided in Attachment 5 to this Categorical Exemption.

Operational Emissions

Existing Emissions

The Project Site is currently developed with two commercial structures, including a car wash and restaurant. The existing uses generate air pollutant emissions from space sources, such as space and water heating, architectural coatings (paint), and mobile sources such as motor vehicle traffic travelling to and from the Project Site. The average daily emissions generated by the existing uses at the Project Site have been estimated utilizing CalEEMod. As shown in Table 2.6, mobile sources are the primary source of air pollutant emissions associated with existing uses at the Project Site.

Proposed Project Emissions

The Proposed Project would result in the demolition of the two commercial structures on the Project Site for the construction and operation of a seven-story residential and commercial mixed-use building. The Proposed Project would generate both stationary and mobile emissions, including the consumption of electricity and natural gas, landscape maintenance, and vehicles traveling to and from the Project Site. Such emissions are typical of a residential and commercial mixed-use development such as the Proposed Project. The analysis of daily operational emissions associated with the Proposed Project has been prepared utilizing CalEEMod. The results of these calculations are presented in Table 2.7, Proposed Project Estimated Daily Regional Operational Emissions, below. As shown in Table 2.7, the operational emissions generated by the Proposed Project would not exceed the regional thresholds of significance set by the SCAQMD. Therefore, impacts associated with regional operational emissions from the Proposed Project would be less than significant.

Table 2.6
Existing Daily Operational Emissions from the Project Site

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Mobile Sources	1.95	2.16	19.30	0.03	2.69	0.71
Area Sources	0.26	<0.005	0.36	<0.005	<0.005	<0.005
Energy Sources	<0.005	0.08	0.07	<0.005	0.01	0.01
Total Emissions	**2.22**	**2.25**	**19.80**	**0.03**	**2.70**	**0.71**
Wintertime (Non-Smog Season) Emissions						
Mobile Sources	1.91	2.36	17.70	0.03	2.69	0.71
Area Sources	0.20	--	--	--	--	--
Energy Sources	<0.005	0.08	0.07	<0.005	0.01	0.01
Total Emissions	**2.11**	**2.45**	**17.70**	**0.03**	**2.70**	**0.71**

Source: CalEEMod 2022.1.1.21. Calculation worksheets are provided in Attachment 5 to this Categorical Exemption.

Table 2.7
Proposed Project Estimated Daily Regional Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Mobile Sources	11.80	9.33	106.00	0.25	22.5	5.82
Area Sources	4.13	0.11	12.00	<0.005	0.01	0.01
Energy Sources	<0.005	0.07	0.06	<0.005	0.01	0.01
Stationary Sources	1.64	7.34	4.18	0.01	0.24	0.24
Total Project Emissions:	**17.50**	**16.90**	**123.00**	**0.26**	**22.70**	**6.07**
Less Existing Emissions:	*(2.22)*	*(2.25)*	*(19.80)*	*(0.03)*	*(2.70)*	*(0.71)*
NET Project Site Emissions:	**15.28**	**14.65**	**103.20**	**0.23**	**20.00**	**5.36**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Potentially Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Wintertime (Non-Smog Season) Emissions						
Mobile Sources	11.60	10.20	97.50	0.24	22.50	5.82
Area Sources	2.74	0.00	0.00	0.00	0.00	0.00
Energy Sources	<0.005	0.07	0.06	<0.005	0.01	0.01
Stationary Sources	1.64	7.34	4.18	0.01	0.24	0.24
Total Project Emissions:	**16.0**	**17.60**	**102.00**	**0.24**	**22.70**	**6.07**
Less Existing Emissions:	*(2.11)*	*(2.45)*	*(17.70)*	*(0.03)*	*(2.70)*	*(0.71)*
NET Project Site Emissions:	**13.89**	**15.15**	**84.30**	**0.21**	**20.00**	**5.36**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Potentially Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod 2022.1.1.21, Calculation worksheets are provided in Attachment 5.

Greenhouse Gas Emissions

The guidance from the State and City on Class 32 Categorical Exemptions does not require the preparation of GHG analyses for projects eligible for exemptions. Specifically, Article 19 of the State's CEQA Guidelines states that eligible projects that qualify for categorical exemptions are deemed to not have a significant effect on the environment. Under Section 15332, the Class 32 exemption that governs in-fill development projects identifies the conditions under which a project can qualify, noting that "[a]pproval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality…" There are no requirements to making findings about a project's effects on GHG. Further, the City issued guidance in 2018 (CP-7828) that clarifies the special requirement criteria for projects that seek to use the Class 32 exemption. In this guidance, they clarify that projects that qualify must provide supporting documents to demonstrate eligibility for the Class 32 exemption, including an air quality study. However, the "[p]urpose of this assessment is to evaluate the regional significance of criteria pollutant emissions from both the construction and operation of a proposed project." An assessment of criteria pollutant emissions has been prepared, as described immediately above. As there is no requirement for preparation of GHG analyses to validate the Class 32 exemption, the following is provided for informational purposes only.

Neither the City of Los Angeles, SCAQMD, nor the State CEQA Guidelines Amendments provide any adopted thresholds of significance for addressing a residential or commercial project's GHG emissions. In October 2008, SCAQMD staff proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 metric tons of CO_2e per year (draft Tier 3 threshold). That draft screening threshold has not been adopted by SCAQMD or the City. Nonetheless, Section 15064.4 of the CEQA Guidelines Amendments serves to assist lead agencies in determining the significance of the impacts of GHGs. Because the City of Los Angeles does not have an adopted quantitative threshold of significance for a mixed-use multi-family residential and commercial project's generation of greenhouse gas emissions, the following analysis is based on the Proposed Project's consistency with applicable plans, policies and building code regulations that have been adopted for the purpose of reducing GHG emissions.

As required in Section 15064.4 of the CEQA Guidelines, this analysis includes an impact determination based on the following: (1) the extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting; (2) whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. The Guidelines do not mandate the use of absolute numerical thresholds to measure the significance of greenhouse gas emissions. As such, this analysis relies on the extent to which the Proposed Project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

Construction

Greenhouse gas (GHG) emissions were calculated using CalEEMod (*Version 2022.1.1.21*). Construction of the Proposed Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. Emissions of GHGs were calculated for each year of construction of the Proposed Project and the results of this analysis are presented in Table 2.8, Proposed Project Construction-Related Greenhouse Gas Emissions. As shown in Table 2.8, the total GHG emissions from construction activities related to the Proposed Project would be approximately 951 metric tons with the greatest annual emissions occurring in 2024. Total Construction Greenhouse Gas Emissions are amortized over the 30 year life of the Project and added to the total operational impacts.

Table 2.8
Proposed Project Construction-Related Greenhouse Gas Emissions

Year	CO_2e Emissions (Metric Tons per Year) [a]
2024	523
2025	428
Total Construction GHG Emissions:	**951**

Note:
[a] *Construction CO_2 values were derived using CalEEMod Version 2022.1.1.21. Calculation data and results are provided in Attachment 5, Air Quality Modeling and Greenhouse Gas Emissions Worksheets.*

Operation

Baseline GHG Emissions

The existing Project Site is currently developed with two commercial structures (totaling approximately 8,300 square feet) and paved surface parking that serve as the existing conditions baseline. The operation of the commercial uses general GHG emissions as a result of vehicle trips and building operations involving the use of electricity, natural gas, water, and generation of solid waste and wastewater. The average daily GHG emissions generated by the existing Project Site have been estimated utilizing the CalEEMod computer model recommended by the SCAQMD. Table 2.9, Existing Project Site Greenhouse Gas Emissions, presents the GHG emissions associated with operation of the existing car wash and restaurant on the Project Site. As shown in Table 2.9, the existing operations on the Project Site generate approximately 669 CO_2eMTY.

Table 2.9
Existing Project Site Greenhouse Gas Emissions

Emissions Source	CO_2e Emissions (Metric Tons per Year)
Mobile	336
Area	0.17
Energy	44.0
Water	2.96
Waste	10.6
Refrigerants	275
Total	**669**
Greenhouse gas emissions were estimated using CalEEMod Version 2022.1.1.21. Calculation data and results provided in Attachment 5 to this Categorical Exemption.	

Project GHG Emissions

The GHG emissions resulting from operation of the Proposed Project, which involves the usage of on-road mobile vehicles, electricity, natural gas, water, landscape equipment and generation of solid waste and wastewater, was calculated with the implementation of the *L.A. Green Building Code* and other project design features that would be effective in reducing GHG emissions, such as the Project Site being an infill lot, its proximity to transit and walking distance to a major employment center. As shown in Table 2.10, below, the net increase in GHG emissions generated by the Proposed Project would result in a net increase of approximately 2,689 CO_2e MTY, which is well below the draft 3,000 $MTCO_2e$ per year threshold of significance considered by the SCAQMD, but not adopted by the City. The Proposed Project's structural and operational features such as low-flow plumbing fixtures and implementing an operational recycling program during the life of the Proposed Project would reduce the Project's GHG emissions. The Proposed Project would comply with the various regulations, plans, and policies that have been adopted with the intent of reducing GHG emissions in furtherance of the State's GHG reduction targets under SB 32.

Plan Consistency

Through required implementation of the Green Building Code, the Project Site's location on an infill site, the Proposed Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including SB 32, SB 375, *L.A. Green Building Code*, and CARB's 2022 Scoping Plan.

Table 2.10
Proposed Project Operational Greenhouse Gas Emissions

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)
Mobile	2,173
Area	4.35
Energy	407
Water	21.60
Waste	20.30
Refrigerants	695
Stationary	4.58
Construction Emissions [a]	31.70
Proposed Project Total:	**3,358**
Less Existing Emissions:	*(669)*
Net Total GHG Emissions:	**2,689**

Notes:
[a] *The total construction GHG emissions were amortized over 30 years and added to the operation of the Project.*
Calculation data and results provided in Attachment 5 to this Categorical Exemption.

Consistency with L.A. Green Building Code

The L.A. Green Building Code contains both mandatory and voluntary green building measures for the reduction of GHG emissions through energy conservation. In accordance with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC), the Project shall comply with all applicable mandatory provisions of the Los Angeles Green Code and as it may be subsequently amended or modified, including:

Energy Conservation. The Proposed Project would include the development of a multi-family residential building with 139 dwelling units and 50,000 gross square feet or more of floor area. As mandated by the L.A. Green Building Code, the Proposed Project must meet Title 24 2022 Standards and include ENERGY-STAR appliances, where applicable. Furthermore, pursuant to Ordinance No 187,714, Chapter IX of the LAMC would require all new buildings to be all-electric buildings, effective January 23, 2023. All-electric includes electricity as the sole source of energy for all lighting, appliances and/or equipment, including, but not limited to, space heating, water heating, cooking appliances, and drying appliances.

Solid Waste Reduction Efforts. L.A. Green Building Code Section 5.408.1 and LAMC Section 66.32 require the construction contractor to obtain an AB 939 Compliance Permit certifying the delivery of the construction and demolition waste to a certified construction and demolition waste processing facility. Diversion efforts would be accomplished through source reduction, recycling, and composting. Finally, the Proposed Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials. As such, a 50 percent reduction

of the Proposed Project's waste stream to the local landfill would reduce methane emissions and thus lower the Proposed Project's contribution to global GHG emissions.

Water Conservation. As mandated by the L.A. Green Building Code, the Proposed Project would be required to provide separate submeters for individual leased, rented or other tenant spaces projected to consume more than 100 gallons per day and any building or addition that is projected to consume more than 1,000 gallons per day. Plumbing fixtures would need to comply with one of the following: (1) a 20% reduction in the building's "water use baseline" as demonstrated in Table 5.303.2.2 of the Los Angeles Plumbing Code; or (2) comply with the maximum flow rates shown in Table 5.303.2.3 of the Plumbing Code. The Proposed Project would also be required to develop a water budget for landscape irrigation use and install automatic irrigation systems with weather or soil moisture-based controllers.

Electric Vehicle Supply Equipment. The Proposed Project would support zero emission vehicles with the promotion of electric vehicle supply equipment (EVSE) on-site. Pursuant to the *L.A. Green Building Code*, a minimum of 30 percent of the total code required residential and non-residential parking is required to be capable of supporting future EVSE; and a minimum of 10 percent for of the total code required residential and non-residential parking is required to be electric vehicle charging stations (EVCS), which can be counted towards the total number of EVSE spaces. The provision of EV infrastructure would further serve to promote the utilization of alternative fueled vehicles thus, reducing the combustion of fossil fuels. Based on these factors, the Proposed Project's vehicle trips would decrease overall per capita energy consumption, decrease reliance on fossil fuels, and would serve to promote reliance on renewable energy sources..

Consistency with SB 375

California SB 375 requires integration of planning processes for transportation, land-use and housing. Under the bill, each Metropolitan Planning Organization would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet the target provided in the Scoping Plan, created by CARB, for reducing GHG emissions. SB 375 requires SCAG to direct the development of the SCS for the region. A discussion of the Proposed Project's consistency with the SCS is provided further below.

Consistency with 2022 Scoping Plan

Jurisdictions that want to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP should also look to the three priority areas (transportation electrification, VMT reduction, and building decarbonization). To assist local jurisdictions, the 2022 Scoping Plan Update presents a non-exhaustive list of impactful GHG reduction strategies that can be implemented by local governments within the three priority areas (Priority GHG Reduction Strategies for Local Government Climate Action Priority Areas). A detailed assessment of goals, plans, and policies implemented by the City which would support the GHG reduction strategies in the three priority areas is provided below. In addition, further details are provided regarding the

correlation between these reduction strategies and applicable actions included in Table 2-1 (page 72) of the Scoping Plan (Actions for the Scoping Plan Scenario).

Transportation Electrification. The City's goals of converting the municipal fleet to zero emissions and installation of EV chargers throughout the City would be consistent with the Scoping Plan goals of transitioning to EVs. Pursuant to City's Green Building Code, a minimum of 30 percent of the Proposed Project's total code required parking is required to be capable of supporting future EVSE. Ten (10) percent of the required commercial parking spaces and 10 percent of the required residential parking spaces is required to be low power electric vehicle charging stations (EVCS), which can be counted towards the total number of EVSE spaces. The provision of EV infrastructure would further serve to promote the utilization of alternative fueled vehicles thus, reducing the combustion of fossil fuels. Therefore, the Proposed Project would not conflict with these goals by installing EV chargers in at least 10 percent of total proposed parking spaces. Installation of additional EV chargers would encourage adoption of EVs. The Proposed Project would comply with the LAMC by installing EV chargers in at least 10 percent of total proposed parking spaces which would exceed the CALGreen 2022 requirement.

VMT Reduction. The City of Los Angeles Mobility Plan 2035 which is the Transportation Element of the City's General Plan contains measures and programs related to VMT reduction throughout the City. With regard to parking standards, the implementation of Mobility Plan Programs and AB 2097 reduce or eliminate parking requirements for certain types of developments near transit (within half a mile). The Proposed Project would not be required to provide residential parking requirements but would provide 145 vehicle parking spaces. Therefore, the Proposed Project would provide a reduced number of parking and would serve to reduce vehicle trips. Additionally, the Proposed Project represents an infill development within an existing urbanized area that would concentrate new development consistent with the overall growth pattern encouraged in the RTP/SCS. The Proposed Project's close proximity to neighborhood-serving commercial/retail land uses and regional transit would result in fewer trips and a reduction to the Proposed Project's VMTs as compared to the base trip rates for similar stand-alone residential and commercial uses that are not located in close proximity to transit. The Proposed Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. Therefore, the location of the Project Site encourages a variety of transportation options. Thus, these Proposed Project characteristics would result in a reduction in VMT, which would overall reduce GHG emissions.

Building Decarbonization. The City has updated the LAMC with requirements for all new buildings, with some exceptions, to be all-electric, which will reduce GHG emissions related to natural gas combustion. Space heating, water heating and cooking for non-restaurant uses would be required to be powered by electricity. In future years, the LADWP will be required to increase the amount of renewable energy in the power mix to comply with SB 100 requirements. The Proposed Project would be required to comply with the City's LAMC that requires all new buildings to be all-electric buildings and would not

include natural gas uses in the residential and retail uses. The combination of the all-electric LAMC regulations and increasing availability of renewable energy will serve to reduce GHG emissions from sources traditionally powered by natural gas.

The Proposed Project would be designed and constructed to meet *L.A. Green Building Code* standards by including several measures designed to reduce energy consumption, including, but not limited to, installing efficient lighting fixtures, low-flow plumbing fixtures, and ENERGY STAR-rated appliances. These measures would further promote a reduction in GHG emissions, which would be consistent with the goals of 2022 Scoping Plan.

Consistency with Connect SoCal (2020 RTP/SCS)

The Proposed Project is consistent with the following key GHG reduction strategies in SCAG's Connect SoCal (2020 RTP/SCS), which are based on changing the region's land use and travel patterns: focusing growth near destinations and mobility options; promoting diverse housing choices; leveraging technology innovations; supporting implementation of sustainability policies; and promoting a green region.

Based on a walkability assessment of the project area by WalkScore.com, the Project Site is rated with a score of 97 of 100 possible points and defined as "walker's paradise– daily errands do not require a car." In addition, the Proposed Project will provide bicycle storage areas for its future residents and guests. Walkscore.com also allocates a transit score of 72 to the Project Site, described as "excellent transit – transit is convenient for most trips" and a bike score of 59 to the Project Site, described as "some bike infrastructure."

The Proposed Project represents an infill development within an existing urbanized area that would concentrate new residential and commercial uses within a High Quality Transit Area (HQTA). The Proposed Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking, which would facilitate a reduction in vehicle miles traveled and related vehicular GHG emissions. These and other measures would further promote a reduction in vehicle miles traveled and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's Connect SoCal Plan.

As demonstrated above, the Proposed Project's characteristics and design features, coupled with compliance with mandatory regulatory measures would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including CARB's 2022 Scoping Plan, SB 32, SB 375, SCAG's RTP/SCS, and *L.A. Green Building Code*. Therefore, the Proposed Project's generation of GHG emissions would not conflict with any applicable plan, policy, or regulation for the purposes of reducing the emissions of greenhouse gases.

Water Quality

Groundwater

Based on the Department of Toxic Substances Control EnviroStor Database, the Project Site is not listed for cleanup, permitting, or investigation of any hazardous waste contamination.

Therefore, the Proposed Project would not exacerbate any hazardous conditions on the Project Site during construction that could affect groundwater conditions. Moreover, any hazardous materials utilized during construction would be used, stored, and disposed of in accordance with all applicable regulatory requirements, and would therefore not pose any potential impacts to groundwater or surface water quality. The Proposed Project, once operational, would not use hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes that are typically associated with the operation of the Proposed Project and the use of these substances would comply with State Health Codes and Regulations. As such, the Proposed Project does not include potential sources of contaminants that could potentially degrade water quality during operation. As such, the Proposed Project would not exacerbate any hazardous conditions on the Project Site that could affect groundwater conditions.

Additionally, A Phase I Environmental Site Assessment (Phase I ESA) was completed for the Project Site by Western Environmental Engineers Co., dated December 5, 2014 (*See Attachment 7 to this Categorical Exemption*). The purpose of the Phase I ESA was to address on-site impacts of chemical use, storage and management, and any potential liabilities due to past and/or current practices associated with the use, storage, treatment, and/or disposal of hazardous waste on the Project Site. The Phase I ESA concluded that no evidence of any recognized environmental conditions (RECs) or potential environmental conditions (PECs) in connection with the Project Site exist. The Phase I ESA determined that no further investigation at the Project Site is warranted. Therefore, the Phase I ESA further supports that the Project Site is not hazardous and would not impact future residents of the Proposed Project. As such, the Proposed Project would not exacerbate any hazardous conditions on the Project Site that could affect groundwater conditions.

Stormwater

The Project Site is currently developed two commercial structures, including a car wash, restaurant, and associated surface parking. Nearly 100 percent of the Project Site is covered with impervious surfaces, with the exception of some ornamental landscaping fronting N. Vermont Avenue and Hollywood Boulevard. Thus, approximately 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath both sites. With respect to water quality from stormwater, surface runoff leaving the Project Site is largely directed towards N. Vermont Avenue and Prospect Avenue, which contain storm drain inlets. Stormwater along N. Vermont Avenue flows southbound and into a storm drain inlet approximately 25 feet west of the Project Site. Stormwater along Prospect Avenue flows westbound into a storm drain inlet approximately 10 feet north of the Project Site. The Proposed Project would continue to generate surface water runoff similar to existing conditions, and stormwater would be directed towards existing stormwater infrastructure that currently serve the Project Site (*See Attachment 1, Figure 1, Stormwater Information Map*).

A Storm Water Pollution Prevention Plan (SWPPP) is required by the Construction General Permit to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. The SWPPP would identify Best Management Practices (BMPs)

for erosion control and other measures to meet the NPDES requirements for stormwater quality. Implementation of the BMPs identified in the SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the Proposed Project would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality during construction.

Additionally, the Proposed Project would be required to demonstrate compliance with Low Impact Development (LID) Ordinance standards and retain and treat the first ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. To ensure that all stormwater related BMPs are constructed and / or installed in accordance with the approved LID Plan, the City of Los Angeles requires a Stormwater Observation Report to be submitted to the City prior to the issuance of the Certificate of Occupancy. Compliance with the LID Ordinance would ensure that the Proposed Project would not adversely affect water quality or significantly contribute to site runoff during the operation of the Proposed Project. Therefore, the Proposed Project would result in less than significant impacts to the existing stormwater infrastructure serving the Project Site.

e) The Project Site can be adequately served by all required utilities and public services.

Water

The Project Site is located within the service area of the Los Angeles Department of Water and Power (LADWP) for potable water service. The LADWP's 2020 Urban Water Management Plan ("UWMP") projects the City of Los Angeles will have a reliable water supply of approximately 509,501 acre-feet per year ("AFY") and 565,751 AFY in 2025 and 2045, respectively, based on growth projections of the 2020-2045 RTP/SCS. Thus, projects that are consistent with the underlying zoning and allowable density requirements of the LAMC and General Plan, are inherently consistent with the future water demands established in the 2020 UWMP. The Proposed Project would be consistent with the underlying land use and zoning regulations of the Project Site. Based on the sewer generation factors provided by the Bureau of Sanitation and assuming all water usage converts to wastewater, it is estimated that the Proposed Project's net increase in water demand would be approximately 11,166 gallons per day, or approximately 12.5 AFY, as shown in Table 2.11, below. Articles 4 and 9 of Chapter IX of the LAMC establish citywide water efficiency standards and require water-saving systems and technologies in buildings and landscapes to conserve and reduce water usage. Plumbing fixtures would need to comply with one of the following: (1) a 20% reduction in the building's "water use baseline" as demonstrated in Table 5.303.2.2 of the Los Angeles Plumbing Code; or (2) comply with the maximum flow rates shown in Table 5.303.2.3 of the Plumbing Code. The Proposed Project would also be required to develop a water budget for landscape irrigation use and install automatic irrigation systems with weather or soil moisture-based controllers. Compliance with the L.A. Green Building Code would further reduce the Proposed Project's operational water demands. Because the Proposed Project is consistent with the zoning and General Plan land use designations, and the Proposed Project's employment growth would be within SCAG's growth forecast, the Proposed Project's increased water demand has already been accounted for in the 2020 UWMP, and impacts upon water demand would be less than significant.

Table 2.11
Proposed Project Estimated Water Demand

Type of Use	Size	Water Demand Rate (gpd/unit) [a]	Total Water Demand (gpd)
Existing Conditions (To Be Removed)			
Car Wash	8,000 sf	3,000 gallons total [b]	3,000
Restaurant	13 seats [c]	25 gpd/seat	325
		Total Existing Water Demand:	**3,325**
Proposed Project			
Residential			
Studio Unit	59 du	75 gpd/du	4,425
One-Bedroom Unit	61 du	110 gpd/du	6,710
Two-Bedroom Unit	19 du	150 gpd/du	2,850
Commercial			
Grocery Store	20,240 sf	0.025 gpd/du	506
		Total Proposed Project Water Demand:	**14,491**
		Less Existing Water Demand:	-3,325
		NET Project Site Water Demand:	**11,166**

Notes: du= dwelling units; sf=square feet; gpd= gallons per day
[a] *Consumption Rates based on City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer Generation Factor for Residential and Commercial Categories table, effective April 6, 2012. It is assumed that all water usage would convert to wastewater.*
[b] *Car Wash land use assumes 50 vehicles per day and 60 gallons of water per vehicle.*
[c] *Restaurant seats were estimated based on 15 sf per seat for the dining area, which is assumed to occupy 2/3 of the restaurant space. The remaining 1/3 of restaurant space is assumed to be occupied by kitchen and BOH space.*
Source: Parker Environmental Consultants, 2023.

Sewer

The Project Site is served by existing 9-inch sewer pipes located along the west side of N. Vermont Avenue, along the northeast side of Hollywood Boulevard, and along the north side of Prospect Avenue. (*Refer to Attachment 1, Figure 2, Sewer Information Map*). Wastewater from the Proposed Project would be treated by the Hyperion Water Reclamation Plant (HWRP), which treats an average daily flow of 275 million gallons per day (mgd) on an average dry weather day and with a maximum daily flow of 450 mgd. This equals a remaining capacity of 175 mgd of wastewater able to be treated at the HWRP. Based on standard sewer flow rates published by the Bureau of Sanitation, the Proposed Project's sewer generation is expected to be 11,166 gallons per day. Pursuant to City policy, the Bureau of Sanitation will check the gauging of the sewer lines and make the appropriate decisions on how best to connect to the local sewer lines at the time of construction. The Applicants would be required to submit a Sewer Capacity Availability Request (SCAR) to verify the anticipated sewer flows and points of connection and to assess the condition and capacity of the sewer lines receiving additional sewer flows from the Proposed Project. If the public sewer has insufficient capacity to accommodate the Proposed Project's wastewater flows, the Applicants would be required to build sewer lines to a point in the

sewer system with sufficient capacity. A final approval for sewer capacity and connect permit would be made at the time. The installation of a secondary line, if needed, would require minimal trenching and pipeline installation, and would not result in any adverse environmental impacts. Ultimately, the sewage flow would be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the Proposed Project. As the Proposed Project would make all necessary improvements and would have a negligible impact on the existing sewer capacity, the Proposed Project's impacts upon the City's sewer system would be less than significant.

Solid Waste

In 2017, the City of Los Angeles entered into exclusive franchise agreements with waste haulers to provide solid waste, commingled recyclables, and organics collection, transfer, disposal and processing services to commercial and multifamily establishments in the City. The companies that were awarded the contract for each franchise secured a dedicated waste stream, increasing the financial viability to develop new organic waste processing and on version technology facilities in the vicinity of the City of Los Angeles. The Project Site is located within the North East Commercial Waste Franchise Zone, which is serviced under contract to Universal Waste Systems, Inc. Under the existing contract, the service provider is required to deliver solid waste resources collected to the following certified facilities: the Central Los Angeles Recycling and Transfer Station (CLARTS), located at 2201 East Washington Boulevard; Chiquita Canyon Landfill, located at 29201 Henry Mayo Drive; and 24th Street Transfer Station, located at 2460 East 24th Street. All solid waste is disposed into these two recycling and transfer facilities. Then all trash and non-recyclables materials are transferred to a landfill that accepts non-recyclable waste. Currently, the Chiquita Canyon Landfill has closed. Therefore, it is assumed that the Proposed Project's solid waste would be disposed of at the Sunshine Canyon Landfill. The Sunshine Canyon Landfill has a remaining capacity of 54.1 million tons and has an estimated remaining life of 17 years. The Proposed Project is anticipated to generate approximately 1,091 cubic yards of asphalt debris before source reduction and recycling efforts. The Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. Under the requirements of the hauler's AB 939 Compliance Permit from the Bureau of Sanitation, all construction and demolition debris would be delivered to a Certified Construction and Demolition Waste Processing Facility.

As shown in Table 2.12 below, operation of the Proposed Project is expected to generate approximately 2,448 pounds per day or approximately 447 tons per year. The Proposed 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. The amount of solid waste generated by the Proposed Project is estimated to be well within the available capacities of area landfills.

Table 2.12
Proposed Project Estimated Operational Solid Waste Generation

Type of Use	Size	Solid Waste Generation Rate [a] (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
Existing Uses (to be removed)			
Car Wash (8,000 sf)	8 emp	10.53 lbs/emp/day	84
Restaurant (300 sf)	2 emp	10.53 lbs/emp/day	21
		Total Existing Solid Waste Generation:	**105**
Proposed Project			
Multi-Family Residential	139 du	12.23 lbs/du/day	1,700
Market (20,240 sf)	81 emp	10.53 lbs/emp/day	853
		Total Project Solid Waste Generation:	**2,553**
		Less Existing Solid Waste Generation:	*(105)*
		NET TOTAL Solid Waste Generation:	**2,448**

Notes: sf = square feet; lbs = pounds; du = dwelling unit; emp = employee
[a] *L.A. CEQA Thresholds Guide, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*
[b] *Employees were calculated utilizing a generation factor of 4 employees / 1,000 sf of market space, 1 employee / 1,000 sf of auto space, and 6.7 employees / 1,000 sf of high-turnover restaurant space, as shown in the Los Angeles Department of Transportation VMT Calculator Documentation, Version 1.3, May 2020.*
Source: Parker Environmental Consultants, 2023.

Fire Services

The factors that the Los Angeles Fire Department (LAFD) considers in determining whether fire protection services for a project are adequate include whether the Project: (1) is within the maximum response distance for the land uses proposed; (2) complies with emergency access requirements; (3) complies with fire-flow requirements; and (4) complies with fire hydrant placement. Pursuant to LAMC Section 57.09.07, the maximum response distance between a residential or neighborhood commercial land use and a LAFD station that houses an engine or truck company is 1.5 miles. If this distance is exceeded, all structures shall be constructed with automatic fire sprinkler systems.

The Los Angeles Fire Department Station No. 35, located at 1601 N. Hillhurst Avenue, currently serves the Project Site. This fire station is located approximately 0.4 mile (driving distance) southeast of the Project Site. The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. Based on the response distance criteria specified in LAMC 57.507.3.3 and the relatively short distance from Fire Station No. 35 to the Project Site, fire protection response would be considered adequate. Pursuant to LAMC Section 57.507.3.1, the required fire flow for a high-density residential development, such as the Proposed Project, is 4,000 gpm from four adjacent fire hydrants flowing simultaneously. The Proposed Project would be required to maintain appropriate fire flow and access pursuant to the Los Angeles Fire Code. LAMC Section 57.507.3.2 addresses land use-based requirements for fire hydrant spacing and type. Additionally, every first story of a residential, commercial, and industrial building must be within

300 feet of an approved hydrant. There is an existing fire hydrant approximately 200 feet east of the Project Site along Prospect Avenue. The number and location of hydrants would be determined as part of LAFD's fire/life safety plan review for the Proposed Project. As such, the required fire flow and hydrant placement for the Proposed Project would be confirmed in consultation with the LAFD during the plan check approval process.

Local access to the Project Site is provided via N. Vermont Avenue, Hollywood Boulevard, and Prospect Avenue. Vehicle access to the Project Site would be provided from one full access driveway off of the south side of Prospect Avenue. The proposed driveway would be designed according to LADOT standards to ensure adequate access, including emergency access, to the Project Site. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the Proposed Project. The Proposed Project would not involve activities during its operational phase that could impede public access or travel upon public right-of-way or would interfere with an adopted emergency response or evacuation plan. Therefore, development of the Proposed Project is not expected to significantly impact fire protection services in the Project area.

Police Services

The Project Site is located in the Northeast Division of the Los Angeles Police Department's Central Bureau. The Northeast Community Police Station, located at 3353 San Fernando Road, serves the Northeast Community and the Project Site. This police station is located approximately 3.6 miles (driving distance) northeast of the Project Site. The Project Site is located within Reporting District 1152.

Operation of the Proposed Project would result in an increase of residents, guests, and employees at the Project Site, thereby generating a potential increase in the number of service calls from the Project Site. Responses to thefts, vehicle burglaries, vehicle damage, and traffic-related incidents would be anticipated to escalate as a result of the increased on-site activity and increased traffic on adjacent streets. The plans for the Proposed Project would incorporate adequate crime prevention design features that would provide security design measures for semi-public and private spaces, which may include, but not be limited to, surveillance cameras, access control to the building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public spaces designed with a minimum of dead space to eliminate areas of concealment, and location of building entrances in high-foot traffic areas. The Proposed Project would be subject to Site Plan Review and would be reviewed by the LAPD for compliance with the recommended site design guidelines to improve public safety. Thus, implementation of the Proposed Project would not significantly impact police protection services in the Project area.

Los Angeles Unified School District

The Project Site is located within the service area of the Los Angeles Unified School District (LAUSD). The Project Site is currently served by one elementary school, one middle school, and one high school. The following schools serve the Project Site:

1) Los Feliz Science/Tech/Engineer/Math/Medicine Magnet School, located at 1740 N. New Hampshire Avenue, approximately 0.2 mile northwest of the Project Site;

2) Thomas Starr King Middle School, located at 4201 Fountain Avenue, approximately 0.7 mile southeast of the Project Site; and

3) John Marshall Senior High School, located at 3939 Tracy Street, approximately 1.2 miles northeast of the Project Site.

Based on LAUSD employment generation rates for residential developments, the Proposed Project would generate approximately 27 elementary students, 7 middle school students, 15 high school students, and 2 special day class student for a total of approximately 52 students.[11] Based on LAUSD employment generation rates for commercial developments, the Proposed Project would generate 14 new students.[12] Collectively, the Proposed Project's residential and commercial components would generate approximately 66 new students. The Project Applicant would be required to pay all applicable developer fees to the LAUSD to offset the Proposed Project's demands upon local schools. Prior to issuance of a building permit, the General Manager of the City of Los Angeles, Department of Building and Safety, or designee, shall ensure that the Applicant has paid all applicable school facility development fees in accordance with California Government Code Section 65995. Pursuant to Government Code Section 65995, payment of development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation." With the payment of a School Development Fee, the Proposed Project's potential impact upon public school services would be less than significant.

Parks

The Proposed Project would result in a net increase of 139 multi-family dwelling units, 327 residents, and 81 employees, which would have the potential to increase demands upon public park facilities. The Project Site is served by parks and recreation facilities, which are owned and maintained by the City of Los Angeles Recreation and Parks Department. Parks and recreation facilities within a two-mile radius of the Project Site include: Barnsdall Art Park, La Mirada Park, Lemon Grove Recreation Center, Bellevue Recreation Center, Griffith Park, Vermont Canyon Tennis Court, Seily Rodriguez Park, Madison West Park, Silver Lake Recreation Center and Dog Park, Carlton Way Park, Riverside Tennis Court, Bond Area, and Cedar Gove Park. In addition, the Proposed Project would provide a total of 7,170 square feet of common open space that would be available exclusively to serve Project residents and their guests, in addition to a total of 3,900 square feet of private open space balconies, which would reduce the Project's demand upon public parks and recreational facilities. The Proposed Project's demand for open space would be

[11] *Student Generation Rates Are As Follows For Multi-Family Residential Uses: 0.1953 Elementary, 0.0538 Middle And 0.1071 High School Students, And 0.0148 SDC (Special Day Class) Students Per Unit. Source: Los Angeles Unified School District, 2022 Developer Fee Justification Study, Table 15, March 2022.*

[12] *Estimated Student Generation Based On 0.1724 Students Are Generated Per Commercial Employee (Source: Los Angeles Unified School District, 2022 Developer Fee Justification Study, Table 15, March 2022). Estimated New Employees Based On Four Employees Per 1,000 Square Feet Of Market Space Per Employee (Source: LADOT, City Of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020).*

met through a combination of (1) on-site open space proposed within the Project Site, (2) payment of applicable taxes in accordance with LAMC Section 21.10.3(a)(1), and (3) the availability of existing park and recreation facilities within the area. The Proposed Project would pay all required park and recreation fees, as required by the LAMC. Development of the Proposed Project is therefore not expected to significantly impact park and recreation facilities in the Project area.

Libraries

The LAPL branches currently serving the Project Site include:

1) Los Feliz Branch Library, located at 1874 Hillhurst Avenue, approximately 0.5 miles northeast of the Project Site; and

2) Cahuenga Branch Library, located at 4591 Santa Monica Boulevard, approximately 0.9 miles south of the Project Site.

Existing library services are expected to adequately serve the needs of future occupants of the Proposed Project. The LAPL Branch Facilities Plan (the "Plan"), adopted in 1988, sets standards for site selection of libraries and identified a list of projects in which existing branch libraries are to be renovated or new facilities constructed in order to bring library resources to the residents of the City in accordance with the standards in the Plan. The goals of the Plan were implemented with money received by two bond programs: Phase I of the Plan was implemented with funds from the 1989 Bond Program and Phase II by the 1998 Bond Program. Under the two bond programs, 64 library facilities have been renovated or built. As of October 2008, all of the projects identified under the Plan have been completed. At present, the Plan is going through a process of revision in which the list of projects for the LAPL through the year 2030 will be updated. There are no planned improvements to add capacity through expansion or development of new libraries in the Project area. However, the Proposed Project would generate revenues for the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could be applied toward the provision of library facilities, staffing, and materials, as deemed appropriate. The Proposed Project's contribution to the General Fund would help offset the Project-related increase in demand for library services. Further, the Proposed Project would not conflict with or impede implementation of the applicable policies and goals related to libraries in the General Plan Framework or Hollywood Community Plan. Moreover, the Proposed Project would not be anticipated to result in a substantial increase in demand that would necessitate new or physically altered facilities, the construction of which could cause environmental impacts. Therefore, the Proposed Project's impacts upon library services would be considered less than significant.

3.0 Exceptions to the Categorical Exemptions

In addition to the above qualifying criteria, there are exceptions to the exemptions depending on the nature or location of a project, or unusual circumstances that create the reasonable possibility of significant effects. As provided in CEQA Section 15300.2, for a proposed project to qualify for an exemption to CEQA, the project must be able to demonstrate that it does not fall under the following exceptions:

a) **Location.** Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located - a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

b) **Cumulative Impact.** All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

c) **Significant Effect.** A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

d) **Scenic Highways.** A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

e) **Hazardous Waste Sites.** A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

f) **Historical Resources.** A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

a) Location

The Proposed Project does not qualify for a Class 3, 4, 5, 6, or 11 Categorical Exemption. As discussed herein, the Proposed Project qualifies under the Class 32 Categorical Exemption – "In-fill Development Projects." Therefore, this exception does not apply to the Proposed Project.

b) Cumulative Impacts

Provided below are individual analyses of the cumulative impacts from traffic, noise, air quality, water quality, public services, and public utilities. In accordance with CEQA Guidelines Section 15300.2, this Categorical Exemption includes an evaluation of the Proposed Project's cumulative

impacts to rule out the exception of cumulative impacts under Section 15300.2(b). Section 15300.2(b), Cumulative Impact, states that: "All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant."

In determining the cumulative impacts, the guidance provided under CEQA Guidelines Section 15064(h) is as follows:

> *"(1) When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.*
>
> *(2) A lead agency may determine in an initial study that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through mitigation measures set forth in a mitigated negative declaration, the initial study shall briefly indicate and explain how the contribution has been rendered less than cumulatively considerable.*
>
> *(3) A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. When relying on a plan, regulation or program, the lead agency should explain how implementing the particular requirements in the plan, regulation or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project.*
>
> *(4) The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable."*

In light of the guidance summarized above, an adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1)

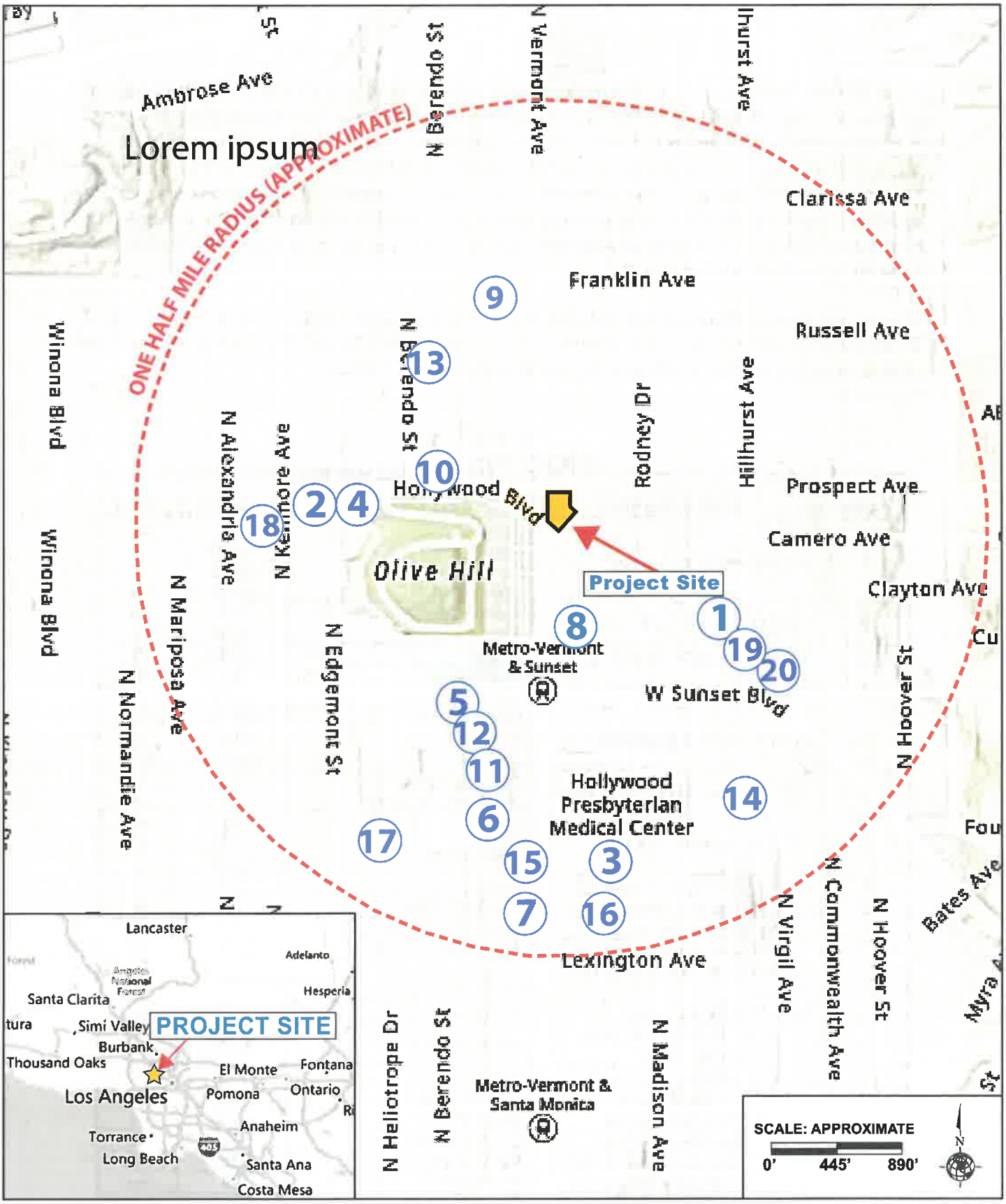
a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, statewide plan, or related planning document that describes conditions contributing to the cumulative effect. (CEQA Guidelines Section 15130(b)(1)(A)-(B)). The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. Accordingly, all proposed, recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment, when considered in conjunction with the Project, were identified for evaluation.

The related projects identified are included in Table 3.1, Related Projects List, below. A total of 20 related projects were identified within a 0.5-mile radius of the Project Site. The locations of the related projects are shown in Figure 24, Location of Related Projects.

Table 3.1
Related Projects List

Project Number	Location/Address	Project Description	Size	Units
1	1515 N. Hillhurst Avenue	Apartments Retail Restaurant Coffee/Donut	202 6,650 5,050 3,025	du sf sf sf
2	4900 W. Hollywood Boulevard	Apartments Retail	150 13,000	du sf
3	1300 N. Vermont Avenue	Office	30,933	sf
4	4850 W. Hollywood Boulevard	Apartments Commercial	96 9,500	du sf
5	4760 W. Sunset Boulevard	Medical Office Retail Parking	422,700 2,300 655,000	sf sf sf
6	1317 N. New Hampshire Avenue	Apartments Affordable Housing	81 11	du du
7	1225 N. Vermont Avenue	Office Medical Office	58 1,320 1,925	du sf sf
8	4649 W. Maubert Avenue	Apartments	153	du
9	4718 W. Franklin Avenue	Condominiums	6	du
10	4773 Hollywood Boulevard	Small Lot Homes	18	du
11	1335 N. New Hampshire Avenue	Apartments	31	du
12	1419-1423 N. New Hampshire Avenue	Apartments	62	du
13	1820 N. Berendo Street	Apartments	7	du
14	4470 W De Longpre Avenue; 1318 N. Lyman Place	Medical Office	95,995	sf
15	4708 W. Fountain Avenue	Coffee Shop	275	sf
16	4652 W. La Mirada Avenue	Single-Family	10	du
17	4845 W. Fountain Avenue	Restaurant	3,290	sf
18	1839 N. Kenmore Avenue	Single-Family	6	du
19	4531 W. Hollywood Boulevard	Restaurant	2,354	sf
20	4477 W. Hollywood Boulevard	Apartment	29	du

Notes: du = dwelling unit, sf = square feet
Source: Overland Traffic Consultants, Inc., December 2023, City of Los Angeles Department of City Planning, Bi-Weekly Entitlement Case Filings (as of September 9, 2023), accessed December 2023.



Source: Overland Traffic Consultants, Inc., City of Los Angeles Department of City Planning Bi-Weekly Entitlement Case Filings as of September 9, 2023.

Figure 24
Location of Related Projects

Cumulative Haul Route impacts

Cumulative impacts associated with hauling activities were assessed by identifying haul routes from other approved or pending projects that would have the potential to have overlapping haul routes utilizing the same roadways as the proposed haul route. As shown in Table 3.2, below, there are five haul routes associated with other projects that could potentially utilize the same roadways or roadway segments as the proposed haul route (see Table 3.2, Related Haul Routes List and Figure 25, Locations of Related Haul Routes). The proposed haul route would generate a maximum of 78 trips per day over a period of 66 days. Assuming that the hauling activities for the related haul routes occur over the same period, up to 34 additional haul trips could occur on affected roadway segments, for a total number of haul truck trips of 112 daily trips. Each haul route approval for the related haul routes would include regulatory compliance measures and recommended conditions prepared by LADOT and LADBS to reduce the impacts of construction-related hauling activity, monitor the traffic effects of hauling, and reduce haul trips in response to congestion. The cumulative impacts associated with the haul route is provided below.

Table 3.2
Related Haul Routes List

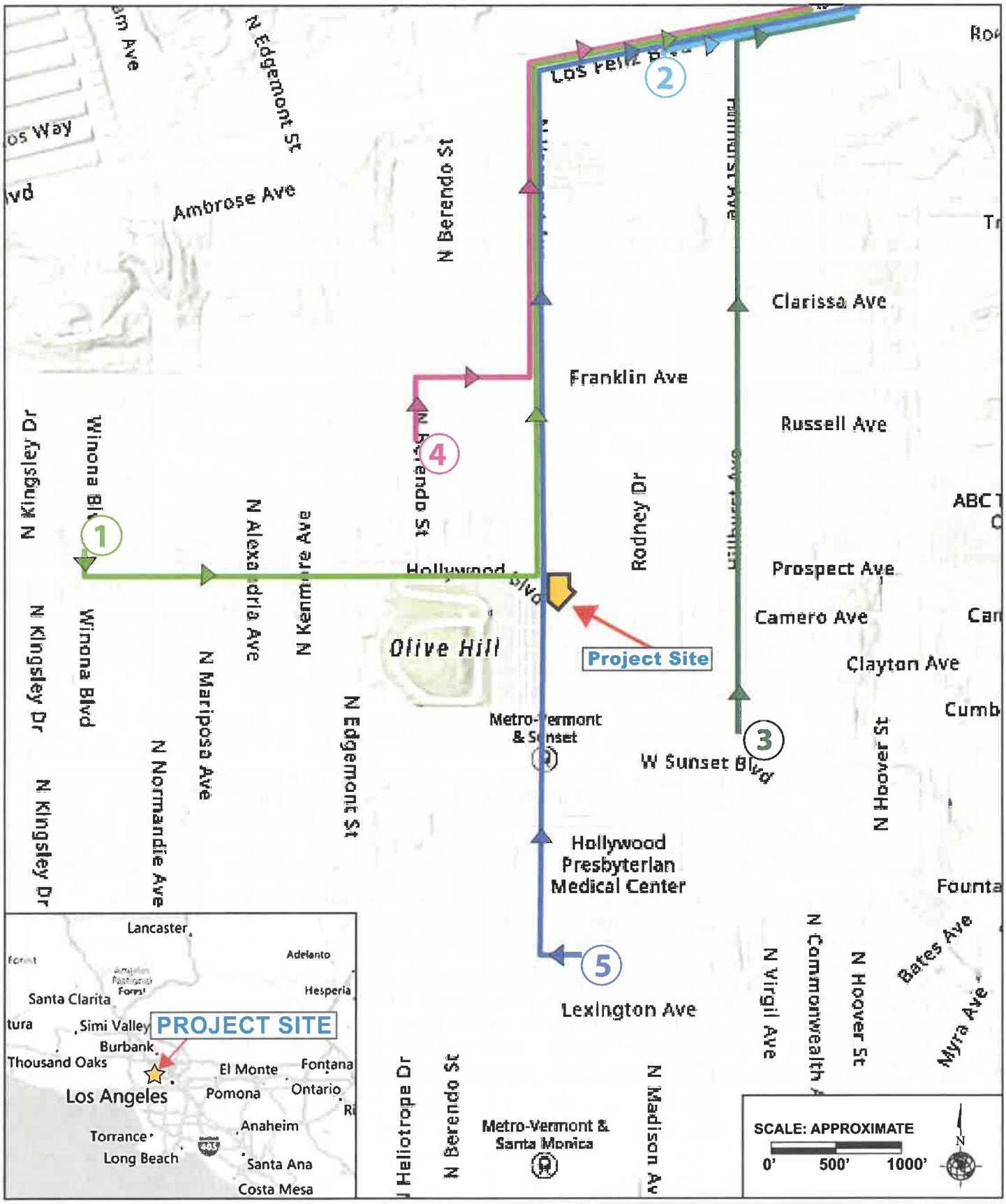
Haul Rte No.[a]	Haul Route Board File No.	Start Location	End Location	Total cubic yards of import/export	Intersecting Roadway with Proposed Haul Route	Estimated Haul Trucks per Day[b]
1	220029	1717 N. Winona Boulevard, 90047	7721 Scholl Canyon Access Road, 90041	2,305 cy	Vermont Avenue, Los Feliz Boulevard	8
2	230001	4544 W. Los Feliz Boulevard, 90027	7721 Scholl Canyon Access Road, 90041	10,252 cy	Los Feliz Boulevard	9
3	--	4477 W. Hollywood Boulevard	Pending	5,342 cy	Los Feliz Boulevard	10
4	--	1820 N. Berendo Street	Pending	250 cy	Vermont Avenue, Los Feliz Boulevard	4
5	--	4652 W. La Mirada Avenue	Pending	185 cy	Vermont Avenue	3

Notes:

[a] *Project Nos. 1 and 2 are located outside the 0.5 mile radius and are not identified in Table 3.1 above. These projects are included because portions of their haul routes intersect with the Proposed Project's haul route. Haul route 3 is associated with related project No. 20; haul route 4 is associated with related project No. 13; haul route 5 is associated with related project No. 16.*

[b] *The number of haul trucks per day was estimated by dividing the total cubic yards of soil import/export with a haul truck capacity of 14 cy and the number of hauling days as specified in the permit. For pending permits where the number of hauling days are unknown, an estimate was provided.*

Source: (1) City of Los Angeles, NavigateLA, website: https://navigatela.lacity.org/navigatela/, accessed February 2024; and (2) City of Los Angeles, ZIMAS, website: https://zimas.lacity.org/, accessed February 2024.



Source: City of Los Angeles, NagivateLA and ZIMAS, February 2024.

Figure 25
Location of Related Haul Routes

Cumulative Traffic Impacts

The City's TAG provides that long-term, or cumulative, effects will be determined through a consistency check with the SCAG RTP/SCS. The RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and GHG reduction targets. As such, projects and land use plans that are consistent with this plan in terms of development location, density, and intensity, are part of the regional solution for meeting air pollution and GHG reduction goals. Projects and land use plans that are deemed to be consistent would have a less than significant cumulative impact on VMT. The Proposed Project is consistent with the underlying zoning and General Plan Land Use Designations. Pursuant to the LAMC, the minimum lot area per dwelling unit is 400 square feet, which equals a base density of approximately 77 dwelling units for the Project Site. Since the Proposed Project would reserve 12 percent of the total dwelling units as affordable units: 16 dwelling units for residents at the "Extremely Low Income" level and one unit at the "Moderate Income" level, the Proposed Project is eligible for an 80 percent increase in base density for a total of 139 dwelling units. Therefore, the Proposed Project's 139 dwelling units would be consistent with the allowed density on the Project Site, pursuant to the LAMC and the TOC. Additionally. SCAG's RTP/SCS encourages land use and growth patterns that facilitate transit and active transportation. The Project Site is an infill site within a Transit Priority Area as defined by CEQA. There are multiple bus lines with multiple bus stops within walking distance from the Project Site. Additionally, the closest Metro Station to the Project Site is the Vermont / Sunset Station, located within 0.25 mile (walking distance) from the Project Site. Therefore, as the Proposed Project is consistent with the growth projections of the RTP/SCS and would result in a less than significant impact under the TAG's VMT per capita threshold, the Proposed Project's cumulative traffic impacts would be less than significant.

Cumulative Noise Impacts

Development of the Proposed Project in conjunction with the 20 related projects identified in the Transportation Impact Study, would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized area of the City of Los Angeles. The nearest related project, Related Project No. 8 located at 4649 W. Maubert Avenue, is located approximately 0.2 miles south of the Project Site. Therefore, the buildings surrounding the proposed construction site would therefore attenuate construction noise by up to 10 dBA. As such, based on the distance to the Project Site and the existing intervening buildings, concurrent construction noise from Related Project No. 8 and the Proposed Project would not cause a cumulative construction noise impact. Construction noise from the related projects would be localized and would not have the potential to create a cumulative noise impact with the Proposed Project.

With respect to cumulative haul route impacts, the potential for cumulative hauling activities was assessed by identifying haul routes from other approved or pending projects that would have the potential to have overlapping haul routes utilizing the same roadways as the proposed haul route. As shown in Table 3.2, Related Haul Routes List and Figure 25, Locations of Related Haul Routes, above, assuming that all of the hauling activities for the related haul routes occur over the same period as the Project's hauling activities, the total cumulative haul truck volume resulting from the

Project plus the related projects is estimated to be 112 trucks per day (or approximately 20 haul trucks per hour on the haul route segments). This increase in temporary trips would be well below the maximum capacity of the streets within the proposed haul route. The proposed haul route is limited to Avenue II and Avenue I roadways, respectively, which accommodate high levels of traffic per day. For example, Los Feliz has a peak-hour traffic volume of approximately 950 vehicles.[13] Vermont Avenue has a peak-hour traffic volume of approximately 1,300 vehicles.[14] Comparatively, the cumulative volume of haul trucks would represent approximately 1.5 to 3 percent of the total peak hour traffic volume on these roadways. As it would take a doubling of traffic volume to increase the noise levels by 3 dBA, an increase of 1.5 to 3 percent of peak hour traffic would result in a less than significant noise impact on the affected roadway segments. Furthermore, similar to the Proposed haul route, each haul route approval for the related haul routes would be subject to regulatory compliance measures and recommended conditions prepared by LADOT and LADBS to reduce the impacts of construction-related hauling activity, monitor the traffic effects of hauling, and reduce haul trips in response to congestion. Therefore, the cumulative noise impacts from the proposed haul route and related haul routes would be less than significant.

With respect to cumulative operational noise impacts, each of the related projects would be required to comply with LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Thus, the siting and development of related projects would be subject to further CEQA review and evaluated on a case-by-case basis, and cumulative operational noise would be less than significant.

Cumulative Air Quality Impacts

Development of the Proposed Project in conjunction with the related projects in the Project Site vicinity would result in an increase in construction and operational emissions in the already urbanized area of the City of Los Angeles. Cumulative air quality impacts from construction and operation of the Proposed Project, based on SCAQMD guidelines, are analyzed in a manner similar to Project-specific air quality impacts. The SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, according to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the project-specific significance thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be

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[13] *24 Hours Traffic Volume, City of Los Angeles, Department of Transportation, Traffic count data at Los Feliz Blvd. W/O Rodney Dr, 5/1/2003. https://navigatela.lacity.org/print/temp/9D09524B-976B-0EC8-B1C3AF26858A4065.pdf?CFID=5690920&CFTOKEN=9a3b4d58aa26a31e-9C26527C-E34E-9DFC-7B645A42A89ECC10*

[14] *24 Hours Traffic Volume, City of Los Angeles, Department of Transportation, Traffic count data at Frnklin Avenue and Vermont Ave., 10/24/2013. https://navigatela.lacity.org/dot/traffic_data/automatic_counts/FRANKLIN.VERMONT.131024-AUTO.pdf*

cumulatively significant.[15] Thus, as discussed in more detail in the supporting analysis above, because the construction-related and operational daily emissions associated with Proposed Project would not exceed the SCAQMD's recommended thresholds, these emissions associated with the Proposed Project would not be cumulatively considerable. Further, each related project would quantify and address air quality emissions and mitigate impacts, if necessary, to ensure no cumulative impacts would occur. Additionally, estimated emissions from similar projects of this size and type are typically well below the regulatory thresholds of significance, such that multiple projects when viewed together are unlikely to exceed SCAQMD's regional thresholds. Therefore, cumulative air quality impacts would be less than significant.

Cumulative Greenhouse Gas Emissions Impacts

As stated previously in the Greenhouse Gas Emissions section of the supporting analysis above, the guidance from the State and City on Class 32 Categorical Exemptions does not require the preparation of GHG analyses for projects eligible for exemptions. Specifically, Article 19 of the State's CEQA Guidelines states that eligible projects that qualify for categorical exemptions are deemed to not have a significant effect on the environment. Under Section 15332, the Class 32 exemption that governs in-fill development projects identifies the conditions under which a project can qualify, noting that "[a]pproval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality…" There are no requirements to making findings about a project's effects on GHG. Further, the City issued guidance in 2018 (CP-7828) that clarifies the special requirement criteria for projects that seek to use the Class 32 exemption. In this guidance, they clarify that projects that qualify must provide supporting documents to demonstrate eligibility for the Class 32 exemption, including an air quality study. However, the "[p]urpose of this assessment is to evaluate the regional significance of criteria pollutant emissions from both the construction and operation of a proposed project." An assessment of criteria air pollutant emissions and cumulative impacts have been prepared, as described herein. As there is no requirement for preparation of cumulative GHG analyses to validate the Class 32 exemption, the following cumulative analysis is provided for informational purposes only.

The GHG emissions from a mixed-use, multi-family residential and commercial project with 139 dwelling units and 13,690 square feet of commercial use is relatively small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change, which can cause the adverse environmental effects previously discussed. Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.

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[15] *SCAQMD, White Paper On Potential Control Strategies To Address Cumulative Impacts From Air Pollution. Appendix D. August 2003 (At Page D-3).*

SCAG's 2020-2045 RTP/SCS, adopted in September 2020, is the regional plan that demonstrates compliance with air quality conformity requirements and GHG reduction targets. As such, projects and land use plans that are consistent with this plan in terms of development location, density, and intensity, are part of the regional solution for meeting air pollution and GHG reduction goals. Planning for more housing and jobs near transit was a strategy incorporated in SCAG's first RTP/SCS in 2012 and carried forward in the 2016 RTP/SCS with a focus on areas that are well served by transit. The Proposed Project is an infill development in a Transit Priority Area (TPA) and would be designed with sustainability features that are aimed at reducing overall GHG emissions.

The Proposed Project would also not conflict with all applicable local ordinances, regulations and policies that have been adopted in furtherance of the state and City's goals of reducing GHG emissions. The Proposed Project would comply with the building efficiency standards of the California's Energy Efficiency Standards for Residential and Nonresidential Buildings, located at Title 24, Part 6 of the California Code of Regulations. Although not originally intended to reduce GHG emissions, increased energy efficiency and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standards. Additionally, the Proposed Project would comply with the L.A. Green Building Code, which imposes more stringent green building requirements than those contained within the CALGreen Code and is applicable to the construction of every new building, every new building alteration with a permit valuation of over $200,000, and every building addition unless otherwise noted. As such, any subsequent cumulative projects of a similar scale or nature would also be required to comply with applicable Title 24 Building Efficiency Standards, the L.A. Green Building Code, and incorporate GHG reducing measures as required. Thus, the Proposed Project would not make a cumulatively considerable contribution to GHG emissions and impacts would be less than significant.

Cumulative Water Quality Impacts

Development of the Proposed Project in combination with the related projects would result in the further infilling of uses in a highly developed area within the Hollywood Community within the City of Los Angeles. As discussed further in the supporting analysis above, the Project Site and the surrounding areas are served by the existing City or County storm drain system. Runoff from the Project Site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest stormwater drainage inlet. It is likely that most, if not all, of the related projects would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected from the Proposed Project and the related project sites, since the surrounding area is highly developed with impervious surfaces. The surrounding area has long been developed and is heavily urbanized and improved with various residential and commercial buildings; thus, subsequent projects are not likely to result in a significant change from existing conditions with regards to runoff quantity. Nonetheless, under the requirements of Article 4.4 of the LAMC, each related project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. Mandatory structural BMPs in accordance with the NPDES water quality program would result in a cumulative reduction of

surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, cumulative water quality impacts would be less than significant.

Cumulative Water Demand Impacts

Development of the Proposed Project and related projects and the cumulative growth throughout the City of Los Angeles, would further increase the demand for potable water within the City. Through the 2020 UWMP, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2045, with implementation of conservation strategies and proper supply management. This estimate is based in part on demographic projections obtained for the LADWP service area from the Metropolitan Water District (MWD). The MWD utilizes a land-use based planning tool that allocates projected demographic data from the Southern California Association of Governments (SCAG) into water service areas for each of MWD's member agencies. MWD's demographic projections use data reported in SCAG's RTP/SCS and account for estimated increases in population (and by association the development of subsequent projects) in the surrounding area. The Proposed Project's contributions to population and housing growth would be consistent with SCAG's growth projections for the City of Los Angeles. As such, the additional water demands generated by the Proposed Project are accounted for in the 2020 UWMP. Additionally, the Proposed Project's growth is consistent with SCAG's growth projections for the Los Angeles subregion. With approval of the requested discretionary actions, the Proposed Project is consistent with the underlying allowable uses per the LAMC and would not exceed the allowable density for the Project Site or exceed the available capacity in the local aqueduct. As such, the additional water demands generated by the Proposed Project are accounted for in the 2020 UWMP, and cumulative impacts associated with increased water demand would be less than significant.

Cumulative Sewer Impacts

Development of the Proposed Project in conjunction with the related projects would further increase regional demands on HWRP's capacity. Similar to the Proposed Project, each related project would be required to submit a SCAR and obtain approval by the Department of Public Works to ensure adequate sewer capacity for each related project. Since the Proposed Project would require approval from the Bureau of Sanitation, signifying that the sewer lines serving the Project Site have adequate capacity, the Proposed Project would not be expected to contribute to a local cumulative impact. Locally, the Proposed Project would not be cumulatively considerable. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the HWRP's service to the City of Los Angeles and surrounding area. However, it is anticipated that the 175 mgd of available capacity in the HWRP would not be significantly reduced with the cumulative wastewater generation from the related projects and Proposed Project. As such, cumulative impacts with respect to wastewater demand would be less than significant.

Cumulative Solid Waste Impacts

The City of Los Angeles Solid Waste Management Plan (AB 939) sets forth strategies that would provide adequate landfill capacity through 2037 to accommodate anticipated growth. The Bureau of Sanitation has projected the need for waste disposal capacity based on SCAG's regional population growth projections. The growth associated with Proposed Project is within those projections. Further, new programs are being implemented to increase the amount of waste diverted by the City, including: multi-family recycling, food waste recycling, commercial recycling and technical assistance and support for City departments to help meet their waste reduction and recycling goals. The City is also developing programs to ultimately meet a goal of zero waste by 2030. Thus, the Proposed Project's contribution to cumulative impacts would continue to decrease as it increases waste diversion rates in accordance with City goals.

Development of the Proposed Project in conjunction with the related projects would further increase regional demands on landfill capacity. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the existing landfills serving the City of Los Angeles. However, the cumulative operational solid waste generation of the related projects and Proposed Project would represent a small fraction of the remaining capacity of the Sunshine Canyon Landfill, which currently has a remaining permitted capacity of approximately 54.1 million tons. Additionally, all subsequent related projects would be individually evaluated, and any related project would be required to mitigate any potential waste impacts, and new landfill facilities would be developed, if necessary. Therefore, the cumulative impacts with respect to solid waste would be less than significant.

Cumulative Impacts to Fire Services

The Proposed Project, in combination with the related projects, could increase the demand for fire protection services in the Project area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., property taxes, government funding, and developer fees) to which the Proposed Project and related projects would contribute. Similar to the Proposed Project, each of the related projects would be individually subject to LAFD review and would be required to comply with all applicable fire safety requirements of the LAFD in order to adequately mitigate fire protection impacts. Specifically, any related project that exceeded the applicable response distance standards would be required to install automatic fire sprinkler systems in order to mitigate the additional response distance. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. On this basis, the Proposed Project would not make a cumulatively considerable impact to fire protection services, and, as such cumulative impacts on fire protection would be less than significant.

Cumulative Impacts to Police Services

The Proposed Project, in combination with the related projects, would increase the demand for police protection services in the Project area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Proposed Project and related projects would contribute. In addition, each of the related projects would be individually subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. Furthermore, each of the related projects would likely install and/or incorporate adequate crime prevention design features in consultation with the LAPD, as necessary, to further decrease the demand for police protection services. To the extent cumulative development causes the need for additional police stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new police stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAPD does not currently have any plans for new police stations to be developed in proximity to the Project Site. No impacts are currently anticipated to occur. On this basis, the Proposed Project would not make a cumulatively considerable impact to police protection services, and cumulative impacts on police protection would be less than significant.

Cumulative Impacts to Schools

The Proposed Project, in combination with the related projects is expected to result in a cumulative increase in the demand for school services. Development of the related projects would likely generate additional demands upon school services. These related projects would have the potential to generate students that would attend the same schools as the Proposed Project. This would create an increased cumulative demand on local school districts. However, each of the related projects would be responsible for paying applicable school fees to mitigate the increased demand for school services. Pursuant to Government Code Section 65995, payment of development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation." With the payment of School Development Fee, any future school infrastructure would be developed as needed, and thus the cumulative impacts on schools from the Proposed Project and any subsequent project would be less than significant.

Cumulative Impacts to Parks

Development of the Proposed Project in conjunction with the related projects could result in an increase in permanent residents residing in the greater Project area. Additional cumulative development would contribute to lowering the City's existing parkland to population ratio, which is currently below the preferred standard. However, each of the residential related projects are required to comply with payment of Quimby Fees (for subdivision projects with greater than 50 units) and/or park and recreation mitigation fees (for all other residential projects). Each residential related project would also be required to comply with the on-site open space requirements of the LAMC. Therefore, with payment of the applicable recreation fees on a project-by-project basis, any future park infrastructure would be developed as needed; therefore, the Proposed Project

would not make a cumulatively considerable impact to parks and recreational facilities, and cumulative impacts would be less than significant.

Cumulative Impacts to Libraries

Development of the related projects is projected to generate additional housing and residents within the study area, which would likely generate additional demands upon library services. This increase in resident population would result in a cumulative increase in demands upon public library services. To meet the increased demands upon the City's Public Library system, Los Angeles voters passed a Library Bond Issue for $178.3 million to improve, renovate, expand, and construct 32 branch libraries. Since the Program's inception in 1998, the Library Department and the Department of Public Works, Bureau of Engineering have made considerable progress in the design and construction of the branch library facilities. Based on the growth forecasts utilized in the 2015-2020 Strategic Plan, much of this growth has already been accounted for in planning new and expanded library facilities. Additionally, any future growth and development would analyze potential impacts on library services, and future library infrastructure would be developed as needed. Thus, the additional residents generated by the Proposed Project would not make a cumulatively considerable impact upon the City's library system. Therefore, the cumulative impacts related to library facilities would be less than significant.

Cumulative Impacts Summary (Class 32)

As presented in the analysis above, the Proposed Project would not result in any significant cumulative impacts from traffic, noise, air quality, water quality impacts, or utilities and public services. The Proposed Project would be consistent with the use type and density of projects that are permitted by right and otherwise anticipated by the zoning code and General Plan, and when viewed in conjunction with other proposed, approved, or reasonably anticipated projects, would not generate impacts that are cumulatively considerable. Thus, the potential for the Proposed Project to result in cumulative impacts is less than significant.

c) Significant Effect / Unusual Circumstances

As noted in the supporting analyses above, there are no unusual circumstances that exist in connection with the Proposed Project or surrounding environmental conditions. The Proposed Project would not result in any significant impacts from noise, traffic, air quality, water quality impacts, or utilities and public services. The Project Site is located in an urbanized area of the Hollywood Community Plan Area and is consistent with the existing physical arrangement of the properties within the vicinity of the Project Site. The zoning designation for the Project Site is C2-1D with a General Plan land use designation of Highway Oriented Commercial. The Proposed Project would be consistent with the designated zoning and would adhere to all requirements of the LAMC, with the approval of the TOC Incentives. There are no features of the Proposed Project, such as its size or location, that distinguish it from others in the exempt class. As such, there are no unique or unusual circumstances that exist in connection with the Proposed Project or surrounding environmental conditions that have the potential to result in a significant environmental impact upon the environment.

d) Scenic Resources

The Project Site is not bordered by or within the viewshed of any designated scenic highway as identified in the Mobility Element of the City of Los Angeles General Plan or a State scenic highway as identified by the Department of Transportation.[16] The closest designated State scenic highway is the Topanga Canyon State Scenic Highway, State Route 27, which is located approximately 22 miles west of the Project Site. Neither N. Vermont Avenue, Hollywood Boulevard, nor Prospect Avenue are designated as a scenic highway. Further, there are some ornamental vegetation/shrubs located on the Project Site along N. Vermont Avenue and Hollywood boulevard, however, there are no protected trees or unique geologic features on-site. However, the removal and replacement of street trees would be subject to the review and approval of the Department of Public Works, Urban Forestry Division. None of the trees on-site and in the public right-of-way are protected tree species as defined under the City's Protected Tree Ordinance (LAMC Section 17.02). Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the Project Site and within the adjacent public right(s)-of-way. Therefore, the Proposed Project would not damage any scenic resources within an officially designated scenic highway.

e) Hazardous Materials

Pursuant to Government Code Section 65962.5, the Department of Toxic Substances Control (DTSC) shall compile and update as appropriate, at least annually, a list of all hazardous waste facilities subject to corrective action (pursuant to Section 25187.5 of the Health and Safety Code), all land designated as hazardous waste property or border zone property (pursuant to Section 25220 of the Health and Safety Code), all information received by the DTSC on hazardous waste disposals on public land (pursuant to Section 25242 of the Health and Safety Code), and all site listed pursuant to Section 25356 of the Health and Safety Code. Based on the DTSC EnviroStor Database, the Project Site is not listed for cleanup, permitting, or investigation of any hazardous waste contamination (*see Attachment 1, Figure 3, to this Categorical Exemption*). Therefore, the Project Site is not located on a site that the DTSC and the Secretary of the EPA have identified, pursuant to Government code section 65962.5, as being affected by hazardous wastes. Therefore, the Project Site is not located on a site that the DTSC and the Secretary of the Environmental Protection have identified as being affected by hazardous wastes or clean-up problems.

Additionally, a Phase I Environmental Site Assessment (Phase I ESA) was prepared for the Project Site, by Western Environmental Engineers Co., dated December 5, 2014 (*Attachment 7 of this Categorical Exemption*). The purpose of the Phase I ESA was to address on-site impacts of chemical use, storage and management, and any potential liabilities due to past and/or current practices associated with the use, storage, treatment, and/or disposal of hazardous waste on the Project Site. The Phase I ESA concluded that no evidence of any recognized environmental conditions (RECs) or potential environmental conditions (PECs) in connection with the Project Site exist. The Phase I ESA determined that no further investigation at the Project Site is

[16] *California Scenic Highway Mapping Systems: Https://Dot.Ca.Gov/Programs/Design/Lap-Landscape-Architecture-And-Community-Livability/Lap-Liv-I-Scenic-Highways, Accessed December 2023.*

warranted. Therefore, the Phase I ESA further supports that the Project Site is not hazardous and would not impact future residents of the Proposed Project.

f) Historic Resources

A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. The Proposed Project involves demolishing and site clearing the existing two commercial buildings and surface parking lot. A Historical Resource Technical Report[17] (*See Attachment 2 to this Categorical Exemption*) was prepared to determine if the Proposed Project would impact any historical resources, to identify historical resources on and in the vicinity of the Project Site, and to assess any potential impacts the Proposed Project may have on identified historical resources. The Historical Resource Technical Report concluded that the Proposed Project would have no direct impact on historical resources.

The commercial buildings located on the Project Site are not currently listed under national, state, or local landmark or historic district programs and are not included as significant in any historic resource surveys of the area, including SurveyLA. Given the fact that the buildings are over 45 years of age, GPA evaluated the buildings' eligibility for national, state, and local landmark and historic district designation. After careful inspection, investigation, and evaluation, GPA concluded that both buildings are not eligible for listing in the National Register of Historic Places and/or California Register of Historical Resources and are not eligible for designation as a Los Angeles Historic-Cultural Monument due to a lack of significance.

The Historical Resource Technical Report also analyzes the potential for the Proposed Project to result in indirect impacts on the historical resources in the vicinity of the Project Site. There are 23 historical resources in the area, including four historic districts, and 16 individual historical resources identified as eligible for national, state, and/or local landmark designation through SurveyLA, as well as two historical resources designated as Los Angeles Historic-Cultural Monuments (HCM). One historical resource, Barnsdall Park, has multiple designations with slightly different boundaries and contributing buildings and structures. These designations include: Barnsdall Park (HCM No. 34); Barnsdall Park (National Register); Aline Barnsdall Complex (NHL); and Hollyhock House (UNESCO World Heritage). Barnsdall Park is referred to as one historical resource for the purposes of the Historical Resource Technical Report. Two historical resources, the Hollyhock House (HCM No. 12) and Barnsdall Park Arts Center (HCM No. 33), are individually designated as HCMs.

The Historical Resource Technical Report concluded that the Project Site is located outside the parcel boundaries of the 16 potential historical resources in the study area and therefore, would not impact their integrity of immediate setting. The Proposed Project would not impact the setting of the three historical resources, 16 potential historical resources, and four potential historic

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[17] *Historical Resource Technical Report, 1666 N. Vermont Avenue, Los Angeles, California, Prepared By GPA Consulting, August 2020.*

districts in the study area such that the integrity of the historical resources would be diminished to a level where they would no longer be eligible for UNESCO, Federal, State, or local landmark designation. While the Proposed Project would introduce a new visual element to the study area, the integrity of setting is not a key aspect of the integrity of these historic resources, potential historical resources, and potential historic districts to convey their significance because their design is not a reflection of their immediate environment. The 16 potential historical resources would also remain highly visible and continue to be prominent features of the blocks on which they are located. Therefore, the Proposed Project would not result in a substantial adverse change to the immediate surroundings of these historical resources to the degree that they would no longer be eligible for listing under national, state, or local landmark programs.