

VI. Other CEQA Considerations

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1. Significant Unavoidable Impacts

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

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

As evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, and summarized below, implementation of the Project would result in significant and unavoidable Project-level impacts related to on-site noise and vibration (human annoyance) and off-site vibration (human annoyance) during construction. In addition, the Project would result in significant and unavoidable cumulative on-site noise, off-site noise, on-site vibration (human annoyance), and off-site vibration (human annoyance) during construction. All other impacts associated with the Project would be less than significant or reduced with mitigation to less than significant.

a. On-Site Construction Noise

As discussed in Section IV.H, Noise, of this Draft EIR, the estimated construction noise levels would exceed the significance criteria by 4.1 dBA at receptor R3, 26.0 dBA at receptor R2 (Equitable Building), and 26.2 dBA at receptor R1 (Pantages Theatre). Therefore, temporary noise impacts associated with the Project's on-site construction would be significant at receptor locations R1, R2, and R3. Mitigation Measure NOI-MM-1 would be implemented to reduce on-site construction noise impacts to the extent feasible. However, the construction noise levels at receptor locations R1 and R2 would still exceed the significance criteria and construction noise impacts would remain significant and unavoidable.

Construction-related noise levels from the related projects would be intermittent and temporary, and it is anticipated that, as with the Project, the related projects would comply

with the construction hours and other relevant provisions set forth in the LAMC. Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual related project and compliance with locally adopted and enforced noise ordinances. Nonetheless, if nearby related projects, including Related Project No. 1, Related Project No. 2, and Related Project No. 5 were to be constructed concurrently with the Project, significant cumulative construction noise impacts would result.

b. Off-Site Construction Noise

As discussed in Section IV.H, Noise, of this Draft EIR, if the total number of trucks from the Project and related projects were to add up to 88 truck trips per hour along Vine Street, the estimated noise level from 88 truck trips per hour would be 71.9 dBA at receptor location R4 (Capitol Records Building), which would exceed the ambient noise levels by 5 dBA and exceed the significance criteria. The Project would generate up to 18 truck trips per hour during peak construction period (site excavation). In addition, during peak periods it is possible that the total cumulative truck traffic related to construction of the Project and other related projects would cumulatively add up to 88 or more hourly truck trips. Therefore, it is conservatively concluded that the Project's contribution to cumulative noise impacts would be cumulatively considerable and cumulative noise impacts from off-site construction would be significant and unavoidable.

c. On-Site Construction Vibration

As discussed in Section IV.H, Noise, the estimated ground-borne vibration levels from Project construction would exceed the significance criteria for human annoyance at receptor location R1 (Pantages Theatre) and receptor location R2 (Equitable Building). Therefore, vibration impacts during construction of the Project would be significant, pursuant to the significance criteria for human annoyance. In addition, construction activities from on-site construction activities at the Project and Related Project No. 1, if constructed concurrently, would exceed the vibration criteria at the Pantages Theatre. As concluded in the Draft EIR previously prepared for Related Project No. 1, the potential ground-borne vibration impacts at the Pantages Theatre would be significant and unavoidable. There are no feasible mitigation measures that could be implemented to reduce the temporary vibration impacts from on-site construction associated with human annoyance to a less-than-significant level. Therefore, project-level and cumulative vibration impacts from on-site construction activities with respect to human annoyance would remain significant and unavoidable.

d. Off-Site Construction Vibration

As evaluated in Section IV.H, Noise, of this Draft EIR, temporary vibration levels could reach approximately 75 VdB periodically as trucks pass sensitive receptors along the anticipated haul route(s). There are residential, hotel, and theatre uses along Hollywood Boulevard, Vine Street, and Gower Street (between the Project Site and the US-101 Freeway), which would be exposed to ground-borne vibration above the 72-VdB significance criteria for human annoyance from the construction trucks. In addition, receptor location R4 (Capitol Records Building) would be exposed to ground-borne vibration from haul trucks, which would exceed the 65-VdB significance criteria for recording studios. Furthermore, related projects would be anticipated to use similar trucks as the Project and generate similar vibration levels along the anticipated haul route as the Project (i.e., Hollywood Boulevard and Vine Street). There are no feasible mitigation measures that would reduce the potential vibration impacts with respect to human annoyance. Therefore, project-level and cumulative vibration impacts from off-site construction with respect to human annoyance would remain significant and unavoidable.

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

In addition to identification of a project's significant unavoidable impacts, Section 15126.2(b) of the CEQA Guidelines states that where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

As discussed above, the Project would result in significant and unavoidable impacts related to on-site noise, off-site noise, on-site vibration (pursuant to the threshold for human annoyance), and off-site vibration (pursuant to the threshold for human annoyance) during construction. As noted above, the Project's significant project-level and cumulative noise and vibration impacts would occur during construction for limited durations from the operation of construction equipment and haul trucks. Such impacts would be short-term and would cease upon completion of certain construction activities. Notwithstanding, as evaluated in Section V, Alternatives, of this Draft EIR, alternatives to the Project were considered to eliminate the significant short-term Project-level and cumulative on-site construction noise impacts, cumulative off-site construction noise impacts, and Project-level and cumulative vibration impacts (pursuant to the threshold for human annoyance) due to on-site and off-site construction activities. As discussed therein, significant construction noise and vibration impacts would be expected to occur with any development scenario because construction activities, including grading and excavation, would occur on a small infill site with existing noise- and vibration-sensitive uses on the east and south property lines. Thus, reducing temporary construction noise and vibration impacts below a

level of significance at adjacent uses is technologically problematic. Furthermore, any reduction in the intensity of construction activities would increase the duration of the construction period and prolong construction noise. Additionally, among the alternatives considered, no feasible alternative was identified that would eliminate the Project's short term, construction-related significant and unavoidable impacts with the exception of the No Project/No Build Alternative. Although the No Project/No Build Alternative would avoid the Project's significant and unavoidable impacts, the No Project/No Build Alternative would not meet the underlying purpose of the Project or any of the Project objectives, and is not considered a feasible development alternative. As discussed in Section V, Alternatives, of this Draft EIR, the Project, as proposed, satisfies the Project objectives to a substantially greater degree than any of the proposed alternatives. This Draft EIR also includes mitigation measures that reduce the potential impacts associated with the Project to the extent feasible.

As discussed in Section II, Project Description, of this Draft EIR, the Project would construct a 13-story hotel with 240 rooms. Five levels of subterranean parking would also be provided. With construction of the Project, the Project would revitalize the Project Site by developing a high-quality hotel development that would provide new lodging opportunities to serve the Hollywood community as well as publicly accessible neighborhood-serving restaurant and bar uses that encourage pedestrian activity in the vicinity of the Project Site. In addition, the development of the Project would also attract and support tourism in the Hollywood area by developing a new hotel option for visitors to the Hollywood area. Furthermore, the Project would develop hospitality uses that would provide short- and long-term employment opportunities, improve the Project area's tax base, and generate transient occupancy taxes for the City.

The Project would redevelop the underutilized Project Site with a high-rise building whose high-quality design, scale, and massing are compatible with adjacent uses and respectful of the existing historical buildings. The clean, contemporary design of the proposed building would complement the various architectural styles of the surrounding buildings. The Project would utilize materials and elements to create an architecturally distinct building that would visually integrate the Project with the surrounding historic buildings. Proposed building materials would include painted concrete, aluminum, glass, and metal. In addition, the Project would incorporate project design features and mitigation measures that promote environmental sustainability. The Project is designed to achieve LEED Silver certification under the USGBC's LEED® v3 Rating System and thereby helps reduce demand on citywide infrastructure and energy resources.

The Project Site is located in an area that is characterized by a high degree of pedestrian activity, and the Project's location allows convenient access to public transit and encourages alternative modes of transportation. The Project Site is specifically located less than 300 feet north of the Hollywood/Vine Station, which is served by the Metro Red

Line, and is within walking distance to numerous bus lines, including those with service that runs every 15 minutes or less during daytime hours. In addition, the Project would provide short- and long-term bicycle parking to promote biking as an alternative mode of transportation. These beneficial features would promote the City's policies to reduce vehicle miles traveled as well as mobile source greenhouse gas emissions.

Overall, the Project presents numerous benefits that override the limited adverse effects it may have on the environment.

3. Significant Irreversible Environmental Changes

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

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

a. Building Materials and Solid Waste

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

During construction of the Project, a minimum of 50 percent of the non-hazardous demolition and construction debris would be recycled and/or salvaged for reuse in compliance with the requirements of the City of Los Angeles Green Building Code. In addition, during operation, the Project would provide a designated recycling area for Project employees to facilitate recycling in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687) and the Los Angeles Green Building Code. Thus, the consumption of non-renewable building materials such as lumber, aggregate materials, and plastics would be reduced.

b. Water

Consumption of water during construction and operation of the Project is addressed in Section IV.L.2, Utility and Service Systems—Water Supply and Infrastructure, of this Draft EIR. As evaluated therein, given the temporary nature of construction activities, the short-term and intermittent water use during construction of the Project would be less than the net new water consumption estimated for the Project at buildout. In addition, water use during construction would be somewhat offset by the reduction in water currently consumed by the existing uses, all of which would be removed as part of the Project. With regard to operation, the estimated water demand for the Project would not exceed the available supplies projected by City of Los Angeles Department of Water and Power (LADWP). Thus, LADWP would be able to meet the water demand of the Project, as well as the existing and planned future water demands of its service area. Furthermore the Project would incorporate sustainability features such as efficient plumbing features, updated landscaping, modern irrigation, and efficient appliances that would reduce the Project's net increase in water demand by at least 20 percent pursuant to the requirements of the City of Los Angeles Green Building Code. Thus, as evaluated in Section IV.L.2, Utility and Service Systems—Water Supply and Infrastructure, of this Draft EIR, while Project construction and operation would result in some irreversible consumption of water, the Project would not result in a significant impact related to water supply.

c. Energy Consumption and Air Quality

During ongoing operation of the Project, non-renewable fossil fuels would represent the primary energy source, and thus the existing finite supplies of these resources would be incrementally reduced. Fossil fuels, such as diesel, gasoline, and oil, would also be consumed in the use of construction vehicles and equipment. Project consumption of non-renewable fossil fuels for energy use during construction and operation of the Project is addressed in Section IV.D, Energy, of this Draft EIR. As discussed therein, construction activities for the Project would not require the consumption of natural gas, but would require the use of fossil fuels and electricity. Therefore, as the consumption of fossil fuels would occur on a temporary and limited basis during construction, impacts related to the consumption of fossil fuels during construction of the Project would be less than significant.

During operation, the Project's increase in electricity and natural gas demand would be within the anticipated service capabilities of LADWP and the Southern California Gas Company, respectively. As discussed in Section IV.D, Energy, of this Draft EIR, the Project would be designed and constructed in accordance with state and local green building standards that would serve to reduce the energy demand of the Project. Specifically, the Project would comply with the City's Green Building Ordinance, as applicable, and new buildings and infrastructure would be designed to be environmentally sustainable and to achieve the standards of the Silver Rating under the U.S. Green Building Council's Leadership in Energy Efficiency and Design (LEED®) green building program or equivalent green building standards. Therefore, the Project would not cause the wasteful, inefficient, and unnecessary consumption of energy. In addition, Project operations would not conflict with adopted energy conservation plans. Refer to Section IV.D, Energy, of this Draft EIR, for further analysis regarding the Project's consumption of energy resources.

d. Environmental Hazards

The Project's potential use of hazardous materials is addressed in the Initial Study included in Appendix A of this Draft EIR. As evaluated therein, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used in hotel operations. Specifically, operation of the Project would be expected to involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and petroleum products. However, all potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers' instructions and handled in compliance with applicable federal, state, and local regulations. Any associated risk would be reduced through compliance with these standards and regulations. As such, compliance with regulations and standards would serve to protect against significant and irreversible environmental change that could result from the accidental release of hazardous materials.

e. Conclusion

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

an existing urban use on an infill redevelopment site, the limited use of nonrenewable resources is justified.

4. Growth-Inducing Impacts

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

- Direct growth associated with a project;
- Indirect growth created by either the demand not satisfied by a project or the creation of surplus infrastructure not utilized by a project.

As discussed in Section II, Project Description, would include 240 guest rooms, approximately 2,742 square feet of guest amenities,¹ and approximately 5,373 square feet of shared guest and public spaces.² Therefore, the Project would not include any new residential development and, thus, would not generate a direct increase in residential population. However, the Project would have the potential to generate indirect population growth in the Project vicinity as a result of the new employees generated by the Project. Below is a discussion of the potential indirect growth-inducing impacts of the Project in accordance with the above-stated CEQA Guidelines section. This discussion includes the Project's effect on fostering growth in the surrounding area.

¹ *Guest amenities would consist of a ground-floor lobby, and gym and restrooms on Level 12.*

² *Shared guest and public spaces would include the coffee bar and outdoor seating on the ground floor and the "living room" and covered terrace on Level 13.*

a. Employment

During construction, the Project would create temporary construction-related jobs. However, the work requirements of most construction projects are highly specialized such that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project. Therefore, given the availability of construction workers, the Project would not be considered growth inducing from a short-term employment perspective, but rather the Project would provide a public benefit by providing new employment opportunities during the construction period.

With regard to employment during operation of the Project, Project's 73,440 square feet of hotel uses would generate approximately 83 employees, based on employee generation rates promulgated by the Los Angeles Unified School District (LAUSD).³ The estimated number of existing employees at the Project Site is approximately 18, based on LAUSD's employee generation rates.⁴ Therefore, the Project is estimated to generate a net increase of 65 new employees on-site. This is a conservative estimate and the number of actual employees would likely be lower due to the limited service nature of the hotel, which is a key feature of the Project Applicant's business model. It is anticipated that the Project could include a range of full-time and part-time positions that may be filled by persons already residing in the vicinity of the Project Site, and who would not relocate their households due to such employment opportunities. It is also possible that some of the employment opportunities offered by the Project would be filled by persons moving into the surrounding area, which could increase demand for housing. However, it is anticipated that some of this demand would be filled by then-existing vacancies in the housing market and others by any new residential developments that may occur in the vicinity of the Project Site. Therefore, given that the Project would not directly contribute to population growth in the Project area and as some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. As such, the Project would not result in a notable increase in demand for new housing, and any new demand, should it occur, would be minor in the context of forecasted growth for the City of Los Angeles or the Hollywood Community Plan area. Furthermore, as the Project would be located in a developed area with an established

³ *Los Angeles Unified School District, 2016 Developer Fee Justification Study, March 2017, Table 14. Based on the employee generation rate of 0.00113 employee per average square foot for "Lodging."*

⁴ *Based on the employee generation rate of 0.00271 employee per average square foot for "Neighborhood Shopping Centers."*

network of roads and other urban infrastructure, it would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth.

c. Utility Infrastructure Improvements

The area surrounding the Project Site is already developed with residential, commercial, and entertainment-related uses, and the Project would not remove impediments to growth. The Project Site is located within an urban area that is currently served by existing utilities and infrastructure. While the Project may require minor local infrastructure upgrades to maintain and improve water, sewer, electricity, and natural gas lines on-site and in the immediate vicinity of the Project Site, such improvements would be limited to serving Project-related demand, and would not necessitate major local or regional utility infrastructure improvements that have not otherwise been accounted for and planned for on a regional level.

d. Conclusion

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

5. Potential Secondary Effects of Mitigation Measures

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

a. Cultural Resources

Mitigation Measure CUL-MM-1 requires that a qualified structural engineer survey the existing foundations and other structural aspects of the Pantages Theatre and the Equitable Building to establish baseline conditions and provide a shoring design to protect it from potential damage. Potholing or other methods of testing the below grade conditions on the Project Site immediately adjacent to the Pantages Theatre and the Equitable Building may be necessary to establish baseline conditions and prepare the shoring design. Such testing would be conducted by a licensed structural engineer with experience rehabilitating historic buildings to ensure that impacts to the Pantages Theatre and the Equitable Building would not occur. This mitigation measure would be beneficial in protecting historical resources that could potentially be damaged by construction. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

Mitigation Measure CUL-MM-2 requires that a preservation plan be prepared consistent with the Hollywood Walk of Fame Specifications and Details. This mitigation measure would ensure that potential impacts associated with historic resources would be less than significant. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

Mitigation Measure CUL-MM-3 states that a qualified archaeologist shall be retained to perform periodic inspections of excavation and grading activities of the Project Site. If archaeological materials are encountered, the archaeologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. Implementation of Mitigation Measure CUL-MM-3 would ensure any impact related to archaeological resources would be less than significant. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

b. Geology and Soils

Mitigation Measure GEO-MM-1 states that a qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities of the Project Site. If paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. Implementation of Mitigation Measure GEO-MM-1 would ensure any impact related to paleontological resources would be less than significant. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

c. Noise

Mitigation Measure NOI-MM-1 requires the use of temporary and impermeable sound barriers along the Project Site's eastern and western property line between the Project construction area and affected receptors to reduce construction-related noise levels. Existing fences and other barriers, including walls, currently separate the Project Site from adjacent uses. The proposed temporary sound barriers would serve to minimize views of the construction area from adjacent uses and reduce construction noise impacts on nearby sensitive receptors. Upon completion of construction, the temporary sound barrier would be removed. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

Mitigation Measure NOI-MM-2 requires that the Applicant shall retain the services of a structural engineer to inspect and document the apparent physical condition of the Pantages Theatre and the Equitable Building, including but not limited to the building structure, interior wall, and ceiling finishes. The structural engineer shall establish baseline structural conditions of the building and prepare a shoring design. In addition, as part of Mitigation Measure NOI-MM-2, the Applicant shall retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a vibration monitoring program capable of documenting the construction-related ground vibration levels at the Pantages Theatre and the Equitable Building during demolition, excavation, and construction of the parking garage. In the event the warning level (0.10 inch/second (PPV) for the Pantages Theater and 0.25 inch/second (PPV) for the Equitable Building) is triggered, the contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level, including but not limited to halting/staggering concurrent activities and utilizing lower vibratory techniques. In the event the regulatory level (0.12 inch/second (PPV) for the Pantages Theater and 0.30 inch/second (PPV) for the Equitable Building) is triggered, the contractor shall halt the construction activities in the vicinity of the buildings and visually inspect the building for any damage. This mitigation measure would reduce vibration impacts at the Pantages Theatre and the Equitable Building. In the event damage occurs to historic finish materials due to construction vibration, such materials shall be repaired in consultation with a qualified preservation consultant and, if warranted, in a manner that meets the Secretary of the Interior's Standards. In addition, this mitigation measure would not result in physical changes to the environment. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

c. Transportation

Mitigation Measure TR-MM-1 requires the implementation of a Transportation Demand Management Program that includes strategies to promote non-auto travel and reduce the use of single-occupant vehicle trips. Mitigation Measure TR-MM-2 requires the

Project to contribute funding towards Transportation Systems Management Improvements within the Hollywood-Wilshire District that would target Vine Street and Hollywood Boulevard corridors. Implementation of Mitigation Measure TR-MM-1 and Mitigation Measure TR-MM-2 would be beneficial in addressing the Project's transportation impacts during operation, and would reduce potential traffic levels to a less-than-significant level. As such, implementation of these mitigation measures would not result in adverse secondary impacts.

6. Effects Not Found To Be Significant

Section 15128 of the CEQA Guidelines states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the EIR. An Initial Study was prepared for the Project and is included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City of Los Angeles determined through the Initial Study that the Project would not have the potential to cause significant impacts related to scenic resources within a City-designated scenic highway; agricultural and forestry resources; objectionable odors; biological resources, including potential conflicts with habitat conservation plans and natural community conservation plans; human remains; landslides, soil erosion, and the ability of soils to support the use of septic tanks; hazards and hazardous materials; hydrology and water quality; physical division of an established community; mineral resources; certain noise-related topics; population and housing; police protection, schools, parks, and other public facilities; recreation; change in air traffic patterns and hazardous design features; and wastewater, stormwater, and solid waste.⁵ A summary of the analysis provided in Appendix A for these issue areas is provided below.

a. Aesthetics

The Project Site is not located within a City-designated scenic highway and does not include any scenic resources. Therefore, as discussed in the Initial Study, the Project would not result in any impact on scenic resources within a City-designated scenic highway. Moreover, as described in Section IV.A., Aesthetics, of this Draft EIR, the Project qualifies as an employment center project within a transit priority area, as defined by SB 743 and confirmed by ZI File No. 2452, and accordingly, any potential aesthetics impacts of the Project are not considered to be significant.

⁵ *At the time the Initial Study was published, the Appendix G thresholds did not address telecommunications facilities and wildfire. The City has since adopted the revised Appendix G thresholds and these topics are evaluated below.*

b. Agricultural and Forest Resources

The Project Site is located in an urbanized area of the City of Los Angeles and is currently developed with a 6,393-square-foot, low-rise commercial building and surface parking areas. The Project Site and surrounding area are not zoned for agricultural or forest uses, and no agricultural or forest lands occur on-site or in the Project area. Therefore, the Initial Study concluded that no impacts related to agricultural and forestry resources would occur.

c. Air Quality

No objectionable odors are anticipated as a result of either construction or operation of the Project. Construction of the Project would use conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402. The Project would not include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, fiberglass molding, or other land uses associated with odor complaints. On-site trash receptacles, which have the potential to create odors, would be contained, located, and maintained in a manner that promotes odor control, such that no substantially adverse odor impacts are anticipated. Thus, the Initial Study concluded that odor impacts would be less than significant.

d. Biological Resources

The Project Site is located in an urbanized area and is currently developed with a 6,393-square-foot, low-rise commercial building and surface parking areas. Ornamental trees and landscaping do not exist on the Project Site. Due to the improved nature of the Project Site and the surrounding areas, and the absence of open space areas, species are unlikely to occur on-site. Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. No riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area. Furthermore, no water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site or in the immediate vicinity of the Project Site.

There are no tree species found within the Project Site that would be protected under Ordinance No. 177,404. With regard to non-protected trees, two Jacaranda street trees are located outside of the property line along Vine Street. Of those trees, one would

be removed to allow for the construction of the Project's required driveway. The remaining Jacaranda street tree would be retained and would be protected during construction of the Project. Following construction of the Project's driveway, there will no longer be sufficient space to plant a replacement street tree along the Project Site's frontage. Accordingly, and pursuant to the City's Urban Forestry Division policies, the Jacaranda tree proposed for removal would need to be replaced with two 15-gallon trees that would be donated to the City in coordination with the Urban Forestry Division. Thus, the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. In addition, since the existing off-site tree that would be removed could potentially provide nesting sites for migratory birds, the Project would comply with the Migratory Bird Treaty Act (MBTA), which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. Compliance with the MBTA would ensure that impacts would be less than significant. Furthermore, the Project Site does not support any habitat or natural community, and no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. Therefore, the Initial Study concluded that impacts to biological resources would be less than significant.

e. Cultural Resources

Although no human remains are known to have been found on the Project Site, there is the possibility that unknown resources could be encountered during project construction, particularly during ground-disturbing activities such as excavation and grading. While the uncovering of human remains is not anticipated, compliance with all applicable regulatory requirements would ensure that the Project's impacts to unknown human remains would be less than significant. Therefore, the Initial Study concluded that impacts to human remains would be less than significant.

f. Geology and Soils

The Project Site is not located in a landslide area as mapped by the State or City of Los Angeles. Further, the Project Site is characterized by a relatively flat topography and Project development does not involve a substantial alteration to the existing topography. As such, no impacts from landslides would occur.

Project construction activities including grading and excavation, which have the potential to disturb existing soils, would occur in accordance with all applicable erosion control requirements. With compliance with these regulatory requirements, soil erosion impacts would be less than significant.

The Project's wastewater demand would be accommodated via connections to the existing wastewater infrastructure in the vicinity of the Project Site. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. The Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems.

g. Hazards and Hazardous Materials

The types and amounts of hazardous materials that would be used for development of the Project would be typical of those used during construction activities and those used for hotel operations. Specifically, construction of the Project would involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. Operation of the Project would be expected to involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and petroleum products. However, all potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers' instructions and handled in compliance with applicable federal, state, and local regulations. Any associated risk would be reduced through compliance with these standards and regulations.

As discussed in the Phase I ESA included as Appendix IS-2 of the Initial Study, no evidence of the use of reportable quantities of hazardous substances was observed on the Project Site during the site reconnaissance. No other indications of release of hazardous substances were observed. The site reconnaissance did not identify any evidence of current or former above-ground or underground storage tanks, clarifiers, or sumps. One grease interceptor was observed on the eastern portion of the Project Site. This grease interceptor collects food grease generated from the existing on-site kitchen, is cleaned out by a licensed hauler on a periodic basis, and is not expected to be a significant environmental concern. No potential Polychlorinated Biphenyls-containing equipment such as transformers, oil-filled switches, hoists, lifts, dock levelers, or hydraulic elevators were observed during the site reconnaissance. In addition, no strong, pungent, or noxious odors were evident. Furthermore, the Project Site is not located within a Methane Zone or Methane Buffer Zone identified by the City.

The Phase I ESA indicated that based on the age of the building, there is potential for asbestos containing materials (ACMs) and lead-based paint (LBP) to be present in the demolition debris. During construction, all ACMs and LBP would be removed in accordance with all applicable regulatory requirements. Specifically, in accordance with SCAQMD Rule 1403, Asbestos Emissions from Demolition/Renovation Activities, prior to demolition activities associated with the Project, the Project Applicant would conduct a survey of the existing areas where construction would occur to verify the presence or absence of any of these materials and conduct remediation or abatement before any

disturbance occurs. Furthermore, the California Division of Occupational Safety and Health (CalOSHA) has established limits of exposure to lead contained in dusts and fumes through California Code of Regulations, Title 8, Section 1532.1, which provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead, particularly since demolition workers are at greatest risk of adverse health exposure. Lead-contaminated debris and other wastes must also be managed and disposed of in accordance with applicable provisions of the California Health and Safety Code. Mandatory compliance with these regulatory requirements would reduce risks associated with ACMs and LBP to acceptable levels. Therefore, a less than significant impact associated with exposure to these materials would occur.

As part of the Phase I ESA, the previous uses of the Project Site and nearby properties were also evaluated to identify any historically recognized environmental conditions. As detailed in the Phase I ESA, the Project Site was vacant until approximately 1913. From approximately 1913 through 1930, the Project Site was developed with a multiple-family residential apartment building. Circa 1935, two restaurant buildings were constructed on the Project Site. By 1955, the two restaurant buildings were converted into a two-tenant building and used as office space and a restaurant. The office space eventually became part of the restaurant operation. As concluded in the Phase I ESA, based on the previous and existing uses on the Project Site, no potential environmental concerns were identified in association with the current or former use of the Project Site.

The Project Site is not located within 0.25 mile of an existing or proposed school. The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction activities and those used for hotel operations. Potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers' instructions and in compliance with applicable federal, state, and local regulations. Therefore, with proper handling and storage, the use of such materials would not create a significant hazard to nearby schools. Impacts would be less than significant, and no mitigation measures are required. Additionally, the Project Site is not located within 2 miles of an airport or a private airstrip or located within an airport planning area and would not result in a safety hazard for people residing or working in the area.

The Phase I ESA included the results of consultation with local agency representatives and a review of available federal, state, and local records. In addition, a computerized government environmental records search was conducted as part of the Phase I ESA for the Project Site. The records search included government databases for registered underground storage tanks, operators who are hazardous waste generators, former landfills, and sites with a known hazardous materials release. Based on this search, the Project Site is not listed on any regulatory database and is not included on a list of

hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, the Project would not create a significant hazard to the public or the environment associated with identification of the Project Site on a hazardous materials list.

According to the City's General Plan Safety Element, the Project Site is not located along a designated disaster route. The nearest disaster routes are Santa Monica Boulevard located approximately 0.8 mile to the south, and Highland Avenue located approximately 0.7 mile to the west. The majority of construction activities for the Project would be confined to the Project Site itself; however, limited off-site infrastructure improvements may require some work in adjacent street rights-of-way. As such, some partial lane closures on Vine Street may occur. However, these closures would be temporary in nature and even in the event of partial lane closures, both directions of travel on area roadways would be maintained. Additionally, the Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan.

There are no wildlands located in the vicinity of the Project Site. Furthermore, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone. Therefore, the Project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. Impacts would be less than significant and no mitigation measures would be required.

Based on the above and as discussed in the Initial Study, significant impacts related to hazards and hazardous materials would not occur.

h. Hydrology and Water Quality

During Project construction, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. However, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), which requires the preparation of an erosion control plan to reduce the effects of sedimentation and erosion. Compliance with existing regulatory requirements would ensure that impacts to water quality during construction would be less than significant.

During operation, the Project would introduce sources of potential stormwater pollution that are typical of a hotel development (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with parking and circulation areas). Stormwater runoff from precipitation events could potentially carry urban pollutants into

municipal storm drains. The Project would be designed to comply with the Los Angeles County Department of Public Works (LACDPW) Hydrology Manual, and with the City's Low Impact Development (LID) Ordinance (Ordinance No. 181,899), which promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. With the use of these and other post-construction best management practices (BMPs) to treat Project runoff prior to discharging into the municipal storm drain system, impacts to water quality during operation would be less than significant.

According to the California Geological Survey, the historic high groundwater level beneath the site was greater than 50 feet below the existing ground surface. In addition, soil borings were drilled to a maximum of 65 feet below the ground surface and groundwater was not encountered during the geotechnical investigation of the Project Site. Since the publication of the Initial Study, the maximum depth of excavation required for the Project has been updated to 55 feet below the existing ground surface. As such, it is not anticipated that Project construction would require dewatering or other withdrawals of groundwater. However, if groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable regulations and requirements related to construction and discharges from dewatering operations. Therefore, Project construction would not deplete groundwater supplies or interfere with groundwater recharge.

With regard to groundwater recharge during Project operation, the Project Site is currently approximately 100 percent impervious. Although the Project would include the addition of landscaped planters, which would technically reduce the imperviousness of the Project Site by an incremental amount, assuming continued 100-percent imperviousness provides a more conservative analysis. Accordingly, surface water infiltration and groundwater recharge on the Project Site would remain negligible. As such, construction and operation of the Project would not substantially affect groundwater levels beneath the Project Site, including depleting groundwater supplies or resulting in a substantial net deficit in the aquifer volume or lowering of the local groundwater table.

As noted above, the Project would not decrease the amount of impervious surfaces on the Project Site. Therefore, there would be no increase in stormwater runoff from the Project Site and peak flow rates for a 50-year storm event would remain unchanged at approximately 0.9 cubic feet per second. However, the Project would result in improved stormwater runoff management through the implementation of High Efficiency Biofiltration BMPs to manage stormwater runoff in accordance with current LID requirements. Thus, the Project would not alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion, siltation, or on- or off-site flooding would occur.

The Project Site is not located within a 100-year flood plain as mapped by the Federal Emergency Management Agency or by the City of Los Angeles. Thus, the Project

would not place housing within a 100-year flood plain or place structures that would impede or redirect flood flows within a 100-year flood plain. However, the Project Site is located within the potential inundation area for the Hollywood Reservoir, which is held by the Mulholland Dam. The Mulholland Dam is a Los Angeles Department of Water and Power (LADWP) dam located in the Hollywood Hills, approximately 1.13 miles northwest of the Project Site. The Mulholland Dam is continually monitored by various governmental agencies to guard against the threat of dam failure, including the California Division of Safety of Dams. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum considered earthquake for the site. Pursuant to these regulations, the Mulholland Dam is regularly inspected and meets current safety regulations. In addition, LADWP has emergency response plans to address any potential impacts to its dams. Given the oversight by the Division of Safety of Dams, including regular inspections, and LADWP's emergency response program, the potential for substantial adverse impacts related to inundation at the Project Site as a result of dam failure would be less than significant.

The Project Site is located approximately 12 miles northeast of the Pacific Ocean. In addition, the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami. The Project Site is also not positioned downslope from an area of potential mudflow. Therefore, no seiche, tsunami, or mudflow events would be expected to impact the Project Site.

i. Land Use and Planning

The Project Site is located in a highly-urbanized area characterized by low-, mid-rise, and high-rise buildings that are occupied by office, commercial, residential, and entertainment-related uses. Land uses immediately adjacent to the Project Site include a surface parking lot to the north; the Pantages Theater to the east; multi-family residential and commercial uses to the south; and the Redbury Hollywood Hotel to the west across Vine Street. The Project would not physically separate or otherwise disrupt an existing residential use on or adjacent to the Project Site, and the proposed hotel use is consistent with other land uses in the surrounding area. All proposed development would occur within the boundaries of the Project Site as it currently exists. Therefore, the Project would not physically divide, disrupt, or isolate an established community. Rather, implementation of the Project would result in further infill of an already developed community with similar and compatible land uses.

j. Mineral Resources

No mineral extraction operations currently occur on the Project Site. The Project Site is located within an urbanized area and has been previously disturbed by

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

k. Noise

The Project Site is not located within 2 miles of an airport or within an area subject to an airport land use plan. The Project Site is also not located within the vicinity of a private airstrip. Therefore, the Project would not expose people working in the Project area to excessive noise levels from airports and no impacts would occur.

l. Population and Housing

As discussed in the Initial Study, the Project proposes a new hotel use that will provide accommodations for visitors to the City, but will not provide long-term housing opportunities. Therefore, the Project would not directly induce population growth in the City. However, the Project could indirectly induce population growth through the creation of temporary construction-related jobs and permanent employment opportunities upon buildout of the Project.

While construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized such that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project.

Since the publication of the Initial Study, the Project buildout year has been updated from 2021 to 2022. According to the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) prepared by the Southern California Association of Governments (SCAG), the employment forecast for the City of Los Angeles Subregion in 2016 is approximately 1,736,929 employees.⁶ In 2022, the City of Los Angeles Subregion is anticipated to have approximately 1,865,221 employees.⁷ Operation of the Project is

⁶ Based on a linear interpolation of 2012–2040 data. The 2016 extrapolated value is calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to 2016: $((2,169,100 - 1,696,400) \div 28) * 4 + 1,696,400 = 1,736,929$.

⁷ Based on a linear interpolation of 2012–2040 data. The 2022 extrapolated value is calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to 2022: $((2,169,100 - 1,696,400) \div 28) * 10 + 1,696,400 = 1,865,221$.

estimated to generate a net of 65 new employees on-site. As such, the Project's estimated 65 new employees would constitute approximately 0.06 percent of the Subregion's employment growth forecasted between 2016 and 2022. It is anticipated that some of this demand would be filled by then-existing vacancies in the housing market and others by any new residential developments that may occur in the vicinity of the Project Site. Therefore, given that the Project would not directly contribute to population growth in the Project area and as some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Furthermore, as the Project would be located in a developed area with an established network of roads and other urban infrastructure, it would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth.

As no housing currently exists on the Project Site, the development of the Project would not displace any existing housing or cause the displacement of any persons or require the construction of housing elsewhere.

Therefore, the Initial Study concluded that impacts related to population and housing would be less than significant.

m. Public Services

(1) Police Protection

With regard to construction, construction sites can be sources of nuisances and hazards and invite theft and vandalism. Therefore, in accordance with standard construction industry practices, the potential for theft of construction equipment and building materials would be minimized through the use of security fencing, lighting, locked entry, and security patrol of the Project Site and construction areas.

Construction of the Project could also potentially impact the provision of Los Angeles Police Department (LAPD) police protection services and emergency access in the vicinity of the Project Site as a result of construction impacts on the surrounding roadways. Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of demolition and graded materials, and construction worker trips. However, during construction of the Project, a Construction Traffic Management Plan would be implemented to ensure that adequate and safe access remains available at the Project Site during construction activities. In addition, designated truck queuing, equipment staging, and construction worker parking areas would be provided. In accordance with City requirements, emergency access to the Project Site would remain clear and unhindered during construction of the Project. Also, given the permitted hours of construction and nature of construction projects, most of the

construction worker trips would occur outside the typical weekday commuter morning and afternoon peak periods, thereby reducing the potential for traffic-related conflicts. Further, pursuant to Section 21806 of the California Vehicle Code, the drivers of emergency vehicles have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Therefore, no construction-related impacts regarding the provision of police protection services or emergency access are anticipated to occur.

The Project would not include the development of new residential units that would increase the residential population in the service area of the Hollywood Community Police Station and generate additional demand for police services. However, the Project's proposed 240 hotel guest rooms would increase the hotel guest population within the Hollywood Community Police Station service area and generate a maximum of 360 persons on the Project Site.^{8, 9} In addition, the Project would generate up to approximately 83 employees, which would also increase the daytime population within the Hollywood Community Police Station service area. However, since the Project does not include any residential uses, the Project would not directly affect the existing officer-to-resident ratio or the crimes per resident ratio citywide or within the Hollywood Community Police Station service area. Nonetheless, to help reduce any on-site increase in demand for police services, the Project would implement comprehensive safety and security features to enhance public safety and reduce the demand for police services, including: 24-hour on-site security personnel to monitor entrances and exits, manage and monitor the fire/life/safety systems, patrol the perimeter of the property, and control and monitor activities in the public spaces and private guest amenity areas; closed-circuit security camera system; keycard entry for hotel guests; and lighting around building entries, walkways, parking areas elevators, and lobbies to maximize visibility.

During operation, emergency vehicles would continue to have access to the Project Site from Vine Street. In addition, the Project's driveway and internal circulation would be designed to incorporate all applicable City Building Code requirements regarding site access, including providing adequate emergency vehicle access. The Project does not include any improvements along the streets surrounding the Project Site that could impede emergency vehicle access. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the Project. Therefore, the Project's operation would not significantly impact emergency vehicle access to the Project

⁸ *Based on the conversion factor of 1.5 persons/room/day for hotel uses provided in the L.A. CEQA Thresholds Guide.*

⁹ *The Initial Study analyzed a Project with 216 hotel rooms and a maximum of 324 persons on-site. The addition of 24 rooms and 36 persons does not change the impact conclusion since the Project does not include residential uses and would not affect the officer-to-resident or the crimes per resident ratios.*

Site and surrounding uses, and the Project is not anticipated to impair the LAPD from responding to emergencies at the Project Site or the surrounding area.

Based on the above analysis, the Project would not generate a demand for additional police protection services that would substantially exceed the capability of the Hollywood Community Police Station to serve the Project Site. Therefore, the Project would not necessitate the provision of new or physically altered police stations, the construction of which could cause significant impacts, in order to maintain acceptable service ratios or response times.

(2) Schools

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

(3) Parks

The Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. While it is possible that some of the new employees that could be generated by the Project may utilize local parks and recreational facilities during work breaks, this increased demand would be negligible due to the amount of time it would take for employees to access off-site local parks. Therefore, while the Project's employment opportunities could have the potential to indirectly increase the population of the Hollywood Community Plan area, new demand for public parks and recreational facilities associated with Project development would be limited. Additionally, although there is the possibility that hotel guests may also utilize local parks and recreational facilities, the demand is also expected to be negligible since hotel guests would likely utilize the recreational amenities provided within the hotel. Therefore, the Project's impact on parks and recreational facilities would be less than significant.

(4) Other Public Facilities

Implementation of the Project would not result in a direct increase in the number of residents within the service population of the Frances Howard Goldwyn–Hollywood Regional Branch Library. In addition, Project employees would be more likely to use library facilities near their homes during non-work hours. It is anticipated that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site. Therefore, Project employees and the potential indirect population generation that could be attributable to those employees would generate minimal demand for library services. Furthermore, due to the developed nature of the Project vicinity, some of the employees that could relocate to the Project vicinity would likely do so by moving into existing units that would have been previously occupied. As such, any indirect or direct demand for library services generated by Project employees would be negligible. As such, impacts on library facilities would be less than significant.

No other public services would be notably impacted by the Project. Therefore, the Project would result in a less than significant impact on other governmental services.

n. Parks and Recreation

Implementation of the Project would not result in on-site residents who would utilize nearby neighborhood and regional parks or other recreational facilities. In addition, while it is possible that some of the new employees that could be generated by the Project may utilize local parks and recreational facilities during work breaks, this increased demand would be negligible due to the amount of time it would take for employees to access off-site local parks. Therefore, while the Project's employment opportunities could have the potential to indirectly increase the population of the Hollywood Community Plan area, new demand for public parks and recreational facilities associated with Project development would be limited. Additionally, although there is the possibility that hotel guests may also utilize local parks and recreational facilities, the demand is also expected to be negligible since hotel guests would likely utilize the recreational amenities provided within the hotel. As such, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that a substantial physical deterioration of the facility would occur or be accelerated. Thus, impacts on parks and recreational facilities would be less than significant. Furthermore, the Project would not include any on-site public recreational facilities or parks and would not require the construction or expansion of public recreational facilities.

Based on the above, the Project would not substantially increase the demand for off-site public parks and recreational facilities, such that substantial physical deterioration of those facilities would occur or be accelerated. The Project's impact on parks and recreational facilities would be less than significant.

o. Transportation

The Project Site is not located within the vicinity of any private or public airport or planning boundary of any airport land use plan. In addition, the Project's maximum height of 185 feet in the midst of a highly urbanized area would not create increased levels of risk with respect to air traffic.

The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections, and the development of the Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. In addition, the proposed uses would be consistent with the surrounding uses. Therefore, no impact would occur.

p. Utilities and Service Systems

(1) Wastewater

Wastewater collection and treatment services within the project vicinity are provided by the City of Los Angeles Department of Public Works Bureau of Sanitation (LASAN). Wastewater generated during operation of the Project would be collected and discharged into the existing 8-inch vitrified clay pipe (VCP) sewer line in Vine Street, flow south, then conveyed to the Hyperion Water Reclamation Plant (HWRP) located in Playa Del Rey. The HWRP is designed to treat 450 mgd, with annual increases in wastewater flows limited to 5 mgd pursuant to City Ordinance No. 166,060. Since the publication of the Initial Study, LASAN released its Sewer System Management Plan for the Hyperion Sanitary Sewer System in February 2017. The HWRP currently processes on average approximately 275 million gallons per day (mgd), and therefore has an available capacity of approximately 175 mgd.¹⁰ The discharge of effluent from the HWRP into Santa Monica Bay is regulated by the HWRP's NPDES Permit issued under the Clean Water Act and is required to meet the Regional Water Quality Control Board's requirements for a recreational beneficial use. Accordingly, the HWRP's effluent to Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed standards. The City's Environmental Monitoring Division also monitors flows into the Santa Monica Bay. The wastewater generated by the Project would be typical of hotel uses. No industrial discharge into the wastewater system would occur. As the HWRP is in compliance with the state's wastewater treatment requirements, the Project would not exceed the wastewater treatment requirements of the Regional Water Quality Control Board. Therefore, impacts would be less than significant.

¹⁰ LASAN, *Hyperion Water Reclamation Plant*, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=ljvz6q49_5&_afLoop=8241943613187783#!, accessed February 26, 2019.

The Project has been revised since the publication of the Initial Study. As shown in Table VI-1 on page VI-28 the Project is now projected to generate approximately 37,407 gallons per day (gpd) of wastewater, or approximately 0.037 mgd, upon completion. The existing restaurant use on the Project Site, which would be removed as part of the Project, currently generates approximately 12,786 gpd of wastewater. Therefore, the net sewage generation on the Project Site would be approximately 24,621 gpd of wastewater, or approximately 0.024 mgd. The Project's average daily wastewater flow of 0.037 mgd represents approximately 0.02 percent of the current 175 mgd available capacity of the HWRP. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the HWRP.

Sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing 8-inch VCP sewer line in Vine Street flowing south, which has an existing capacity of 0.77 cubic feet per second or 413,997 gpd. The Project's net increase in wastewater flow is approximately 24,621 gpd and represents less than 6 percent of the existing sewer line capacity. Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Based on the updated Sewer Capacity Availability Request (SCAR) approved by LASAN, which is provided as Appendix J, of this Draft EIR, the Project is approved to discharge up to 30,328 gpd to the 8-inch sewer line in Vine Street. The SCAR does not account for the removal of existing uses, which generate approximately 12,786 gpd of wastewater. As described above, after accounting for the removal of existing uses, the Project Site would result in an estimated wastewater generation of 24,621 gpd, which is well below the SCAR's permitted 30,328 gpd. As such, based on the current approximate flow levels and design capacities in the sewer system and the estimated net wastewater flow of 24,621 gpd from the Project Site, the existing sanitary sewer main in Vine Street would have adequate capacity to accommodate the additional infrastructure demand created by the Project. No upgrades to existing sewer mains would be required.

Based on the above, the Project would not exceed the available capacity within the sewer distribution infrastructure that would serve the Project Site and impacts with respect to wastewater infrastructure would be less than significant.

(2) Stormwater

Stormwater flows from the Project Site would not increase with implementation of the Project. The Project would not alter the amount of impervious surfaces on the Project Site and stormwater flows following development of the Project would be the same as the flows currently generated by the existing use. Additionally, the Project would implement High Efficiency Biofiltration BMPs to improve stormwater runoff management and comply with the City's LID Ordinance (Ordinance No. 181,899), which promotes the use of natural

**Table VI-1
Estimated Project Wastewater Generation**

Land Use	Unit	Generation Factor ^a	Total Wastewater (gpd)
EXISTING			
Restaurant ^b	6,393 sf	30 gpd/15 sf	12,786
<i>Subtotal Existing</i>			<i>12,786</i>
PROPOSED			
Hotel Guest Rooms	240 rm	120 gpd/rm	28,800
Guest Amenity Spaces			
Level 1 Lobby	1,248 sf	0.050 gpd/sf	62
Level 12 Restrooms	677 sf	0.200 gpd/sf	135
Level 12 Hotel Guest Gym	817 sf	0.200 gpd/sf	163
Shared Guest & Public Spaces			
Level 1 Outdoor Seating ^c	563 sf	0.050 gpd/sf	28
Level 1 Coffee Bar ^d	280 sf	0.720 gpd/sf	202
Level 13 Living Room & Covered Terrace ^{b,e}	4,530 sf	25 gpd/15 sf	7,550
Corridors, Elevator Lobbies, and Circulation			
Elevator Lobbies and Circulation (Levels 1, 1M, 12 & 13)	3,015 sf	0.050 gpd/sf	151
Guestroom Corridors (Levels 2–11) ^f	20,340 sf	—	—
Back of House^g			
Level 1	603 sf	0.120 gpd/sf	72
Level 12	1,314 sf	0.120 gpd/sf	158
Level 13 Living Room & Covered Terrace	497 sf	0.120 gpd/sf	60
Roof Level	216 sf	0.120 gpd/sf	26
<i>Subtotal Proposed</i>			<i>37,407</i>
TOTAL NET PROJECT DEMAND			24,621

gpd = gallons per day

rm = rooms

sf = square feet

^a Based on 100 percent of generation rates provided by LASAN's Sewerage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012.

^b Assumes 15 square feet per person to estimate existing seat count. Based on the assumption that 1 restaurant seat = 15 square feet. Source: International Code Council. (2014). 2015 International Building Code, Section 1004.1.2. Country Club Hills. ICC.

^c The LASAN generation rate for "Lounge" uses (i.e., 50 gpd per 1,000 square feet) is applied.

^d The LASAN generation rate for "Coffee House: No Food Preparation" uses (i.e., 50 gpd per 1,000 square feet) is applied.

^e The Project may allocate a portion of this square footage to food-related services. Therefore, to provide a conservative estimate of wastewater generation, the LASAN generation rate for "Restaurant: Fast Food" uses (i.e., 25 gpd per seat) is applied to the entire 4,530 square feet of Level 13 shared guest and

Table VI-1 (Continued)
Estimated Project Wastewater Generation

Land Use	Unit	Generation Factor ^a	Total Wastewater (gpd)
<p><i>public spaces.</i></p> <p>^f <i>Wastewater from this use is included above in wastewater generation from the Project's proposed hotel guest rooms.</i></p> <p>^g <i>LASAN does not provide a generation rate for this type of use. Therefore, the LASAN generation rate for office uses (i.e., 120 gpd per 1,000 square feet) is applied.</i></p> <p><i>Source: KPFF Consulting Engineers, 2018; Eyestone Environmental, 2018.</i></p>			

infiltration systems, evapotranspiration, and the reuse of stormwater, as described above under Hydrology and Water Quality. Therefore, the Project would not require the construction of new stormwater drainage facilities or expansion of existing facilities. Impacts would be less than significant.

(3) Telecommunications Facilities

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

(4) Solid Waste

Construction activities associated with the Project would generate debris, which would be recycled to the extent feasible. Pursuant to the requirements of SB 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Construction materials would be recycled in accordance with the City of Los Angeles Green

Building Code (Ordinance No. 181,480), which requires a minimum construction waste reduction of approximately 50 percent. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. Given the remaining permitted capacity of approximately 59.83 million tons at the Azusa Land Reclamation facility, as well as the remaining capacity of 93.47 million tons at the Class III landfills open to the City according to the Los Angeles County Integrated Waste Management Plan (CoIWMP) 2014 Annual Report, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

Since the publication of the Initial Study, Los Angeles County has released the CoIWMP 2016 Annual Report, and the Project's construction waste haul route has been updated to travel to the Chiquita Canyon Landfill. The CoIWMP 2016 Annual Report explained that the Chiquita Canyon Landfill would continue operations until July 31, 2017, although its Conditional Use Permit (CUP) expired in June 2016. No estimated remaining permitted capacity as of December 31, 2016 was available. In addition, the application process of the Chiquita Canyon Landfill's new CUP with an increased disposal capacity and expansion had not been finalized. However, following the preparation of the CoIWMP 2016 Annual Report, the County of Los Angeles Board of Supervisors approved the expansion of the landfill in June 2017 for 30 years or 60 million tons, whichever occurs first. In addition, the Chiquita Canyon Landfill was also approved for capacity to receive inert waste.¹¹ As such, the Chiquita Canyon Landfill would have sufficient capacity to accommodate the Project's construction and demolition waste.

Nonetheless, the CoIWMP 2016 Annual Report estimates that the remaining permitted capacity of the Azusa Land Reclamation facility is 56.34 million tons and the remaining capacity for County Class III landfills open to the City is 85.45 million tons, as of December 31, 2016.¹² Should the Project's construction and demolition waste be diverted from Chiquita Canyon Landfill, the Azusa Land Reclamation facility and Class III landfills available to the City would continue to have sufficient capacity to accommodate the Project's construction and demolition waste.

During operation of the Project, shown in Table VI-2 on page VI-31, the proposed hotel would generate approximately 874 pounds of solid waste per day. The Project would result in an increase in the amount of solid waste currently generated by the existing uses.

¹¹ *County of Los Angeles Board of Supervisors, Statement of Proceedings for the Regular Meeting of the Board of Supervisors of the County of Los Angeles, June 27, 2017.*

¹² *County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017, Appendix E-2 Table 1.*

**Table VI-2
Estimated Project Solid Waste Generation**

Existing and Proposed Land Uses	Units	Generation Rate^{a,b}	Total
Existing Land Uses			
Commercial (Restaurant)	18 emp ^c	10.53 lbs/emp/day	190 lbs/day
<i>Existing Total</i>			<i>190 lbs/day</i>
Proposed Land Uses			
Commercial (Hotel)	83 emp ^d	10.53 lbs/emp/day	874 lbs/day
<i>Proposed Total</i>			<i>874 lbs/day</i>
Total Net Generation			684 lbs/day (0.34 tons/day)
<p><i>du = dwelling unit</i> <i>emp = employees</i> <i>lbs = pounds</i> <i>sf = square feet</i></p> <p>^a L.A. CEQA Thresholds Guide, 2006, page M.3-2. ^b The L.A. CEQA Thresholds Guide does not provide separate rates for restaurant or hotel uses. Therefore, the generation rate for commercial uses is applied. ^c Since the publication of the Initial Study, the Los Angeles Unified School District (LAUSD) released the 2016 Developer Fee Justification Study in March 2017. The employee generation rates provided in Table 11 of the 2012 Developer Fee Justification Study are identical to those provided in Table 14 of the 2016 Developer Fee Justification Study. Therefore, the employee generation rate for "Neighborhood Shopping Center" land uses (0.00271 employee per average square foot) is applied. ^d LAUSD, 2016 Developer Fee Justification Study, March 2017, Table 14. Based on the employee generation rate for "Lodging" land uses, which is 0.00113 employees per average square foot. Source: Eyestone Environmental, 2018.</p>			

Specifically, with implementation of the Project, the proposed hotel would generate a net increase of approximately 684 pounds (0.34 tons) of solid waste per day or approximately 124.1 tons of solid waste per year. However, it is noted that the estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures, such as compliance with AB 341, which requires California commercial enterprises and public entities that generate four or more cubic yards per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Based on the CoIWMP 2014 Annual Report, the 2014 annual disposal was 4.02 million tons and the remaining total disposal capacity was 93.47 million tons as of December 31, 2014.¹³ The estimated annual net increase in solid waste that would be

¹³ The five Class III landfills open to the City of Los Angeles include Antelope Valley, Calabasas, Chiquita Canyon, Lancaster, and Sunshine Canyon City/County. While the Calabasas Landfill is open to the City of Los Angeles, its service area is limited to the cities of Hidden Hills, Agoura Hills, Westlake Village, and Thousand Oaks per Los Angeles County Ordinance No. 91-0003. As the Project Site is not within this (Footnote continued on next page)

generated by the Project represents approximately 0.003 percent of the City's 2014 annual solid waste disposal and approximately 0.0001 percent of the remaining capacity for the County's Class III landfills open to the City based on the capacity reported in the ColWMP 2014 Annual Report.

According to the ColWMP 2016 Annual Report, the 2016 annual disposal was 4.42 million tons and the remaining total disposal capacity was 93.47 million tons as of December 31, 2016.¹⁴ As such, the Project's estimated annual net solid waste increase of 124.1 tons would represent approximately 0.003 percent and approximately 0.0001 percent, respectively.

Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste that would be generated by the construction and operation of the Project. Additionally, the County will continue to address landfill capacity through the preparation of ColWMP annual reports. The preparation of each annual report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Impacts to landfills would be less than significant. The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include a recycling area or room of specified size on the Project Site. In addition, the Project would recycle construction materials in accordance with the City of Los Angeles Green Building Code (Ordinance No. 181,480), which requires a minimum construction waste reduction of approximately 50 percent. The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals by providing clearly marked, source sorted receptacles to facilitate recycling. Since the Project would comply with federal, state, and local statutes and regulations related to solid waste, impacts would be less than significant.

q. Wildfire

As discussed above in Section 6.f, there are no wildlands located in the vicinity of the Project Site. Furthermore, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or state responsibility area. Therefore, the Project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildfires. Impacts would be less than significant.

service area, the Calabasas Landfill was excluded from the annual disposal and remaining disposal capacity amounts.

¹⁴ *This amount does not reflect the Calabasas Landfill (as stated above) or the estimated remaining disposal capacity/expansion of the Chiquita Canyon Landfill.*